

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

NOTICE OF FILING, PUBLIC HEARINGS, AND REQUEST FOR COMMENTS

D.P.U. 25-42 May 7, 2025

2025 Climate Compliance Plan of Fitchburg Gas and Electric Light Company d/b/a Unitil.

On April 1, 2025, Fitchburg Gas and Electric Light Company d/b/a Unitil ("Company" or "Unitil") filed with the Department of Public Utilities ("Department") its 2025 Climate Compliance Plan ("CCP"). Unitil 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. 25-42.

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 Unitil to: (1) detail the total investment required and to 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 information related to certain LDCs' efforts to eliminate their reliance on the Everett Marine Terminal; (3) include customer, stakeholder, and community input where practicable; and (4) 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; Constellation Energy LNG Supply Agreements, D.P.U. 24-25-B/D.P.U. 24-26-B/D.P.U. 24-27-B/D.P.U. 24-28-B at 18-19 (2024).

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.

Unitil states that its CCP reflects its specific operating profile compared with the other Massachusetts LDCs. The Company explains that it is a distinctly small contributor to GHG emissions and serves a population with a high proportion of environmental justice populations facing comparatively high energy burdens. Accordingly, Unitil states that its CCP must balance customer affordability with its obligation to help Massachusetts meet its GHG reduction targets.

Unitil's CCP includes the following elements: (1) implementation of an NPA framework to avoid investments in gas infrastructure; (2) creating an integrated energy process to coordinate activities of overlapping gas and electric distribution companies; (3) complying with Department directives regarding the line extension policy for new customer connections; (4) monitoring ongoing pilots for networked geothermal systems, (5) supporting renewable natural gas developer connections and monitoring the renewable natural gas and hydrogen market for opportunities to decarbonize "hard-to-electrify" customers; and (6) working with stakeholders on the Everett Marine Terminal to identify, assess and document the feasibility of alternative means of meeting customer supply requirements safely, reliably, and affordably.

In addition to these focus areas, Unitil's CCP includes information on the workforce transition, including information on career development and training opportunities. Lastly, the Company's CCP includes five proposed performance metrics.

Unitil's filing includes prefiled testimony supporting its CCP and the following attachments: (1) a proposed NPA framework and stakeholder process; (2) an assessment of potential gas transition costs, analysis of depreciation, and alternative regulatory approaches relating to Massachusetts' decarbonization goals; (3) a report on efforts to reduce or eliminate reliance on liquefied natural gas resources at the Everett Marine Terminal; and (4) a model tariff for the Company to recover certain incremental costs that are not recovered through existing rates.

In its filing, Unitil states that it seeks Department approval of the Company's proposed CCP, NPA framework, and CCP factor model tariff. Specifically, Unitil requests that the Department find that the Company's CCP includes the right priorities and initiatives for the next five years. Unitil also requests that the Department confirm that the proposed NPA Framework meets the Department's requirements. Lastly, Unitil requests the Department's approval of its

proposed cost recovery tariff to recover incremental costs needed for 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 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, and the Company's attorney, Patrick H. Taylor at taylorp@unitil.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. 25-42); (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 "25-42" 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, Patrick H. Taylor at taylorp@unitil.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 eeadiversity@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, jelzabeth.c.mcnamara@mass.gov, and stephanie.mealey@mass.gov.

Translation and Interpretation Services

English

ATTENTION: Translation and/or interpretation services are available upon request. Please email Kaylee Burgess at dpu.ej@mass.gov to request language services, specifying your preferred language and contact information.

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)

提醒您: 您可依照需求申請筆譯和/或口譯服務。請以電郵聯絡 Kaylee Burgess(<u>dpu.ej@mass.gov</u>)來申請语言服务请求,請在 電郵內註明需要的語言和聯絡資訊。

Tiếng Việt (Vietnamese)

LƯU 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

العربية (Arabic)

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

ខ្មែរ (Khmer)

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

Español (Spanish)

ATENCIÓN: Los servicios de traducción y/o interpretación están disponibles bajo solicitud. Por favor envíe un correo electrónico a Kaylee Burgess en dpu.ej@mass.gov para solicitar los servicios de idiomas, especificando su idioma preferido e información de contacto.

简体中文 (Simplified Chinese)

提醒您:您可依需要申请提供笔译和/或口译服务。 请发送电子邮件给 Kaylee Burgess (dpu.ej@mass.gov)来申请语言服务要求,并注明您的首选语言和联系信息。

Kreyòl Ayisyen (Haitian Creole)

ATANSYON: Gen sèvis tradiksyon ak/oswa entèpretasyon ki disponib sou demann. Tanpri voye imèl bay Kaylee Burgess nan dpu.ej@mass.gov pou mande sèvis lang, ki enfòme lang ou pi pito a ak enfòmasyon kontak ou.

Français (French)

ATTENTION: Des services de traduction et/ou d'interprétation sont disponibles sur demande. Veuillez envoyer un e-mail à Kaylee Burgess à l'adresse dpu.ej@mass.gov pour demander des services linguistiques, en précisant votre langue préférée et vos coordonnées.

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.



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

ORDER OF NOTICE

D.P.U. 25-42 May 7, 2025

2025 Climate Compliance Plan of Fitchburg Gas and Electric Light Company d/b/a Unitil.

Fitchburg Gas and Electric Light Company d/b/a Unitil ("Company") is required to publish the attached Notice of Filing, Public Hearings, and Request for Comments ("Notice") as soon as possible but no later than May 14, 2025, in either The Boston Globe or the Boston Herald. In addition, the Company shall publish the attached Notice as soon as possible but no later than May 16, 2025 in The Sentinel & Enterprise.

The Company is required serve a copy of the attached Notice no later than **May 9, 2025**, on: (1) the Mayors, the Chairs of Select Boards, the Town Clerks, and the City Clerks in its service territory; (2) the service lists in: Fitchburg Gas and Electric Light Company, D.P.U. 23-81; Fitchburg Gas and Electric Light Company, D.P.U. 24-GSEP-01; and Fitchburg Gas and Electric Light Company, D.P.U. 24-28; and (3) any person who has filed a request for notice with the Company. The Company's service may be by electronic distribution, which the Department finds reasonable and consistent with the public interest.

Finally, the Company shall prominently display the Notice on its website from three business days following receipt of the notice from the Department through the end of the comment period on **June 6, 2025**.

The Company shall make return of service and proof of publication (including evidence of the required website posting) no later than **June 2**, **2025**.

By Order of the Department,
/s/
Mark D. Marini, Secretary