

## Fox, Julia (ENE)

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**From:** Mariel Marchand (CLC) <mariel.marchand@capelightcompact.org>  
**Sent:** Tuesday, February 25, 2025 12:13 PM  
**To:** MA-GMAC (ENE)  
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Dear GMAC Members,

Thank you for the opportunity to submit written public comments.

The Compact participated in the Department of Public Utilities' Technical Session for Phase II of the Electric Sector Modernization Plans held on January 23, 2025. The Compact's focus was on the biannual reporting and metrics aspects of the proceeding. One of the Compact's main concerns is that the ESMP biannual reports should provide the reporting required by the ESMP Order (at 473-74) dated August 29, 2024, including information on any program that is mentioned in the ESMP (like AMI, EVs, etc.) as opposed to only focusing on the incremental ESMP investments. Compact counsel raised this issue during the Technical Session, but the electric distribution companies ("EDCs") did not agree with including the information in the biannual report itself. Instead, in the biannual reports, the EDCs indicated that their current plan at that time was to provide links to information on the various respective dockets where stakeholders could find information about the non-incremental ESMP investments. (The EDCs' actual proposal is due on March 18, 2025.) For example, the Compact was told it could find the customer-facing AMI metrics (including deployment and outcome metrics) in the AMI Factor docket; however, we have since attempted to locate the metrics with no luck. The ESMP Order (at 474) stated that the summaries should "provide stakeholders with the ability to preview in a single location all proceedings and filings before the Department that may inform implementation of ESMP investments." The Compact does not believe that providing links in the biannual report is the type of reporting that was intended by the DPU in the ESMP Order.

At the January GMAC meeting, Larry Chretien raised the point that there is a long list of reconciling factors and that they are all filed in separate dockets which makes it very hard to track (and even harder to participate in each proceeding). This concern aligns with the Compact's point at the Technical Session. At the Technical Session, the Compact's point seemed to receive some support from DOER, but the Compact is concerned that not many parties are participating on the metrics and reporting aspects of Phase II. It also seems that it may be a concern that the Compact shares with GMAC members. As a result, the Compact is raising this issue to the GMAC.

We appreciate all of the time the GMAC has spent on these issues and the opportunity to comment.

Best,  
Mariel

**Mariel Marchand**

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