

Composite of EDC dispositions for GMAC Stakeholder Recommendations

Table 1. — EDC responses to GMAC recommendations¹

#	Section	Recommendations	Disposition (joint)	Explanation
4	Overarching	The ESMPs should propose a long-term cost allocation methodology for proactive infrastructure upgrades to enable the interconnection of DG to succeed the reactive investment approval process conducted through the Provisional System Planning Program. The ESMPs should contemplate both a cost allocation methodology for medium and large DG and for small residential DG facilities. If this is not possible before the January filing, the EDCs should submit a detailed proposal and timeline for a stakeholder process that will develop a long-term cost allocation methodology. This proposal should include how stakeholder engagement and discussion will occur in parallel to the ESMP proceedings and should propose a date by which the EDCs will file a long-term cost allocation proposal at the DPU.	Adopted but modified	<p>Δ A long-term cost allocation methodology for proactive infrastructure upgrades would be very difficult for the EDCs to develop and for the DPU to review and adjudicate in the time period (seven months) allowed by statute.</p> <p>+ The EDCs propose to work with interested stakeholders to develop a long-term cost allocation methodology for proactive infrastructure upgrades for small, medium, and large distributed generation facilities.</p> <p>+ The EDCs will work with stakeholders after the DPU adjudication is complete and will present their long-term cost allocation methodology for proactive infrastructure upgrades to the DPU for review in a proposed generic proceeding, with a goal of receiving DPU feedback on such proposals in time for the 2030-2034 ESMPs.</p>
8	Overarching	The EDCs should review and respond to the recommendations included in the Memorandum of the GMAC Equity Working Group. The Memorandum of the GMAC Equity Working Group is included as Appendix A of this document.	Adopted but modified	<p>Note: see Table 2 for summary of EWG responses.</p> <p>Δ The review of the EWG metrics, and metrics generally, would be very difficult for the EDCs to develop and for the DPU to review and adjudicate in the time period (seven months) allowed by statute.^{2,3}</p> <p>+ The EDCs propose to work with interested stakeholders to address metrics relating to the EDCs' respective incremental ESMP investments in a future phase of the ESMP dockets subsequent to the DPU's review of the ESMPs.</p>

¹ Commonwealth of Massachusetts, Department of Public Utilities. EDC Dispositions for GMAC Stakeholder Recommendations. Eversource Energy, National Grid, Until. D.P.U. 24-10 / 24-11 / 24-12, filed January 29, 2024. Ref: Exhibit ES-Stakeholder-2/NG-Stakeholder-2/UN-Stakeholder-2.

² Note, however, proposed quantitative metrics: "As committed to in [Eversource's] Equity Framework, the Company will provide periodic Eversource Equity Engagement and Outreach activity and program reports and information, to stakeholders as agreed upon. Such reports could include information such as: types and numbers/locations of public participation activities and programs, community, and other stakeholder participation levels (expected and actual), service delivery results, and types/numbers/content of community feedback, inputs, and requests, with the Company responses and outputs, of such engagement and outreach activities." From Commonwealth of Massachusetts, Department of Public Utilities, Direct Testimony of Erin Engstrom, NSTAR Electric Company d/b/a Eversource Energy. D.P.U. 24-10, filed January 29, 2024. Ref: Exhibit ES-Stakeholder-1.

³ "The EDCs are proposing the following stakeholder metrics: The number of outreach and involvement meetings about the respective EDCs' ESMP filing with stakeholders, including EDCs, municipal leaders, community-based organizations and customers (i.e., residential, commercial and industrial, as well as DER customers); The number of outreach and involvement meetings about specific ESMP infrastructure

14	Sec. 3 Stakeholder engagement	<p>The EDCs in coordination with the CESAG should develop goals and clear reporting metrics of success by which to measure the efficacy of proposed stakeholder engagement, including:</p> <ol style="list-style-type: none"> Clearly defined identification of stakeholder groups, historical concerns, and potential conflicts with other stakeholder groups' interests, ESMP goals and outcomes for each stakeholder group, Information stakeholders need to be well informed, Information utility companies need to understand stakeholders' concerns, Appropriate and diverse vehicles for meaningful dialogue Methods for tracking, organizing, analyzing, and responding to stakeholder feedback in a way that provides transparency so that stakeholders know what input was incorporated and what input was not incorporated. 	Adopted but modified	<p>+ EDCs intend to co-lead the CESAG.</p> <p>+ EDCs acknowledge the value of early and transparent engagement practices.</p> <p>Δ EDCs intend to tailor CESAG membership to individual service territories and needs.</p> <p>Δ The CESAG will enable a Community Engagement Framework to guide the EDCs on best practices for soliciting feedback regarding energy infrastructure development.</p> <p>Δ The development of reporting metrics is premature.</p>
15	Sec. 3 Stakeholder engagement	<p>To avoid duplication, the GMAC recommends having the CESAG within the GMAC structure, possibly within the Equity Working Group. The DPU should review the proposed CESAG framework before a working group is established.</p>	Rejected	<p>Δ CESAG and GMAC and/or Equity Working Group serve different purposes. EDCs believe they can simultaneously (a) deliver safe and reliable energy to all customers, (b) achieve clean energy goals, and (c) meet energy justice objectives through the CESAG.</p> <p>Δ CESAG is intended to be flexible/custom to communities and their stakeholders.</p> <p>Note: no further explanation was provided on how the Equity Working Group's purpose is different.</p>
16	Sec. 3 Stakeholder engagement	<p>The GMAC recommends that the CESAG have a co-chair structure, where the group is led in part by EDCs and GMAC.</p>	Adopted but modified	<p>+ EDCs intend to co-lead the CESAG.</p> <p>Δ CESAG is intended to be flexible/custom to communities and their stakeholders.</p>

projects with stakeholders, including EJs, municipal leaders, community-based organizations, and customers (i.e., residential, commercial and industrial, as well as DER customers); and 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 response to these requests classified as under consideration, implemented, not accepted with reason, and other." From Commonwealth of Massachusetts, Department of Public Utilities. Direct Testimony of Jennifer Schilling, NSTAR Electric Company d/b/a Eversource Energy. D.P.U. 24-10, filed January 29, 2024. Ref: Exhibit ES-Metrics-1.

17	Sec. 3 Stakeholder engagement	To clarify the CESAG's focus and measure its success, the GMAC recommends that the CESAG: <ul style="list-style-type: none"> a. Develop consistent definitions of equity, inequity, and discrimination, b. Include more specific definitions of equity, c. Adopt quantifiable reporting metrics, d. Develop a detailed explanation of the stakeholder engagement process (timeline, stakeholder groups, potential trainings, desired outcomes), and e. Define parameters/process for community benefits agreements 	Adopted but modified	+ EDCs have developed consistent definitions where possible. + EDCs are requesting the DPU review metrics following ESMP review. Δ The development of details on stakeholder engagement process and CBAs are premature but will be developed as part of the CESAG.
18	Sec. 3 Stakeholder engagement	The ESMPs articulate the concerns and interests municipalities have with engaging with the decision-making process and supporting the siting of infrastructure; however, additional detail and structure is needed in the Municipal Outreach subsections with regards to how EDCs will effectively and proactively engage municipal officials and coordinate with municipalities on providing transparent information and supporting education and awareness around infrastructure improvements, particularly as the locations of needed infrastructure projects over the next 10 years are already well-established.	Adopted	Note: The updated ESMPs now contain new dedicated subsections within Sec. 3 Stakeholder Engagement offering their commitments to engage municipal leaders directly, particularly in locations where infrastructure siting has been identified.
43	Sec. 6 5- and 10- year planning solutions	The ESMPs should clarify how stakeholder engagement and community feedback will occur for all solutions presented.	Adopted	+ EDCs will use the CESAG for large distribution (and transmission) infrastructure projects which need siting approval, whereas the EDCs' equity frameworks will be applied to other project types, including in-flight and previously approved projects.
48	Sec. 6 5- and 10- year planning solutions	The ESMPs should propose a process to expand GMAC and general stakeholder participation to allow stakeholders to provide input before and during the development of the next ESMP, instead of providing input only after the ESMP is developed.	Adopted but modified	+ EDCs will consider for the next ESMP cycle. + EDCs note this is in addition to stakeholder participation improvements on individual projects.
80	Sec. 12 Workforce, Economic, and Health Benefits	Regarding workforce benefits, the ESMPs should: <ul style="list-style-type: none"> a. Include reporting metrics related to the training programs, ideally aligned with those produced by the Equity Working Group b. Identify specific strategies to address the lack of diversity in the energy sector c. Specify which types of jobs are expected to grow because of the ESMP, as well as what existing workers will be supported to transition to new jobs d. Establish a unified approach to a statewide workforce plan e. Include a workforce organization chart in the ESMP, and f. Leverage existing resources and infrastructure to integrate clean tech education, curriculum, and opportunities 	Adopted but modified	Note: see Table 2 for summary of EWG responses. + Identification of workforce diversification strategies, job growth, support for existing workers, and education/training resources were adopted. Δ A unified approach to a statewide workforce plan was rejected due to the variability of each EDCs' workforce needs. Δ An organization chart was rejected as the companies' structures are too complex.

Table 2. — EDC responses to EWG-specific recommendations

#	Recommendations	Disposition (joint)	Explanation
1	Procedural: Environmental justice and equity metrics should reflect the impact of the work, not just efforts. For example, the utilities offered to track attendance and the number of community engagement meetings. Metrics should also include how the EDCs responded to customer concerns and which suggestions were implemented.	Adopted but modified	<p>Δ Review of the EWG metrics, and metrics generally, would be very difficult for the EDCs to develop and for the DPU to review and adjudicate in the time period (seven months) allowed by statute.</p> <p>+ EDCs acknowledge the premise and may incorporate such metrics in a future phase of the ESMP dockets.</p>
2	Procedural: All public-facing materials should be reviewed for plainspoken language, visualizations, clarity, transparency, and completeness.	Adopted but modified	<p>Δ It is not feasible for all public-facing materials to be reviewed for plainspoken language.</p> <p>Δ Clarity, transparency, and completeness are subjective qualities.</p> <p>+ A CESAG objective is gauging receptivity to public-facing information.</p>
3	Procedural: The EDCs should work to consolidate overlapping stakeholder engagement efforts to maximize the use of participants' time.	Adopted but modified	<p>Δ CESAG engagements may be proposal- or company-specific.</p> <p>+ CESAG will allow for opportunities to co-develop a single statewide comprehensive stakeholder engagement framework that will enable the execution of one cohesive approach to enhanced community outreach.</p>
4	Procedural: Stakeholder engagement should begin at the very earliest planning stages for all project types that will have impacts on consumers, including, but not limited to, rate impacts, service reliability, construction, disruptions, etc. Specific stakeholder engagement requirements within the ESMP process, including but not limited to adequate community notification, community compensation, and awareness can be referenced in the Advanced Energy Group Grid Modernization Task Force Recommendations	Adopted but modified	<p>Δ EDCs will begin stakeholder engagement earlier in the planning process for specific projects pursued based on DPU approval of their respective 2025-2029 ESMP. This engagement will be informed by the CESAG and community-based experts as the EDCs and community-based organizations develop a Community Engagement Framework.⁴</p> <p>Note: see below for additional details on the CESAG.</p>
5	Procedural: Community-based organizations and community leaders should have representation and leadership within working groups created by the ESMPs (e.g., CESAG).	Adopted	+ Community-based organizations will have majority representation and co-leadership at CESAG.
6	Procedural: The EDCs should track and publish baseline equity-related data and continue to provide regular progress updates.	Adopted but modified	Δ Review of the EWG metrics, and metrics generally, would be very difficult for the EDCs to develop and for the DPU to review and adjudicate in the time period

⁴ "Through the CESAG, National Grid will continue to work to integrate equity and environmental justice by: (a) increasing transparency and education about future infrastructure investment plans, including the need for investments and the benefits and impacts to a host community; (b) engaging early with stakeholders, including directly and via trusted community sources, and enhancing open communication that supports clear and timely information sharing, community feedback, and ongoing dialogue; (c) expanding our understanding of community concerns and priorities; (d) enhancing project and program outcomes by identifying opportunities to mitigate adverse impacts and support community and customer benefits; (e) reducing barriers to participation in customer programs that can benefit low-income customers and environmental justice populations; (f) partnering with our communities and local organizations in support of broader social, economic, and environmental progress; (g) directly supporting economic opportunity and advancement through the development of a more local, diverse clean energy workforce and the utilization of diverse and sustainable businesses in our jurisdictions; and (h) monitoring and informing on our progress in supporting equity and environmental justice on a regular and transparent basis." From Commonwealth of Massachusetts, Department of Public Utilities. Direct testimony of Melissa Lavinson and Meghan McGuinness on behalf of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid. D.P.U. 24-11 filed January 29, 2024. Ref: D.P.U. 24-11 Exhibits NG_Stakeholder-1_2_3.

			(seven months) allowed by statute. + EDCs acknowledge the premise and may incorporate such metrics in a future phase of the ESMP dockets.
7	Recognition: The ESMPs should provide detailed workforce development plans to recruit, hire, train, and retain people from disadvantaged communities and EJCs.	Adopted but modified	Δ More specific workforce development strategies are detailed in each revised ESMP.
8	Recognition: The EDCs should publicize linkages between grid modernization planning and overall environmental burdens and benefits, particularly related to environmental impacts that have historically disproportionately affected EJCs and disadvantaged communities. Benefits of grid modernization should include reduced greenhouse gas emissions, improved air quality, improved health outcomes, and reduced excess mortality.	Adopted but modified	+ The EDCs take all of these factors into account when creating their respective ESMPs. Δ The benefits of grid modernization are included in the net benefits analysis. <i>Note: modification wasn't clear.</i>
9	Recognition: The EDCs should work with local organizations in communities hosting distribution infrastructure to develop the community benefits agreements referenced in the ESMPs. Local collaboration can help ensure the agreements recognize and respond to community concerns.	Adopted but modified	+ CBAs will be developed and executed on an individual host community basis. + CESAG, with community organizational membership, will be a repository for feedback and lessons learned to improve upon methods to drive benefits of the just transition. <i>Note: modification wasn't clear.</i>
10	Distributive: Rates, incentives, and benefits associated with grid modernization should be clearly spelled out for consumers along with how to access assistance for customers in arrears. The benefits and requirements for programs which will provide an opportunity for consumers to participate on the grid must also be transparently explained. The ESMPs need to include the net benefits for customers after considering the anticipated costs of grid upgrades to help the GMAC, DPU, and other stakeholders determine what is fair and reasonable. The ESMPs should also include distributional equity analysis plans to understand the impacts and keep energy burdens at a manageable level for customers across all income groups, regardless of whether net benefits are provided.	Adopted but modified	Δ Review of rate redesign and cost allocation for proactive investments would be very difficult for the EDCs to develop and for the DPU to review and adjudicate in the time period (seven months) allowed by statute. + EDCs support addressing rate redesign options and customer energy burdens with stakeholders and the Department in a generic proceeding. Additionally, the EDCs look forward to participating in D.P.U. 24-15. + Net Benefit Analysis does include the benefits associated with grid modernization for the proposed ESMP investments.
11	Distributive: Disadvantaged communities, EJCs, and LMI customers should have priority access to innovative financing, technology, energy-efficiency upgrades, building weatherization, and electrification adoption.	Rejected	Δ Better suited for the Energy Efficiency Advisory Council and the respective three-year energy efficiency plans of the Massachusetts Program Administrators.
12	Distributive: The EDCs should work to rectify any existing differences in service quality by working with disadvantaged communities and EJCs. The EDCs should also work to rectify anticipated future differences in service quality in communities	Rejected	Δ EDCs disagree with the premise of this recommendation. Service quality is system-wide and reviewed in separate service quality proceedings. On average, EJCs do not experience worse reliability performance than non-EJCs in the EDCs' service territory.

whose infrastructure is vulnerable to climate change impacts, as identified by the EDCs' climate vulnerability assessments.

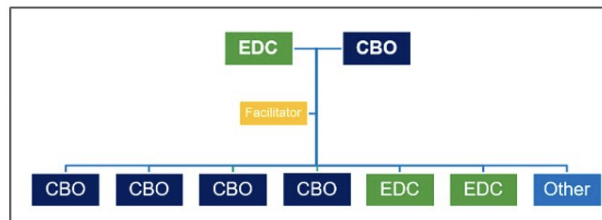
CESAG Proposed Structure Reference Image:

ESMP Update: CESAG Membership Framework (Eversource)

Co-chaired by an EDC and a community-based organization (CBO) (voted upon by CESAG members at the first meeting).

Composition of nine (9) members with representatives from each of the three (3) EDCs, five (5) representatives from different CBOs across the Commonwealth, and one (1) environmental or equity advocate.

CESAG charter and by-laws, including term limits will be co-developed by the EDCs and CBOs with input from the equity representative



Eversource ESMP 3-1