**Introduction and Background**

The Grid Modernization Advisory Council (GMAC) was established by An Act Driving Clean Energy and Offshore Wind (the Climate Act)[[1]](#footnote-2) and is charged with reviewing and providing recommendations to the state investor-owned electric distribution companies (EDCs) regarding their electric-sector modernization plans (ESMPs). As Massachusetts continues its leadership in reducing greenhouse gas (GHG) emissions with the commitment to achieve Net Zero emissions in 2050, it will increasingly rely on an expanded role for the electric power system to meet those goals.[[2]](#footnote-3) The GMAC is an integral part of improving transparency and stakeholder engagement in the electric distribution system planning process in the Commonwealth.

Prior to review of the draft ESMPs but after passage of the Climate Act in 2022, the GMAC convened for the first time in March 2023. In the five months leading up to the filing of draft ESMPs, the GMAC hosted presentations from GMAC members, external experts, and EDC representatives on topics such as distributed energy resources (DER), interconnection challenges, cost allocation and investment alternatives, stakeholder engagement, and relevant proceedings at the Department of Public Utilities (DPU). This time allowed for engagement with subject matters pertinent to the ESMPs for GMAC members to inform their ESMP review. Further, the EDCs and GMAC members developed an outline so that the ESMPs would have a consistent format for ease of review by the GMAC and the DPU.

The GMAC’s formal review of the first generation of draft ESMPs began on September 1, 2023, and was an intensive 80-day process. Many stakeholders supported the GMAC ESMP review process, including GMAC members and their designees, members of the public who attended meetings and provided public comment, staff of the EDCs who provided presentations and responded to questions, staff of the Department of Energy Resources (DOER), and the GMAC consultant team (Synapse Energy Economics, the Wired Group, and GreenerU).

After receiving the draft ESMPs on September 1, 2023, the GMAC met on a biweekly basis to perform a rigorous and comprehensive review of the draft plans. Each GMAC meeting was structured to allow for consultant summary presentations and GMAC discussion on ESMP sections. An Executive Committee of the GMAC was established and held monthly meetings to provide direction for the GMAC review and development processes to develop final recommendations to the EDCs. At the September 14, 2023, meeting, the GMAC approved an Equity Working Group Charter and membership. This subcommittee of seven voting members and one non-voting EDC representative met four times over the course of the GMAC review period and provided oral and written recommendations.

The GMAC also convened a joint meeting with the Clean Energy Transmission Working Group (CETWG)[[3]](#footnote-4) on October 13, 2023, required by the Climate Act, to discuss related distribution and transmission challenges and strategies with grid modernization. During the joint meeting, presentations were made by three GMAC Members highlighting issues impacting both the distribution and transmission systems.

The GMAC’s stakeholder engagement process consisted of multiple opportunities for the general public to provide oral or written feedback to the GMAC throughout its review of the ESMPs. From March through August, the GMAC reserved meeting time for public comment. Written public comment was accepted at any time to the GMAC email inbox, administered by DOER, and submitted comments were posted on the GMAC website. Emails with information on the GMAC review process and public comment opportunities were sent out to a listserv of 1,000+ interested stakeholders during the review period.

Additionally, the GMAC hosted two public listening sessions where members of the public were invited to address the GMAC with any comments or concerns on the ESMPs. A brief presentation on the GMAC process and overview of the ESMPs was provided at the listening sessions and language interpretation services were provided.

Due to timing, the GMAC’s comments to the utilities were submitted ahead of the release of Order 20-80. As such, the GMAC and EDC did not substantively discuss how processes and topics might interrelated in the same way the CETWG, energy efficiency plans and other processes were treated during GMAC meetings.

The GMAC website serves as a repository for all documents of the GMAC, including meeting presentations, and meeting agendas and minutes in English and Spanish.[[4]](#footnote-5)

**Procedural Comments**

The ESMP process is novel in its conception through law, which requires evolution of the process to learn from its execution and accommodate the realities of implementing such a comprehensive and voluminous undertaking. Throughout the preparation and review of the draft ESMPs, the GMAC gained specialized knowledge. This knowledge was essential to equip the GMAC to fulfill its statutory duty to the greatest extent possible and provide recommendations on the ESMP drafts to the EDCs, and it also makes the GMAC uniquely suited to provide procedural recommendations to the DPU at this time. The GMAC recognizes that the compressed timeline for initial action did not afford the DPU an opportunity to set procedural guidelines for the ESMP process prior to commencement of the inaugural ESMP process. The GMAC also recognizes that both the Council and the EDCs faced unforeseen challenges with this unprecedented process. As such, the GMAC believes this proceeding is the most effective vehicle for the DPU to begin to investigate and implement the rules and procedures for future ESMP iterations so the ESMP process best meets its intended purpose under law, in support of the Commonwealth’s clean energy policies and objectives. With this objective in mind, the GMAC recommends the DPU consider the following procedural topics:

**The 2028 ESMP Process (“ESMP 2028”)**

* The DPU should set a minimum schedule (subject to further refinement by the GMAC) for the EDCs to engage with the GMAC and stakeholders at least 24 months in advance of providing a draft ESMP to the GMAC for review, however, such additional processes should not limit the GMAC’s scope of analysis, examination, or discussion topics;
* The DPU should direct the EDCs to submit draft ESMPs no later than 240 days before the electric company files the plan with the Department;
* The DPU should clarify how the ESMP process and ESMP stakeholders should coordinate with the Climate Compliance Plan process specified by Order 20-80 due in 2025;
* The DPU should direct the EDCs to utilize standardized terms and formats across their 2028 ESMPs, including for clearly describing and summarizing implementation plans and investments.

**Filing Requirements for ESMP 2028**

* The DPU should set requirements for uniform filing formats and minimum filing requirements for ESMP 2028 based on GMAC, EDC, and stakeholder input and experience in the adjudicatory proceedings;
* The DPU should direct the EDCs to provide reporting on the transmission infrastructure upgrades associated with the ESMPs to allow for transparency of the associated transmission analysis and cost estimates in alignment with the distribution investments proposed in the ESMPs.

1. St. 2022, c. 179, § 53, codified as G.L. c. 164, §§ 92B-92C. [↑](#footnote-ref-2)
2. Clean Energy and Climate Plan for 2050 states that Massachusetts’ path to economy-wide decarbonization relies on an expanded role for the electric power system. [↑](#footnote-ref-3)
3. *See* CETWG, available at<https://www.mass.gov/info-details/clean-energy-transmission-working-group-cetwg>. [↑](#footnote-ref-4)
4. DOER, GMAC, available at<https://www.mass.gov/info-details/grid-modernization-advisory-council-gmac>. [↑](#footnote-ref-5)