

Grid Modernization Advisory Council (GMAC)

MEETING MINUTES

Thursday, November 16, 2023, 12:30 – 4:00 p.m.

Hybrid Meeting

Councilors Present: Sarah Bresolin Silver (virtual), Kelly Caiazzo, Larry Chretien (virtual), Sarah Cullinan, Jeremy Koo (designee for Julie Curti, virtual), Commissioner Elizabeth Mahony, Amy McGuire, JS Rancourt, Kyle Murray, Jonathan Stout, Andy Sun (virtual), Kate Tohme (designee for Kat Cox-Arslan), Alex Worsley, Kathryn Wright (virtual)

Councilors Absent: Marybeth Campbell

Non-voting Councilors: Digaunto Chatterjee, Carol Sedewitz, Kevin Sprague (virtual)

DOER Staff Present: Aurora Edington, Julia Fox, Sarah McDaniel, Lou Sahl

Consultants Present: Paul Alvarez, Ben Havumaki, Jennifer Haugh, Tim Woolf

1. Call to Order

Commissioner Elizabeth Mahony, as Chair, called the meeting to order at 12:34 p.m.

2. Roll Call

Commissioner Elizabeth Mahony shared the agenda (slide 2) and took roll call.

3. Logistics

Commissioner Elizabeth Mahony reviewed slides 3 through 6 describing upcoming EDC listening sessions and the upcoming process for reviewing the recommendations report, voting, and submitting to the utilities pending DPU review. Only minor grammar and syntax cleanup will occur after today's meeting. Specific objections should be indicated throughout the meeting and will be recorded in the appendix so there will be one final vote.

Commissioner Elizabeth Mahony mentioned the City of Boston sent several thoughtful and detailed comments about this process. She said she appreciated this helpful document.

4. Review of Updated Draft GMAC Report

Tim Woolf, Synapse, began the discussion to indicate that we will start with the most contested items first and make our way down through the list. We were unable to make this document as short as it could be as time constraints limited this ability.

a. Glossary

The consultants included a glossary that is hoped to clarify terms that are used in the report.

Councilor Kelly Caiazzo, Office of the Attorney General, representing the Office of the Attorney General: Are we talking about the definitions? I have a lot of thoughts about the definition of “newly proposed investment” and others. I appreciate the effort for standardization, but I did want to make sure the meaning is clear. When we talk about something that has not been proposed to the DPU, I’m wondering how we’re thinking about all of Eversource’s major substation projects that were disclosed and described in a rate case. Eversource has an approved PBR (performance-based revenue adjustment) and there’s a cost recovery mechanism component for these major projects, so when we say newly proposed, are we excluding all of that, which is a big part of Eversource’s ESMP? On top of that, I think Eversource would be differently situated than National Grid and Unitil because they have categorized certain projects as network investments, which I understand to be major substation projects. By this pure definition, those might be newly proposed, whereas Eversource’s might not be. I just want to be clear about what’s on the table.

Commissioner Elizabeth Mahony: Do you think it is possible to amend the definition to meet your impression?

Councilor Kelly Caiazzo: I have another concern: I do think that when we think about the scope of the ESMPs, we want to consider sometimes what we’re really focusing on as what’s newly proposed and what needs a cost recovery mechanism. But in other ways we’re thinking more broadly; looking at considerations of alternatives and forecasting, that’s going to be at least related to base investments, or at least that’s how they might have an impact. And in some ways when we think about what investments meet the Commonwealth’s climate goals and impacts on ratepayers, we might not be thinking about what’s newly proposed as opposed to the whole picture. I don’t have a solution for how to amend that, but I do want to raise those points.

Tim Woolf: I can add a clarification. This definition was never intended to suggest that anything not newly proposed be ignored or relevant in the ESMP; it’s just a way to separate out how they’re viewed or should be viewed.

Kate Tohme, designee for Kat Cox-Arslan, New Leaf Energy, representing the distributed generation renewable energy industry: Regarding projects that have been approved versus

proposed, if they've just been raised or included in a prior docket before the DPU but haven't received approval, but circumstances have changed and are they still considered new?

Commissioner Elizabeth Mahony: I was thinking specifically in terms of the CIPs (Capital Investment Projects).

Kate Tohme: Maybe we say approved or currently pending?

Commissioner Elizabeth Mahony: Yes, that would help. I'm trying to get after a category that I just don't know about yet.

Councilor Kelly Caiazzo: I think boundaries about what has been approved or is pending is clearer.

Tim Woolf: I'm going to type in proposed language changes, so if you don't like it, speak up.

Commissioner Elizabeth Mahony: This term ("newly proposed") is used 12 other times and is probably in ten recommendations. I would say, do we need to put a pin in this and as we're going through recommendations, take stock of whether this definition matches how we're using the term?

Councilor Kelly Caiazzo: I think that's a fair exercise. I did look at that, but to your point, it's used a fair amount.

Councilor Digaunto Chatterjee, representing Eversource: I propose that if EDC projects are very specific, in a rate case, we don't typically get down to discussing individual projects. It's typically in programs (versus projects). Instead of saying specific costs, maybe say cost recovery mechanisms pending. As alternatives, to those base capital or currently pending projects will go through the same cost recovery mechanism. For example, if we came up with a non-wires alternative, we would be seeking incremental investment if the cost recovery is the same.

Councilor Kelly Caiazzo: My comment wasn't going to that—specifically regarding recommendation #31, the ESMP should go to newly proposed capital spending; I was wanting to say that we aren't cutting out.

Councilor Digaunto Chatterjee: Maybe include that language to #31.

Councilor Kelly Caiazzo: We can look at this on a break.

Councilor Sarah Cullinan, Massachusetts Clean Energy Center, representing the Massachusetts Clean Energy Center: Change to EDC investments instead of projects or programs?

Tim Woolf: Next definition is distributed energy resources (DER). There are lots of cases where DER is called out. In many cases, it's clear, but sometimes it's not. I collected examples of where DERs are defined in other places in Massachusetts, but it occurred to us that the statute is

relevant here, so we took this from there—it serves our purpose. We checked throughout the report and clarified accordingly.

Councilor Digaunto Chatterjee: Just one edit: everything in there is controllable except for energy efficiency. We've never thought of energy efficiency as a DER, but we've always thought of energy efficiency as being included in our base as well as incremental demand forecast. But we've never used it in the context of a DER because it's not a resource that can be called upon. It's a passive resource, not an active resource.

Commissioner Elizabeth Mahony: The challenge is that this definition is in the statute now. So how do we refer to it in the body?

Councilor Sarah Bresolin Silver, ENGIE North America, representing the energy storage industry: This is a very expansive definition of DER and I do support including it because it's in the statute. It seems appropriate. It's unfortunate that there are many other definitions of DER, but this seems most relevant for our purposes. My concern with just using this definition throughout the plans is what Digaunto Chatterjee said, and the plans don't perform analysis or forecasting on maybe everything in here—thermal storage, for example. What I found confusing initially is that it often referred just to solar and not storage. Not sure if my assumption there could be confirmed or not by the utilities.

Councilor Larry Chretien, Green Energy Consumers Alliance, representing low- to moderate-income residential customers: It's been a few years since I was on the Energy Efficiency Advisory Council (EEAC), but I was always impressed by the impact of passive energy efficiency work, not just on energy supply but on demand. I absolutely think that energy efficiency ought to be in the definition. It's a signal, a reminder, to all of us doing planning that if we want to minimize demand, energy efficiency is something we can adopt. Can you control it? Yes, you can, when you replace an inefficient electricity user with one that is more efficient.

Commissioner Elizabeth Mahony: Yes, this is defined in the statute, but when we take a step back, if we're not comfortable with this definition for use in the document, we could take a step back from the statute language. Just back to Councilor Sarah Bresolin Silver's point is when we use this term in our document, we make sure that what we've defined here is how we've used it throughout.

Tim Woolf: There's no problem if this is inconsistent with how Eversource or the EDCs define it in their plans. This is the GMAC report. It's up to us in this room to define it. There's nothing saying that the EEAC and others can't increase the amount of energy efficiency that's currently being planned in light of the costs proposed through grid modernization. It's an additional resource that can be used to reduce costs and I would be concerned if it was taken out of the definition and "incremental DER."

Councilor Alex Worsley, Enel North America, representing the transmission-scale renewable energy industry: I'm supportive of this definition. Tim Woolf, you mentioned a couple places where you may have identified where this didn't fit—maybe you could review those circumstances.

Commissioner Elizabeth Mahony: Does anyone oppose, and if we agree, we agree that we don't have the time today to scrub the document for those references but that afterwards we will make sure the doc is clear on the times that we use DER and when we might need to put in some sort of caveat to meet the intent of the document. Does anyone oppose using this definition? (Commissioner Mahony observed none.) We will flag wherever we use DER and come back to this before we leave today.

Tim Woolf: The next two definitions are relevant: "business-as-usual DERs"—as in, those assumed to be in place, some naturally occurring DERs without utility support, which underlies a lot of forecasting—versus "incremental DERs," which would be new investments. It's important to talk about DERs as alternatives and to distinguish when they're incremental.

Councilor Kelly Caiazzo: I had a little trouble with this distinction and phrasing. Part of what I was getting caught up on was "supported by EDCs under current policies and practices."

Kate Tohme: I share your concerns, and I don't have an answer. I don't necessarily see a need for this distinction.

Commissioner Elizabeth Mahony: It's only used three times in the report.

Councilor Amy McGuire, Highland Electric Fleet, representing the electric vehicle industry: I echo that sentiment and suggest that we call out specifically which DERs we're talking about as opposed to bucketing them. It's a little confusing as to what is business as usual, which changes over time, and since that won't be consistent over time, for clarity's sake, maybe we don't need these definitions. Maybe we should go back to either using DER or some subset of DERs identified in that definition.

Commissioner Elizabeth Mahony: Does anyone disagree with striking it?

Tim Woolf: You will have to look at every time DER is used. For example, load casting has DERs in a business-as-usual case. A lot of places where the report suggests alternatives to investments would be incremental. If we don't distinguish it, it'll be confusing. Maybe there's a way to get better language.

Commissioner Elizabeth Mahony: It's only used three times so we're going to have to do that exercise anyway. I don't know if we've actually distinguished this. We need to come up with some rules of the road that everyone agrees to, and then DOER can do the scrubbing to achieve what Tim Woolf is pointing at.

Councilor Amy McGuire: We need to look at each time DER is used, unfortunately, and carefully consider when we're using it.

Councilor Sarah Cullinan: DER is used 74 times in the report.

Commissioner Elizabeth Mahony: We need to move on and abide by what the council wants and open meeting law.

Kate Tohme: I would think about if this is a distinction for our report or if it's a distinction the EDCs should consider. Should it be a recommendation or observation to offer to the EDCs to include in their plans?

Commissioner Elizabeth Mahony: There is a recommendation for the EDCs to define DER, distributed generation, etc.

Councilor Sarah Bresolin Silver: My overall concern with term DER is that in the ESMPs, often when the term is used, it was really just solar. I just want the ESMPs to be clear about whether they're actually looking at all DERs or just solar forecasts.

Commissioner Elizabeth Mahony: Thanks for the reminder—it might be helpful in that recommendation that we just pointed out to say that.

Tim Woolf: Next, non-wires alternatives (NWA): this definition came about for the same reason as DER.

Commissioner Elizabeth Mahony: I am strongly against this definition; NWAs are not just DERs, but they could be a computer program, for instance.

Councilor Kyle Murray: Agreed.

Kate Tohme: Agreed.

Councilor Digaunto Chatterjee: Agreed; it could be technology or tech platforms, all of the above.

Kate Tohme: Instead of defining it here, we could have a footnote—not only, but includes XYZ.

Commissioner Elizabeth Mahony: Programs and initiatives to employ technology or technology platforms? Or do we leave it at DERs?

Councilor Kelly Caiazzo: I like Kate's idea of putting it in a footnote.

Commissioner Elizabeth Mahony: We can put it in a footnote the first time it comes up in the document.

Councilor Sarah Cullinan: You could say “solutions deployed in geographically targeted areas to address a specific constraint”—just another option.

Councilor Amy McGuire: I have a preference for using a footnote, but I think the reference to DERs is limiting, so I suggest we change that language in how we describe it and keep it at

“programs and initiatives or investments that address...” etc. I think we need to broaden it—this can be everything from a software solution or other thing we haven’t thought of yet.

Commissioner Elizabeth Mahony: I’m leaning toward footnote because there’s so much that goes into it. The word “includes” is indicative but not limiting.

Tim Woolf: Finally, demand response. There was a comment where demand response was mentioned, and the question was, does this apply to EVs and time-of-use rates? It seemed to make sense to include this to clarify it can include a lot of different things.

Councilor Alex Worsley: How many times are we using demand response outside of the DER definition?

Tim Woolf: Very few.

Councilor Kelly Caiazzo: Can I make a few edits to the first sentence if we keep it?

Commissioner Elizabeth Mahony: It’s used five times. Aside from tips to edit, what are people’s feelings on this one?

Tim Woolf: Of all the definitions, it’s the least needed. This was just in response to one person who wasn’t sure what it meant. I figured it’s better to define it once up front.

Councilor Amy McGuire: This might be another instance where a footnote might be useful, since it’s less a definition and more of a “this may include” type of reference, but I’m open to other opinions.

Commissioner Elizabeth Mahony: I suggest not using it as a definition.

Councilor Kelly Caiazzo: Can we say “any utility program, initiative, or rate to incentivize customers to reduce or shift load to optimize the efficiency of the grid and to reduce peak demand”?

Councilor Alex Worsley: I’d prefer not to specifically mention peak loads.

Aurora Edington, DOER staff member: So, retain the definition up to “efficiency of the grid”?

Councilor Kelly Caiazzo: That’s fine.

Commissioner Elizabeth Mahony: Just to review this glossary section, we’re removing demand response and NWA to footnotes; striking BAU and incremental DERs; using the definition of DER from the statute, but making sure every time it’s used that it matches this definition, and if it doesn’t, we’ll make a note of it. We amended the recommendation that makes sure we’re asking the EDCs to first define what DERs mean vs. Distributed generation, then their definition of business-as-usual vs. incremental. Then for newly proposed investments, we’ll check on where this is used and come back to it.

b. Introduction

Tim Woolf: The introduction section was all agreed to.

c. Compliance with the Climate Act

Tim Woolf: This was changed to “requirements of the Climate Act,” which is different from compliance. The blue language denotes changes to this section.

Councilor Kelly Caiazzo: As I was reading through this, I think this achieved the goal of some of the edits I sent. I have a question: the appendix needs to be framed as the work and conclusions of the GMAC. If it's a tool, is it appropriate to say this is a framework the consultants helped with rather than saying this is a chart created by the GMAC? I'm open to how other members feel about that. I believe this is not an actual recommendation or observation where we're specifically asking for a response.

Commissioner Elizabeth Mahony: Where are you thinking we would make that sort of caveat? The appendix provides an assessment—are you saying the appendix is a tool that the GMAC used? Do you think it goes in this section or in the actual appendix?

Councilor Kelly Caiazzo: For example, in the appendix, in the third paragraph of the results of the GMAC assessment, we could just say it's the GMAC's consultants' assessment. Mostly these edits would be to the language in the appendix itself, not to the section.

Kate Tohme: It's referenced in that section, so the first reference should be footnoted to indicate the appendix. So every time we say “the GMAC” here, we say “the appendix.”

Commissioner Elizabeth Mahony: I like what you're saying. Any disagreement?

Councilor Kelly Caiazzo: I like that framing; it would be helpful. One further edit to the second paragraph, “GMAC is not attempting to make a legal determination of compliance.” Just end the sentence there.

Commissioner Elizabeth Mahony: Does everyone agree? (No dissent was observed.)

d. Observations and recommendations

Commissioner Elizabeth Mahony: Regarding #14 here—I don't think that we as a body has determined whether the GMAC can make the determination that an EDC has met a statutory requirement. I'm hoping to strike that. (No disagreement was observed.)

Tim Woolf: Regarding overarching observation #10 regarding rate designs: what we've done here is pull them all together. There's a lot in here and covers many of the comments that were scattered about. I will say that there are a couple more that haven't been incorporated into this. Does this belong as written in the overarching recommendations?

Councilor Sarah Cullinan: I wonder if this is a recommendation instead of observation, because of the use of the word should.

Aurora Edington: This is in the recommendation section.

Kate Tohme: I have a comment regarding some others that could apply here; I think that DOER and consultants did a great job boiling recommendations down to this amount. But we are still asking a lot of the EDCs in a short time period before initial filing with the DPU. For everyone's consideration, we also have an option to make some of these recommendations be for future iterations. To the extent that we don't want to take limited time away from recommendations that are absolutely necessary to be addressed for these ESMPs, maybe we can specify some noted as being considered for future ESMPs. I noted Councilor Kelly Caiazzo's comment about potential rate design; maybe we don't want the EDCs to spend time doing that now, but note that they will be doing that in another forum.

Commissioner Elizabeth Mahony: The way I was reading it, the ESMPs should describe in detail how they could utilize rate design in the future.

Kate Tohme: Maybe we want to make that clear.

Councilor Larry Chretien: Is this an observation about what should have been included or a recommendation moving forward? It's an important topic. We as a GMAC have one bite at this apple. This plan goes to the DPU, rate cases are going forward, and if we don't speak to it now to signal our concern, it's a major issue about equity. It's also about different rates and incentives for demand reduction. The statement overall makes sense. Maybe this should be in the observations section, but acknowledging we don't have time to redo the plan and get into this, we could describe in detail how it could be utilized.

Councilor Sarah Bresolin Silver: I am okay with this; I support this. I would like to reserve the opportunity to go back and perhaps add to this, depending on how folks feel about additional recommendations. I want to say I hear and understand what Councilor Kate Tohme and Councilor Larry Chretien said and I also agree with the Chair on the distinction between proposing rates and considering them.

Tim Woolf: On recommendation #34, I left this as separate because it stood on its own and has more details. It's somewhat overlapping but we could leave it alone. This is more about providing information than anything else.

Commissioner Elizabeth Mahony: This is maybe meant to consolidate with the recommendation above. I'm struggling that maybe it's too detailed for these plans, but it's calling out need to do this.

Councilor Kelly Caiazzo: I would support adding something that's specifically references time-varying rates (TVR) to a larger recommendation, but I haven't processed this fully enough to get into the details as written.

Councilor Sarah Bresolin Silver: I think that these sub-bullets make two points about the need for an opt-out TVR, which will really have us encouraging the Commonwealth through the utilities as the implementers for the widespread adoption of time-varying rates. This is an important tool in the decarbonization toolbox. I think getting some info on the timeline of when we think we can have partial and full implementation of time-varying rates is very important.

Councilor Amy McGuire: I'll just reiterate that I like the piece in here that calls for a specific timeline. Some of the other things we called out in a prior piece are where timelines feel important in those as well. Granted, a lot of those are unknown for specific timelines; I do think that a broad stroke on timeline would perhaps help us firm up the reality of it if it is going to be considered and will be in some near-term timeframe.

Councilor Kyle Murray: I think a lot of this work has already been done in the grid modernization dockets: setting out timelines on TVR, opt-out TVR, but no discussion on other states' work. I don't think that is new work that really needs to be done, to my knowledge. I would support including of all of that. I don't know about a review of other states because that might take a little longer, but a lot of A and B was done.

Commissioner Elizabeth Mahony: Yet they're not in the ESMPs. That's part of the struggle: we know that AMI investments are being made and we don't want to lose time between plans without having advancement in these important issues, so I'm focused in on Councilor Amy McGuire's point about timeline and recognizing what Councilor Sarah Bresolin Silver is putting out there and Councilor Kyle Murray's point about how we incorporate it all. Is it enough to go back to #10 and make sure that that one specifically calls out TVRs and make an overall point about timeline in this and envelop #34 into #10, or is that oversimplifying it?

Councilor Sarah Bresolin Silver: #10 is already a monster—we might want to turn that into sub-bullets anyway. That would be just adding another concept to that paragraph.

Councilor Kelly Caiazzo: Some of this language may be from what I submitted. There is a reference to AMI functionality, so in that sentence, we could add implementation of TVR and increased DER adoption.

Tim Woolf: This may be a simplifying edit: replace rate designs with time-varying rates in #10.

Councilor Sarah Bresolin Silver: I agree with that, because I think we're talking about rate design more than for residential ratepayers, and also for batteries and EV charging. I agree with keeping it broad. I would prefer to keep TVR separate. If we add it to this paragraph, an important part of that is the opt-out and emphasis on timeline, so I would like to see that language included.

Councilor Alex Worsley: I think we should keep #34 separate. Any opposition to that? Seems like #10 is getting at something slightly different and should be included.

Councilor Sarah Cullinan: I was going to offer something similar. #10 is overarching, direction, something important generally. #34 #35 are within five- and ten-year solutions.

Commissioner Elizabeth Mahony: Then we leave #10 as it was. Any other amendments to #34 or #35?

Councilor Kelly Caiazzo: Can I take a moment? I may have a comment later on #34.

Councilor Sarah Cullinan: We also must consider whether we want Councilor Sarah Bresolin Silver's suggested version of #35 vs. DOER's version.

Commissioner Elizabeth Mahony: Yes.

Aurora Edington: DOER's suggested version is shorter and less detailed to get AMI incorporated, but that's a council decision which way you want to go.

Councilor Sarah Bresolin Silver: I think there was a typo in #35; should be an "of" in there. I do understand what the DOER is saying; I think that the original proposal is good, and if we go with the DOER suggestion, we add an extra sentence or two related to the granularity of the data and what customers will be able to see on their bills and an understanding of how it's settled and other load-serving entities, they will be interested in the data-transfer capabilities so they can transfer data quickly, and then specifically a need for understanding for how real-time access to the meters is going to work so that customers will understand how they can participate in demand response programs. I would add a sentence at the end of that paragraph if we're going to keep it: "At a minimum, the protocol should consider the granularity in which customer bills will be settled, how bulk transfers of AMI data will be completed, and how real-time access to data will be implemented to enable demand-response participation."

Councilor Kyle Murray: I support that addition.

Councilor Alex Worsley: We could add Councilor Sarah Bresolin Silver's—I prefer additional detail.

Tim Woolf: #19—providing a copy of the load-forecasting model in the ESMPs.

Kate Tohme: My concern here is that everything included in ESMPs and the initial filing through the EDC is going to be part of the case record in the proceedings. We've already established this will be a short turnaround and there's a lack of staff and resources. There are concerns of discussing at least whether these models should be in the ESMPs vs. made available for interested stakeholder review. Moving forward, our recommendation is that the GMAC and interested stakeholders have an interaction with the EDCs at an earlier stage of the analysis process for future iterations. For this one, my question to the EDCs, could this be made public versus included in an initial filing?

Councilor Larry Chretien: I strongly support the way it's written—that kind of transparency is important. As a Councilor, I get questions from the public who have something to add that I

would have missed. I really wish the EDCs would work together and come up with one model that they can agree upon, because it's difficult to get descriptions of how it's working.

Councilor Amy McGuire: I'd agree with Councilor Larry Chretien; I feel strongly that it's important to have more transparency in what the forecasting looked like and what was taken into consideration and how. Hearing Councilor Kate Tohme's point on what the DPU will need to review, that aside, it's important for the DPU through the adjudicated proceeding to have a strong understanding of not only what was important, but what the forecasted approaches look like and technologies and other stuff considered in the plans. I support keeping it as drafted.

Commissioner Elizabeth Mahony: My struggle is that I think everything is built on these forecasts and I don't think the DPU can proceed without looking at these forecasts. I get your point, but if they're not included in ESMPs, they will be asked for in discovery.

Kate Tohme: What do these forecasts look like? Five hundred pages?

Councilor Digaunto Chatterjee: I don't understand the recommendation about the load forecasting model. It would be helpful for me to understand what the ask is here. The load forecasting model is the assimilation of many many many proprietary tools that are used to collect customer-specific data that is confidential, as well as substation meter readings, as well as long-term weather normalization temperature humidity. I can think of two dozen inputs that go into load forecasting models that then provide for us the load forecast. The models are where the analysis is occurring, some of which are proprietary. The results, however, the forecasts, in every EFSB proceeding we share an inordinate amount of forecast data to the DPU as well as to the EFSB. I would encourage the wording is changed to forecast vs. forecasting model, which is a different implication.

Councilor Sarah Cullinan: I've seen this confusion and talking past each other in other contexts; people don't really know what they're asking for regarding a model or analysis behind something. I think the EDCs already provide a lot of this in the reliability reports, and so the way it's presented there is interim outputs and steps that build to what the forecasts are and analyses of forecast are assumptions and where they come from. I think that's what stakeholders want; not the actual models and every single input and number analysis. Some form of what is provided on annual reliability reports would be what stakeholders would actually find helpful.

Councilor Larry Chretien: The level of detail and granularity is difficult to capture in the phrase. I want to point out the numbers, how they got there, the model, I believe that's financed by ratepayer dollars and that's important to mention. The outcome affects every ratepayer. Also having done this at GECA, we'll intervene when we can. We don't always have the bandwidth, but here we have an opportunity to provide analysis when we have the info and shouldn't have to be through the docket with the DPU.

Councilor Kathryn Wright: I support Councilor Larry Chretien and Councilor Amy McGuire's suggestion to have as much transparency as possible. In the technical session yesterday, there were a lot of underlying assumptions. The public deserves to have detailed results so the DPU can understand.

Councilor Amy McGuire: Some suggested language here: striking models—this is about distribution planning, so longer-term outlook as well as nearer-term forecasting. That might be in the next bullet. I suggest we want similar transparency of all the things that go into coming up with the plans; we don’t need the secret sauce on what the database tools are being used and mixing it all together to come up with the outputs. Everything else would be of great value.

Kate Tohme: This clarification makes me comfortable having this in there. I suggest “provide a copy of their load forecasts and a description of...”

Councilor Kelly Caiazzo: This is fine with me to make these edits. We’ll circle back regarding intervenors.

#43—stakeholder participation. More is detailed in Equity Working Group recommendations.

Commissioner Elizabeth Mahony: some of earlier discussion, should say “The ESMP should propose a process to expand...” Should be telling us in ESMPs how they’re going to involve stakeholders.

#58—winter peaking. The original language prioritized energy efficiency: the language was changed to make it more general.

#67—integrated gas-electric planning. The original language was when estimating how investments in ESMPs will impact rates, they should account for rate impacts on gas customers as well as electric. This was modified to explain why it’s important: gas utility impacts are inextricably linked to electrification.

Sec 4—blue-lined text was drafted by Councilor Kathryn Wright regarding the Equity Working Group recommendations.

Councilor Kathryn Wright: The purpose of this section was to better connect Equity Working Group recommendations with whole document. The content isn’t anything new; it’s largely summarizing how the Equity Working Group and GMAC worked together throughout this process and highlights some key points in the memo already approved.

Commissioner Elizabeth Mahony: This was added at my suggestion, so DOER pulled language from the Equity Working Group memo. We thought it was important to include in the body of report. These recommendations are exceedingly important, and the work of the Equity Working Group was well done and well carried out. I want everyone to understand the priority those recommendations hold with GMAC in moving forward, thus the inclusion of this section.

Woolf introduced Section 5 of the report regarding the process for the next ESMPs to be filed. Suggestions were about how much detail to include. We wanted to include some ideas for what should be discussed in December meeting. Added are a few bullets saying “examples of type”—not limiting, not meaning to suggest we discussed it, but a sampling of several topics that have come up by GMAC.

#31b—started as a point about affordability and equity, and it talked about rate impacts, increases, designs, etc. 31b was added and gets at the issue of transmission and how much spending should be considered as a part of this whole practice, and how much the EDCs should be optimizing and considering some of these alternatives as a way of reducing transmission costs. This comes up once here and once later on. These came from Councilor Sarah Bresolin Silver.

Commissioner Elizabeth Mahony: We talked about this in a previous meeting; challenge before us is that these are distribution system plans, not transmission, and the DOER has authority over distribution system; however, we know that distribution has impact on transmission—we have CIP. We might want to put a caveat in here. We should start B with “Investments in and load impacts on the distribution system unavoidably have a corollary impact on the transmission system.”

Councilor Kyle Murray: I agree with your comments. Instead of maybe “should give greater consideration to mechanisms,” just say discuss or explain, but not necessarily put them in as proposals in the plan. I think it should say the ESMPs should discuss in detail some level of detail the interplay between distribution planning, transmission planning, and impacts one can have on the other.

Councilor Sarah Bresolin Silver: I agree mostly with both of what you said. I would make a suggestion to maybe add as a paragraph “to maintain affordability, the ESMPs should give greater consideration to how they can coordinate with ISO-NE and other stakeholders to identify mechanisms.”

Councilor Amy McGuire: I agree with those two edits. Time-varying rates and whether we want to call out TVR specifically on rate mechanisms more generally—is this an opportunity to broaden that? The word “including” in this phrasing means it’s not limited to, but I’m definitely in favor of maintaining the broadest of approaches and recommendations when it comes to any future things, we could figure out to do.

Commissioner Elizabeth Mahony: Are you suggesting changing it to say “and rate mechanisms” after “time-varying rates”?

Councilor Amy McGuire: Yes.

Kate Tohme: I’m just noting this is turning more into a recommendation, and I support Councilor Sarah Bresolin Silver’s reference to coordination. The jurisdiction DPU does have is coordinating with ISO-NE, so we could consider recommending that the EDCs submit a plan or proposal to coordinate with transmission operators, ISO-NE, and the DPU, either for now or for the future.

Commissioner Elizabeth Mahony: There is a recommendation later that we could pull this information from that’s related.

Councilor Kelly Caiazzo: I support the coordination point. This is minor, but I question whether we need specificity of transmission has been as high as 35% of total customer bill. Maybe say something more general.

Tim Woolf moved on to #39.

Commissioner Elizabeth Mahony: Councilor Sarah Bresolin Silver, looking between what you offered in observation #31 and what we have before us in recommendation #39, what can we do today? What is important to you in #31b that needs to be incorporated into recommendation #39?

Councilor Alex Worsley: Can we just move sub-bullet B to #39 here? That seems to work well here either separately or as a sub-bullet. Maybe we include that in addition? I don't care whether it's a new one or sub-bullet to #39.

Councilor Kyle Murray: I like Councilor Alex Worsley's suggestion. I support Councilor Kelly Caiazzo's recommendation to eliminate costs. We don't get that specific anywhere else in the report, and it's drawing on outside sources there.

Commissioner Elizabeth Mahony: We are striking that sentence.

Councilor Sarah Cullinan: I'd like to offer that what #39 is missing that #31 captures is the affordability aspect—some demonstration or explanation for how impacts to transmission system impact costs, basically.

Councilor Sarah Bresolin Silver: I agree with removing 35% and I'm happy to move to recommendations. One primary difference is the cost to the transmission system and another is how DERs can be used, so they do make separate points.

Councilor Amy McGuire: The time-varying rates comment didn't get captured.

Kate Tohme: The Commissioner's new sentence should go at the beginning. We should say that the EDCs should indicate what coordination has occurred with the transmission operators and ISO-NE and other stakeholders to identify mechanisms for deferring or avoiding new transmission spending ... and any ongoing or planned coordination in the future, and that in future coordination the EDCs should consider: bullet point. Should propose a plan for future coordination. Other suggested changes:

- "To identify transmission system upgrades associated with ESMP capital investments and propose a plan for future coordination."
- "To maintain affordability, the ESMPS should give greater consideration on during coordination with ISO-NE and transmission owners..."
- The first sentence of the sub-bullet should move to the first sentence of #38.

Councilor Digaunto Chatterjee: "Stakeholders" is a very broad term. I just want to make sure it's clear that transmission owners will not be able to publicly share any specific transmission upgrades outside of ISO-NE because of competitive procedure. How Councilor Kate Tohme has worded it is about coordination and drives to some specific outcomes, which is fine.

Councilor Sarah Bresolin Silver: I'd like something to be additive here; greater consideration is a little bit additive. I would like it to say "encourage greater coordination."

#11—CESAG. Minor rewording. No comments.

#34—TVR.

Councilor Kelly Caiazzo: For #34a, I suggest "consideration of default opt-out TVR for basic service customers, as well as consideration of TVR options for all distribution customers, ..."

Councilor Larry Chretien: For #34a, if we could broaden this, basic-service customers are diminishing greatly because of aggregation, and we need to make sure that consumers can engage with TVR whether they're within aggregation or basic service.

Commissioner Elizabeth Mahony: Agreed, and this was captured in Councilor Kelly Caiazzo's language suggestion.

Observation #4—defining newly proposed investments.

Councilor Sarah Bresolin Silver: These seem like two separate points. It's a small point.

Kate Tohme: This is just semantics but, how the investments "would be" reviewed by the DPU; it's not clear how the EDCs are going to seek cost recovery review from the DPU.

Councilor Kelly Caiazzo: Maybe this is a grammar issue.

Kate Tohme: These are three separate categories.

Commissioner Elizabeth Mahony: Kate is saying it's important that we show we understand how to capture all of this.

Kate Tohme: I would leave the first clause: how the EDCs would seek DPU for cost recovery. Do we have this as a recommendation as well? I think we do. If this is mentioned as a recommendation, this is fine as an observation.

Councilor Sarah Cullinan: Footnote #18 refers back to definition of newly proposed, so we need to remove that.

Tim Woolf: Agreed, unless we delete the glossary definition and use this one instead. We still have to come back to that.

Councilor Sarah Cullinan: The letter in the appendix the EDCs provided was getting at this. Is it worth it to say the letter starts to address this?

Tim Woolf: We discussed with the DOER how to deal with the letter because it came in so late, so to suggest it was part of review is an overstatement.

Councilor Sarah Cullinan: That compilation of information addresses this.

Tim Woolf: Recommendation #2 covers this. Should we copy this to the observation or leave as is?

Kate Tohme: For this one, instead of saying, “about to be under review,” say “proposed for review in future proceedings.”

Councilor Kelly Caiazzo: If you change the definition of “newly proposed,” I’m wondering there is still anything left in that bucket; if something is coming in a forthcoming proceeding, for example. I guess it does depend what definition we’re working with.

Commissioner Elizabeth Mahony: In #2, does the first sentence capture what buckets we’re thinking of?

Kate Tohme: The categories I was just editing was for all investments, not “not newly proposed.”

Commissioner Elizabeth Mahony: The first sentence is trying to get after solely what is in the ESMPs. The second is the other two buckets. Does that fully capture all the investments we’ve been thinking about?

Councilor Kelly Caiazzo: I think it would be for those investments that are not newly proposed, which investments are already approved by the DPU and which investments and in what quantity are under review in a current proceeding.

Commissioner Elizabeth Mahony: So we’re losing “about to propose.”

Kate Tohme: The definition of “newly proposed” is anything not already approved or pending. My comment is I agree with Councilor Kelly Caiazzo’s remark.

Tim Woolf: So leave the last phrase in or take it out?

Commissioner Elizabeth Mahony: Take it out.

Councilor Sarah Cullinan: The distinction with “newly proposed” within the ESMPs is those investments for which they’re seeking cost recovery from DPU right now in this initial ESMP proceeding versus things that are not in the immediate five-year plan or might be approved in the next. There is a difference there between the short term of what is needed and the long term. We don’t need to put any language in there, but that’s how I’m thinking about this. If the EDCs are seeking cost recovery for something incremental, more specific than broad brush is everything the ESMP is ever going to need.

Commissioner Elizabeth Mahony: Do we need language?

Councilor Sarah Cullinan: I don't think so. What captures it is that we're asking them to describe how they're going to obtain DPU review and approval, so that part would encompass what is now vs. what is down the road. Just wanted to voice how I see it coming together.

Kate Tohme: I agree with Councilor Sarah Cullinan. It would be good to get a thumbs up from the EDCs that they understand what we're saying: all capital investments not approved or pending, and we're looking for a list of investments seeking cost recovery, and for those that have already been approved or pending, where was that approved and under what mechanism are you receiving cost recovery.

Councilor Digaunto Chatterjee: Throughout the ESMP, we have treated everything beyond five years as a base plan and not incremental for purposes of cost recovery, because we believe that the KBAR mechanism would be adequate to continue to have the EDCs recover those costs through our base rates. So we don't make that distinction between now and then as relates to the safety and reliability programs.

Councilor Carol Sedewitz: That is specifically for Eversource, but it's different for other EDCs. We'll be specific in our responses as we're writing this and tried to be in Attachment A. We'll make that part of the ESMPs to make sure it's very clear what cost recovery mechanisms are already underway, have been approved, or which are pending or will be asked for as part of this.

Councilor Sarah Cullinan: Digaunto Chatterjee, the KBAR is part of the PBR mechanism applied for the next eight years—the ESMP goes to 2050. Assuming KBAR goes all the way to 2050, that captures it, but otherwise there will be a set of investments after an eight-year period that will need some kind of cost recovery. This doesn't have to be detailed, but acknowledging that that covers that period and there will be a mechanism that captures it would help.

Councilor Kelly Caiazzo: My main concerns with this definitional point is just because a cost recovery mechanism is approved does not mean individual investments have been approved, and I want to make sure that's been made clear.

Tim Woolf: Should we finish discussion on this term? We meant to come back to it.

Commissioner Elizabeth Mahony: Do we want to include and keep this definition in the glossary? I think the exercise we just went through for #49 is where we should leave it—to remove it.

Councilor Sarah Cullinan: And remove footnote #18.

Tim Woolf: Done.

Commissioner Elizabeth Mahony: Regarding observation #4, now that we've gone through review of recommendation, is everyone comfortable? We left that dangling. (No dissent was observed.)

Tim Woolf: In the requirements of the climate act section, the original draft had some observations about whether there was sufficient information or not. The leftover observation was that ESMPs provide information relevant to these requirements and one councilor suggested it's no longer needed.

Councilor Kelly Caiazzo: I suggested potentially deleting but I'm fine leaving it as is.

Tim Woolf: #20 was a new one from Councilor Kathryn Wright.

Councilor Kathryn Wright: I'm attempting to separate this, and believed it was #19 and that there were two separate concerns: CESAG and limited discussion of other stakeholder groups outside of communities including developers and municipalities.

#32—updated for clarity. This has to do with natural gas as a backup for heat pumps.

Councilor Kyle Murray: I may have added the thing about hybrid systems and associated costs. I would like to say “natural gas and other hybrid systems as a backup for heat pumps” and “ongoing maintenance cost of gas pipelines, GHG emissions, and other.” I have concerns about every one of those, which are so insanely complex.

Councilor Jonathan Stout, Dana-Farber Cancer Institute, representing large commercial and industrial end-use customers: I would suggest “alternative fuel infrastructure” there, as it's more inclusive.

Councilor Digaunto Chatterjee: The public comments were that not all delivered fuels can be maintained.

Councilor Kyle Murray: The question is, can they even stay in business—again, it's all so complex. Gas pipeline maintenance and other systems, alternative fuel infrastructure. I like that.

#4—no objections

#7—Councilor Alex Worsley had added text getting to investment alternatives and more details describing how they are considered.

#5—provisional system planning program and cost allocation

#11—glossary discussion about DG and DER and the importance of the ESMPs offering definitions

#14—lack of clarity about 14g (annual greenhouse gas emissions)

Digaunto Chatterjee: Can I ask for a clarification of what that is asking for?

Tim Woolf: It's basically asking for the current forecast of annual GHG emissions based on current state of your system. If you make a forecast, your system is going to change. Maybe this

belongs more in forecasting than current state, but concept is forecast and how they compare with requirements.

Commissioner Elizabeth Mahony: I'm also seeking clarification—is this about emissions of the power sector or of their distribution system?

Tim Woolf: This pertains to requirement of the Act, but effectively, the power sector.

Councilor Digaunto Chatterjee: If it is saying, how much electrification and solar hosting capacity is on the current system, that can be translated with how that aligns or doesn't align with the CECP. I think that is doable. If it's saying anything else, I don't know what that is.

Councilor Kyle Murray: The GHG emissions requirements are set out by the Global Warming Solutions Act at a statewide level. I don't know that we have stuff specific to each utility, but there are reductions they have to hit, and the commissioner has to set out through the three-year planning process to set out a target to hit. But I don't know if we have utility-specific emissions targets that I'm aware of.

Commissioner Elizabeth Mahony: I think there's a way to do this to get to Digaunto Chatterjee's point because of the CIPs exercise. In looking for investments made to enable clean energy, what will these investments do to contribute to those considerations that then translates into GHG emissions reductions? That's the way I was seeing it. I don't know if we need to clarify this point, but instead of Climate Act we should refer to GWSA targets.

Tim Woolf: Doesn't the Climate Act have more specific targets?

Councilor Carol Sedewitz: Should this be in section 4 of the report, not section 6?

Councilor Digaunto Chatterjee: In this we can draw what those investments can enable incrementally.

Councilor Sarah Cullinan: Did the EDCs actually intend can you attribute a GHG emissions number to your current system? Or this is what we have enabled getting toward your final goal? I don't think what we're asking for is translated to an emissions number. Is that what you're thinking?

Tim Woolf: I think it would be useful to have a forecast and emissions in absence of newly proposed investments.

Councilor Digaunto Chatterjee: We would look at all systems.

Councilor Sarah Cullinan: I would just frame it more toward the amount of electrification and hosting capacity needed.

Councilor Digaunto Chatterjee: I think the CECP has interim goals: 2025 is the starting year of the ESMP that requires a certain amount of net GHG emissions reduction, which translates to

specific amounts of clean energy technology resources. We can compare what can actually be enabled, distinct and separate from what's in service today, and we can line that up with that 2025 goal.

Councilor Sarah Cullinan: That's how I was thinking about it. I would frame it as "progress toward CECP targets in pursuit of the GWSA." Goals in the CECP implicate a certain amount of electrification and clean energy hosting capacity and those have to be achieved at those intervals.

Kate Tohme: I'm hearing that this ask doesn't actually belong in this section; what we're saying is existing GHG emissions can't be attributable to a service territory, so we're not looking for current state. Instead in later sections we should indicate how the proposed capital investments are going to contribute to meeting the CECP goals for GHGs. Then the question of leaving up to EDC discretion is to quantify GHG in tonnage and moving that marker on the CECP goal how much the investments are moving that marker and identifying it in some quantifiable manner.

Commissioner Elizabeth Mahony: I agree, except there is room for current analysis based on what Digaunto Chatterjee expressed; there is room to build out more things. That would be helpful here, and we can make sure that is captured in another place.

Councilor Kyle Murray: The way the EEAC has done this is the Secretary sends a letter saying "here is a total GHG emissions reduction goal for three-year plan for 2022-2024 and the MTCO_{2e} equivalents." The EDCs should say "here are things we are doing in our plan that are enabling in these goals and show progress." Is that how you were envisioning it?

Commissioner Elizabeth Mahony: Would that be forecast of potential or available annual GHG emissions reductions?

Councilor Larry Chretien: I love the spirit of 14g and I might come at it differently, which is the CECP is one relevant document that should be referenced. The other is the sublimits established by previous Secretary of Energy and Environmental Affairs which specifically indicate what targets should be for energy, buildings, transportation. The CECP is specific about the number of electric vehicles and heat pumps and the amount of megawatts of solar. What this is getting at is I want to know if there is something about the grid that's holding us back from achieving the numbers of those resources. I think it's up to DEP to calculate GHG emissions, but I want to know if we're having trouble increasing adoption because of what we're doing or not doing in terms of grid modernization.

(There were many indications of agreement.)

Councilor Digaunto Chatterjee: How about this suggested language: "an assessment of the current distribution system hosting capacity of electrification and clean energy and a comparison against the corresponding 2025-year interim CECP goal." And we'll all come in short—that can then be added together amongst.

Councilor Jonathan Stout: I'd like to clarify that this should be an emissions goal.

Councilor Sarah Cullinan: I'm back to being confused, because what Councilor Larry Chretien was getting at, the CECP has numbers associated with EVs, MWs, and that's what we're looking at in terms of targets, not emissions.

Councilor Digaunto Chatterjee: We can expand it to CECP deployment targets for clean energy resources and electrification technologies and delete references to EVs and solar.

Councilor Sarah Cullinan: I don't think we want to convert that to emissions.

#16—new text proposed by Councilor Sarah Bresolin Silver that links to the earlier discussion about transmission.

#26—language was edited to clarify what was there already

Councilor Alex Worsley: I have a recommendation that we use the same language that I proposed in overarching recommendation #7 with an explanation of what should be included in this one as well. That language was what I was really trying to drive at and I want to make sure this is echoed here again.

Tim Woolf: This is repetitive, and we should be consistent. We will pull language from R7.

#30—clarification around optimizing DERs and the whole issue of including locational analysis in geographical deployment of DER.

Commissioner Elizabeth Mahony: in that first sentence, minimize costs associated with “such integration while maximizing system benefits.”

#36—NWA criteria

Commissioner Elizabeth Mahony: I like this, and it helps our earlier discussion.

#47—new text; clarifying what was there before

Commissioner Elizabeth Mahony: Going back to what isn't in the ESMPs versus what we think what processes should be proposed, I was struggling with whether or not we were asking them to put this in this ESMP or to develop a process to do this. Can we clean this up to clarify?

Kate Tohme: I think propose a process.

#59—similar thing; new text to clarify in response to questions, mirroring what was said above in short-term solution set

#80b—clarification about ref case and benefit cost analysis

Commissioner Elizabeth Mahony: Do we go for consistency and use exact language about what has been approved and what is pending by DPU?

Councilor Kelly Caiazzo: Agreed, and can we do the same for #49?

Tim Woolf: For benefit-cost analyses, I'm not so sure you need to worry about where it's being proposed for review of cost recovery. In BCA, you have a reference case and an additional scenario, so cost recovery isn't as important here.

Kate Tohme: Councilor Kelly Caiazzo is just saying we should clarify the definition since we deleted it in the glossary.

Commissioner Elizabeth Mahony: I do take Tim's point about the actual construction phase vs. what's been approved for cost recovery.

Kate Tohme: Maybe the second sentence isn't necessary.

Tim Woolf: We'll strike it.

Councilor Kelly Caiazzo: Specifically in the second sentence, I propose it say that the EDCs should clearly identify investments in five-year plan that are "approved, pending, or newly proposed before the DPU."

Aurora Edington: We had three lookbacks. Where did we end up on the DER definition?

Commissioner Elizabeth Mahony: My recollection is we were solid with the definition, but the recommendation was that they consider how to distinguish it—done—and the only thing we wanted to do was to do a good scrub of the document to make sure that where DER is used matches this, as long as everyone agrees that's okay.

Sarah McDaniel, DOER counsel: What if it doesn't match? Make edits?

Commissioner Elizabeth Mahony: My suggestion is that we don't change body of the recommendation to match the definition; just clarify that the recommendation is DER and whatever else. If it's either limited compared to this definition or expanded beyond, we make sure the recommendation clearly points to that.

Aurora Edington: We will strike business-as-usual and incremental and check uses of those terms.

Commissioner Elizabeth Mahony: Finally, does anyone want to indicate that they've abstained from or object to any observations or recommendations? (None were observed.)

5. Vote

Councilor Kyle Murray moved and Councilor Alex Worsley seconded the motion to approve the observations and recommendations of the GMAC, allowing the DOER to make amendments

with cleanup and corrections as directed by the end of day, November 20, 2023. The motion carried.

Commissioner Elizabeth Mahony thanked the utilities, the consultant team, the GMAC, and DOER staff for their hard work.

6. Adjourn

Commissioner Elizabeth Mahony, as Chair, adjourned the meeting at 4:03 p.m.

Respectfully submitted,
Jennifer A. Haugh
GreenerU

Meeting Materials:

- Meeting agenda
- Meeting presentation slides
- Draft GMAC report: meeting version
- Master scale of agreement consolidated votes (report)
- Master scale of agreement consolidated votes (new data)
- Draft meeting minutes from November 9, 2023, GMAC meeting