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September 21, 2006

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, Second Floor
Boston, MASS 02110

RE: DTE 02-38, Distributed Generation – Reply Comment of low-income weatherization and fuel assistance program network

Dear Secretary Cottrell,

Pursuant to Department notice dated August 11, 2006, this is the reply comment of the low-income weatherization and fuel assistance program network to the Massachusetts Distributed Generation Collaborative 2006 Final Report (2006 DG Report), filed June 30, 2006. As noted in our initial comment, the network is generally supportive of the DG collaborative and, as part of a project funded by the Massachusetts Technology Collaborative (MTC), is installing DG technologies in low-income settings in order to learn more about economic, technical, and programmatic aspects of DG in the field.

More particularly, as also noted in the network's initial comment, as DG policy is developed by the Department, the network is particularly interested in the definition and equitable allocation of costs and benefits of DG. The network will therefore be interested in participating in policymaking proceedings at the Department, including any consideration of standby rates such as those proposed by the Division of Energy Resources (DOER) in its initial comments in this proceeding. It is possible, for example, that DG penetration greater than the 1.6% assumed by DOER could have a more significant rate impact than that projected. The network, on behalf of its low-income clients, is therefore interested in the details of the development (or lack thereof) of such rates.

The network continues to look forward to working with the Department, DOER, the MTC, and the Parties on this and other important DG issues.

Respectfully,