

Stakeholder Comments

Received by MA-GMAC@mass.gov by Friday June 9, 2023

Pertaining to the Electric Sector Modernization Plan: EDC Draft Proposed Structure (June 1, 2023)

Accessible at: <https://www.mass.gov/doc/qmac-prereadesmp-draft-outline/download>

Compiled comments

1. Barr Foundation
2. Acadia Center
3. Nexamp, Inc.
4. Coalition for Community Solar Access

FEEDBACK ON ESMP OUTLINE

TO: EDCs and Grid Modernization Advisory Council (GMAC)
FROM: Kathryn Wright
DATE: June 9th, 2023

Thank you for the opportunity to provide early feedback on the outline for the electric sector modernization plans (ESMPs). After reviewing, there are areas where I have comments or clarifying questions. My first set of comments cover cross-cutting topics in the outline.

- **Stakeholder versus Community Engagement:** Early in the document, the outline references stakeholder engagement for different customer classes. The ESMPs require both stakeholder and community engagement. There is a difference between the stakeholder engagement processes that the EDCs participate in with the GMAC and the public process that will be necessary for cities and towns hosting future ESMP projects. To be responsive to community needs, the ESMPs will require both public education and early consultation in cities and towns with projected infrastructure needs. The Attorney General's Office recently released a set of [recommendations from a working group focused on increasing public participation in energy regulatory processes](#). While the target of these recommendations are the Department of Public Utilities and Energy Facilities Siting Board, the sections on "Information and Knowledge Accessibility" and "Reforming Public Engagement Approaches" contain best practices which can be applied to EDC engagement process.
- **Environmental justice versus disadvantaged communities:** The outline uses environmental justice and disadvantaged communities interchangeably. These terms are not interchangeable in some state and federal contexts. Can the EDCs clarify the definitions for these terms? How will these communities overlap or differ from the communities targeted by the Mass Save Communities First Partnership or who have been underserved by energy efficiency investments to date?
 - Ideally, if multiple incentives or investments are serving the same jurisdictions, applications and engagement processes should be streamlined between ESMPs, Mass Save and other initiatives.
- **Resilience:** The outline references resilience and reliability throughout, but the state's *Climate Assessment* and *Hazard Mitigation and Climate Adaptation Plan* are not listed as reference documents in the opening section. This is relevant because there are differences in the way the EDCs are regulated to think about resilience and reliability (e.g. SAIDI and CAIFI) and how the public and state think about climate resilience.
 - For example, if current energy rates make it unaffordable to optimally heat or cool a residence during extreme weather events, occupant discomfort and health risks would not count towards an EDC system or customer disruption metric. However, health risks from heat exposure are priority climate impacts discussed in the state's 2022 Climate Assessment. A broader consideration of resilience and reliability would be in alignment with the state.

Additionally, it would be helpful if the EDCs could surface what climate projections they are using and if they differ from the state.

- **Transparency and Accountability:** We have not had a chance to discuss what the public reporting process will be between the 5-year ESMP planning cycles. Given the proposed level of investment, at a minimum the public should be able to easily access information about any planned ESMP projects in their city or town and any ongoing engagement processes.

Lastly, I have clarifying questions and comments on specific sections.

- **5.1 Electric Sector Projections:** The outline references projections by jurisdiction. Can you please clarify what jurisdiction means in this context? I am unsure if this is referring to EDC territories, cities or towns or something else. It would be helpful to understand the granularity we should expect in the ESMPs.
- **8.2 Transport:** Thank you for your prompt response to the information request to provide further detail on your electrification projections. Based on my reading of the document, the focus of the transportation projections seems to be light and/or medium-duty electric vehicles. It is unclear from the outline or the information request how transit electrification is being factored into the analysis. The 2022 Climate Act established a 2040 electrification target for the MBTA. The electrification of the MBTA, RTA and fleets will have differing impacts on the grid than LDVs. Mass transit is the primary mobility mode for many residents of Massachusetts cities. Can the EDCs clarify if these transit targets are incorporated into their analysis and planning? Will this be discussed in the ESMP document?
- **9.2 Decarbonized Gas:** The references to hydrogen and biogas conflict with the state's 2050 Climate Roadmap which emphasized that the most cost-effective application of these fuels was in energy dense applications such as industrial processes and aviation. In addition, both technical experts and community group expressed concerns about the health, safety risks, and emissions impacts of deploying biogas and hydrogen in buildings in our communities within the Future of Gas docket (an example joint comment letter is linked [here](#)). Given this, I believe the other solution sets in Section 9 should be the focus of the ESMPs.
- **12.3 Training:** Is the workforce training referenced in this section referring to Mass Save training programs or a new initiative? Will these training programs incentivize job creation and job placement within the targeted communities referenced earlier in the outline?

Thank you again for the opportunity to provide feedback. I look forward to discussing the outline and to continued collaboration.

Sincerely,
Kathryn Wright

June 9, 2023

Grid Modernization Advisory Council
100 Cambridge Street, 9th Floor
Boston, MA 02114

Re: **Feedback on Electric-Sector Modernization Plans**

Dear Grid Modernization Advisory Council members,

Acadia Center appreciates the opportunity to offer feedback on the draft outlines for the Electric-sector Modernization Plans provided by the Electric Distribution Companies (EDCs). While consumer-oriented technology has raced forward in recent years, the energy grid that underpins the Northeast's economy has not. Aging infrastructure, the regulatory structure that governs utilities, the planning and investment policies, and the focus on increasing supply-side resources (rather than decreasing demand) all date from an era when energy came only from large fossil-fueled power plants, and customers had little choice about their energy.

This draft plan outline represents an important first step to modernize our grid into one that is responsive and flexible. While Acadia Center appreciates the provided draft plan outline, we do have comments and questions that may improve this draft and the process overall. Additionally, Acadia Center would like to express our support for the comments provided by the Barr Foundation.

- Acadia Center wishes to stress the urgency of building infrastructure in advance of customer need. This will require both anticipating customer demand and doing it in larger and integrated sections that incorporate aspects such as solar, EV load, heat pumps, batteries, and housing growth. While it may be difficult to ask the EDCs to incorporate every potential load growth scenario (such as a new housing development) every piece of additional information added to modeling has the potential to create more reliable predictions and a more responsive system.
- Acadia Center believes it is important that the Grid Modernization Advisory Council is afforded the opportunity to review and comment on the assumptions and forecasts that the EDCs are making before the plans are fully drafted.
- Battery storage should be specifically identified as a part of the demand forecast and considered as a resource on the supply side, as well.
- Demand forecasts should have more granularity beyond jurisdictional level. Forecasts should have a range of sensitivities (e.g. around electrification levels), as well as more granularity based on season and geography. Simply looking at annual peak will not show needed complexity or potential solutions.



Acadia Center

Advancing the Clean Energy Future

15 Court Square • Suite 1000

Boston, MA 02108

617.742.0054 • acadiacenter.org

- It may be prudent to include a section on rate design in the forecast area, given the effect of different rate designs on the potential deployment of different technologies.
- Will ISO-NE's CELT forecast reports be considered as another input when doing this analysis?
- Will the subsection on non-wire alternatives identify opportunities for partnerships with third-parties among the solution set?

Acadia Center appreciates the opportunity to offer this feedback on the draft outlines for the electric-sector modernization plans and thanks the EDCs for their work. If you have any questions or concerns, please do not hesitate to reach out.

Sincerely,

Kyle Murray

Massachusetts Program Director and Senior Advocate

Acadia Center

kmurray@acadiacenter.org

617-742-0054 x106



June 09, 2023

Dear Commissioner Mahony and Members of the Grid Modernization Advisory Council,

The modernization of the electrical grid is essential for the effective integration of renewable energy sources and the transition to a sustainable energy future. In Massachusetts (MA), as in other regions, solar developers play a crucial role in the deployment of solar energy systems.

Collaborative Successes in Other Markets:

Experience from other markets demonstrates that intense and sustained collaboration between solar developers and utilities has yielded positive results in grid modernization efforts. For instance, in California, collaborative efforts between solar developers and utilities resulted in streamlined interconnection processes, standardized technical requirements, and improved system planning. Similarly, states like New York and Hawaii have successfully engaged solar developers in grid modernization discussions, leading to innovative policies and effective integration of distributed solar resources. These collaborative models demonstrate the value of involving solar developers in shaping grid modernization plans.

Taking a look at New York in particular, the state has been implementing a comprehensive grid modernization strategy known as Reforming the Energy Vision (REV). As part of this initiative, the New York State Public Service Commission (PSC) has actively engaged solar developers and other stakeholders to transform the electricity market and enable greater integration of clean energy resources. Solar developers have participated in various working groups and collaborative processes to provide feedback on grid planning, market design, and regulatory reforms. Through these efforts, solar developers have influenced the development of policies such as the Value of Distributed Energy Resources (VDER) framework, which aims to fairly compensate distributed energy resources like solar for the value they provide to the grid. The engagement of solar developers has contributed to innovative approaches for grid modernization and accelerated the deployment of solar energy in New York.

Uniquely Situated to Provide Feedback:

Solar developers possess valuable insights and expertise that make them uniquely qualified to provide feedback on grid modernization plans. Here are some key reasons:

- **System-Level Understanding:** Solar developers have an in-depth understanding of solar technologies, deployment challenges, and system requirements. Their

expertise in interconnection processes, grid integration, and solar project development enables them to assess the impact of grid modernization initiatives accurately.

- **Real-World Experience:** Solar developers are on the front lines of renewable energy deployment. They encounter various technical, regulatory, and operational issues during project development. This hands-on experience equips them with practical knowledge and unique perspectives on how grid modernization plans can effectively address challenges and optimize solar integration.
- **Market Insights:** Solar developers have extensive market knowledge inside and outside the Commonwealth, with insights into evolving trends, technologies, and customer preferences. Their understanding of market dynamics can contribute to the development of grid modernization plans that align with the needs of solar developers and enable the growth of solar energy in MA.
- **Innovative Solutions:** Collaborating with solar developers can foster innovative solutions for grid modernization. Developers often employ advanced technologies and practices, such as energy storage, demand response, and microgrids, to enhance solar system performance and grid integration. Their expertise in these areas can inform grid modernization plans, enabling the adoption of cutting-edge solutions.


Involving solar developers in the ideation of grid modernization plans in MA can yield substantial benefits. Drawing from successful collaborations in other markets, MA can harness the expertise and insights of solar developers to develop effective grid modernization strategies. By actively engaging solar developers, MA can leverage their system-level understanding, real-world experience, market insights, and innovative solutions to optimize the integration of solar energy, facilitate a smooth transition to renewable resources, and ensure a resilient and sustainable electrical grid for the future.

Thank you for the opportunity to provide feedback on the EDC's draft ESMP Outline. Nexamp looks forward to continued participation in this initiative moving forward.

Sincerely,



Benjamin Piiru
Director, Grid Integration
Nexamp, Inc.



June 9, 2023

Dear Commissioner Mahony and members of the Grid Modernization Advisory Council,

Thank you for the opportunity to review and provide comments on the draft EDC Electric System Modernization Plans (ESMP) outline. We greatly appreciate the open stakeholder process on the plans, as they will shape the Commonwealth's ability to decarbonize at the scale and speed needed to address the climate crisis in an affordable, equitable manner.

The Coalition for Community Solar Access (CCSA) is a national Coalition of businesses and non-profits working to expand customer choice and access to solar for all American households and businesses through community solar. Our mission is to empower every American energy consumer with the option to choose local, clean, and affordable community solar. We work with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win, win, win for all, starting with the customer.

CCSA appreciates that the draft ESMP outline contains the major key elements as required under last year's An Act Driving Clean Energy and Offshore Wind ("Climate Law"). Upon review of the outline, CCSA recommends the consideration of the following additional items and comments:

- Section 4.2: Current State of the Distribution System - Sub-region 1
 - Add "battery storage, standalone and integrated with DER"
 - Add "grid services" - this could include demand response, time-based retail electric pricing, smart inverter controls, and more
- Section 5.2: 5- and 10-year Electric Demand Forecast - Sub-region 1
 - Add forecasts for growth of battery storage (standalone and coupled with DER)
 - Add forecasts for grid services (see above; including but not limited to responsive load)
- Section 6: 5- and 10-year Planning Solutions: Building for the Future
 - CCSA recommends a full subsection here to discuss cost allocation approaches and options. Cost allocation is a very important topic and warrants a deep dive on the considerations and tradeoffs to various approaches from a holistic, policy driven perspective before considering

what the appropriate cost allocation approaches are to specific regional investments.

- 6.1 "Summary of existing investment areas and implementation plans (existing asset management and core investments, including EV and EE programs)"
 - Ensure that this includes any approved CIP upgrades
- 6.5 Sub-region 1
 - Distribution and transmission study timeline improvements for interconnection of DER
- Section 8: 2035 - 2050 Policy Drivers: Electric Demand Assessment
 - It may be appropriate in this section to add forecasts for large-scale onshore renewables and transmission projects
- Section 9.6: Alternative cost-allocation and financing scenarios - impact on investments
 - CCSA recommends that solar and storage should not necessarily be treated as distinct in these processes. The CIP 2.0 should examine how storage and solar can enable each other and provide additional capacity by offsetting or deferring utility upgrades.

Please do not hesitate to reach out if you have any questions about these comments or if we can be of any assistance to the GMAC.

Sincerely,

Kate Daniel
Northeast Regional Director
Coalition for Community Solar Access