
Grid Modernization Advisory Council (GMAC) Public Listening Session

NOTES

Monday, October 30, 2023, 6-7:30 PM
Virtual Zoom Meeting

Councilors Present: Sarah Bresolin Silver, Kelly Caiazzo, Larry Chretien, Sarah Cullinan, Commissioner Elizabeth Mahony, Kyle Murray, Jonathan Stout, Alex Worsley, Kathryn Wright

Non-voting Councilors: Carol Sedewitz, Kevin Sprague

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

Consultants Present: Jennifer Haugh

1. Call to Order

Commissioner Elizabeth Mahony, as Chair, called the listening session to order at 6:03 p.m. Commissioner Mahony introduced herself and the role of the Grid Modernization Advisory Council, and went through the introductory slides describing the role and process of the GMAC. DOER Staff Member, Aurora Edington, presented an overview of the electric-sector modernization plans (ESMPs). The Commissioner then called upon members of the public who had pre-registered to speak, followed by others who had joined the session who were also interested in submitting comments. Public commenters were allowed three minutes to address topics related to the GMAC and ESMPs.

2. Public Comments

Amaani Hamid, Senior Regulatory Affairs Manager at Leap:

Hamid works for Leap, a DER [distributed energy resource] aggregator that works on connected solutions and storage. Hamid is excited about this opportunity. One of the issues they see as a barrier for grid modernization is the 150% site load export cap that is currently in place, so she would like the utilities to make changes in 2024 to update that cap to increase it so that larger assets can participate. Leap put in a proposal to the EEAC [Energy Efficiency Advisory Council] for a cap of 600%, but they actually believe no cap is the best solution. 600% would represent

middle schools and other places with large battery storage capacity. Commissioner Mahony noted that Hamid had also submitted written testimony.

Rachel Loeffler spoke and submitted written testimony:

GMAC (Grid Modernization Advisory Council) Public Comment Listening Session #1
 October 30, 2023
 Comments provided by Rachel Loeffler

<p>Thank you, Build Trust and Local Relationships</p>	<p>Thank you for hosting this public forum, and accepting public comment on the process. I understand the enormity of the task facing the Commonwealth as it faces the energy transition and increased energy demand. All large-scale infrastructure projects succeed or fail based upon building trust, and local relationships. I am speaking today to request that the public process embrace the small town wisdom: Good neighbors talk to their neighbors and neighbors are stronger together.</p>
<p>Good neighbors talk face to face and take the time to walk through the specific plans.</p>	<p>My mayor [Town Manager] recently said, "When starting a new construction project, even though a project has the right to do the work on their own property, good neighbors talk to their neighbors, walk them through the plans, what to expect during construction, and what the final result of the work will be." I encourage the GMAC to consider a more direct approach to outreach with property owners where utility upgrades and construction takes place. A good neighbor knows that a notice in the mail is insufficient on its own to build trust and set expectations for projects of any complexity.</p>
<p>Reciprocity to Private Landowners</p>	<p>Private landowners who have granted utility company's access to the land are important collaborators and stakeholders in any improvement project. Those who provide an easement to the public utility, do so with a belief in the public good and shared benefit to all. They do so, expecting reciprocity in return-- That the Utility company will use this easement with the utmost care and thoroughness to protect the landowner, the land, and its future value.</p>
<p>Collective Knowledge</p>	<p>Private landowners and abutters have a detailed collective knowledge of the land, how it functions throughout the seasons, and what other features are nearby or adjacent to the proposed work. They should not be excluded from the process, but instead engaged early on to test assumptions of existing conditions and assist in vetting the viability of the final restoration of the land.</p>
<p>Conservation Commission or Letter</p>	<p>Historically, notice to a property owner or an abutter of proposed improvements has taken two forms. A general letter indicating the work is about to begin, and or when there is a wetland nearby, notification through the local Conservation Commission.</p>

Unintended impacts	Though this is better than no communication, it is fairly passive and requires the land owner to be vigilant and aggressive in getting access to the proposed plans and work, to ascertain the extent of potential impact to their property.
Adversarial	In addition, it changes what could be a collaborative and proactive relationship, into one that may be adversarial, since any unforeseen negative consequences of the work can only be remediated after the work has begun, sometimes at great cost, and prolonged timelines.
No place to talk	Thirdly, it takes what could be a private discussion between the landowner and utility, into the public forum of the conservation commission. Which is not necessarily appropriate, as the commission's jurisdiction is the protection of wetlands and rare species not people, or private interests.
Wetlands more protected than private home/property owners	Currently the way the improvement work has been approached by the public utilities: Wetlands and Rare Species in the Commonwealth are more protected than individual homeowners and property owners granting easements to the utility company.
Access vs Ownership	Right of Access is not the same as ownership, and should be approached with care and integrity.
Protection	Actions taken through right of access should not diminish the value of the property or home, and should not cause short-term or long-term harm to private infrastructure on the homeowner's land.
New type of public engagement	As you consider a new public engagement process, please consider meeting individually with private landowners whose land you will be entering. During this meeting you should share your existing conditions plans, your temporary construction conditions, and restoration plans. These should be detailed in capturing the existing conditions and showing the limit of work, changes to terrain, management of stormwater, and engineering to protect adjacent areas from harm. The private landowners can help identify issues and complications unknown to the utility company because the utility company may lack detailed knowledge of the land.
Increased transparency Public availability of plans	These plans, and comments by landowners on the plans should be publicly available to all. Any promises made by utility company representatives should be met, with recourse to a government public agency, in case crews on the ground cut corners or lack sufficient information.

Closeout of project with Landowner and State Rep	The process may also benefit from a final walk through with the property owner after the work is complete. Ideally this meeting would take place with a state or local representative, who would thereby have an understanding of the work and its impact throughout their district.
Time Effort Investment	I realize that these modifications to engagement may require more time and effort upfront, but may save time and money in the long run, while strengthening relationships with the landowners granting access through their land.
Thank you	Again thanks for sharing your time and offering the opportunity to speak, and I look forward to neighborly collaboration in the years ahead.

Thanks again,
Rachel Loeffler

Kate Warner, Energy Planner for Martha’s Vineyard:

Warner is an energy planner at the Martha’s Vineyard Commission, a regional planning agency. They’ve been meeting a lot with Eversource regarding the Vineyard as a low-load high-renewable generation area. Warner wanted to know how this work that GMAC is doing will influence and streamline the DPU [Department of Public Utilities] process. She was asking because they’ve been waiting a long time for DPU to review Eversource’s CIP [Capital Investment Project], and they can’t add more solar to the grid until that’s complete. They can install small projects but no significant-sized arrays, and it’s keeping them from working to do better to meet state’s climate goals. There is a disconnect when the DOER comes up with some good things, but there are roadblocks to actually getting them done. She understands the concept of least-cost to ratepayers, but one thing that is often discussed with the MVC is undergrounding with respect to resilience. There are policies in place requiring underground wires in certain areas, but Massachusetts will only do that if local entities pay for it. Can we look at Connecticut policies to see how we might adopt some of their policies? We will need more resilience and undergrounding is more and more necessary.

Claire Chang, Greenfield Solar Store:

The documents utilities provided are a bit big to read through. She wants to impress that we make sure the utilities are on track to meet the 2030 and 2050 climate goals as established by the legislature and Governor. One of the ways to meet those goals is to ensure low-income communities have access to the solar loan program and are provided support. This program stopped in 2019. There was 30% load support which matched federal tax credit, because many low- to moderate-income households can’t take advantage of the full tax credit. She would appreciate that to be reinstated and loan support is increased from 30 to 50% or even higher to low- to moderate-income communities that have roofs and can then offset their own energy use. She thinks this is a really important avenue so that environmental justice communities and low- to moderate-income communities can participate in helping the Commonwealth meet our climate goals.

Rosemary Wessel, Berkshire Environmental Action Team:

Wessel wanted to back up Chang’s request with other MassCEC programs: Solarize Mass and Heat Smart. As a low- to moderate-income household, these programs made all the difference in the world to get solar independently priced. The original price was looking like \$30,000–\$35,000, but ended up being \$11,5000, which combined with a solar loan made it very possible. Right now, those programs are not active and it would be great to see them reinstated to help low- to moderate-income households to catch up.

Sruthi Davuluri, AutoGrid:

Thank you for putting together this platform. Sruthi represents AutoGrid, which is a virtual power plant (VPP) and distributed energy resource management system (DERMS) provider. She appreciates the thorough detail in the ESMPs. One opportunity is for the DOER to provide non-wires alternatives; she wanted to emphasize that National Grid provided a lot of detail on their approach and covered when each substation would be reaching capacity limitations and begin non-wires alternatives procurement processes with a lot of specifics. She would say she looked for same level of detail from Eversource; as a VPP provider, it’s helpful to see where substations with limited headroom will come online and to provide non-wires alternatives in the future. It’s helpful to see that level of detail. Eversource is on way to finalizing their analysis. In their ESMP, they also promote IEEE 1547 as a standard for PPRs. She wasn’t sure of the status for OEMs to meeting that but is in favor of open communication and protocols. She would like to hear more about behind-the-meter storage tariffs; an open question for the group is about whether behind-the-meter batteries will be able to export into the grid in the coming years.

Rosemary Wessel, Berkshire Environmental Action Team:

Wessel added that she hasn’t read all the ESMPs but has been talking to the owners of a peaking power plant to adopt storage to replace their fossil fuel use. They had a lot of questions about what price they’d have to pay to send energy to grid to storage. What would it cost for them to buy off the grid? Are those sorts of plans included in this or is that another forum? She is also talking to Solar and Scholars re: Connected Solutions, homeowners would have to pay up to \$10K just for upgrading their home to deliver energy to the grid. Who’s responsible for those costs?

3. Adjourn

Commissioner Elizabeth Mahony, as Chair, adjourned the listening session at 7:04 p.m.

Respectfully submitted,
Jennifer A. Haugh
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