



July 20, 2010

Elizabeth Cellucci, Esq.  
Director of Consumer and External Affairs  
Department of Public Utilities  
One South Station  
Boston, MA 02133

**RE: Termination of Electric Service to Customers with Serious Medical Conditions**

Dear Ms. Cellucci:

Western Massachusetts Electric Company ("WMECO" or the "Company") is pleased to provide these responses to the questions asked in the Department of Public Utilities' ("Department") July 2, 2010 correspondence in the above captioned matter. For clarity, we have restated the questions and provide our response.

**1. How does the Company define and distinguish between (a) Life Support Customers ("LSC") and (b) customers with a "serious medical condition" whose accounts are protected from termination for non-payment, pursuant to 220 C.M.R. § 25.03 (1)(a)1?**

- (a) Life Support Customers - When a Massachusetts customer calls to notify the Company there is someone in the home who is dependent upon life support equipment such as oxygen and heart monitors, a critical customer code is established in the customer service system indicating they require life support. Customers with this critical customer code are notified in advance of major storms or capacity situations via an automated telephone messaging campaign. While a portion of life support customers may be protected against termination for non-payment based on a showing of financial hardship, life support customers are not automatically so protected. See 220 C.M.R. § 25.03 (1)(a)(1).
- (b) Customers with a "serious medical condition" - To qualify for year-round protection from termination for non-payment, pursuant to 220 C.M.R. § 25.03 (1)(a)1, a customer must certify financial hardship and medical hardship. To receive medical hardship certification at least one member of the household must have a serious illness certified by a physician, Board of Health official, nurse practitioner or physician assistant. These customers retain their year-round protected status if they stay current with both their medical and financial hardship certifications as required by 220 C.M.R. 25.03(4).

**2. Does the Company have an established process for maintaining a complete, accurate and current list of accounts protected pursuant to 220 CMR § 25.03 (1)(a)1? Please describe the process.**

Yes, the Company has an established process which is depicted in Exhibit 1. Recently, WMECO has implemented a Web portal that is accessed exclusively by physicians – MDform. This secure web portal enables doctors to certify their patients' medical condition after completing a simple registration process. The information will then be sent automatically to the Company's customer information system. This new process is depicted in Exhibit 2.

The MDform process is simple. When a customer requests medical protection to maintain service, the Company will send a letter asking the customer to contact his physician to certify his medical condition. The letter will include instructions for

physicians on how to register for MDform and how to use the web site<sup>1</sup>. Once the physician completes the certification, the Company will inform the customer via letter of his status (i.e., whether his physician has certified his need for medical protection, whether the protection is for a chronic or serious illness situation, and the duration of the protection).

This process eliminates time delays and costs associated with mailing or faxing forms to physicians and asking them to return the completed forms via mail or fax.

The Company has also taken into consideration those physicians who do not have access to the internet. In this case, the physician will be asked to call a newly-established toll-free number. Once this call is placed, the doctor will receive a paper form, via fax, for completion. The doctor can then fax the form back to the Company for processing.

**3. Does the Company have an established process for maintaining a complete, accurate and current list of LSCs, as defined in 220 C.M.R. § 19.02? Please describe the process.**

Yes, WMECO annually reminds customers of the Company's Medical Alert system which helps customers who may be dependent upon electrically operated life-support equipment. WMECO specifically codes these customers' accounts and contacts them if a Power Watch has been issued or the Company becomes aware of a significant event that may cause power outages.

When WMECO customers call to notify the Company that there is someone in the home who is dependent upon life support equipment Customer Service Representatives are instructed to process this information as follows:

- (a) Verify the telephone number on the account is the primary phone number to be called in the event of an emergency.
- (b) Note the account - Life Support and add a Medical note.
- (c) If the account is in active collections, the caller is connected to the Collections Center and will be informed of the requirements for serious illness protection.

The Company prepares a "call table" of LSCs weekly. In the event of a storm, Power Watch or other event requiring notification of customers on medical support, WMECO prepares and initiates an automated dial-out campaign. The automated dialing software will call each number in the call table and, if the phone is answered by either an individual or an answering system, will read a message containing information concerning the upcoming event. The automated dialing software will cycle through each telephone number on the dialing table until either the phone is answered or a pre-set number of attempts have been made.

**4. If the Company serves jurisdictions other than Massachusetts, do regulatory requirements for medical protection and LSC accounts differ from those in Massachusetts? If so, please specify the jurisdictions and any difference in such requirements. Do any such differences create a difficulty for the Company?**

Northeast Utilities ("NU"), the parent company of WMECO, also has subsidiaries that serve customers in Connecticut and New Hampshire. The respective regulations for medical protection are compared below. The differences in regulation do create some challenges, but NU has established processes and training to allow us to deal with these differences.

---

<sup>1</sup> Physicians will only have to register for MDform the first time they use the portal.

The primary difference that causes concern is terminology and the lack of clear definitions (e.g., definition of chronic illness).

	Massachusetts	Connecticut	New Hampshire
Financial hardship necessary	Yes	No	No
Who may certify medical condition	Registered physician, physician assistant, nurse practitioner or local board of health official	Registered physician	Licensed physician or mental health practitioner
Conditions Covered	The customer or someone living in the customer's home is seriously ill	The home of any customer during such time as any resident therein is seriously ill or in a life threatening situation	When a medical emergency exists at the location or would result from the disconnection of service
Duration of Certification	Financial hardship – quarterly (except during moratorium) Serious illness – quarterly; where illness is chronic – every six months	Period specified by the physician; however, if the physician has failed to specify the length of the illness or if the physician has indicated that the length of the illness is not readily ascertainable, then the serious illness or life threatening situation certificate shall be renewed every 15 days. If the physician specifies that the length of the illness is life long, the certificate shall be renewed yearly.	Renewed every 60 days as necessary
Requirements for continuing service	Maintain current financial hardship and serious illness certification	Serious illness – Enter into an agreement to amortize the unpaid balance of the account over a reasonable period of time, and keeps current his account.	Maintain payment arrangement

	Massachusetts	Connecticut	New Hampshire
		Life threatening situation – Customers who are current with the physician's certificate of life threatening situation are expected to remain current with their account or an established reasonable amortization agreement; however, they shall not be terminated for failure to remain current with their account.	
Appeal Process	Yes	Yes. If a utility company wishes to contest the validity of a written serious illness certificate, it may request an investigation by the DPUC and a hearing before a DPUC hearing officer	No formal process
Conditions for terminating service	On July 2, the DPU requested the electric distribution companies to notify the Consumer Division when it intends to initiate the termination process for an account that has or had “medical protection status”.	If the customer fails to comply with the above requirements, the company may terminate service after providing notice of termination.	A utility shall not disconnect service to a customer who has provided evidence of a medical emergency without approval from the NHPUC.  The NHPUC shall not approve disconnection of service to customers deemed to have a medical emergency when the customer has made a good faith effort to make payments towards the utility bill.

**5. Please describe and discuss the circumstances, if any, under which the Company would terminate service to a LSC for the customer's failure to pay a bill or an account balance.**

LSC customers are not automatically provided medical protection status. If, while the customer is informing the Company of his need for life support equipment, the account is discovered to be in active collections, the customer is connected to the Collections Center and informed of the requirements for serious illness protection.

**6. Please describe and discuss under what circumstances the Company would terminate service to a medical protection account for the customer's failure to pay a bill or an account balance.**

The Company would terminate service to a customer whose financial hardship paperwork and serious illness certifications were not current.

If you have any questions regarding the Company's responses to this matter, please call me.

Very truly yours,

/s/

Donald M. Bishop