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July 13, 2023

Re: Comments on Electric Sector Modernization Plan Draft Proposed Structure

Dear Commissioner Mahony and Grid Modernization Advisory Council Members,

The towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County, organized and operating collectively as the Cape Light Compact JPE, a joint powers entity pursuant to G.L. c. 40, §4A ½ and G.L. c. 164, §134 (the “Compact”), have the following comments on the Draft Proposed Structure for the Electric Sector Modernization Plan (“ESMP”) submitted by the electric distribution companies (“EDCs”):

1. The ESMPs should fully account for overlap and/or duplication with energy efficiency, and should define the roles of the following in the ESMPs:
 - a. Energy Efficiency Advisory Council;
 - b. Energy Efficiency Program Administrators and recognition of the statewide MassSave® brand;
 - c. Massachusetts Clean Energy Center and the Clean Energy Lives Here™; and
 - d. Clean Energy Transmission Working Group.
2. Section 6: The Compact supports the June 29, 2023 comments on data access by the Department of Energy Resources (“DOER”), and agrees that the EDCs should include “a description of what a uniform statewide data access strategy and process might look like for the Commonwealth.” (at 2) The work of the AMI Stakeholder Group, including on data access and time-varying rates (“TVR”), should be described in the ESMP. (A description of progress by all relevant working groups should be included in the ESMPs.)
3. Section 13.2 contains the “[p]rocess to support updates to the ESMP throughout the 5-year cycle.” This section is crucial given, among other things, pending Department of Public Utility (the “Department” or “DPU”) dockets (e.g., D.P.U. 22-51 through 22-55), the upcoming energy efficiency Three-Year Plans, and resolution of existing working groups (e.g., AMI Stakeholder Group will submit its final report in August 2024). The capital improvement projects (“CIP”) dockets (D.P.U. 22-51 through 22-55) seek to resolve significant barriers to distributed generation interconnection in certain saturated areas of the Commonwealth. In particular, the Cape CIP in D.P.U. 22-55, where a DPU order is pending, was challenged in a way that could result in those interconnection barriers not being resolved. See D.P.U. 22-55, Compact Initial Brief at 9 (Section B) (March 9, 2023). The EDCs should have a mechanism in the ESMP that would allow them to propose investments in such situations that are currently unknown but essential for clean energy goals.

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4. Section 13.3: “Reporting and Metrics” should be a category of its own outside of the Conclusion in Section 13. Metrics and reporting will be critical to meeting clean energy goals. This section should include existing metrics, as well as note when and how future metrics are to be considered. For example, if TVR metrics are not adopted in D.P.U. 21-80, it should be noted in the ESMP when and how they will be considered. See D.P.U. 21-80, Compact Comments at 6-7 (May 3, 2023). The Compact raised the need for comprehensive and coordinated reporting across all of an EDC’s activities and dockets (e.g., performance-based ratemaking, energy efficiency, grid modernization, advanced metering, electric vehicles, provisional system planning) on such crucial measurements as peak demand reductions, without which it will be impossible to effectively gauge whether the Commonwealth is truly moving towards its clean energy goals. D.P.U. 21-80, Compact Final Comments at 5 (May 24, 2023).
5. Section 1.0 or 2.0: The ESMP should clearly describe the Grid Modernization Advisory Council roles and responsibilities set forth in An Act Driving Clean Energy and Offshore Wind (2022), including to review and provide recommendations on the ESMPs according to the enumerated criteria.

The Compact appreciates the opportunity to provide feedback.

Submitted by:

A handwritten signature in blue ink that reads "Margaret T. Downey". The signature is written in a cursive style and is contained within a thin black rectangular border.

Margaret T. Downey, Administrator