Grid Modernization Advisory Council (GMAC)
Equity Working Group

MEETING MINUTES

Monday, October 23, 2023
Virtual Zoom Meeting

Councilors Present: Kathryn Wright, Barr Foundation (chair)*
Julia Fox, Department of Energy Resources
Larry Chretien, Green Energy Consumers Alliance*
Chris Modlish, Attorney General's Office
Kyle Murray, Acadia Center*
Vernon Walker, Clean Water Action
Mary Wambui, Planning Office for Urban Affairs

Non-Voting Councilors: Erin Engstrom, Eversource

Councilors Absent: --

DOER Staff Present: Sarah McDaniel

Consultants Present: Jennifer Haugh, GreenerU
Chelsea Mattioda, Synapse
Daniela Miranda, GreenerU
Tim Woolf, Synapse

* GMAC members

1. **Call to Order**

Kathryn Wright, as Chair, called the meeting to order at 11:02 a.m.

2. **Welcome, Roll Call, Agenda**

Wright welcomed the group and took roll call. She then discussed slide 3, that illustrated the Equity Working Group process. There are no detailed agendas for the EDCs' listening sessions yet, but the timing is set. Today's meeting will include time for public comment, followed by response from EDCs, then a vote.

3. Approval of Meeting Minutes

Wright provided two small clarifying amendments to the meeting minutes of October 10, which were featured as tracked changes. One was clarifying "this" for metrics, and the second was a comment from Wambui indicating that the ongoing stakeholder process was at EEAC, not AEG. Wambui indicated that it's a general process in the energy world for stakeholder processes. Councilor Kyle Murray moved to approve the minutes of October 10. The motion carried unanimously.

4. Presentation: Additional Equity Considerations

Tim Woolf, Synapse, presented slides 7 and 8.

Woolf indicated that his understanding of this presentation was equity considerations that go beyond metrics—i.e., taking a big-picture look at equity categories that don't easily fall into metrics. One of the key metrics or categories that is included in the Equity Working Group's table is affordability, so he's going to talk about ways to help address affordability by mitigating rate impacts in the ESMPs. The main point he's going to make here is that rate impacts can be mitigating by optimizing infrastructure investments and choosing the lowest-cost options. This sounds simple, but it's actually hard to do. There's a lot of analysis that has to happen to reach that optimization. This warrants more attention, not just to reduce cost, but because the impacts address equity concerns.

One of the key elements of optimizations is an extensive benefit-cost analysis. This was not included in the ESMPs initially, but it's coming. Thus there's not much to respond to. How should benefit-cost analyses be done to ensure optimization?

First, a benefit-cost analysis should articulate, quantify, and monetize investments. It's remarkable how infrequently these benefits are monetized; it's said this can't be done, but then another utility does it. One clarification on the terms here: there are three ways to present results:

1. One is in monetary terms—this is the best, as it gives us a discrete unit of measurement that we're all familiar with.
2. If you can't do that, you can at least quantify impacts: for example, reliability and resilience have ways to quantify impacts, even if you don't want to monetize them, and then you can go the next step and monetize.
3. The analyses should look at multiple alternative investment options: it's not just looking at conventional technologies, but looking at everything and including as alternatives DERs, NWAs, and delaying investments, the last of which can save a lot of money if it doesn't undermine other goals.

A note about discretionary vs. non-discretionary investments: the past will show a lot of non-discretionary investments, e.g., replacing substations. Now it's more complicated because there are so many more alternatives. Could you replace it with NWAs and other DERs? Furthermore, there's a lot of new technologies, whether it's AMI, VBO, DERMs, etc. They might make a lot of sense, or they might not. The key here is if a particular investment is discretionary, it needs to be evaluated on its own so that you can see what the costs and benefits are of that specific investment. What often happens is utilities look at an entire bundle of investments and compare that to doing nothing—that doesn't tell you much. It needs to be broken down if you're going to understand how to optimize the system.

One last point is benefit-cost analyses should be done using a certain perspective, whether it's utility costs only or societally, including things like greenhouse gases that don't affect rates. At a minimum is that however the test is defined, it's also useful to do your basic, fundamental utility-system test that looks like increases in revenues and reductions and nothing else—it just looks at those costs, and that gives you a very clear picture of how investments will affect revenue and rates.

If you're going to optimize investments, you need to do a rigorous and extensive analysis of rate impacts, which are different from benefits. If utilities do any rate impact analysis at all—not mentioned in ESMPs—they just look at the entire picture without doing a breakout, and it's usually done after the fact. But they don't use this to go back and look at the results and optimize investments with the goal of mitigating rates. It might be that a particular project looks pretty good via a cost-benefit analysis, but rate impacts can be pretty significant—there can be different results that way. That decision-making process of looking at rate impacts and cost-benefit analyses is essential here.

Lastly, rate impacts should account for three different effects: increased or decreased costs, reduced sales (and thereby have upward pressure on rates), and other DERs that can increase sales (EVs, heat pumps) that put downward pressure on rates. We need to wrap all of these together to see the bigger picture.

Discussion

> ***Larry Chretien***: Thank you—this is much needed clarification. This is the direction I believe is essential for our work. I'll add a couple points: I find it very frustrating as I did when I was on the EEAC to think about each utilities' projections of benefits and costs, essentially using their language, when I would like them to speak in one language and have that sort of process by consultants so it can be clearer to us as to what we can expect in terms of benefits and costs for different kinds of investments. It's going to make the public process better, including for the next docket filed. And I think a big part of our recommendation as a Council ought to be making sure the DPU is adequately staffed to review this kind of information, because the stakes are high and we want good investments to be approved, and weaker investments to be either deferred or denied. That's going to require more staff power to look at all the analyses, and it's going to require people with accounting skills, etc., because we're talking about a lot of money. I'm worried that the DPU will be outmatched in terms of being able to review that on a timely basis. Your final bullet is spot on: in general, I believe we've got to figure out how to weed out the best investments from the weakest, but want to share I've already shared with commissioner and staff that it supports work that Synapse has done, a study in California that EVs can add downward pressure on rates, so it shouldn't be necessarily assumed that EVs and heat pumps are cost drivers—there are nuances there, particularly with managed charging. Just want to point out that all has to be factored in. I appreciate that Synapse is behind us and we should all get behind it.
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> ***Kathryn Wright***: Thank you for what you presented. You mentioned around cost-benefit analyses that some utility cost tests account for greenhouse gas emissions and societal impacts, and some don't. Are there some societal costs that you recommend we pursue? We received some public comments that specifically reference the National Equity Screening Project to review specifically how those are measured.
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> ***Tim Woolf***: First, we'll be talking about this at the whole GMAC meeting on Thursday, and I have some specific suggestions there. When I say the utility cost test, I mean the simplest test there is, which just includes anything that affects customer revenue requirements. It's not well named. What I plan to recommend Thursday is to use the same test that's used for energy efficiency, which has been vetted for years and years. It does include all the utility system costs, but also greenhouse gas emissions, that are consistent with the climate change plans. So that

would be my starting point; it's a sound place to start. The point here about the utility system test is that a secondary test would isolate how things affect just revenue requirements. The first thing to be using would be what they're using for energy efficiency.

Mary Wambui: Thank you very much. I hate to be the person that is actually really disturbed by the phrase "BCA." The EEAC worked a lot on equity, and the greatest challenge to equity was actually the BCA, because inequities are baked into our existing system. That's a fact and we know it. How do we make sure that this becomes a vehicle for recognizing equity and making some of the recommendations that will come out of this group a reality? I understand why people need to do calculations, as I have a background in economics, but I recognize this vehicle is a serious threat to equity without persistence and intentionality—it's a good tool, but also the worst tool. It has not given us equity in Massachusetts. While people rave and are excited about our energy efficiency system and it's getting better, but I'm really worried.

Tim Woolf: I completely agree with all your points. We at Synapse are currently finishing up a document on this very issue. The premise is that BCA cannot address inequity at all; they're not designed to get at distributional impacts. I will share this when it's ready in a couple weeks. This is supported/funded by National Equity Screening Project. The next slide tries to get a little bit more at this, but it doesn't really get there—there's still a lot to do to get at equity issues.

Chris Modlish: As part of these general analyses, in terms of costs, do they go down to the customer level analyzing energy burden? Have you looked at or other states looking at incentive systems to incentive just beyond CBAs but the utilities to keep energy burdens below a certain level across certain income segments?

Tim Woolf: Energy burden is unfortunately not something that can be captured in a BCA. But one of the primary metrics used in a distributional equity analysis, and also in Massachusetts, short of doing a full-blown DEA, it's appropriate to collect energy burden metrics and look at how different energy choices affect the metrics. That's a big issue, but it's not able to be put into a BCA in a dollar term. There are states all over the country looking at equity; energy burden is one of the most common equity metrics, and there have been discussions about turning into incentives and penalties. I don't know of the state doing that yet, but it's a matter of time.

Kyle Murray: To Modlish's point about energy burden, National Grid has a rate case going on right now. They've just released a performance incentive mechanism, so this is an opportunity for a recommendation we can get together, because that could really help drive some change.

Larry Chretien: Regarding staffing and funding, I would appreciate that being a recommendation that comes from our group that the state fund at a certain level—not for GMAC, but we can issue that. In terms of BCA, would like to see something related to the utility-owned DERs vs. third party, because they've been saying third-party DER solar storage is not considered much of a benefit at all. I would like to see that actual analysis run.

Mary Wambui: EEAC and the BCAs are not necessarily guaranteeing equity. But it's the cost-effective requirement through the EEAC saying "we can't do this, we can't justify this expense." Just having the data doesn't necessarily hurt us here. It's not just the EEAC; it's BCAs overall in the energy world infrastructure.

Tim Woolf: To Murray's point, he talked about a good test for BCAs in the ESMPs; you just gave me the idea that we can start with the energy efficiency test being used currently, but we can add to that some considerations of equity. This doesn't have to be a monetary value, but it can be a part of the test that qualitatively or quantitatively.

Woolf presented slide 8 and discussed the same concept of equity going beyond metrics. Benefits are hard to pin down. How well are they distributed? A lot that utilities propose are things like reliability, resilience, etc., and it's hard to pin down who's going to experience them. BCAs do not provide information on distributional costs and benefits. This is an issue for the DPU; it's not really within our scope, not within the next few months anyway.

We need to be thinking about the distribution of the benefits, which is very much within the scope of the GMAC and our discussions. Some benefits are valued differently by different customers, especially EJCs. What value do these communities place on improved reliability and resilience? Can these communities install energy efficiency measures? There is a lot of discretionary spending. A lot of infrastructure investments are designed to reduce risk, but how much do EJCs want to pay for risk? These issues aren't easy to resolve, but at a minimum, the ESMPs should report on how their investments will impact different customer groups. This will allow for a much more informed decision-making process. It won't be black and white, but it allows for a much more robust discussion.

Erin Engstrom: It's very helpful for the EDCs before going into the next iteration. When talking about benefits to EJC customers, are you talking about all of the benefits, or just the incremental benefits related to projects that have already been given regulatory approval?

Tim Woolf: ESMPs should be focusing on future investments that are all incremental to what they would be doing otherwise. You want to isolate the effects of those particular dollars being spent. For any particular benefit or project, the incremental impacts on the EJCs vs. other customers should be articulated and described, if not quantified. There is a way to indicate whether reliability will go up or down in particular areas, for example.

Erin Engstrom: From Eversource, for example, if you look at our ESMP and its holistic view, we're looking at $12 billion. But we have regulatory approval to do a majority of that; only $900 million is incremental, so we were viewing this from a perspective of everything we've put forward because it's a comprehensive view regardless of whether or not it's incremental. We took a different approach because all of these projects impact one another. For all the grid modernization work we've received approval for, we don't necessarily have some of these metrics in there, but we are looking at this holistically.

Tim Woolf: I would advise against a holistic approach in this case because you may have portions of proposed investments that are not cost-effective.

Larry Chretien: Regarding the first bullet, these things are interrelated, but would like to see that annually or periodically the EDCs would produce a report on reliability and be clear that we made X$ investments for that to try to get to distributional investments. Our next set of investments should be mapped out. You have to tell a story, show it, prove it. Not all of this is necessarily numerical, but we can then see for ourselves and see whether we're green-lighting where we should. Similarly with other aspects: we'll all benefit from greenhouse gas emissions reduction. Where are EV pumps and solar panels going, etc.; then people can draw some conclusions based on that.

Mary Wambui: In the end, while reliability, etc., is proposed, I think Massachusetts needs a benefit called equity holding the same weight as other measures. The EEAC is thinking about distributional equity, and if we think about this as a foundation in energy investments, we would like to see full economic energy infrastructure that supports full economic participation and wellbeing of EJCs. I'm not sure how that needs to be built, but it needs to be something that's called out maybe from the recommendations from this working group.

Tim Woolf: That makes perfect sense. This has been done for years with energy efficiency: it's subtle and isn't called out as much as it should be, but if we were all to do the lowest-cost energy-efficiency improvements, we would see a range of programs that everyone should benefit from these programs.

Erin Engstrom: A question for this group is that equity is actually the one term that isn't defined at the state level. I think that it would be really helpful if we could have a common definition as we are using so we're all working off the same terminology.

Kathryn Wright: We've actually put froward a draft recommendation based on what we've been seeing in councilor comments, so that's on the table for today.

4. Review of Equity Assessment Table

Wright cued up the next agenda item, which is looking at the table and reviewing workforce and economic benefits, health benefits, and resilience and reliability metrics. She said that one thing that's coming up for her as she looks at workforce is it's very focused on some of the anticipated job creation and transitions that are implied by this ESMP and future, but doesn't do as good of a job as some of the questions raised earlier about customer-owned DER vs. utility-owned, and self-determination of EJCs and utility customers related to energy, which has its own set of economic benefits. We'll have to think about how and where we resolve that issue. Maybe there are suggestions for metrics or ways of improving the drafts.

a. Workforce

Mary Wambui: Tim Woolf talked about distributional benefits, and I think the way we get to that is targeting areas that have historic investments and if there is infrastructure being put there, there be community benefit agreements.

Kathryn Wright: I think Los Angeles did this; they looked at solar installation by zip code and developed incentives, programming, and support in partnership with community organizations.

Mary Wambui: San Diego has done something similar, I think.

Kathryn Wright: Do we want to call out specifically that utilities should be looking for communities with low DER penetration and use that as a metric to drive incentives? I'm trying to figure out how we phrase this.

Larry Chretien: I hesitate to put myself in a constrained box, but to what extent should GMAC expand our purview? How much is about trying to promote solar adoption, EV adoption, heat pump, etc., in a widespread fashion all across the state in a way that's equitable? If that's the case, we've got a lot more work to do—those are all issues I'm interested in and want to make sure that the utilities are at least supporting that. But are we here to make sure the grid can accommodate those things?

Kathryn Wright: I think our mission is to assess whether the grid accommodate the amount of electrification anticipated, but to Tim Woolf's point, it's in our purview to have a conversation and provide recommendations to ensure that the benefits of the results of the ESMP are distributed across different types of customers. At least that's how I'm thinking about it.

Kyle Murray: It's a great question and a difficult one. All of this stuff is tied together. We want to make sure the grid is ready for this, and reducing the peak is important for that. So DERs, storage, and solar can help on that end. My thinking is we can provide some high-level recommendations on those areas, but not dig into specifics like "solar program should be modified to do XYZ."

Mary Wambui: I think ESMPs provide an opportunity to expand or improve electricity availability and if there are any investments they're making in expanding from transmission and distribution, whatever it is they're doing, there needs to be something that bakes in economic participation and wellbeing of previously or currently marginalized groups.

Kathryn Wright: How do we translate that into a recommendation or a way to point the utilities to think about how they might measure success in that area?

Tim Woolf: Just as a preview of the Synapse report, our view is that participation in DERs should be one of the more important metrics to understand equity. If your community participates in DERs or EE, you're going to see lower bills. You've got the list of those metrics in the table.

Erin Engstrom: To Mary Wambui's point, this is different from what Tim Woolf, Kyle Murray, and Mary Wambui are alluding to. In general, investments proposing in ESMP should consider communities potentially impacted by that infrastructure, and part of that is including a community benefits agreement and additional incentives that host communities receive. That's a separate component than DER enablement.

Kathryn Wright: That makes sense to me, and perhaps we also reference CBAs as a potential driver of economic benefits, so it would be appropriate to reference it here too. I'm trying to quantify impacts of those that should be in EJCs in addition to our higher-level recommendations that reemphasizing that CBAs should be a part of any infrastructure investments as a result of ESMPs. And to Tim Woolf's point on DERs, that's good to hear—we can perhaps leave some of those metrics and tracking where we were talking about some of the programmatic pieces put forward in the ESMPs.

b. Health benefits

Kathryn Wright: This was an area discussed qualitatively in the ESMPs. This is something that the state's climate plan does take the time to quantify, so we have a number of quantitative benefits put forward.

Mary Wambui: The EEAC talked about this; what we have here is fine, but I had a conversation two weeks ago and there was a reference to a study done in Maryland regarding health metrics; this may help us think about metrics.

Larry Chretien: I'd be interested in following up on what they're trying to do to capture Medicare and Medicaid dollars to improve health.

Mary Wambui: We do something on the affordable housing side that sort of captures that type of data, but not sure how that would work in the energy world.

Larry Chretien: That's a non-energy benefit that is tracked in Mass Save—Eric Belleveau from Optimal is measuring for low-income people some health benefits.

Tim Woolf: I haven't been that engaged either, so I don't know for sure. I can check with Eric.

Kathryn Wright: To the extent the EEAC is measuring health benefits, we should be in alignment with the report to the GMAC.

c. Resilience and reliability

Kathryn Wright: Last week we proposed resilience metrics and showing particular benefits coming from investments to EJCs.

Julia Fox: New metrics were just posted on the website. She thinks some of these metrics get around distributional equity and improvements there.

Tim Woolf: How do you define EJC?

Kathryn Wright: We're using state's definition, which is tied to specific demographics and geography. You could use geographic demographics to back into accounts.

Erin Engstrom: We can back into the circuits that overlay with the GIS data of what quantifies a specific area of Massachusetts that meets the state's threshold. We can't back in at the customer level, but we can back in at the circuit level, and we know how many customers are on that circuit and that portion of the overlay that's covered by the EJC. You also have to consider that people are constantly moving in and out of communities, so certain sections that are technically EJ categorized, but not the whole community is EJ, per se.

Tim Woolf: I sometimes struggle with this; if it's geographic, some communities warrant special attention, but some households may not be included if they are part of that.

Jennifer Haugh: Letters o and p are the same in this section of the table.

Mary Wambui: I appreciate Tim's question. The DPU expanded the EJC definition to include 60 communities; definition does matter. I hope we can get to something that gets us to distributional equity.

Kathryn Wright: To unpack that, should we use EJC definition or "underserved by Mass Save system"? I'm trying to think about what we can accomplish in the next two meetings—is it trying to lift up the list of communities that the EEAC communities used to identify in the current system? Would that be a more holistic method of addressing making sure everyone is covered? I'm trying to clarify that we need to identify who's underserved, or other.

Mary Wambui: I don't know if we can accomplish that with the time we have, but our experience with EEAC is we identified the most underserved communities in the Commonwealth, and identified them as 37, and the DPU expanded that list to 60. For this next plan, we are going to go back and ask for it to be 37, because it affects the distributional equity differently. Just a heads up: issues with definitions don't give you the type of equitable outcomes that you want in the end.

Erin Engstrom: Mary Wambui is spot on about EEAC; participation rates in Mass Save programs are very different than just EJCs as a whole, which is why the EEAC proposed 37 distinct communities, the most underserved. What we have that's different now is we'd never identified our EJ communities at the circuit level, so our understanding is more granular. That allows us more granular-level detail as to who should be targeted for those benefits. That's really important, because if we just looked at it at the community level, some don't need to be served or get additional incentives or benefits—it's a small subset of those communities, so we should be focused on the most underserved or hardest hit communities as a whole.

Chris Modlish: Something that may help is whenever EJCs are referenced in the document, it should be broken it down into the four categories that make up EJCs more granularly so we know which parts of the EJC definition are being reported on.

Larry Chretien: The saga there of the EEAC proposing 37 and DPU expanding it just suggests to me here we make our recommendations as clearly as we can, but remembering the fact that under current law, the DPU is still the ultimate decider. The more specific we can be, the better. Maybe like the EEAC reiterating its preference for 37 is all we can do. The clearer, the better. Hopefully this DPU will receive things a little better than the last one.

Kathryn Wright: This is an appendix to the higher-level recommendations, so we'll keep editing it, so as you notice things, please feel free to email the GMAC email address and we'll work to incorporate line edits as well. We have public comments starting at 12:30; we can start a discussion around the draft recommendations but might pause us to see if anyone joined just to do the public comment.

5. Public comments

There were none.

6. Recommendations

Wright reviewed slide 10, covering the timeline for recommendations, and went through what the process looks like. The November 3 meeting is noon to 1 p.m.; an email came from DOER with a Zoom link on Friday.

Fox wanted to plug and remind EWG to share the listening sessions with their networks. Information is posted on the GMAC website with registration links. There will be a short presentation with public comments with a three-minute allowance for speakers. If there is anyone who needs language interpretation services (the top seven languages spoken in the state), please email MA-GMAC@mass.gov; the deadline is today.

Wright provided an overview of how the recommendations document is structured. There are recommended definitions of equity, then high-level comments and feedback based on the ESMPs. The final section is the specific recommendations grouped into the categories based on the definition of energy justice: procedural, recognition, distributive. The table is an appendix. There was no high-level feedback on structure or alternatives.

The first section covers defining equity as a working group. We pulled a definition from one of the national labs, then further broke this down into definition of equity and justice that we saw references to in both GMAC counselor comments and public comments. We wanted to put this together as a starting point. National Grid is using a version of this, but there is a lack of addressing structural inequities and racism.

Discussion

> ***Julia Fox***: I have no issue with definition of equity, but hearing from a conversation earlier in meeting, might be useful to add an EJC definition from the Commonwealth so it can be used throughout the rest of the document.
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> ***Kathryn Wright:*** Good point, because we don't define it in this document, though it is in the ESMPs right now.
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> ***Mary Wambui***: I second what Julia Fox said, because it needs to be as specific to the state as possible.
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> ***Kathryn Wright***: We can make that edit.
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> ***Erin Engstrom***: Can we add a definition of disadvantaged community vs. EJC?
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> ***Kathryn Wright***: For those who have been more involved in EEAC, do you all have a working definition of disadvantaged community?
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> ***Mary Wambui***: We used what was specific to Massachusetts for our definition of equity; in this case, that would be the definition of EJCs. Chris Modlish had said something about the four categories.
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> ***Chris Modlish***: Throughout the document should include references the breakdown by the four different definitional categories of EJCs. For instance, in siting facilities in an EJC community, is it language-isolated, income, or both, etc. so reporting isn't just broadly on EJCs but specifically on segment.
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> ***Kathryn Wright***: Erin Engstrom's question is different—do we also need a definition of disadvantaged communities that's separate from that? EJCs is clearly defined for the state using the four categories. "Disadvantaged communities" is a term widely used and we want to understand how that's different.
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> ***Larry Chretien***: I haven't paid enough attention to this document, but later on behind the definition, we talk about how grid modernization may affect rate design and its disproportional impact. I like that because we're concerned about energy burden. If we are raising rates by $0.02, that's going to have a bigger impact on low- to moderate-income households than the rest of us. The definition doesn't really get at that, unless you can point to it—we might want to be a little more specific in that regard. I don't have a suggestion on how to do that.
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> ***Kathryn Wright***: We can look at the whole document and think about how we want to work that in, but drafting that bullet and looking at our charter, it isn't just referring to EJCs but also LMIs; they have overlapping components, but they aren't the same.

Chris Modlish: Regarding disadvantaged communities, appears to me in that paragraph, it's defined in the latter part of the sentence—"historically marginalized and overburdened." We could add in energy burden or something that gets at lack of affordability in certain communities. It could be energy equity recognizes that certain communities have been historically burdened.

Mary Wambui: I would recommend leaving the definition as it is, because unlike the EEAC, we have not had a GMAC study that finds out anything about all these inequities. The reason we had a working definition at the EEAC is we could reference that study. But in grid modernization, that has not happened, and economic actually includes affordability and economic participation, so that definition is all-encompassing.

Kathryn Wright: We'll still give it a holistic read, but this is an intentionally encompassing definition based on what we're supposed to include as this group. Just some high-level comments: some of what we pulled forward is what Tim Woolf presented on today—there is not a lot of detail on customer benefits and net benefits, and we have a lot of questions about rate impacts that aren't answered by the plan. We also make some notes about the current state of stakeholder and community engagement in the plans; there are a lot of details put onto the CESAG, but there are some big challenges with the structure of that group (utility-led). Wright had included a comment about customer- vs. utility-owned DERs and whether that's something we should address now.

Julia Fox: One of the big things our small group was working on was distinguishing comments vs. recommendations. We spoke about the inclusion of CBAs and complementing that with distributional cost benefit analysis. I wonder if this shouldn't be placed higher up in our documents under comments, and then talking about the distributional part of our recommendations. I'm looking for thoughts on how to structure this to emphasize that point.

Kathryn Wright: My reaction is that we can mention here, because if our recommendations are isolated, would not want that not to appear.

Mary Wambui: I agree with Kathryn that it can be mentioned here but should also be referenced elsewhere. It's super important—those are the two pieces that will really make or break the ESMPs.

Kathryn Wright: We can adjust a bit, especially what we learned from Tim Woolf's presentation. We can adjust some of the wording on that third bullet and add it to the distributional section of the recommendations.

Erin Engstrom: On the first bullet, I know that National Grid and Eversource provided maps and locations of EJ communities, so is this specific to Unitil?

Kathryn Wright: We would like them to be consistent; there are also some cases where it would have been helpful to see EJCs. For example, in the resilience chapter, EJCs were not identified in the resilience and reliability section. Uniformity and more disclosure is better, because we don't have the same information right now in each of the plans. We can also make this a little more specific, but that's in general.

Erin Engstrom: For the second bullet, we recently provided specific feedback to the GMAC recommendations of what's come froward so far at the meetings. There were a couple of comments related to the CESAG, we provided feedback in our responses to those, but we know that the EDCs are certainly willing to have the CESAG be co-led with a community organization.

Members being compensated is a great recommendation and we'd be willing to have a further conversation here or at the GMAC about the structure or composition, so we know that we feel strongly that it should be co-led with a community-based organization.

Kathryn Wright: Thanks for flagging that—I don't know that everyone has seen the responses but thank you for letting us know.

Kyle Murray: I have a quick comment about the concept of uniform data across what we were just talking about. There may be times when there's a real big disagreement about one utility or another about what they can and cannot provide. Do the best efforts possible to have a uniform set of data, and in some cases, if one utility or another wants to go above and beyond, that'd be appreciated, but I hesitate on that because I don't want to see two very different sets of data coming out.

Mary Wambui: I would like to know what Kyle Murray hesitates on. I think recommendations should stay on as well as the CESAG recommendation, which should also stay on. I heard Erin Engstrom's response, but our recommendation should still be kept there.

Kathryn Wright: Not all comments have been addressed, such as compensation.

Kyle Murray: I want to be clear—these are good recommendations and would like to keep them. I'd like to see uniform data, but if utility wants to go above and beyond, I want to make sure that set of data is uniform from utility to utility so we aren't creating the same problem.

Mary Wambui: As far as data is concerned, we don't get enough; data is one of the biggest challenges to equity.

Kathryn Wright: I recognize that we only have six minutes left in our meeting, so I want to hear of any specific comments about the recommendations section. We are accepting line edits and will work to incorporate them. One amendment is to add the distributional equity analysis under the distributional section, but I would like to hear other recommendations or wording adjustments.

Erin Engstrom: Do these recommendations supersede the recommendations related to any of these topics that any of the GMAC members? From the EDC perspective, once we receive these, are we to consider all of these as well as GMAC recommendations related to these topics, or is the charter to develop these recommendations on behalf of the GMAC?

Kathryn Wright: My understanding is we are presenting to GMAC and these are additional.

Julia Fox: We are also discussing with the consulting team how to integrate these recommendations; these could be an appendix or folded in. These are considered as additional and treated as GMAC recommended if adopted by the full GMAC.

Kathryn Wright: There is some wording around metrics, where we're looking for an EDC response where this is something where you can begin collecting a baseline and reported in future vs. now. I just want to flag that. How that gets sorted with Excel table and process we're currently going through, don't know the answer. My request is to take some time to sit with this document and send any additional edits; feel free to track changes or use line edits or comments and send to the GMAC email address by October 30. We'll have a new version out ahead of the listening sessions, and our goal on November 3 is to discuss any additional comments from listening sessions and vote to send to the GMAC for consideration for inclusion. I will get additional clarification on process before then.

7. Adjourn

Wright, as Chair, adjourned the meeting at 12:59 p.m.

Respectfully submitted,
Jennifer A. Haugh
GreenerU

Meeting Materials:

- Meeting agenda
- Meeting minutes from October 10, 2023
- Meeting presentation slides for October 23, 2023
- Equity Working Group equity assessment recommendations and table