



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

NOTICE OF FILING, PUBLIC HEARINGS, AND REQUEST FOR COMMENTS

D.P.U. 25-40

May 7, 2025

2025 Climate Compliance Plan of The Berkshire Gas Company.

On April 1, 2025, The Berkshire Gas Company (“Company”) filed with the Department of Public Utilities (“Department”) its 2025 Climate Compliance Plan (“CCP”). Berkshire states that it submitted its CCP pursuant to Role of Gas Local Distribution Companies as the Commonwealth Achieves its Target 2050 Climate Goals, D.P.U. 20-80-B (2023). The Department docketed this matter as D.P.U. 25-40.

Pursuant to D.P.U. 20-80-B, each Massachusetts gas local distribution company (“LDC”) is required to file a CCP with the Department every five years, beginning no later than April 1, 2025. D.P.U. 20-80-B at 134-136. For the inaugural CCPs, the Department required that each CCP expand on previous net zero enablement plans by demonstrating how each LDC proposes to: (1) contribute to the prescribed greenhouse gas emissions reduction sublimits set by the Executive Office of Energy and Environmental Affairs for both Scope 1 and Scope 3 emissions; (2) satisfy customer demand safely, reliably, affordably, and equitably using market ready technology available at the time of the filing; (3) use pilot or demonstration projects to assist in identifying investment alternatives; and (4) implement recommendations for future plans. D.P.U. 20-80-B at 134-135.

The Department also directed each LDC to: (1) detail the total investment required and include a description of at least one alternative method to meet the required emissions reductions, providing the estimated costs for the considered alternative and a demonstration that the proposed plan is superior to the alternative; (2) include customer, stakeholder, and community input where practicable; and (3) report on hybrid heating switchover practices, including technical resources provided to Mass Save contractors and service area specific guidance that differs from cold-climate sizing and design trainings offered by common manufacturers. D.P.U. 20-80-B at 135 & n.85.

As part of the CCP proceedings, the Department will investigate several issues addressed in the recent 2025 gas system enhancement plan (“GSEP”) Orders issued on April 30, 2025 in D.P.U. 24-GSEP-01 through 24-GSEP-06. Specifically, the Department will investigate the following: (1) requirements related to the timeline for analysis of non-pipeline alternatives (“NPAs”) in advance of the date a pipeline project is planned to commence, including a potential requirement to perform a cost-benefit analysis comparing non-NPA projects and NPA projects, as part of the NPA framework; (2) the Company’s decommissioning practices and related

depreciation charges; (3) the issue of stranded costs associated with GSEP investments in light of the consultant's report on potential stranded GSEP investments filed with the Company's CCP; and (4) the appropriateness of requiring the Company to integrate its GSEP into its CCP.

Further, on June 14, 2024, the Department directed the Company to submit information on the Company's line extension allowance policies in D.P.U. 20-80. The Company provided testimony on its line extension allowance policies in August 2024, and the Department solicited written comments from stakeholders. In February 2025, the Department solicited comments from stakeholders on a draft line extension allowance policy. The Department will continue its inquiry into the Company's line extension allowance policies and the Department draft line extension policy in the CCP proceedings.

Berkshire states that its proposed CCP is a strategic plan to advance decarbonization goals in its service area over the next decade, with goals over the five-year CCP term that are necessary to ensure the next steps toward decarbonization. Berkshire's CCP includes six focus areas.

First, Berkshire will continue to implement its energy efficiency programs. Berkshire states it will focus on building shell retrofits and energy efficient equipment, including hybrid heat pump systems.

Second, Berkshire states that integrated energy planning is a key priority, including the enhancement of data analytics, technology adoption, and workforce expertise. Berkshire plans to put into place a comprehensive integrated energy plan that includes whole-system modeling during the next five years.

Third, Berkshire plans to integrate NPAs into its planning processes. The Company states that it aims to expand and scale up NPA projects, with a focus on networked geothermal systems and electrification initiatives.

Fourth, Berkshire plans to explore the viability of networked geothermal in its service area. The Company states that it will conduct feasibility studies, evaluate pilots, and submit proposals for networked geothermal projects with the Department over the next five-to-ten years.

Fifth, Berkshire will focus on low-carbon fuels. The Company states that it will use a combination of strategies, including small quantities of alternate fuels such as biomethane in the short-term and the use of hydrogen and renewable natural gas in the long-term.

Sixth, Berkshire plans to implement customer-focused strategies for new customer connections. The Company will focus on customer education of emissions, reliability, costs, and available incentives, as well as monitoring customer adoption of decarbonization strategies.

In addition to these focus areas, Berkshire's CCP includes a summary of potential electrification and other pilots that the Company plans to evaluate. The projects summarized in Berkshire's CCP include an electrification pilot in Williamstown, Massachusetts, a purge gas recapture pilot, and an advanced mobile leak detection pilot. Further, Berkshire proposes to

work with stakeholders on workforce transition and labor equity issues. Lastly, the Company's CCP includes five proposed performance metrics.

Berkshire's filing includes pre-filed testimony supporting its CCP and the following attachments: (1) a proposed NPA framework and its stakeholder process; (2) an assessment of potential gas transition costs, analysis of depreciation, and alternative regulatory approaches relating to Massachusetts' decarbonization goals; and (3) a model tariff for the Company to recover certain incremental costs that are not recovered through existing rates.

In its filing, Berkshire states that it seeks Department approval of the Company's proposed CCP, NPA framework, and CCP factor model tariff. Specifically, Berkshire requests that the Department find that: (1) the Company's CCP includes the right priorities and action items for the next five and ten years; and (2) by following the plan, Berkshire will contribute to GHG emissions reduction goals. Berkshire also requests that the Department confirm that (1) the proposed NPA Framework meets the Department's requirements; and (2) using this framework to evaluate gas asset investments against NPAs meets the Department's standards for prudent investments. Lastly, Berkshire requests the Department's approval of its proposed cost recovery tariff to recover incremental costs needed for NPA evaluations, customer outreach, implementation, gas asset decommissioning, and other CCP action items not covered by current rates.

The Department will conduct two virtual public hearings, using Zoom videoconferencing, to receive comments on the Company's filing:

- one on **June 4, 2025, beginning at 2:00 p.m.** Attendees can join by entering the link, <https://us06web.zoom.us/j/87197815903>, from a computer, smartphone, or tablet. No prior software download is required. For audio only access to the hearings, attendees can dial in at **1-646-931-3860** (not toll free) and then enter the **Meeting ID# 87197815903**;
- and the second on **June 5, 2025, beginning at 7:00 p.m.** Attendees can join by entering the link, <https://us06web.zoom.us/j/83417649618>, from a computer, smartphone, or tablet. No prior software download is required. For audio only access to the hearings, attendees can dial in at **1-301-715-8592** (not toll free) and then enter the **Meeting ID# 83417649618**.

If you anticipate providing comments via Zoom during the public hearing, please send an email by **June 2, 2025**, to jennifer.cargill@mass.gov, elizabeth.c.mcnamara@mass.gov, and stephanie.mealey@mass.gov with your name, email address, and mailing address. If you anticipate commenting by telephone, please leave a voicemail message by **June 2, 2025**, at 1-617-305-3729 with your name, telephone number, and mailing address. Interpretation services will be available over the Zoom platform upon request. To request interpretation services for the public hearings, please email Kaylee Burgess at dpu.ej@mass.gov, specifying your preferred language and contact information by **May 21, 2025**.

Any person interested in commenting on this matter may submit written comments no later than the close of business (5:00 p.m.) on **June 6, 2025**. Written comments from the public may be sent by email to dpu.efiling@mass.gov, jennifer.cargill@mass.gov, elizabeth.c.mcnamara@mass.gov, and stephanie.mealey@mass.gov, and the Company's attorney, Alex E. Soter, Esq., at alex.soter@avangrid.com. Please note that in the interest of transparency any comments will be posted to our website as received and without redacting personal information, such as addresses, telephone numbers, or email addresses. As such, consider the extent of information you wish to share when submitting comments. The Department strongly encourages public comments to be submitted by email. If, however, a member of the public is unable to send written comments by email, a paper copy may be sent to Mark D. Marini, Secretary, Department of Public Utilities, One South Station, Boston, Massachusetts, 02110.

Any person who desires to participate otherwise in the evidentiary phase of this proceeding shall file a petition for leave to intervene no later than 5:00 p.m. on **May 28, 2025**. A petition for leave to intervene must satisfy the timing and substantive requirements of 220 CMR 1.03. Receipt by the Department constitutes filing and determines whether a petition has been timely filed. A petition filed late may be disallowed as untimely, unless good cause is shown for waiver under 220 CMR 1.01(4). To be allowed, a petition under 220 CMR 1.03(1) must satisfy the standing requirements of G.L. c. 30A, § 10. All responses to petitions to intervene must be filed by the close of business (5:00 p.m.) on the second business day after the petition to intervene was filed.

The Attorney General of the Commonwealth of Massachusetts ("Attorney General") filed a notice to intervene in this matter pursuant to G.L. c. 12, § 11E. Further, pursuant to G.L. c. 12, § 11E(b), the Attorney General filed a notice of intent to retain experts and consultants to assist her investigation of the Company's filing and has requested Department approval to spend up to \$150,000 in this regard. Pursuant to G.L. c. 12, § 11E(b), the costs incurred by the Attorney General relative to her retention of experts and consultants may be recovered in the Company's rates. Any person who desires to comment on the Attorney General's notice of intent to retain experts and consultants may submit written comments to the Department not later than the close of business (5:00 p.m.) on **May 28, 2025**.

All documents should be submitted to the Department in .pdf format by email attachment to dpu.efiling@mass.gov and jennifer.cargill@mass.gov, elizabeth.c.mcnamara@mass.gov, and stephanie.mealey@mass.gov. The text of the email must specify: (1) the docket number of the proceeding (D.P.U. 25-40); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. All documents submitted in electronic format will be posted on the Department's website through our online [File Room](#) as soon as practicable (enter "25-40" on the line for "Docket No."). In addition, one copy of all written comments and petitions to intervene should be emailed to the Company's attorney, Alex E. Soter, Esq., at alex.soter@avangrid.com.

The filing and all subsequent related documents submitted to the Department or issued by the Department will be available on the Department's website as referenced above as soon as is practicable. To the extent a person or entity wishes to submit comments or intervene in

accordance with this Notice, electronic submission, as detailed above, is sufficient. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), contact the Department's ADA coordinator at eadiversity@mass.gov or (617) 626-1282.

For further information regarding the Company's filing, please contact the Company's attorney, identified above. For further information regarding this Notice, please contact Jennifer Cargill, Elizabeth McNamara, and Stephanie Mealey, Hearing Officers, Department of Public Utilities, at jennifer.cargill@mass.gov, elizabeth.c.mcnamara@mass.gov, and stephanie.mealey@mass.gov.

Translation and Interpretation Services

English

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Português (Portuguese)

ATENÇÃO: Disponibilizamos nossos serviços de tradução e/ou interpretação de acordo com a sua demanda. Para solicitar um serviço linguístico, envie um e-mail para Kaylee Burgess através do endereço dpu.ej@mass.gov, informando o idioma desejado e seus dados para contato.

繁體中文 (Traditional Chinese)

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Tiếng Việt (Vietnamese)

LUU Ý: Các dịch vụ biên dịch và/hoặc phiên dịch có sẵn theo yêu cầu. Vui lòng gửi email đến Kaylee Burgess theo địa chỉ dpu.ej@mass.gov để yêu cầu dịch vụ ngôn ngữ, nêu rõ ngôn ngữ ưa thích của quý vị và thông tin liên lạc

(Arabic) العربية

يرجى الانتباه: تتوفر خدمات الترجمة و/أو الترجمة الفورية عند الطلب. لطلب خدمات لغوية يرجى التواصل مع Kaylee Burgess بإرسال رسالة إلكترونية إلى العنوان dpu.ej@mass.gov، تحدد فيها اللغة المفضلة لديك وتذكر معلومات الاتصال.

ខ្មែរ (Khmer)

ជូនចំពោះ៖ សេវាកម្រិតបកប្រែ និង/ឬអ្នកបកប្រែផ្ទាល់ គឺមានតាមការស្នើសុំ។ សូមផ្ញើអ៊ីមែលទៅ Kaylee Burgess តាម dpu.ej@mass.gov ដើម្បីស្នើសុំសេវាកម្មបកប្រែភាសា ដោយបញ្ជាក់ភាសាដែលអ្នកចង់បាន និងព័ត៌មានទំនាក់ទំនង។

Español (Spanish)

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简体中文 (Simplified Chinese)

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Kreyòl Ayisyen (Haitian Creole)

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Français (French)

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Русский (Russian)

ВНИМАНИЕ! Услуги письменного и/или устного перевода предоставляются по запросу. Для запроса услуг перевода обращайтесь к Kaylee Burgess по адресу dpu.ej@mass.gov. В запросе укажите язык перевода и контактную информацию.

한국어 (Korean)

주의: 요청 시 번역 및/또는 통역 서비스가 제공됩니다. Kaylee Burgess에게 dpu.ej@mass.gov로 이메일을 보내 선호하는 언어와 연락처 정보를 명시하여 언어 서비스를 요청하십시오.

