



August 27, 2026

Elizabeth McNamara, Hearing Officer  
Massachusetts Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110  
via email

**Re: D.P.U. 26-62, Design and Implementation of Time-Varying Rates**

Dear Ms. McNamara,

The City of Cambridge respectfully submits the following comments regarding the design and implementation of time-varying rates.

The City of Cambridge supports the Department's investigation into time-varying rates for electricity customers and is supportive of the rollout of the advanced metering infrastructure that will make such rates possible. We believe that thoughtful rate design has significant potential to lower customer energy costs, reduce carbon emissions, help mitigate strain on the grid, and reduce the costs of the grid buildout needed to serve peak loads. These outcomes align closely with Cambridge's work to reduce emissions, enable a transition off fossil fuels, and reduce energy burdens for our residents.

We also believe that the following considerations are important to the successful and equitable implementation of time-varying rates:

- A commitment to extensive and accessible **communication to ratepayers**: The implementation of time-varying rates could represent a significant shift in how most residential ratepayers choose to use electricity. The Electric Distribution Companies (EDCs) need to provide extensive, advance communication to ratepayers of how the time-varying rate will work; provide this communication in multiple languages; and conduct targeted outreach in environmental justice communities. We want to ensure that vulnerable populations are not further burdened if they have not received clear communication about how to benefit from the new rate structure. There may need to be a low-income exemption to ensure people aren't

---

**Julie Wormser**  
Climate Chief

City Hall Annex  
344 Broadway  
Cambridge, MA 02139  
**Phone:** 617-349-4600

**[www.cambridgema.gov/departments/  
officeofsustainability](http://www.cambridgema.gov/departments/officeofsustainability)**

priced out of staying safely cool during the hottest time of day.

- Ensuring that **municipal aggregations** can access, build on, and complement the rate structure: Cambridge operates one of the Commonwealth's largest municipal aggregation programs. The implementation of time-varying rates could offer municipalities the opportunity to bring further benefits to aggregation participants. Municipal aggregations must be provided access to granular load data to enable a clear understanding of time-of-use patterns in consumption and be able to design potential supply rates that build on these patterns.
- Aligning rate design and its implementation to **incentivize electrification**: time-varying rates should further enable a shift to electrification, particularly for heating loads. The early success of the heat pump rates provides a foundation on which to build further electrification-oriented rate design. The communications and outreach around time-varying rates should clearly identify how the rate structure can enhance electrification, and how devices (such as programmable thermostats and smart appliances) can be set to benefit from these rates.
- Requiring **"shadow" (parallel) billing** during the transition to time-varying rates. As customers move onto time-varying rates, the EDCs should provide "shadow" or parallel billing that shows each customer what their bill would have been under their prior flat rate alongside their actual bill under the new rate. Presenting this comparison clearly on the monthly bill — ideally for a transition period of at least twelve months, so it spans a full seasonal cycle — allows ratepayers to understand how the new structure affects them, learn how their usage patterns drive the difference, and adjust their consumption with confidence.

Shadow billing also builds trust in the transition, gives customers and their advocates the data needed to identify anyone who is worse off, and provides the Department and the EDCs with an early-warning signal for populations that may require additional outreach or a low-income exemption. We recommend the Department require shadow billing as a standard element of any time-varying rate rollout.

Thank you for considering our comments in your review of proposed time-varying rates.

Sincerely,



Julie Wormser  
Chief Climate Officer

cc: [kerri.phillips@mass.gov](mailto:kerri.phillips@mass.gov)  
[nnadkarni@cambridgema.gov](mailto:nnadkarni@cambridgema.gov)

---