

EDC Dispositions for GMAC Stakeholder Recommendations

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4. Dispositions: The disposition of each MA EDC for each recommendation

#	Section	Recommendation	Eversource Disposition	National Grid Disposition	Unutil Disposition
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	Adopted, but modified	Adopted, but modified
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	Adopted, but modified	Adopted, but modified

#	Section	Recommendation	Eversource Disposition	National Grid Disposition	Unutil Disposition
14	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> <ul style="list-style-type: none"> a. Clearly defined identification of stakeholder groups, historical concerns, and potential conflicts with other stakeholder groups' interests, b. ESMP goals and outcomes for each stakeholder group, c. Information stakeholders need to be well informed, d. Information utility companies need to understand stakeholders' concerns, e. Appropriate and diverse vehicles for meaningful dialogue f. 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	Adopted, but modified	Adopted, but modified
15	3 - Stakeholder Engagement	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.	Rejected	Rejected	Rejected
16	3 - Stakeholder Engagement	The GMAC recommends that the CESAG have a co-chair structure, where the group is led in part by EDCs and GMAC.	Adopted, but modified	Adopted, but modified	Adopted, but modified
17	3 - Stakeholder Engagement	<p>To clarify the CESAG's focus and measure its success, the GMAC recommends that the CESAG:</p> <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), e. Define parameters/process for community benefits agreements 	Adopted, but modified	Adopted, but modified	Adopted, but modified

#	Section	Recommendation	Eversource Disposition	National Grid Disposition	Unitil Disposition
18	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	Adopted	Adopted
43	6 - 5- and 10- Year Planning Solutions	The ESMPs should clarify how stakeholder engagement and community feedback will occur for all solutions presented	Adopted	Adopted	Adopted
48	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	Adopted, but modified	Adopted, but modified
80	12 - Workforce, Economic, and Health Benefits	Regarding workforce benefits, the ESMPs should: 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 f. Leverage existing resources and infrastructure to integrate clean tech education, curriculum, and opportunities	Adopted, but modified	Adopted, but modified	Adopted, but modified

#	Section	Recommendation	Eversource Disposition	National Grid Disposition	Unil Disposition
EWG1		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	Adopted, but modified	Adopted, but modified
EWG2		Procedural: All public-facing materials should be reviewed for plainspoken language, visualizations, clarity, transparency, and completeness	Adopted, but modified	Adopted, but modified	Adopted, but modified
EWG3		Procedural: The EDCs should work to consolidate overlapping stakeholder engagement efforts to maximize the use of participants' time	Adopted, but modified	Adopted, but modified	Adopted, but modified
EWG4		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	Adopted, but modified	Adopted, but modified
EWG5		Procedural: Community-based organizations and community leaders should have representation and leadership within working groups created by the ESMPs (e.g., CESAG).	Adopted	Adopted	Adopted
EWG6		Procedural: The EDCs should track and publish baseline equity-related data and continue to provide regular progress updates	Adopted, but modified	Adopted, but modified	Adopted, but modified
EWG7		Recognition: The ESMPs should provide detailed workforce development plans to recruit, hire, train, and retain people from disadvantaged communities and EDCs	Adopted, but modified	Adopted, but modified	Adopted, but modified

#	Section	Recommendation	Eversource Disposition	National Grid Disposition	Unil Disposition
EWG8		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 EJs 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	Adopted, but modified	Adopted, but modified
EWG9		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	Adopted, but modified	Adopted, but modified
EWG10		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	Adopted, but modified	Adopted, but modified
EWG11		Distributive: Disadvantaged communities, EJs, and LMI customers should have priority access to innovative financing, technology, energy-efficiency upgrades, building weatherization, and electrification adoption	Rejected	Rejected	Rejected
EWG12		Distributive: The EDCs should work to rectify any existing differences in service quality by working with disadvantaged communities and EJs. The EDCs should also work to rectify anticipated future differences in service quality in communities whose infrastructure is vulnerable to climate change impacts, as identified by the EDCs' climate vulnerability assessments	Rejected	Rejected	Rejected

GMAC Recommendation 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.

Response:

Adopted, but modified. The 2022 Climate Act requires an extensive amount of information to be included in an ESMP, but limits the Department's review to seven months from the date an ESMP is filed. Moreover, each EDC is required to submit their ESMP on the same date, further complicating the Department's review of these comprehensive plans in such a limited timeframe. In addition, the 2022 Climate Act, contemplates consideration by the Department of several issues that, standing alone, might require far longer than seven months to review. As such, a long-term cost allocation methodology for proactive infrastructure upgrades envisioned in GMAC-Recommendation-4 would be very difficult for the EDCs to develop and for the Department to review and adjudicate in the time period allowed by statute.

However, the EDCs accept the purpose of the recommendation, and 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. Once the Department's adjudication of the ESMPs is complete (currently scheduled for the first half of 2024), the EDCs will work with stakeholders during 2024 and the early part of the 2025-2029 ESMP term to this end and present their long-term cost allocation methodology for proactive infrastructure upgrades to the Department for its review in a proposed generic proceeding, with a goal of receiving Department feedback on such proposals in time for the 2030-2034 ESMPs.

GMAC Recommendation 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.

Response:

Adopted, but modified. The EDC's responses to the EWG recommendations unrelated to metrics can be found here:

Exhibit ES-Stakeholder-2;
Exhibit NG-Stakeholder-2;
Exhibit UN-Stakeholder-2.

With regard to the metrics proposed by the EWG, the 2022 Climate Act requires an extensive amount of information to be included in an ESMP, but limits the Department's review to seven months from the date an ESMP is filed. Moreover, each EDC is required to submit their ESMP on the same date, further complicating the Department's review of these comprehensive plans in such a limited timeframe. In addition, the 2022 Climate Act, contemplates consideration by the Department of several issues that, standing alone, might require far longer than seven months to review. As such, the review of the EWG metrics, and metrics generally, would be very difficult for the EDCs to develop and for the Department to review and adjudicate in the time period allowed by statute.

However, the EDCs accept the purpose of the recommendation, and 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 Department's review of the ESMPs.

GMAC Recommendation 14 (Stakeholder):

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:

- a. Clearly defined identification of stakeholder groups, historical concerns, and potential conflicts with other stakeholder groups' interests,
- b. ESMP goals and outcomes for each stakeholder group,
- c. Information stakeholders need to be well informed,
- d. Information utility companies need to understand stakeholders' concerns,
- e. Appropriate and diverse vehicles for meaningful dialogue
- f. 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.

Response:

Adopted, but modified. As discussed in testimony and the ESMPs, the EDCs intend to co-lead the CESAG. At this time, the EDCs do not intend to pre-identify stakeholder involvement in the CESAG. Rather, the EDCs intend to tailor the CESAG to be the most representative of each EDC's service territory and their needs. The CESAG will be the avenue or forum to develop a statewide comprehensive stakeholder engagement framework that can be implemented prior to project development. The EDCs are establishing the CESAG to further enable continuous constructive engagement geared towards making the process of implementing the ESMP more transparent and increasing EDC accountability to impacted stakeholders. The EDCs recognize the valuable role community-based organizations can play in developing trust with the communities they serve. The CESAG will enable co-development of a Community Engagement Framework to guide the EDCs on best ways to engage communities about proposed clean energy infrastructure projects and best practices for soliciting their feedback. The EDCs recognize that engaging stakeholders early and often is necessary and that those potentially impacted by this transition deserve to play a role in energy discussions that affect their lives.

Additionally, as discussed in response to GMAC Recommendation 8, the EDCs are requesting metrics be discussed subsequent to the Department's review of the ESMPs. Therefore, it is premature to develop reporting metrics beyond those already proposed.

Please refer to:

Exhs. ES-ESMP-1, at Section 3.5, and ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3.5, and NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3.5, and UN-Stakeholder-1.

GMAC Recommendation 15 (Stakeholder):

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.

Response:

Rejected. The EDCs respectfully reject this recommendation because the CESAG and GMAC and/or Equity Working Group serve different purposes. At their core, the EDCs are responsible for providing safe and reliable energy to all customers. However, the EDCs believe reliability and energy justice goals can be accomplished simultaneously and that this balance will improve the collective success in achieving our shared clean energy goals. The CESAG is intended for the EDCs to partner with community-based organizations representing territories across the state. As the EDCs continue to build and enhance their community engagement efforts, it is important the EDCs remain continuously informed by the voices of the communities they serve. The EDCs will further this goal by directly partnering with community-based experts as part of this process. The best path towards successful and clear community engagement is to have a governing framework co-developed by those stakeholders that live in and engage with communities daily.

Please refer to:

Exhs. ES-ESMP-1, at Section 3.5, and ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3.5, and NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3.5, and UN-Stakeholder-1.

GMAC Recommendation 16 (Stakeholder):

The GMAC recommends that the CESAG have a co-chair structure, where the group is led in part by EDCs and GMAC.

Response:

Adopted, but modified. The EDCs agree the CESAG should have a co-chair structure. However, given the CESAG focus on developing best practices around stakeholder outreach and establishing a co-authored community engagement framework, the EDCs feel it is pivotal that a community-based organization serve as the CESAG co-chair.

Please refer to:

Exhs. ES-ESMP-1, at Section 3.5, and ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3.5, and NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3.5, and UN-Stakeholder-1.

GMAC Recommendation 17 (Stakeholder):

To clarify the CESAG's focus and measure its success, the GMAC recommends that the CESAG:

- 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),
- e. Define parameters/process for community benefits agreements.

Response:

Adopted, but modified.

- a., b. The EDCs have developed consistent definitions where possible.
- c. As stated in Exhibits ES-Metrics-1, NG-Metrics-1, and UN-Metrics-1, the EDCs are requesting the Department review metrics subsequent to its review of the ESMP.
- d. The EDCs provided additional detail on stakeholder engagement in their respective Stakeholder testimonies and ESMPs. However, currently, it is premature to develop a prescribed list of stakeholder groups, potential trainings, and desired outcomes as that will be the goal and outcome of the CESAG.
- e. The parameters and process for developing community benefits agreements will be discussed as part of CESAG to ensure community-based organizations and experts are involved in the decision making.

Please refer to:

- Exh. ES-ESMP-1, at Section 3.5;
Exh. NG-ESMP-1, at Sections 3.2, 3.3, and 3.5;
Exh. UN-ESMP-1, at Section 3.5.

GMAC Recommendation 18 (Stakeholder):

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.

Response:

Adopted. Please refer to:

Exh. ES-ESMP-1, at Section 3.3;
Exh. NG-ESMP-1, at Section 3.4;
Exh. UN-ESMP-1, at Section 3.3.

GMAC Recommendation 43 (5- and 10-Year Solution):

The ESMPs should clarify how stakeholder engagement and community feedback will occur for all solutions presented.

Response:

Adopted. The EDCs will use the Community Engagement Stakeholder Advisory Group process 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. Please see:

Exh. ES-ESMP-1, at Section 3;
Exh. NG-ESMP-1, at Section 3.5;
Exh. UN-ESMP-1, at Section 3.

GMAC Recommendation 48 (5- and 10-Year Solution):

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.

Response:

Adopted, but modified. The EDCs will consider this recommendation for ESMP Section 6 for implementation in the next ESMP cycle, as the proposed process should occur in the early stages of ESMP development. The EDCs note that this recommendation is in addition to existing commitments to improve stakeholder participation on individual projects.

GMAC Recommendation 80 (Workforce, Economic, Health):

Regarding workforce benefits, the ESMPs should:

- 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
- f. Leverage existing resources and infrastructure to integrate clean tech education, curriculum, and opportunities

Response:

Adopted, but modified.

- a. Please refer to the EDCs' response to GMAC Recommendation 8.
- b. The EDCs adopt this recommendation.

Eversource will continue to address diversity in the energy sector with strategies highlighted in Exh. ES-ESMP-1 at Sections 12.2 and 12.3, which include developing a robust pipeline of electric distribution and clean energy workers.

National Grid will continue to progress the strategic workforce development efforts outlined in its ESMP to build a pipeline of diverse talent from underrepresented and historically marginalized communities. Please refer to Exh. NG-ESMP-1 at Section 12.3.

Unitil describes its strategies in Exh. UN-ESMP-1 at Section 12.3. Unitil's talent acquisition team continues to identify opportunities to improve the lack of diversity in our company.

- c. The EDCs adopt this recommendation. Please refer to:

Exh. ES-ESMP-1 at Section 12.2;

Exh. NG-ESMP-1 at Section 12.2;
Exh. UN-ESMP-1 at Section 12.2.

- d. The EDCs will review this recommendation and will consider it for future ESMPs. However, the EDCs have their own respective workforce needs and constructs to their employment agreements, so a unified approach may not be feasible.
- e. Rejected. Each EDC's organizational charts are extensive and not readily adaptable for inclusion in their respective ESMP. There is not a single organizational chart that can cover the individuals engaged in the ESMP or cover all aspects of the company from regulatory (filing and cost recovery), operations (construction, operations and maintenance), engineering (planning and design), accounting (cost records), procurement (equipment purchasing and contracting), information technology (cyber security, data and integration), customer relations (education and outreach), and human resources (recruiting, training and retention) to name a few.
- f. The EDCs adopt this recommendation. Please refer to:

Exh. ES-ESMP-1 at Sections 12.2 and 12.3;
Exh. NG-ESMP-1 at Section 12.3;
Exh. UN-ESMP-1 at Section 12.2.

GMAC Recommendation EWG 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.

Response:

Adopted, but modified. With regard to metrics, the 2022 Climate Act requires an extensive amount of information to be included in an ESMP, but limits the Department's review to seven months from the date an ESMP is filed. Moreover, each EDC is required to submit their ESMP on the same date, further complicating the Department's review of these comprehensive plans in such a limited timeframe. In addition, the 2022 Climate Act contemplates consideration by the Department of several issues that, standing alone, might require far longer than seven months to review. As such, the review of metrics, would be very difficult for the Department to review and adjudicate in the time period allowed by statute.

However, the EDCs accept the purpose of the recommendation, and 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. The EDCs have proposed metrics associated with their incremental ESMP investments, as addressed in:

Exhibit ES-Metrics-1
Exhibit NG-Metrics-1
Exhibit UN-Metrics-1

GMAC Recommendation EWG 2:

Procedural: All public-facing materials should be reviewed for plainspoken language, visualizations, clarity, transparency, and completeness.

Response:

Adopted, but modified. Although the EDCs will strive to review public-facing materials addressing the qualities noted in the recommendation, it is not feasible for all public-facing materials to be reviewed for plainspoken language. Moreover, clarity, transparency and completeness are qualities that are subjective. The EDCs will endeavor to elicit stakeholder feedback regarding specific recommendations improving the breadth of understanding of their respective public-facing ESMP-related materials, in an effort to expand the public's receptivity to the information provided in such materials. This is also one of the objectives of the CESAG.

Please refer to:

Exh. ES-ESMP-1, at Section 3.5

Exh. NG-ESMP-1, at Section 3.4

Exh. UN-ESMP-1, at Section 3.4

GMAC Recommendation EWG 3:

Procedural: The EDCs should work to consolidate overlapping stakeholder engagement efforts to maximize the use of participants' time.

Response:

Adopted, but modified. The EDCs will work to consolidate stakeholder engagement where such engagement is intended to exchange information that is not specific to any individual EDC. The EDCs will need to continue to engage stakeholders on a company-specific basis where the effort is intended to engage stakeholders on a company-specific proposal or issue. The CESAG will allow for a structured opportunity for the EDCs and community-based organizations to co-develop a single statewide comprehensive stakeholder engagement framework. This will enable the execution of one cohesive approach to enhanced community outreach.

GMAC Recommendation EWG 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.

Response:

Adopted, but modified. The EDCs will begin stakeholder engagement earlier in the planning process for specific projects pursued based on Department 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. Please refer to the following for a discussion on stakeholder engagement:

Exhs. ES-ESMP-1, at Section 3; ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3; NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3; UN-Stakeholder-1.

GMAC Recommendation EWG 5:

Procedural: Community-based organizations and community leaders should have representation and leadership within working groups created by the ESMPs (e.g., CESAG).

Response:

Adopted. Community-based organizations will have majority representation and co-leadership at CESAG. Please refer to the following for a discussion on CESAG:

Exhs. ES-ESMP-1, at Section 3.5; ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3.5; NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3.5; UN-Stakeholder-1.

GMAC Recommendation EWG 6:

Procedural: The EDCs should track and publish baseline equity-related data and continue to provide regular progress updates.

Response:

Adopted, but modified. This recommendation is related to metrics. With regard to metrics, the 2022 Climate Act requires an extensive amount of information to be included in an ESMP, but limits the Department's review to seven months from the date an ESMP is filed. Moreover, each EDC is required to submit their ESMP on the same date, further complicating the Department's review of these comprehensive plans in such a limited timeframe. In addition, the 2022 Climate Act contemplates consideration by the Department of several issues that, standing alone, might require far longer than seven months to review. As such, the review of metrics would be very difficult for the EDCs to develop and for the Department to review and adjudicate in the time period allowed by statute.

However, the EDCs accept the purpose of the recommendation, and propose to work with interested stakeholders to address metrics relating to equity in a future phase of the ESMP dockets. The EDCs have proposed metrics associated with their incremental ESMP investments, as addressed in:

Exhibit ES-Metrics-1
Exhibit NG-Metrics-1
Exhibit UN-Metrics-1

GMAC Recommendation EWG 7:

Recognition: The ESMPs should provide detailed workforce development plans to recruit, hire, train, and retain people from disadvantaged communities and EJCs.

Response:

Adopted, but modified.

National Grid provided a workforce development strategy in Section 12.3 of the ESMP.

Eversource provides comprehensive workforce and training strategies in Section 12.2 and Section 12.3 of its ESMP.

Unitil provides information on workforce development in ESMP Sections 12.2 and 12.3.

GMAC Recommendation EWG 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 EJC and disadvantaged communities. Benefits of grid modernization should include reduced greenhouse gas emissions, improved air quality, improved health outcomes, and reduced excess mortality

Response:

Adopted, but modified. The EDCs take all of these factors into account when creating their respective ESMPs. The benefits of grid modernization are included in the net benefits analysis. Please refer to the following:

- Exh. ES-Net Benefits-1
- Exh. NG-Net Benefits-1
- Exh. UN-Net Benefits-1

GMAC Recommendation EWG 9:¹

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.

Response:

Adopted, but modified. To ensure that communities that host clean energy infrastructure directly benefit from the infrastructure that is built in their community, a connection between the clean energy infrastructure and specific benefits received for hosting that infrastructure is necessary. Such community benefits agreements (CBA) can take shape as individual EDCs work with a clean energy host community to develop a community benefits agreement specific to that community. No two communities are created equal. CBAs will be developed and executed on an individual host community basis. As CBAs are developed with host communities, the EDCs will take feedback and lessons learned from that process back to the CESAG to further ensure all EDCs and community-based organizations continue to re-think and formulate new methods and approaches to drive benefits of this just transition across the Commonwealth. Please refer to the following for a discussion of community benefits agreements:

Exhs. ES-ESMP-1, at Section 3.5; ES-Stakeholder-1;
Exhs. NG-ESMP-1, at Section 3.5; NG-Stakeholder-1;
Exhs. UN-ESMP-1, at Section 3.5; UN-Stakeholder-1.

¹ The specific language offered as a recommendation by the GMAC is bolded, for ease of reference.

GMAC Recommendation EWG 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

Response:

Adopted, but modified. With respect rate redesign and cost allocation methodologies for proactive investments, the 2022 Climate Act requires an extensive amount of information to be included in an ESMP, but limits the Department's review to seven months from the date an ESMP is filed. Moreover, each EDC is required to submit their ESMP on the same date, further complicating the Department's review of these comprehensive plans in such a limited timeframe. In addition, the 2022 Climate Act contemplates consideration by the Department of several issues that, standing alone, might require far longer than seven months to review. As such, a full analysis of rate redesign options, even if able to be developed by the EDCs in time for consideration by the Department in the present ESMP dockets, would be very difficult to review and adjudicate in the time period allowed by statute. The 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, recently opened by the Department. However, the Net Benefit Analysis does include the benefits associated with grid modernization for the proposed ESMP investments. Please see Exhibits ES-Net Benefits-1, NG-Net Benefits-1, and UN-Net Benefits-1 for the net benefit analysis testimony.

GMAC Recommendation EWG 11:

Distributive: Disadvantaged communities, EJCs, and LMI customers should have priority access to innovative financing, technology, energy-efficiency upgrades, building weatherization, and electrification adoption

Response:

Rejected. Recommendation-EWG-11 is better suited for the Energy Efficiency Advisory Council and the respective three-year energy efficiency plans of the Massachusetts Program Administrators.

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

Response:

Rejected. The 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.