

## Fox, Julia (ENE)

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**From:** Tiffany Tisler <TTisler@keeganwerlin.com>  
**Sent:** Thursday, October 5, 2023 12:28 PM  
**To:** MA-GMAC (ENE); Edington, Aurora (ENE); Fox, Julia (ENE)  
**Cc:** Jack Habib; Cheryl Kimball; Tiffany Tisler; Ashley Marton; Kevin F. Penders  
**Subject:** EDC Proposed Stakeholder Process Metrics for Consideration by Grid Modernization Advisory Council Equity Working Group

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Dear Ms. Edington and Ms. Fox:

Fitchburg Gas and Electric Light Company, d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, and NSTAR Electric Company d/b/a Eversource Energy (collectively, the “EDCs”), have been working to develop proposed metrics associated with proposals included in their respective Electric Sector Modernization Plans (“ESMPs”), submitted to the Grid Modernization Advisory Council (“GMAC”) on September 1, 2023. As you are aware, the EDCs are subject to a wide array of metrics associated with various aspects of investments that are currently being pursued outside of their ESMPs. Such metrics have been approved by the Department of Public Utilities (the “Department”) (or are pending review by the Department). The EDCs are compiling that list of metrics for informational purposes for the GMAC to provide a distinction between metrics currently tracked (or proposed to be tracked) by the EDCs in various contexts (Grid Modernization, Electric Vehicle Infrastructure, Capital Investments Funded by Performance Based Rates, etc.), and those that the EDCs will be proposing for investments proposed through their respective ESMPs that are not currently tied to existing programs or investment plans.

The incremental metrics proposed by the EDCs will cover ESMP-related investments and the stakeholder process proposed by the EDCs to review such investments. Pursuant to feedback from the GMAC on September 28, 2023, the EDCs are first providing the GMAC their proposed stakeholder process metrics, to facilitate review by the GMAC Equity Working Group in the short term. To that end, the EDCs propose the following stakeholder process metrics:

- The number of outreach and involvement meetings **about the respective EDCs ESMP filing** with stakeholders, including EJC, 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 projects** with stakeholders, including EJC, municipal leaders, community-based organizations, and customers (i.e., residential, commercial and industrial, as well as DER customers).
- 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.

The third proposed stakeholder metric reflects the general categories of feedback the EDCs have received during stakeholder engagement processes on specific infrastructure project proposals:

- **Visual mitigation:** shrubs/tree planting or relocating objects out of a specific line of sight.
- **Access accommodations:** adjusting work zones to allow for continuity of access for school bus, elderly services, or regional transit.
- **Work hours:** adjusting work hours to accommodate traffic/pedestrian management or construction noise.
- **Right-of-way maintenance:** backfilling and repaving based on feedback from stakeholders, usually public way managers such as DPW or DOT.
- **Informational accommodations:** using local feedback to tailor outreach methods such as timing of meetings, translation of content into appropriate languages, and ADA access.
- **Engineering accommodations:** adjusting engineering design, to the extent practicable, to address stakeholder concerns.
- **Damage Prevention:** identifying conditions prior to construction to ensure the integrity of adjacent utilities, businesses, residents, and structures.

The EDCs may be able to implement the third proposed metric during the pre-permitting phase of project development (i.e., prior to formal regulatory filings seeking approval of projects), and during the permitting phase, pending further discussion about the methodology by which stakeholder feedback is proposed to be obtained.

The EDCs would benefit from discussions with the GMAC Equity Working Group (“EWG”) regarding their ideas on how a potential equity metric could be developed, tracked and implemented. The EDCs also welcome discussions with and feedback from the EWG on the three stakeholder engagement metrics the EDCs propose in this letter. Finally, the EDCs would welcome discussions with the EWG about the role the proposed Community Engagement Stakeholder Advisory Group (“CESAG”) could play in the ongoing tracking of metric results.

Thank you for your attention to this matter.

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