

Grid Modernization Advisory Council (GMAC)

MEETING MINUTES

Thursday, November 9, 2023, 1-4 p.m.

Hybrid Meeting

Councilors Present: Leah Brams (designee for Amy McGuire, virtual), Sarah Bresolin Silver (virtual), Kelly Caiazzo, Mary Beth Campbell (virtual), Larry Chretien (virtual), Kat Cox- Arslan, Kate Tohme (designee for Kat Arslan-Cox, virtual), Jeremy Koo (designee for Julie Curti, virtual), Commissioner Elizabeth Mahony, Charles Maitland (designee for JS Rancourt, virtual), Sarah Cullinan (virtual), Corrin Moss (designee for Sarah Cullinan after 3 p.m., virtual), Kyle Murray, Jonathan Stout, Andy Sun (virtual), Alex Worsley, Kathryn Wright

Councilors Absent: —

Equity Working Group

Members Present: Kathryn Wright (chair), Larry Chretien, Julia Fox, Chris Modlish, Kyle Murray, Mary Wambui

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

DOER Staff Present: Aurora Edington, Julia Fox, Sarah McDaniel, Austin Dawson, 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 1:06 p.m.

2. Roll call

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

3. Meeting Minutes

Councilor Kyle Murray moved to approve the GMAC minutes of October 26, 2023. Councilor Jonathan Stout seconded. The motion carried unanimously.

Councilor Kyle Murray moved to approve the Executive Committee minutes of October 27, 2023. Councilor Jonathan Stout seconded. The motion carried unanimously.

Councilor Kyle Murray moved to approve the Equity Working Group minutes of November 3, 2023. Councilor Kathryn Wright seconded. The motion carried.

4. Logistics

Commissioner Mahony reviewed slides 4 through 7 with logistical details regarding the EDC [Electric Distribution Companies] listening sessions and upcoming process for the GMAC to review and approve recommendations regarding the ESMPs.

5. Equity Working Group Process

Commissioner Elizabeth Mahony expressed appreciation for the Equity Working Group's process.

Councilor Kathryn Wright presented slides 8 through 12. The Equity Working Group met four times to discuss how equity and affordability are addressed in the ESMPs, as well as reacted to the proposed EDC metrics and technical sessions. Ultimately the Equity Working Group developed and voted unanimously in favor of forwarding their memorandum of recommendations to the GMAC.

As Councilor Wright explained, some of the group's initial comments and observations discuss the tight timeline of this process, which limits the working group's ability to give this a thorough review. There was also missing information that the group was unable to evaluate. The group's recommendations are categorized as distributive, procedural, and recognition justice. One of the comments regarding the EDCs' proposed metrics was that while they touch on procedural equity, they do not factor in accountability or a measurement of outcomes.

Councilor Larry Chretien, Green Energy Consumers Alliance, representing low- to moderate-income residential customers: I was glad to be part of the committee, given that I represent low- to moderate-income communities. I just want to reinforce the fact that this isn't a question of whether the ESMPs are equitable or not; the whole thing is very iterative, and if you were to ask us to review the docket six months from now, we might have something different to say. We're simply commenting on what we know now. Particularly regarding bill impacts, there is no information. This is our best effort to make comments that both EDCs and the DPU [Department of Public Utilities] can consider.

Councilor Kathryn Wright said the next steps will likely be determined in December, as the Equity Working Group's charter determined that the duration is only through the GMAC's review process.

Councilor Sarah Bresolin Silver, ENGIE North America, representing the energy storage industry: I liked how the memo started with definitions. I think it's a terrific idea to have the same definitions across all plans. Is there any thought to standardizing definitions further?

Councilor Kathryn Wright, Barr Foundation, representing the environmental justice community: The "environmental justice communities" definition comes from what the Commonwealth uses. The "disadvantaged communities" definition comes from discussions; legislation is pending on a more official definition. We were trying to provide some definitions based on what we've seen in the field; the planning literature uses the three-part definition of energy equity, for example.

Councilor Sarah Bresolin Silver: Do you think there's value to submitting these to the DPU to adopt? Is this appropriate for the GMAC?

Commissioner Elizabeth Mahony: This may be something we could cover in December in terms of what we can cover with the GMAC. This process is giving feedback for utilities; whatever is ultimately encompassed within the plans will be ruled on by the DPU, but it's something we can think about.

Mary Wambui, Equity Working Group member: I just wanted to respond to that observation by saying that equity is very place specific. Because Massachusetts has not had an electric sector modernization equity analysis, it's difficult at this point to define it as precisely as it should be defined, but what the Equity Working Group proposed is a first step. Broad definitions are good, but in the end, to make any undertaking equitable, there has to be built-in specificity. This is what happened with the Energy Equity Advisory Council's definition of equity.

Councilor Kelly Caiazzo, Office of the Attorney General, representing the Office of the Attorney General: I would recommend that we use the same terms throughout the broader GMAC draft report and be consistent within our documents.

Commissioner Elizabeth Mahony pointed out that there is still an opportunity to provide feedback and vote on this next week. She thanked Councilor Wright again for leading this charge and to the Equity Working Group members, both on the GMAC and additional volunteers. She recognized the timeframe the group worked under and indicated that they really rose to the challenge.

6. Draft GMAC Report: Outline and Observations

Tim Woolf, Synapse, kicked off the discussion by saying he will be focusing on the redlines in the document for discussion. He shared the draft GMAC recommendations document on his screen for review.

a. Observation #5: cost recovery

Councilor Sarah Cullinan, Massachusetts Clean Energy Center, representing the Massachusetts Clean Energy Center: The EDCs provided additional information in their letter and table, which addressed this; I raised this as a need to provide clarity as to what from these plans is the ask of the DPU was immediately actionable versus what part of these plans is more speaking to a general long-term strategy. The information that was provided to split out the parts of the plans that are already approved in some kind of cost recovery or reviewed by the DPU or already have a path forward in seeking cost recovery that is responsive to this, they provide the information that was needed to meet that objective of the DPU here. Something that is still a question from the letter the EDCs provided is what they meant by their ask that the DPU is going to approve the plan, and what does that mean? In the plan they include a lot of information and assumptions, so in asking the DPU to approve the plan, does that mean that they're approving every single piece of information going into it, every assumption, every outcome, or is there more of a delineation that can happen in terms of what could be the pieces that will be iterated on going forward so they're not numbers or functions that are set in stone? I hope that provides a bit more context.

Kate Tohme, designee for Kat Cox-Arslan, New Leaf Energy, representing the distributed generation renewable energy industry: I agree with Councilor Cullinan on this point. In recognizing that these are recommendations to the EDCs, I think that our observation or recommendation here is that the EDCs should be very clear to the DPU on exactly what they're asking approval of in these plans since these adjudicatory proceedings are going to be very quick, and that the asks don't have to be identified through discovery. I'd also recommend that the GMAC consider providing comments directly to the DPU.

Councilor Kelly Caiazzo: Some questions about cost recovery were about ways to get at what incremental means and to help define that, and I do agree that the appendix to the letter provides some of that information. One question is there was a reference in the letter to cost recovery being part of a base proceeding or a docket, and I wondered, would this be an ESMP docket or is something else being considered? Some transparency and clarity would be helpful.

Tim Woolf: I had a similar question about cost recovery and the term "incremental ESMP." My reading is that they are not requesting cost recovery. Is that true?

Commissioner Elizabeth Mahony: We do have time to address the letter at the end. Can we wait until then?

Woolf referred to the blue text on the screen, which is new language for the GMAC's consideration in addressing #5. He indicated that the point is to provide a little more direction as to how this information should be incorporated in the draft.

Commissioner Elizabeth Mahony: I'm struggling a little with the relationship between the letter and our recommendations and how we pull it all together. I'm having a tough time reacting in real time because of the complications of that. We can come back to this.

Tim Woolf: Regarding compliance with the Climate Act, Councilor Wright suggested we discuss the appendix table and particularly the noncompliance portions.

Councilor Kathryn Wright: I included this suggestion because it was the first time, we saw the information laid out that way, and thought it might be valuable to review that.

Woolf walked through the appendix, which started with new language regarding compliance. He jumped to the table, which references § 92B and § 92C. The table breaks down the language of the Act and attempts to indicate where information is cited within the ESMPs and an assessment of whether the plans are compliant. In a lot of cases, plans are compliant. In some cases, it says “partial” because we don’t have enough information to understand alternatives explored. Where it is clearer is where it says “no”: there are cases where information isn’t there.

Commissioner Elizabeth Mahony: When we frame it the right way, that this is just us trying to look at everything before the Council and what’s required of the utilities, I think it’s helpful for us to say we’re not making any assessments on behalf of the DPU; this is just a flag for our review where we’re seeing things land. I think it’s a helpful exercise, but before we dive any deeper, want to ask the Council if they think it’s helpful.

Councilor Alex Worsley, Enel North America, Representing the transmission-scale renewable energy industry: One thing that might make it a little more helpful is that we apply our specific sections and recommendations to tie more context about why we may or may not have up to the body of the recommendations.

Commissioner Elizabeth Mahony: If we’re looking at this in terms of what where we’re seeing connections.

Tim Woolf: In the table, suggesting for each one, we explain why.

Councilor Alex Worsley: For “no” or “partial,” some more context and be more explicit would help.

Councilor Kathryn Wright: I just wanted to second Councilor Alex Worsley’s recommendation; I got to the appendix and thought we weren’t there.

Councilor Kyle Murray, Acadia Center, representing the environmental advocacy community: I agree with the concept, but I don’t want the appendix to become monstrously huge, so maybe use hyperlinks.

Commissioner Elizabeth Mahony: I’m told we do have hyperlink capabilities.

Kate Tohme: I recommend that rather than framing it as a legal assessment, we frame it as potentially insufficient or missing information. One purpose of GMAC is to identify information that would be sought through discovery but is otherwise identified in advance of the filing. It’s not the charge of the GMAC to conduct a legal assessment, but it’s valuable for us to tell the EDCs that we can’t see how these are being met in the draft plans.

Councilor Kyle Murray: I'm fine with that, but we are not a legal body. None of this is legally binding; with the EEAC, none of that is legally binding. just recommendations out of a group. This is not a pronouncement by the Attorney General's Office. It's implicit that these are not legal findings, just opinions of the working group. It's fine to put in that specification, but that's what every working group and council is charged with.

Commissioner Elizabeth Mahony: I think Councilor Kate Tohme's addition is that this is we're trying to get as much information on the record before we start the record.

b. Observation #28: solution sets

Councilor Kelly Caiazzo: The new observation is helpful to understand when looking at some recommendations that come later in DER [distributed energy resources] interconnecting, etc., so just trying to state a simple point in the observations section.

Commissioner Elizabeth Mahony: Is this suggestion a subset of 28 or its own new observation?

Councilor Kelly Caiazzo: I think it could be a subset.

Tim Woolf: How do we define DERs? Included here is a proposed definition. This is important because there are a couple of types of DERs that might not fall within these categories, especially EVs and heat pumps—are they DERs or not? I've heard different opinions on that.

Kate Tohme: I just wanted to jump back and support Councilor Kelly Caiazzo's observation here; it's important for inclusion and to consider the potential of associated recommendation that the ESMPs include alternatives if the proposals are not approved by the DPU.

Councilor Sarah Bresolin Silver: I've raised this a couple times, and National Grid does have a definition of DER. What was challenging in the ESMPs was sometimes the term DER included storage and sometimes it didn't. Consistency of using the terms throughout the plans would be appreciated.

Commissioner Elizabeth Mahony: It would be helpful to understand how plans currently define DERs and then to where Tim Woolf and Councilor Sarah Cullinan are coming from is this is the Council's report, so how are we observing DERs as it pertains to our observations and recommendations? I will go back to where we have defined DERs in previous DPU lives and where it has been defined in the context of the CIPs—not that the CIPs should drive ESMPs, but it's one place we could source.

Councilor Sarah Cullinan: My comment here was more along the lines of making sure we were consistent with what we define as DER. There was another point in our document where we say DG [distributed generation] and DER, and I wondered what do we mean by that—is one a subset of the other? Our document needs to be clear about how we define it, and maybe that's different from how the EDCs define it.

Councilor Alex Worsley: I went through the recommendations and think our document should be consistent. Definitions should be helpful, particularly with respect to incorporating technology. We use the term DER differently in different situations.

Commissioner Elizabeth Mahony: What I'm hearing is that we should define DERs for the purpose of this report, and we should do a scrub of the report to make sure we're using that term appropriately throughout. Secondly, we should point out that there are differences amongst utilities in how they apply the term.

Charles Maitland, designee for JS Rancourt, DXS: Direct Expansion Solutions, representing the building electrification industry: I want to comment on the underlined text: building electrification technologies vary, and something like "behind-the-meter load-shifting technology" might be more accurate for buildings.

Councilor Kyle Murray: I agree about definitions and having a two-step action plan here. We should look at how it's defined on the DPU side, talk about whether that's what we want to use, and if we want to use a different one, explain why we're opting for a different one.

Kate Tohme: The term "distributed generation" has been explicitly defined by the DPU and is different than this proposed definition, and it's defined differently within the ESMPs. Distributed generation and DER should not be used interchangeably.

Councilor Carol Sedewitz, representing National Grid: We did make a definition of it in our submission of the report on page 198 and agree that we could do this and consistently. I'm not sure if that definition meets what you're looking for, but I just wanted to clarify.

Councilor Digaunto Chatterjee, representing Eversource: For what it's worth, I agree with Kate Tohme; we define distributed generation as any asset that produces voltage or frequency that has an impact on the grid, and therefore needs to be studied for interconnection. It's easy to conflate that term with energy efficiency or electric vehicles that may or may not have a direct negative reliability impact on the grid that needs to be assessed and studied through a process. Battery storage and electric vehicles specifically need to be studied for interconnection, but it's not so much the case for energy efficiency or demand response, which are operational tools that can be used to defer grid investments in a non-wires context. We would make a clear delineation to not conflate distributed generation and DER. We will have a clear definition and explain that.

Tim Woolf: What is important here is DERs play different roles in these plans. One is that without influence from utilities, they may impact or reduce demand. Second, they might be solutions to mitigate peak demand. What I've heard now is we're going to need to make those distinction. As we come up with definitions, keep in mind their effects on system vs. utility control.

Councilor Digaunto Chatterjee: We look at 15 different types of DERs, including distributed generation. Our framework is out there, and it is specific. There are many different profiles of energy efficiency.

7. Draft GMAC Report: GMAC Recommendations to the EDCs

a. Introductory paragraph

Tim Woolf: We're now into recommendations. The bottom of this paragraph includes a comment from Kate Tohme; maybe we should say more about what "responding" may mean, listing examples of additional language.

Kate Tohme: A reason behind this is to make sure we're getting uniform responses from all three EDCs for ease of reference and analysis by the DPU, so whether these exact recommendations or a uniform format with information that needs to come from all three EDCs might be helpful for the GMAC and the DPU.

Councilor Kyle Murray: Wordsmithing here—does the statute state that they must respond to the recommendation? If GMAC request that they respond, is that strong enough? Or are we saying this particularly because we want them to respond point by point, versus the statute, which might say they have to respond?

Commissioner Elizabeth Mahony: My quick reaction is that I think this is the first go, and it's not us making an interpretation of the statute but what we as a council think would be helpful for the process. I think it's helpful to suggest they respond to each, and that's what we think would be helpful to the process.

Councilor Kyle Murray: Maybe add a sentence in there that the Climate Law requires them to respond and GMAC requests that EDCs respond to each one, just to make it clear.

b. #3

Tim Woolf: There is then an overarching set of recommendations from Kate Tohme regarding the third point that would be best if Kate described.

Kate Tohme: For the distributed generation sector, our biggest priority is to see these broken into three separate recommendations. Recognizing these plans were put together on expedited timeline, and the EDCs have been working with stakeholders for several years on cost allocation and proactive system planning, it's pertinent that we ensure that the ESMPs fulfill the legislative intent of forwarding the goal to have proactive infrastructure upgrades for distributed generation interconnection and a long-term cost allocation methodology. The distributed generation sector sees this as a three-part process that needs to be addressed:

- *The ESMPs should propose a long-term proactive distribution system planning process for the interconnection of distributed generation, utilizing the analysis process proposals and subsequent comments submitted in D.P.U. 20-75. Proactive distribution system investments are critical to ensuring DERs can interconnect to the grid at a reasonable cost and expeditious manner to meet the Commonwealth's goals. The proactive planning process should be as uniform across all three EDCs as possible, ensuring coordination of overarching assumptions and DER stakeholder engagement.*

- *The ESMPs should propose a long-term cost allocation methodology for proactive infrastructure upgrades to enable the interconnection of distributed generation to succeed the reactive investment approval process conducted through the Provisional System Planning Program. If this is not possible before the January filing, then the EDCs should submit a detailed proposal and timeline for a stakeholder process that will develop a long-term cost allocation methodology. This proposal should include how the stakeholder engagement and discussion will occur in parallel to the ESMP proceedings and should propose a date by which the EDCs will file a long-term cost allocation proposal at the DPU.*
- *Extension of the Provisional System Planning Program as currently proposed in the ESMPs will require significant additional adjudicatory proceedings over the next 5 years and will not incorporate proactive system planning as required by the Climate Act. The EDCs should submit a detailed proposal for streamlining of CIPs over the next 5 years, including incorporation of proactive system planning in advance of the next ESMP process. The proposal should include, at a minimum, batch review of existing group studies as well as application of the long-term proactive analysis process and cost allocation methodology in the interim between this and the next ESMP process.*

We think that it's very important that there be streamlining or batching of that process to the DPU and that there also be implementation of the long-term cost allocation and proactive analysis. We think it's important to get accurate recommendations in here to make sure these are implemented.

Commissioner Elizabeth Mahony: We are all in a difficult position in that we've had such a short timeline to do all this. Even if you think we should have started August 11, 2022, it's still not enough time. That said, we are not starting from scratch, and we've had a lot of discussions—written and verbal—about how we could attack this over the last set of years outside of this framework. Unfortunately, we are where we are, so what Kate Tohme is offering is a realistic pathway forward. I am frustrated; I struggle with the package that we're relying on CIPs, which was a provisional program. CIPs are reactionary and the GMAC and ESMPs should not be reactionary; we should be coming up with proactive planning, and it is important for the utilities, the development community, and for the Commonwealth to plan for where we're doing our upgrades. But the timeline has put us in this place. The way that Kate Tohme has framed it is that we are turning a page here. This is not the process we would have preferred, but we can't waste any more time and get to like 2027 and find ourselves at this all over again. We're all getting sick of this story, and to Kate Tohme's point, I'm not sure how we're going to get through that many CIPs in the next couple years. I think that Kate Tohme is offering a pragmatic approach and recommendations that will hopefully be successful.

Councilor Digaunto Chatterjee: I wholeheartedly agree that we should be doing this. In our ESMP, we tried proposing specific infrastructure investments to get us to 6 gigawatts. We ultimately need to get to 8 gigawatts, but we got to 6 just by what's in the queue. In Section 8 or 9, we proposed how we plug that gap between 6 and 8 and plan for solar where there's none in the queue today. We proposed that we take it in 400-500 megawatt chunks and plan for where solar wants to go based on current conditions. That's in the draft ESMP right now. We don't have point #3 here which is how we make that more actionable, so we will take that proposal and turn

it into a Gantt chart for 2024 before the next ESMP starts so the planning has been done, to show that every five years we will have 500 more megawatts. So, in three or four ESMPs, we'll have solved for 2050. Maybe that's not aggressive enough for some stakeholders. But instituting a stakeholder forum and talking to developers, identifying constraints, planning, implementing, using CIP rate recovery mechanism to develop solutions, etc., could get us there.

Kate Tohme: I appreciate the explanation and comments, Commissioner Mahony. I want to reiterate that what we're looking at is a proactive process, because enabled hosting capacity drives development rather than reacting to it. Whether these proposals should be submitted to the DPU, the answer is yes—we recommend that there be three specific proposals included in the ESMPs: (a) a proposed analysis to make it clearer what that proposed process is; (b) what stakeholder engagement is included for distributed generation; and (c) either a long-term cost allocation or streaming or batching proposed extensions of system plans or programs.

Commissioner Elizabeth Mahony: Part of this exercise is that the utilities are so in the weeds on everything that you feel confident that you've touched on things, and we're reviewing and saying we're not seeing it, so it's an expression of that. I hope that's helpful when it comes time to the DPU.

Tim Woolf: One thought about this is there are several places in recommendations where we talk about what should be done for the DPU. Should the ESMPs include a separate section that includes all dockets before DPU so it's all in one place?

Commissioner Elizabeth Mahony: I see these as yes, there will be action at the DPU, but I think the plans should propose how the utilities are going to engage in these processes.

Tim Woolf: Rather than it be sprinkled throughout, it's all laid out somewhere, so all requests the EDCs are planning to make of DPU, just to summarize and make it easier to find.

Councilor Carol Sedewitz: As we go through the proposals you have, Kate Tohme, the thing we must keep in mind is there are ongoing concurrent applications in our queue and studies ongoing and figuring out that process of where you are today and agreements in place. We have obligations and are trying to find a framework and have that path of where we get to five years from now. There will still be a need for applying some of the provisional plan process that we've outlined today on some of the things that are ongoing because you need to be responsive to customers. Thanks for your input—we need to think through how to make this clearer to make sense for all our customers.

Kate Tohme: We recognize that the situation in the Commonwealth will inevitably be different from the first round of ESMPs versus future rounds, so there needs to be consideration for ongoing interconnection over time. Regarding Tim Woolf's point, this goes back to Councilor Sarah Cullinan's first recommendation on being clear about what the EDCs are asking approval of, not only specific cap investments, processes, functions, working groups, etc., but everything for which they seek DPU approval.

c. #6 Equity Working Group Recommendations

Councilor Sarah Cullinan: It would be helpful for there to be a section dedicated to where the EDCs identify the key policy drivers where consideration, discussion, and development of policies would take away certain uncertainties or help them to do their planning, such as what is needed on the state or local side to enable them to do the planning they need. I think it'd be helpful to include this within the ESMPs. This could be a place to kick off a process where potentially GMAC goes forward with that work on those identified policy issues.

Jeremy Koo, designee for Julie Curti, Metropolitan Area Planning Council, representing municipal or regional interests: I support Councilor Sarah Cullinan's recommendation in engaging with municipalities to get their feedback. We're asking dozens of municipalities across the state to play host to a rapid scale-up of infrastructure DER siting and they feel left out of the conversation until we get to the point where there's a plan in place to site new infrastructure there. So, in keeping with our recommendation of proactively engaging communities with the ESMPs as a whole, this could be beneficial to address proactively.

Tim Woolf: There is a whole set of recommendations on rate design from Councilor Sarah Cullinan (#37, #57, #61). Her suggestion was to move them up to the overarching recommendations section and consolidate them with new language on rates, which Woolf had proposed.

Councilor Sarah Cullinan: My comment was purely organizational—our recommendations on aspects of rate design were scattered throughout the recommendations, and I thought it made the most sense to consolidate them into one place in whatever format that takes. It wasn't a proposal to change the language.

Councilor Larry Chretien: I definitely support proposed new overarching recommendations on rates that Tim Woolf proposed and appreciate the recommendations Councilor Sarah Cullinan has made. I want to highlight the need to avoid residential demand charges and carefully weigh those impacts on environmental justice communities. I'm glad to see that there. I'm not sure how to reconcile what Tim Woolf wrote with what Councilor Sarah Cullinan wrote.

Tim Woolf: I just want to clarify that the new language is just the recommendations consolidated but I added a little at the bottom:

- *Further, the EDCs should coordinate on their proposals for alternative rate designs. Finally, the ESMPs should describe the EDC's plans to coordinate on rate design and their plans to petition the Department to open either a generic rate design proceeding or submit rate design proposals in separate Department proceedings.*

Commissioner Elizabeth Mahony: Does the group think we should combine this? I'm seeing several thumbs up for the record. Are we comfortable with this much detail in our recommendation? These points are important regarding rates, environmental justice communities, impacts, and making it happen in the future.

Councilor Kelly Caiazzo: I submitted a recommendation that shows up later, and Tim Woolf captured this in this recommendation regarding procedures. I think it's fair to put this as an overarching recommendation. We can't get into a lot of detail just in this document, so that was the reason for my more general recommendation.

Councilor Sarah Cullinan: I'm thinking about that last part and whether I think the EDCs have discussed before that they don't necessarily have a strong opinion about rate design specifically, and this strikes me as being a policy decision area. So maybe it's not necessarily that we are tasking the EDCs with commissioning the department to do that, but maybe we're asking the DPU consider that moving forward to help with rate design.

Commissioner Elizabeth Mahony: We should add that to the December discussion list for future ESMP processes.

Councilor Kyle Murray: We are recommending avoiding residential demand charges, so if people have conflicting opinions on that, we should discuss it. I'm comfortable with this language. Rate design is extremely complicated, so I just want to be clear that we are making a recommendation as a Council to avoid a specific rate device.

Commissioner Elizabeth Mahony: For clarity, right now, are there demand charges on residential customers?

Councilor Digaunto Chatterjee: Not in Massachusetts. Demand charges are proposed for battery storage, but not for residential customers. There are other fixed charges that are in place.

Councilor Kyle Murray: Some people go back and forth between demand vs. fixed.

Councilor Sarah Bresolin Silver: That doesn't mean that people won't still have signals of when a good time is or not. That doesn't have to mean demand charges.

Councilor Kelly Caiazzo: It is absolutely a priority of this Council and what the Attorney General's Office is concerned about with low- to moderate-income customers. My point is there are so many issues to consider and there is not a specific proposal or detail that we're responding to, so that's why I would want to say, here are our priorities as to what we're concerned about and rate impacts without actually saying what rate designs should or shouldn't be.

Commissioner Elizabeth Mahony: Would you be comfortable as the AGO's office to offer language?

Councilor Kelly Caiazzo: Yes.

Tim Woolf: Here I borrowed language from recommendations, but the Council might want to consider.

Councilor Digaunto Chatterjee: I just wanted to agree with Councilor Kelly Caiazzo that this is a very complex topic, but to Councilor Kyle Murray's point about the GMAC putting its stake in

the ground and saying no residential demand charges, at the end of the day, the EDCs have to do one thing, which is recover costs. To understand that one needs to understand what that future customer load profile looks like with electric vehicles and fully electrified houses. Using a construct of time-bearing or even volumetric rate into that future construct where the entire load shape would be different, and costs differ, and adoption of technology driving costs, etc., will be different. I would echo that saying what rate design should or should not be may be preempting a generic docket to rethink this whole thing and we need a lot of time for that, so I would for what it's worth support maybe not having language that does say "do not."

Councilor Sarah Bresolin Silver: I tend to agree with Chatterjee that we really don't talk about rates, so it's difficult to give some recommendations about that. I like the idea of a generic docket about rates of the future, because so many things are being assigned rates as new technologies are adopted. I am still willing to support this statement about demand charges, but we can't say too much about rates in this. It's not a very large part of the plans.

Councilor Larry Chretien: This came about from the first meeting that grid modernization is going to cause impacts on ratepayers in various ways. It plays out according to a million scenarios. I didn't expect to see any plan referencing residential demand charges; Synapse picked up on that. As an organization, the Green Energy Consumers Alliance supports time-bearing rates, but there are other ways of going about it. We're an advisory group; we're not preempting the EDCs from proposing anything in particular, and we have no authority over the DPU to go forward, but I think we should plant a flag here based on what we believe to be an issue of equity, make sure we're referencing low- to moderate-income consumers. We know enough about how we can structure an equitable system that can cover all the costs. We agree about cost recovery; just do it in an intelligent way to help people adjust as we proceed. We'd be mealy-mouthed if we don't mention opposition of demand charges. To go a lot further is beyond our scope.

Councilor Kathryn Wright: Councilor Larry Chretien just said what I was going to say. I'm comfortable with the language as it is. Even if we work with Councilor Kelly Caiazzo to come up with alternative wording, we should state clear principles of rate design. We certainly know how people behave on a day-to-day basis; we know that low- to moderate-income families do not have a lot of energy expenses within their control. We have heard a lot of public comments in opposition to residential demand charges.

Councilor Kyle Murray: I just wanted to have this discussion.

Commissioner Elizabeth Mahony: I would find value in seeing what Councilor Kelly Caiazzo would offer as an alternative to look at side by side, because our offices have been thinking about rate design and it maybe comes back to Tim Woolf's question earlier: should we have a section on what could happen in the future at the DPU? As these plans roll out and bring a lot of things together, particularly advanced metering infrastructure, we don't want to waste time not thinking about rate design in the next couple years and how it impacts customers.

Councilor Kelly Caiazzo: It wouldn't be changing too much, but maybe flipping the order of some of this to start broadly and narrow down into the principles we'd want to see. We can talk about timing.

Aurora Edington, DOER staff member: I propose we send out a list of new recommendations and observations and put a placeholder there for rates, which we will discuss on November 16. We'll talk then about the tweaked language before voting on it.

d. #10 Stakeholder Engagement / Equity Working Group Charter

Councilor Kathryn Wright: We will need to figure out whether to make an amendment to the Equity Working Group charter to extend its activity. This is on the agenda for the December GMAC meeting. Additionally, a community benefits agreements isn't mentioned as a discussion item in CESAG. I don't know if it's referenced as part of distribution infrastructure.

Councilor Digaunto Chatterjee: We already have community benefits agreements for every infrastructure project we do; an entire organization is dedicated to doing this and works actively with all community leaders. The implication of this somehow being tied to this recommendation; maybe I'm not understanding the parameters and processes being very community specific. CESAG will potentially have a community leader in addition to Eversource focused on a community—it would be different in Dorchester than in Cambridge. That's what community benefits agreements are effective in doing: they are very localized.

Councilor Kathryn Wright: Is the process the same across all EDCs and does the public understand that?

Councilor Digaunto Chatterjee: I think process is very different across and within an EDC and within different communities. It depends on the community.

Commissioner Elizabeth Mahony: I hear you that every community benefits agreement will be different, but there should be some core principles about the process for engaging, and for certain communities there are specifications, but it would be helpful to start by explaining what some of that is and tying it together a bit more.

Councilor Digaunto Chatterjee: Right, but this is why we're instituting a CESAG to develop a framework to give to community benefits agreement personnel to use.

Councilor Kathryn Wright: I think we're on the same page: I just want to see a definition of parameters and processes for community benefits agreements.

Jeremy Koo: Again, I'd like to emphasize that there is historically a number of municipalities concerned with limited communication of infrastructure project development within their jurisdictions. The paradigm is balancing community engagement with accelerating process. Municipalities want to be more proactively engaged in siting substations and engagement should already be starting in those communities to avoid delays. Municipalities are also interesting in collaborating around public awareness and support climate goals and address community

benefits. Not all municipalities are larger urban core. Some are thinly staffed small towns and still willing to collaborate with EDCs around infrastructure.

e. #19 sensitivity analyses

Councilor Kelly Caiazzo: I suggested to add a “high load management” sensitivity to the analysis.

Tim Woolf: Technically, low load forecast is meant to indicate what could be achieved through load management and other types of DERs.

Councilor Kelly Caiazzo: Maybe the best way to deal with the “high management” scenario is to include “for example.” There are a few different ways to get to lower loads, so that’s the distinction. In thinking about high load management, there could be even more sensitivities, but wanted to see that even if it is for illustrative purposes.

Commissioner Elizabeth Mahony: There has been a lot of discussion around non-wires alternatives and having intelligence around what a high load management would do would help us understand. I support what you’re throwing out there.

f. #34: Grid Compensation Fund

Councilor Kelly Caiazzo had suggested optimized DER integration. Woolf said this is similar to #30, #33, #38 and the proposed consolidated language discussed earlier.

Councilor Alex Worsley: With respect to #30, #33, #38, and the overarching recommendation #5; these are all very similar and very important. Should we consolidate them? We speak a lot to whether we should provide more guidance on what exactly we want to see. Just wanted to throw that out there.

Commissioner Elizabeth Mahony: Would it be helpful to have an overarching recommendation with sub-bullets?

Councilor Digaunto Chatterjee: I have no objection here, but just wanted to highlight that there are hundreds of thousands of generators in ISO-NE to avoid transmission investments. Promoting optimized DER integration doesn’t always necessarily have to be tied to avoiding grid infrastructure upgrades, but promoting doing things we can’t envision today—grid upgrades are just one aspect. I support Councilor Kelly Caiazzo’s recommendation to keep it distinctive from capital investment.

Councilor Kyle Murray: I think they are distinct from each other. Again, putting these in the overarching recommendations section and having sub-bullets would make sense, because this is so important to the entirety of these plans—avoiding spending, promoting DERs and distributed generation. They should go up front either with sub-bullets or on their own. It’s one of the biggest things for me, actually.

Commissioner Elizabeth Mahony: We need to think on how to approach it. I have no opposition to adding Councilor Kelly Caiazzo's suggestion but am wondering how we make it all flow together, given that they are similarly aligned. And there could be overarching statement with sub-bullets or putting them in numeric order, but I would prefer to keep them separated somehow.

g. #37 rate design proceeding

Tim Woolf said this gets to the discussion earlier about consolidating rate design.

h. #40 transmission system upgrades

Councilor Kelly Caiazzo: This is just about the time that it would take for studies to be performed and so forth, so this is a request that if there is information available, it be provided and to remove barriers to make that available.

Councilor Digaunto Chatterjee: I wanted to support that and also say regarding item 32a: the EDCs won't be able to meet that. When we determine the final ESMP distribution plan, we have to undergo transmission study in ISO-NE and sometimes this could take a year. I just want us to be aware that we just finalized distribution substations and modeling. We will highlight process and time, but for 32a, we just wouldn't have the information.

Commissioner Elizabeth Mahony: Agreed. We are challenged to think about distribution costs and planning. Regarding 32a, is there an alternative to this? You all have done significant work at this point because of the existing CIPs. Is there a scenario where you could say for example in these five CIPs, we are seeing this investment?

Councilor Digaunto Chatterjee: We have conducted a transmission study for the pending and approved CIPs and have specifically hosted those transmission upgrades within the ISP-NE so we can definitely speak to those transmission costs. So, if we could narrow 32a with that, we can comply with it.

Councilor Sarah Bresolin Silver: I strongly support Councilor Kelly Caiazzo's proposed language and hear Digaunto Chatterjee's point. I like Commissioner Mahony's recommendation. I don't understand 32a, so maybe it's moot; "implied" transmission level costs are what that means. Maybe it's actual, not implied.

Commissioner Elizabeth Mahony: My read is that it is what's implied by what's provided by the distribution level.

Paul Alvarez, The Wired Group: I just wanted to add that when you decide to build a new substation or expand capacity, the transmission lines feeding that are known and maybe need to be expanded as part of those decisions, so I don't understand Digaunto Chatterjee's concern there. That must be part of the same project. I'd like to hear him explain further.

Councilor Digaunto Chatterjee: It's not known. We have separate distribution planning models. Each goes through extensive transmission analysis after a station is determined. We have to come up with switch gear, etc. A study for one station takes about six months.

Councilor Kelly Caiazzo: Regarding recommendation #40 and the term "implied," what I was thinking about was to the extent that those enablements or delivery of benefits depend on associated transmission upgrades be clear so it's an apples-to-apples comparison, so we understand the whole scope. Any general information about expected scope because it can be dramatically different as to what assessing transmission upgrades could be—e.g., relatively small or tens of millions of dollars. Any information could be helpful.

i. #43 NWA criteria

Commissioner Elizabeth Mahony: This ties back to #30, #33, and #38, and we might be able to bring this in line with that. (Commissioner Mahony noted that Councilor Sarah Cullinan had to leave.) Maybe we can consolidate and frame those.

Tim Woolf: Kate Tohme had added new recommendations about long-term proactive distribution system planning—this looks like overarching recommendations.

Councilor Kat Cox-Arslan: I think it's fine to do that.

j. #56 winter peak load projections

Woolf pointed out additional suggested language from Councilor JS Rancourt.

k. Section 13: Conclusion

Councilor Kathryn Wright suggested proposed metrics should be addressed in a single section for better structure.

Tim Woolf: Metrics are used in two different ways, planning metrics and reporting metrics. These are very different in terms of how we want to describe them. I think we should identify which is which and put them in an appendix so they're easy to find.

Councilor Kathryn Wright: I was just noting that some comments in the reliability and resilience section might be in alignment with reporting metrics and recommends that they're all together.

l. Metrics-related recommendations

Woolf went through the following suggestions from the consultants:

- #84 metrics should describe incremental impacts and how EDCs will measure them.
- #85 reporting metrics should not include reference to DPU approval of cost recovery because the proposed reporting metrics are useful regardless of DPU approval.

- #86c. seek to identify locational benefits of different siting options within each service territory.
- #87b rate impact analysis should follow same structure of BCA in terms of alternative cases and incremental investment projects.
- #88 reporting metrics should be in appendix, including equity and other ESMP reporting.

Commissioner Elizabeth Mahony: Do you mean they should be sprinkled throughout and mentioned again in an appendix?

Tim Woolf: We received metrics separately, and we wouldn't recommend sprinkling them throughout.

Councilor Digaunto Chatterjee: Regarding #77, we'd have a difficult time complying with this one.

Tim Woolf: This comes from the consultants. The concept is to understand the impacts of electrification on gas customers. This doesn't seem that demanding—if heat pumps are being installed, gas is avoided, so that'll suggest benefits.

Councilor Digaunto Chatterjee: On a high level, it sounds easy, but it's very locational; we're modeling individual pipeline investments in a specific geographic area and targeted electrification of those customers and neighborhoods, that has just started—it will take quite a bit of time to identify all of those factors and translate that to specific avoidance or deferral of gas capital infrastructures. That's the level of analysis we're doing, so hypothetically yes, but for us to actually do analysis to comply with this, we have to do this at a locational neighborhood level and that's what we cannot do.

Commissioner Elizabeth Mahony: I'm struggling because, number one, I think a lot of what the plans encompass is the buildout of electrification, so with that there are costs and benefits, and they will certainly have impacts on gas customers, but you are planning for electrification so there has to be some assumption there that should probably be captured on the electric side. But there will be impacts on gas side, including lower greenhouse gas emissions. Tim Woolf, there's going to be great costs to whatever gas customers will be left on the system—is that what you're getting after? I'm struggling to see what benefits gas customers will face by electrifying.

Tim Woolf: There are significant avoided gas costs that should be roughly commensurate with increased electric costs. If you're doing a rate-case analysis, the missing piece is gas avoided. This dovetails into the gas-electric section of the ESMPs.

Councilor Kyle Murray: With #31, we need to look at things holistically; we need to look at every one of the backup systems that may be in place and the costs associated with them. Natural gas still has maintenance costs even if you're only using it for a few hours a year. So, with #77, we need to look at things holistically, not just as “this backup system will benefit by shaving the peak” at what cost elsewhere—externalities? Is maintaining the gas system still \$40 million a year? Is that better than investing out?

Councilor Larry Chretien: Perhaps what came to my mind is contained in the utility plans; a lot of these questions have to do with the adoption rate of electrification to gas customers. Is there a simple table where we could see under a base case where each EDC is going to install what are they projecting for heat pumps and electrification by previous customer segment—gas, oil, propane, etc.—and where? That is important for seeing how well we’re doing in terms of going after oil and propane customers.

Charles Maitland: Plus counting the number of heat pumps, it’s how heat pumps are sized. In the Boston climate region, if you size a heat pump at 50% peak load, we generally assume a 0 or -4 design day. If you could do half of that electrical capacity, you could electrify 90% of the hours of the year. That’s one way in which electric consumers impact gas consumers; there’s an affordable case of still using both systems.

Commissioner Elizabeth Mahony: This is not a settled question; people want to think about it. I appreciate Digaunto Chatterjee’s challenges, but also see from the Council’s perspective the value of making the point here. Everyone can think about that, and we’ll continue this discussion at the next meeting.

Councilor Digaunto Chatterjee: A modification would be helpful.

Councilor Kelly Caiazzo: I had submitted an additional topic to discuss scope of ESMP, so I’ll let you tell me where we’re going.

Commissioner Elizabeth Mahony: We’ve got a bunch of stuff to do.

m. Discussion points on process

Councilor Kathryn Wright and Councilor Sarah Cullinan had offered additional comments on future ESMPs.

Councilor Kathryn Wright: I wonder if it’s easy enough for us to suggest what we could have done with more time versus punting this to later.

Councilor Sarah Bresolin Silver: I would prefer to have one document that has all our suggestions together. It could be in this document or another one. If we need more time to think through how this process went, we shouldn’t put it here, but if we think we’ve thought about it enough, we should. I’m not sure I’ve had enough time, but if Council’s preference is to do it now, I’ll go along with that.

Councilor Alex Worsley: Instead of specific recommendations, perhaps we include high-level topics to be approved and come back to this later. We may not have the time to do a detailed review to come up with specific recommendations. A way to bridge the gap there may be recognizing that we already have a lot to review.

Kate Tohme: I did prepare a list of specific recommendations for this section in preparation for this meeting but thought maybe we discuss and present in December and send this directly to the DPU. I'm open to either, but recognize that with limited time, it may be more appropriate to have specific recommendations be in comments to DPU, especially since this process will be for DPU directives; however, I think makes sense for the EDCs to make process proposals to DPU as well in light of the short turnaround of adjudicatory proceedings.

Commissioner Elizabeth Mahony: I confirm that Kate Tohme submitted a long list.

Councilor Kelly Caiazzo: What we could do next time, is it might be helpful to say certain technical reviews may be a short addition to the process of what the GMAC didn't do. The statute references modeling and such that it might help to clarify that with a brief statement on limitations.

Commissioner Elizabeth Mahony: Councilor Kathryn Wright, can we find a middle ground?

Councilor Kathryn Wright: That's fine—we can also send directly to DPU.

Commissioner Elizabeth Mahony: We'll craft something there; it's helpful to flag this and good to have it in writing. The December meeting will help, and we can figure out how to communicate that best.

8. Additional Topic Areas to Discuss

Commissioner Elizabeth Mahony shared slide 18 on additional topic areas to discuss that were not included in the scroll-through. One was from Kate Tohme: "Through the GMAC recommendations spreadsheets, Council members posed many questions akin to information requests in an adjudicatory proceeding. To inform the impending adjudicatory proceedings it would be beneficial for the EDCs to consider responding to these information requests and including responses with their initial filings to the DPU. We suggest discussing whether a spreadsheet of information requests should be included as an appendix to the GMAC recommendations."

Kate Tohme: My comment was that there have been a lot of questions to EDCs and reflective of questions of DPU during proceeding. One goal is to have as much info as possible to avoid extended discovery period. Rec to have appendix of questions to EDCs to indicate that it may be valuable to everyone if the EDCs provide that information in advance, whether in spreadsheet or incorporation into the plans.

Commissioner Elizabeth Mahony: Maybe we can help.

Jack Habib, counsel for Eversource: The Councilors' feedback has been helpful. When we file, we will make it easy to help GMAC figure out current and future infrastructure proposals. Compliance with Act: discussion was exactly right that the GMAC is not offering legal advice—just suggesting what could be helpful. The best outcome is likely "approval with modifications."

Kevin Sprague, representing Unitil: Thank you to the GMAC for amount of work you put into this. We appreciate the position you're in trying to understand the complex nature of these plans. That's not an easy task at all. One thing that would help me is that 100 recommendations is still a tremendous amount of work, so if there was any way the council could somehow prioritize recommendations, that would be helpful, just to make sure that I'm trying to address and assign resources to those recommendations.

Commissioner Elizabeth Mahony: Part of everyone's homework is to fill out scale of agreement, and hopefully that'll get after your last point about priorities; we're all trying to scale down and consolidate where we can. Unfortunately, the timeline we've been on means we haven't been able to work it out. The scale of agreement should help with that. One question for next week: do we need to extend meeting by an hour?

Councilor Sarah Bresolin Silver: If we extend by an hour, recommend noon to 4 p.m. instead of 1–5 p.m.?

Commissioner Elizabeth Mahony: We'll send a poll.

Councilor Kyle Murray: If the DOER thinks we need the time, I will try and find the time.

Commissioner Elizabeth Mahony: We will take a hard look at what we've got ahead of us and send a poll if necessary, recognizing the noon start request. Everyone has a lot of homework coming up, so hopefully that will make for a faster review next week.

9. Adjourn

Commissioner Elizabeth Mahony, as Chair, adjourned the meeting at 4:10 p.m.

Respectfully submitted,
Jennifer A. Haugh
GreenerU

Meeting Materials:

- Meeting agenda
- Meeting slides
- Draft GMAC Report
- Memorandum of the Equity Working Group
- Written Public Comments