

Massachusetts Electric Company
Nantucket Electric Company
each d/b/a National Grid
D.P.U 15-155

**PRE-FILED DIRECT TESTIMONY
OF
MARINA LEVY
ON BEHALF OF
LOW-INCOME WEATHERIZATION AND
FUEL ASSISTANCE PROGRAM NETWORK**

Date: March 18, 2016

TESTIMONY OF MARINA LEVY

1 **I. Introduction**

2 **Q. Please state your name and business address.**

3 A. My name is Marina Levy. My business address is 7 Winthrop Square, Boston, MA 02110.

4 **Q. By whom are you employed and in what capacity?**

5 A. I work as a Research Assistant for the National Consumer Law Center (NCLC).

6 **Q. What are your principal responsibilities in that position?**

7 A. I assist advocates at NCLC with research. I analyze and compile data, conduct internet
8 searches, and produce graphs and write-ups for a variety of NCLC's functional groups, including
9 housing, student debt, auto fraud, and utilities. I also help the utility team organize trainings on
10 utility advocacy for low income customers, and I take intake calls from advocates from other
11 organizations looking for help with their utility cases, as well as from consumers in
12 Massachusetts looking for help with a utility issue.

13 **Q. Please describe your educational background and professional experience.**

14 A. In 2012, I graduated from Suffolk University with a Bachelor of Arts degree, where I double-
15 majored in Government and Applied Legal Studies. From 2012 to 2013, I worked as a paralegal
16 in criminal and immigration matters at Masferrer & Associates in Boston. In 2013, I began
17 working at the National Consumer Law Center in my current capacity. In 2015, while working at
18 NCLC, I took a semester-long class at Bunker Hill Community College on data management,

1 where I learned the basics of data manipulation and analysis with Tableau, a data visualization
2 program, as well as R, a statistical programming language.

3 **Q. Have you previously testified before the Department or other regulatory agencies?**

4 A. No, I have not.

5 **Q. What is the purpose of your testimony?**

6 A. The purpose of my testimony is to share with the Department the data that I have compiled
7 about Massachusetts Electric Company and how it compares to other electric companies, in
8 relation to low income consumers in the state of Massachusetts.

9 **Q. How is your testimony organized?**

10 A. My testimony is organized as follows: Section I is an introductory section. Section II
11 discusses the data that I have compiled from the monthly reports submitted by utility companies,
12 explains how the data is compiled and organized, and displays the graphs that I have created to
13 better illustrate the numbers.

14 **II. Data Compiled from Monthly Reports submitted by Utility Companies**

15 **Q. Please describe the data that you have compiled.**

16 A. Approximately each month, NCLC receives monthly “credit and collection reports” submitted
17 by gas and electric companies in Massachusetts to the Department of Public Utilities.

18 I currently have data from the reports submitted by Fitchburg Gas & Electric, Massachusetts
19 Electric Company (National Grid), Keyspan (National Grid), Columbia Gas, Eversource Gas &
20 Electric, and Western Massachusetts Electric Company (Eversource). Although I also receive
21 reports from Nantucket Electric Company (National Grid), I don’t collect the data because of the
22 company’s small size—it has a little over eleven thousand total residential accounts.

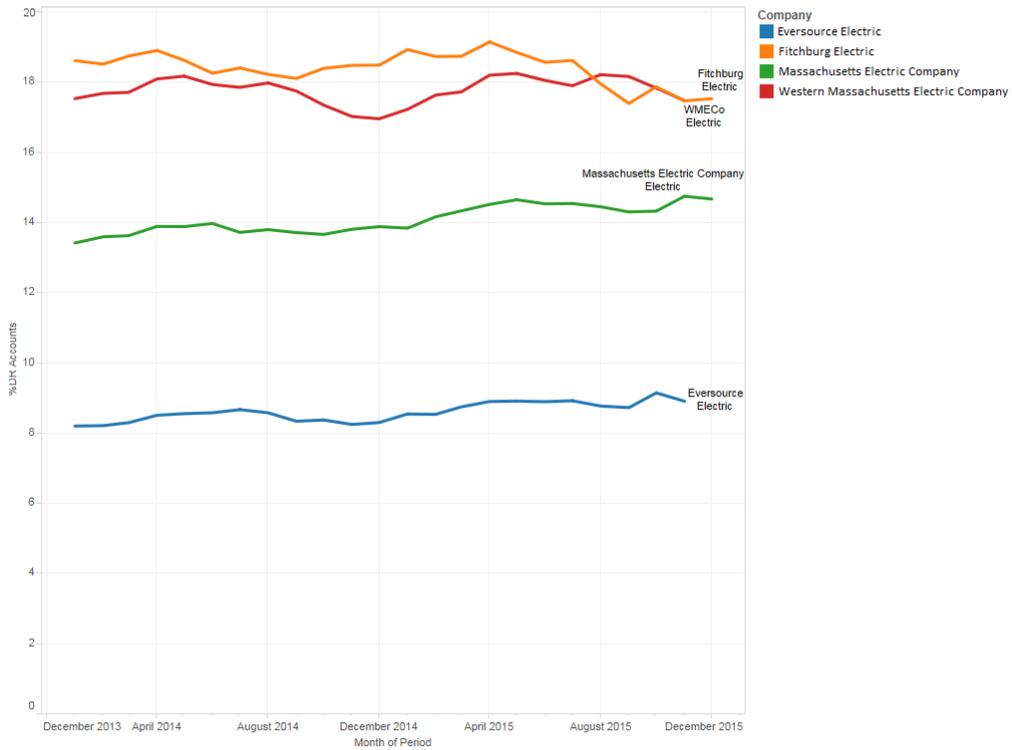
1 I have data for all of 2014 (January through December) from all the companies, and all of 2015
2 for Columbia Gas, Fitchburg Gas & Electric, Keyspan (National Grid), and Massachusetts
3 Electric Company (National Grid). For Eversource Gas & Electric and WMECo, I have data
4 through November 2015.

5 Using the data from these monthly reports, I created an Excel spreadsheet that compiles all the
6 data points, per month, for each company. Each company is assigned one row per monthly
7 report, where all the information provided in the reports is included. The relevant data points for
8 this testimony include “Number of residential accounts,” “Number of Service Disconnections for
9 Non-Payment,” “Number of (Low Income Discount Rate) Accounts,” “Number of (Low Income
10 Discount Rate) Service Disconnections for Non-Payment,” and “Number of (Arrearage
11 Management Program) Accounts.”

12 Using a data visualization program called Tableau, I created a set of graphs to compare
13 Massachusetts Electric Company’s performance to other electric companies on data points
14 concerning low income customers.

1

Graph 1: Percentage of Discount Rate Accounts



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3 Graph 1 displays the percentage of discount rate accounts for electric companies, by dividing the
 4 number of discount rate accounts by the number of total residential accounts, and multiplying
 5 that number by 100. The graph shows that Massachusetts Electric Company has a higher
 6 proportion of Low Income Discount Rate (LI-DR) accounts relative to Eversource Electric. This
 7 is also true in absolute values, as Massachusetts Electric Company has a higher number of
 8 discount rate accounts than Eversource Electric.

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Table 1: Number of Accounts as of November 2015

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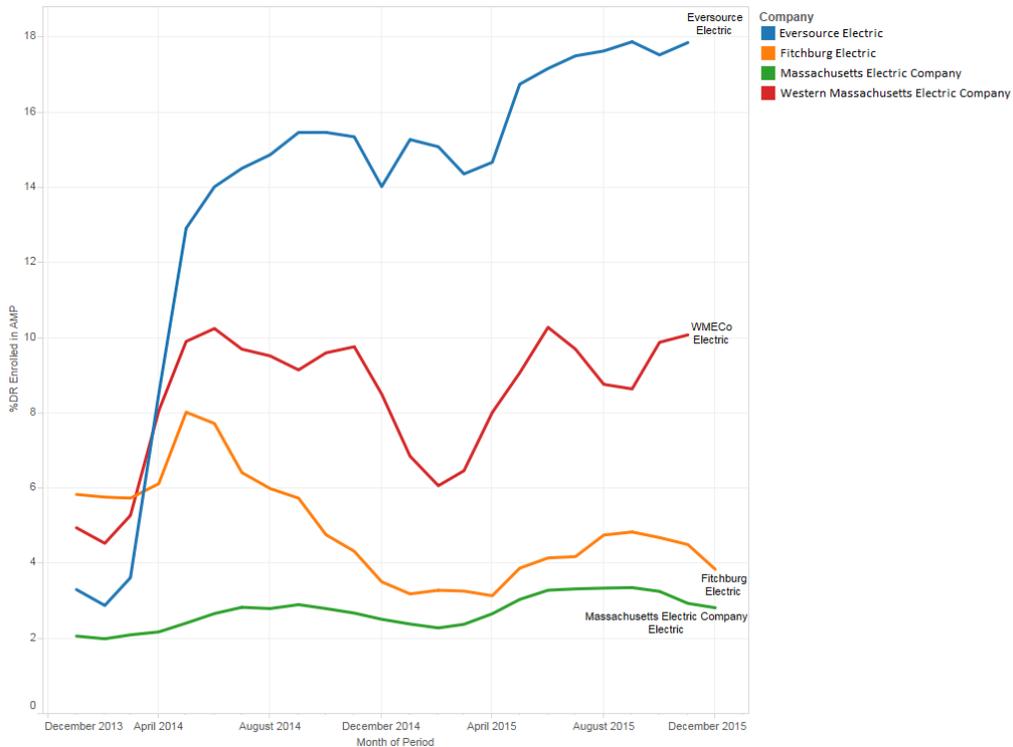
| | Residential Accounts | Low Income Accounts | Percentage of Residential Low Income Accounts |
|--------------------------------|----------------------|---------------------|---|
| Massachusetts Electric Company | 1,179,449 | 173,962 | 14.75% |
| Eversource Electric | 1,007,284 | 89,714 | 8.91% |

11

12 The larger number of low income discount rate accounts suggests that Massachusetts Electric
 13 Company has at least a similar, if not higher, percentage of low income customers in need as

1 Eversource Electric. Yet, despite having more customers on the discount rate, Massachusetts
2 Electric Company appears to have the lowest rate of enrollment of low income discount rate
3 customers into arrearage management programs (AMP), as shown in Graph 2:

4 **Graph 2: Percentage of Discount Rate Accounts Enrolled in AMP**

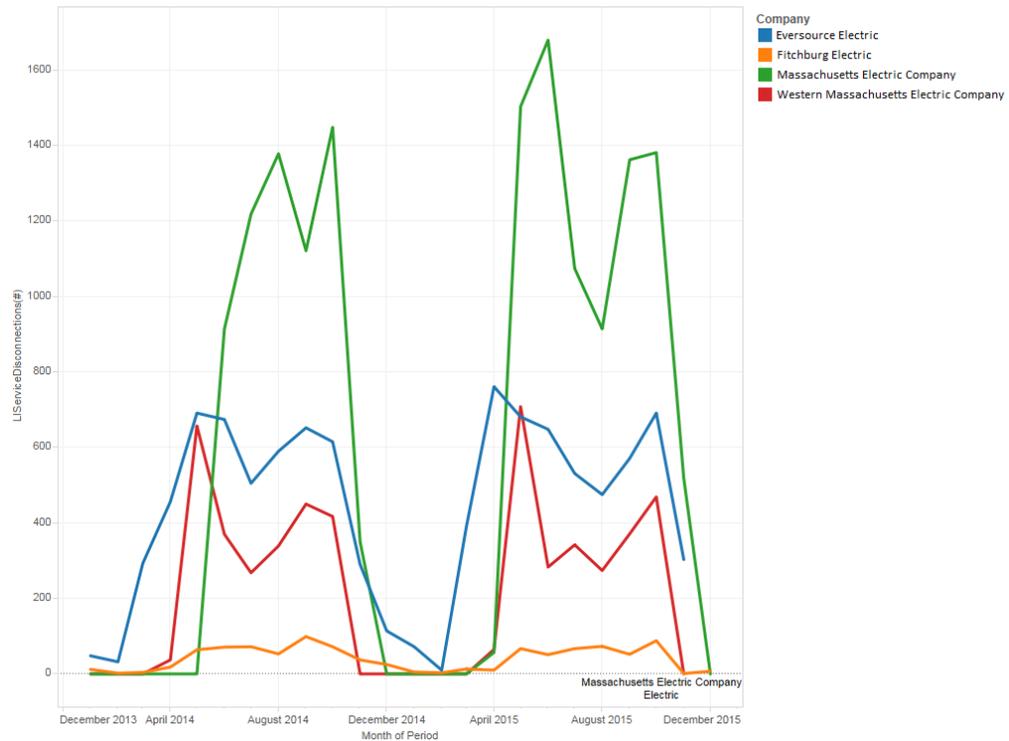


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6
7 Graph 2 displays the rate of discount rate accounts enrolled in AMP by dividing the number of
8 AMP accounts by the number of LI-DR accounts, and multiplying by 100.

9 As of November 2015, 2.93% of LI-DR customers were enrolled on AMP for Massachusetts
10 Electric Company, versus 17.85% for Eversource Electric. The monthly reports filed by utility
11 companies with the Department provide no basis for concluding or inferring why the AMP
12 enrollment rate is so different across the reporting companies.

13 The number of LI-DR account service disconnections for Eversource Electric and Massachusetts
14 Electric Company is comparable, given the size of each company:

1 **Graph 3: Number of Low Income Discount Rate Accounts Service Disconnections**



2

3 From January 2014 to November 2015 (which reflects the most updated information I have

4 available for Eversource Electric), Eversource Electric disconnected 10,095 discount rate

5 accounts. For that same time period, Massachusetts Electric Company disconnected 14,917

6 accounts. I find those numbers to be similar, although Massachusetts Electric Company did

7 perform more disconnections. In addition, Massachusetts Electric Company does have more low

8 income customers. What this suggests to me is that Massachusetts Electric Company's low

9 income customers are at least as much in need of being on AMP programs as Eversource Electric

10 customers are—yet, despite this, Massachusetts Electric Company falls largely behind in its

11 AMP enrollment rate when compared not just to Eversource Electric, but to every other electric

12 company, as reflected in Graph 2.

13 From January 2014 to November 2015, Eversource Electric (which, when compared with

14 Massachusetts Electric Company as shown in Table 1, has a smaller number of low income

1 customers, and a slightly lower number of low income service disconnections) reported 274,384

2 AMP enrollments. For that same time period, Massachusetts Electric Company reported 99,734

3 AMP enrollments.

4 **Q: Does this conclude your testimony?**

5 A: Yes, it does.