

GMAC Equity Working Group Comments on the ESMP Phase II Metrics and Biannual Reports Filing

Date: March 24, 2025

I. Purpose:

The Grid Modernization Advisory Council (GMAC) Equity Working Group (EWG) provides the following comments on the Massachusetts electric-distribution companies' (EDCs) initial filing for near-term ESMP metrics and biannual report templates.

II. Background:

During Phase I of the Electric-Sector Modernization Plan (ESMP) proceeding, the EWG provided extensive feedback on metrics and stakeholder engagement. The EWG's recommendations were included as a memorandum in the Final GMAC Report submitted to the EDCs in November 2023¹. As the discussion of metrics and reporting was postponed to Phase II², the EWG is using this opportunity to provide feedback on the proposed EDC metrics and biannual report structure. The EDCs did not adopt many of the EWG's originally proposed metrics. In this letter, the EWG focuses on metrics and reporting requirements that are especially important. The EWG had an initial conversation with the EDCs about the metrics and reporting filing at its February 20, 2025 meeting.³ To complement that meeting, the EWG discussed and agreed to submit an open letter summarizing the group's feedback for consideration.

For reference, the Equity Working Group is comprised of seven voting members including representatives of the Massachusetts Department of Energy Resources, the Office of the Attorney General, two Grid Modernization Advisory Council members, and two members external to the Council. The EDCs have one non-voting representative.

The Equity Working Group currently consists of the following representatives:

Kathryn Wright, Chair	Barr Foundation
Chris Modlish	Attorney General's Office
Julia Fox	Department of Energy Resources
Erin Engstrom (non-voting)	Eversource
Mary Wambui	Planning Office for Urban Affairs

¹ Observations and Recommendations of the Grid Modernization Advisory Council (November 2023) at 331 – 47, available at <https://www.mass.gov/doc/gmac-final-report/download>.

² D.P.U. 24-10/24-11/24-12, Interlocutory Order on Scope of Proceedings (Feb. 20, 2024) (Interlocutory Order) at 3 and D.P.U. 24-10/24-11/24-12 Order at 470.

³ Draft February 20, 2025 EWG meeting minutes at 2-6, available at <https://www.mass.gov/doc/draft-meeting-minutes-16/download>.

Jolette Westbrook

Environmental Defense Fund

Kyle Murray

Acadia Center

Larry Chretien

Green Energy Consumers Alliance

III. Comments on the EDC's Proposed Metrics:

The EWG's initial comments were structured to align with three components of energy justice: distributional, procedural, and recognition. Subsequently, the EDCs adopted a similar three-part equity framework as part of the ESMPs, which uses distributional, procedural and structural equity. The EWG comments on the metrics and the biannual reports continue to use the three-part structure introduced in the original comments.

a. Procedural

Metrics

In previous comments and conversations with the EDCs, the EWG acknowledged that the proposed Phase I stakeholder engagement metrics identify the quantity of engagement but do not reflect the quality of engagement. The EWG notes the addition of the second, new stakeholder metric that measures aspects of ESMP infrastructure project outreach⁴ and believes it is an important initial step in measuring the legibility and accessibility of ESMP processes to the public. However, the ideal method to assess if stakeholder and community engagement processes are successful would be to use a metric that incorporates direct participant feedback. The EWG encourages reporting of survey results or results from other standardized feedback forms that the EDCs use to assess the efficacy of their engagement meetings as a trackable metric under stakeholder engagement. Such a metric could include consolidated results to questions such as:

- After the engagement, how would you rate your understanding of the proposed ESMP project?;
- How would you rate your understanding of *why* the project is happening?;
- Do you understand the pathways for future engagement and conversation?; and
- Do you feel like your concerns were heard during this meeting?

Biannual Report

The proposed biannual reporting section on stakeholder engagement could provide additional details to help assess the impact of stakeholder engagement work. The EDCs are proposing to provide updates on their internal efforts to train their staff in the March biannual

⁴ For ESMP infrastructure projects, measures engagement opportunities by tracking: Do stakeholders impacted by ESMP infrastructure projects have the necessary information and opportunity to participate in and inform project development and implementation. Is the outreach: In plain language? Available in the appropriate language(s) specific to host communities? Provide information about required approvals (e.g., permitting)? Provide appropriate and accessible contacts for feedback? (D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 5).

report.⁵ While this will be critical to the success of engagement during the ESMP term, the EWG believes the most illuminating updates for stakeholders and the public include:

- A summary of issues and concerns being raised by the public;
- How the EDCs plan to work to address concerns between reporting periods; and
- How public understanding of grid modernization, the ESMPs, and how ESMP implementation will impact their community, is evolving over time.

In addition, the EDCs should use this section to report on outcomes from the CESAG, specifically how they plan to use the community engagement framework in the coming year and how they are using stakeholder feedback and learnings from hosting community engagement sessions to adapt and evolve the framework. In the Phase I ESMP Order, the DPU encouraged the EDCs to gather input from the CESAG, GMAC, and GMAC Equity Working Group to enhance the framework⁶ and as such, this section should detail which stakeholders were consulted and any relevant adjustments. To preserve consistency and to ensure stakeholders are made aware of progress in a timely manner, these updates should be provided in both the September and March biannual reports.

b. Distributional:

Metrics

In initial comments, the EWG highlighted that the proposed stakeholder and investment metrics provided limited insights into benefits and burdens resulting from the ESMPs or how such benefits and burdens would be distributed. In previous comments, the EWG provided a set of metrics as examples of the types of measures to include in reporting to help understand the progress of ESMPs and its impact on the energy transition. Since then, the EDCs have revised the metrics to include information on the DER hosting and load serving capacity in environmental justice communities (EJCs).⁷

The EWG recommends that the EDCs expand upon this approach to include information on how EJCs and low-income communities (LICs) are benefitting from all types of ESMP investments. Specifically, the EWG recommends that for all ESMP investment metrics proposed by the EDCs and approved by the Department, the EDC's report the information by EJC and LIC to the extent reasonably practicable.

The EDCs have previously stated during GMAC meetings that this information is readily available.⁸ Further, the EWG notes that the EDCs currently report information on how their investments in energy efficiency, advanced metering infrastructure, and electric vehicles affect low-income customers and EJCs. The EWG recommends the same approach should be applied to ESMP investments.

⁵ D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 4.

⁶ D.P.U. 24-10/24-11/24-12 Order at 385.

⁷ D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 5-6.

⁸ Draft February 27, 2025 GMAC meeting minutes at 7, available at <https://www.mass.gov/doc/draft-meeting-minutes-17/download>.

In addition, the EWG recommends that the EDCs commit to reporting on additional distributional-oriented investment metrics as other components of the ESMPs become active in the future. Two specific suggestions are:

- Reporting on community benefit agreements (CBAs) once the process is developed. Example metrics include:
 - Quantity of executed CBAs;
 - Locations of CBAs; and
 - A disclosure of the benefits be provided.
- Reporting on the Grid Services Compensation Fund once active.⁹ Example metrics include:
 - Location of projects and noting which are located in EJC.

Biannual Report:

The EWG recognizes that the biannual reports propose consolidating metrics from other relevant filings and providing a list of relevant dockets¹⁰ and notes that this will be a significant improvement in providing transparency and improved understanding of progress towards the energy transition and grid modernization for stakeholders. The inclusion of the other reporting metrics is responsive to our previous feedback. The EWG previously stated that the proposed ESMP reporting would not provide a holistic snapshot of the impact of the ESMP investments on electrification, distributed generation and increased resilience and reliability.¹¹

While the EWG commends this approach, we are concerned that an Excel document is not the most accessible pathway for the public to monitor progress. Ideally, visuals, including figures or dashboards, would be a more approachable method for communicating with impacted communities and the general public. We note some utilities have taken a visualization-oriented approach with their grid investment reporting, such as Hawaiian Electric.¹² The EWG recommends that the EDCs explore visual options for reporting ESMP progress.

c. Recognition/Structural

Metrics

Recognition justice corresponds most closely to structural equity in the EDCs' equity frameworks. We continue to have concerns that the 3rd stakeholder reporting metric¹³ will not

⁹ The EDCs propose to provide updates on stakeholder involvement for Grid Services in their March biannual report. The EWG recommends this additional metric is provided. (D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 1.)

¹⁰ D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 7.

¹¹ Please refer to Appendix 1 where we have mapped the existing reporting metrics and proposed metrics against the suggestions from our original comments and have noted where gaps still exist.

¹² Hawaiian Electric PBR Scorecards and Metrics available at <https://www.hawaiianelectric.com/about-us/performance-scorecards-and-metrics/affordability>.

¹³ The number and category of requests made as part of stakeholder feedback on specific ESMP infrastructure projects, classified into visual mitigation, access accommodations, work hours, right-of-way maintenance, informational accommodations, engineering accommodations, and damage prevention, as well as the EDC's

provide clarity on how EDCs are listening and responding to public feedback. The metric as written also will not provide transparency into the EDCs' rationale for decision-making.

In responding to the GMAC's recommendations on the draft ESMPs, the EDCs provided standardized categories for their responses on integrating GMAC feedback, including accepted, accepted but modified, and rejected. In some cases under this method, the rationale and meaning behind responses was unclear to Council members. In the Phase I ESMP Order, the DPU requested the EDCs provide additional clarity to the GMAC in future responses to comments. We suggest that modifying this metric would also be an opportunity to provide additional clarity to communities by requiring more substantive public responses to feedback to recognize their concerns.

Biannual Report

In addition to adjusting the third stakeholder metric to include justifications for responses, the biannual report could be used to summarize major themes from stakeholder engagement meetings and how the EDCs intend to respond to community feedback. The EWG reemphasizes the importance of CBAs as a way for the EDCs to build bridges with EDCs. The EWG reaffirms its recommendation for the EDCs to provide summary reports on CBAs and the benefits EDCs are receiving from CBAs for both transparency to the public and information sharing across communities. We look forward to continued collaboration with the EDCs on these topics in the future.

Sincerely,

The GMAC Equity Working Group

Appendix 1- How Current EDC Proposal Responds to Previous EWG Metrics Suggestions

The following table provides a high-level overview of categories of metrics that are or are not currently represented in current EDC reports or proposed in ESMP phase II. The full list of metrics included in the original EWG comments are not intended to be prescriptive, but illustrative of the types of metrics the EWG recommends are explored. The EWG welcomes further conversations to discuss further development of ESMP metrics.

response to these requests classified as under consideration, implemented, not accepted with reason, and other. (D.P.U. 24-10/11/12 March Biannual Report Template (3-18-25) at 5).

Metrics Categories from Original EWG Comments	Are there metrics in this category between proposed ESMP metrics, existing metrics, and ESMP biannual reports?	EWG Recommendation¹⁴
Accessibility and Community Engagement	Some, but distributional and structural equity not fully addressed. Please see comments in above pages.	Recommend including CBA metrics
Workforce and Economic Benefits	No	Please see recommended metrics in original comments. Incremental job impact of ESMPs and job placement rates for trainings related to ESMPs would be important to include in future biannual reports.
Health Benefits	No	In future forecasting updates in the biannual reports, provide calculations of the incremental impact of the ESMP implementation on health indicators (e.g., air pollution).
Financial and Economic Incentives	Some. The existing metrics help demonstrate clean technology deployment and incentives. The proposed metrics help paint a picture about the benefits of the ESMPs. However, please see comments above regarding locational improvements.	Many of the metrics we suggested are covered via other EDC reporting mechanisms (e.g., under the EV metrics category or required reporting under the Three-Year Plans.) We support consolidating all these related metrics in the biannual report.
Affordability	Some under AMI, but not in ESMP metrics.	We recognize this comment is out of the scope of Phase II; however, given the amount related ongoing work and the associated cost, we recommend a metric to access the overall affordability impact of these related proceedings. This could include tracking overall energy burden over time by customer class, bill increases or over time, or some of the other suggestions from our original feedback.
Resilience and Reliability	Some, but please see comment regarding locational improvements above.	Many of the metrics EWG suggested are covered via other EDC reporting mechanisms. We support consolidating all these related metrics in the biannual report.

¹⁴ In the original EWG comments, we provided many metrics as samples to consider (Refer to Appendix Ai: Equity Working Group’s Proposed Metrics in the GMAC Final Report, at 39-44, available at <https://www.mass.gov/doc/gmac-final-report/download>).