



ELM

ENVIRONMENTAL LEAGUE
OF MASSACHUSETTS

January 28, 2026

Peter A. Ray
Department of Public Utilities
One South Station, 3rd Floor
Boston, MA 02110

RE: 2026 Winter Rate Relief Filings by Gas and Electric Distribution Companies

Dear Secretary Ray,

Thank you for the opportunity to offer comment on the proposals of the gas and electric utilities on their petitions for 2026 winter bill relief in these dockets:

- Petition of Boston Gas Company, Massachusetts Electric Company, and Nantucket Electric Company, each d/b/a National Grid, for its 2026 Targeted Winter Relief Proposal, D.P.U. 26-11
- Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its 2026 Winter Bill Relief filing, D.P.U. 26-14
- Petition of NSTAR Gas Company d/b/a Eversource Energy for approval of its 2026 Winter Bill Relief Filing, D.P.U. 26-15
- Petition of Eversource Gas Company of Massachusetts d/b/a Eversource Energy for approval of its 2026 Winter Bill Relief Filing, D.P.U. 26-16
- Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its 2026 Electric Winter Rate Relief Filing, D.P.U. 26-18
- Petition of Fitchburg Gas and Electric Light Company d/b/a Unitil for approval of its 2026 Gas Winter Rate Relief Filing, D.P.U. 26-19
- The Berkshire Gas Company filed its proposal in Petition of The Berkshire Gas Company pursuant to G.L. c. 164 and 220 CMR 6.04, 6.11 for approval of its 2025/26 peak local distribution adjustment factor and gas adjustment factor filings, effective November 1, 2025, D.P.U. 25-PGAF-BERK
- Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty filed its proposal in Petition of Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty Utilities pursuant to G.L. c. 164 and 220 CMR 6.04, 6.11 for approval of its 2025/26 peak local distribution adjustment factor and gas adjustment factor filings, effective November 1, 2025, D.P.U. 25-PGAF-LIB

The Environmental League of Massachusetts (ELM) supports the companies' petitions for winter bill relief, with a key exception - collecting interest on deferred payments. Massachusetts consumers need rate relief, not another opportunity for the utilities to receive extra compensation for serving their customers' needs. ELM urges the Department to minimize the amount of interest charged to consumers through these rate relief dockets, preferably by denying recovery for carrying costs entirely. ELM also requests that the

Department explore other solutions for reducing rates and consumers' winter bills permanently, rather than perpetuating seemingly annual filings of emergency rate relief petitions.

Utility Proposals

In general, the gas utilities are asking for approval of a 10% reduction in billed charges associated with customer usage during the months of February and March 2026, to be deferred for collection, with carrying charges at the prime rate (6.75% in filings), through the local distribution adjustment factor during the months of May to October 2026.¹

The electric utilities are also asking for a 10% reduction in billed charges during the months of February and March 2026 that would be deferred and collected from residential customers from April to December 2026, with carrying charges at potentially varying rates.²

Utilities Should Forgive All Carrying Charges

As the Governor said when announcing the agreement her administration had reached with the utilities, the objective of this wintertime adjustment is that "relief is on the way!" Deferral of charges until summer (just in time for peak electric demand), supplemented with interest charged at the prime rate is hardly relief at all.

Massachusetts consumers are struggling with energy costs - with a Boston Globe survey finding that 21% believe utility bills to be the primary strain on their household budget.³ At the same time, many of the gas and electric utilities and their parent companies have brought

¹ In Liberty Gas's proposal, they do not identify any short-term deferral of monies, due to use of funds over collected from energy efficiency surcharge and residential assistance factor. Cover Letter, D.P.U. 25-PGAF-LIB, Jan 26, 2026.

² Unutil proposes a customer charge carrying rate of 3.81% (Calculation of Deferred Costs Recovery Rate, Electric Rate Proposal, Att. 2, Jan 26, 2026). National Grid proposes to specify in a later filing (Petition for Approval, DPU 26-11, January 26, 2026). Eversource does not specify in its filing (NSTAR Electric, Winter Bill Relief Filing, DPU 26-14, Jan 26, 2026)

³ Nguyen, Andrew, "Explore the full results of the Suffolk University/Boston Globe poll of Mass. Residents", Boston Globe, November 25, 2025, available at: <https://www.bostonglobe.com/2025/11/25/metro/full-poll-results-massachusetts-voters>



in record earnings and profits in 2024 and 2025,⁴ and Eversource disclosed that 10% of consumers' bills goes directly to profit.⁵

Ultimately, the interest that the utilities propose to charge will result in higher overall costs to consumers than simply collecting the charges as incurred. The utilities already receive interest charges and fees when customers do not pay their bills in full and on time. These proposals would create a similar "late charge" for residential customers state-wide - but one that consumers cannot change or opt out of by paying their bills early or on time.

The utilities propose to forgive two months of carrying costs, presumably to cover interest for February and March, the months in which rate relief is offered. This portion of the utilities' request highlights that the utilities could, if they wanted, forgive all months of carrying charges.

The utilities themselves proposed this solution in last year's winter bill relief dockets - though two utilities included charges in their initial proposals before revising. On February 28, 2025, the Department approved the gas companies' deferrals of charges for March and April 2025, without any interest or carrying charges.⁶ It should do the same here.

Department Should Approve a Lower Interest Rate than Prime

One of the key reasons we have granted monopoly franchises to investor-owned utilities is their ability to harness large amounts of capital to invest in infrastructure that we, as consumers, need. ELM understands that such financing is not free. It should, however, be more affordable than the prime interest rate, given monopoly control and regulated returns. The Department should examine whether this high rate of interest is in fact necessary for the gas utilities to delay partial collections by a few months. At a minimum, the Department should approve a lower rate for carrying costs for these deferred collections from customers, such as the relevant rate of inflation.

More Permanent Solutions

Within the last twelve months, the Governor has twice called upon gas companies to lower their winter residential rates - and twice, the gas companies have filed petitions seeking to

⁴ See, e.g. National Grid, [2025/26 Half Year Results Statement](#), Nov 6, 2025 (announcing 21% increase in profits before tax for 2025 over 2024); Eversource Energy, [Eversource Energy Reports Third Quarter 2025 Results](#), Nov 4, 2025 (announcing earnings of \$1.2B in the first nine months of 2025, compared with \$739 million for the same period in 2024)

⁵ Simmoneau, Ben, "[Gov. Maura Healey deflects blame for surge in Massachusetts utility delivery rates, utility bills](#)," WCVB News, Feb 20, 2025.

⁶ DPU 24-PGAF, Revised Reconciling Factors, Letter Order, Feb 28, 2025



defer (not eliminate) a portion of charges from winter to summer. While this does result in lower consumer bills during the winter months, it does not begin to address any of the underlying issues that are causing ratepayers bills to be such a burden.

The Department's investigation into gas and electric delivery charges (DPU 25-200) may provide an opportunity to examine the root causes of the affordability issues Massachusetts consumers face, including the incentives our rate structure gives utilities to prefer capital solutions that potentially drive up consumer costs. ELM encourages the Department to seize this and other opportunities to work with stakeholders and utilities to create more permanent solutions to affordability.

Thank you for your consideration. Please do not hesitate to contact me at aboydrabin@environmentalleague.org with any questions.

Sincerely,



Amy Boyd Rabin

Vice President of Policy
Environmental League of Massachusetts

