Creating A Clean, Affordable, Equitable and Resilient Energy Future For the Commonwealth

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENERGY RESOURCES

Grid Modernization Advisory Council

June 13, 2024

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Massachusetts Department of Energy Resources

Agenda

Item	Time
Welcome, Agenda, Roll Call	1:00 – 1:05
Public Comment Period	1:05 – 1:20
Meeting Minutes Review and Voting 2024 GMAC Meeting Schedule	1:20 – 1:35
GMAC Stakeholder Engagement Materials Proposal	1:35 – 2:00
10-minute Break	*2:00 – 2:10*
Consultant Presentation on ESMP Briefs	2:10 – 3:30
Strategic Planning for 2025 Activities	3:30 – 3:55
Close	3:55 – 4:00

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Public Comment

- 15-minute period for public comment
- Speakers will have up to **3 minutes** to speak on any topics of interest related to the GMAC. Once everyone who has pre-registered has provided comment, others may speak, as time allows.
- Please state your name and affiliation before delivering your comment.

Meeting Minutes

- Calling for vote to finalize:
  - February 28, 2024 GMAC minutes
  - May 17, 2024 Executive Committee minutes

- *Motion to approve the February 28th minutes [as distributed/as corrected]?*
- *Motion to approve the May 17th ExCom minutes [as distributed/as corrected]?*

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2024 ESMP/GMAC Schedule

Date	Category	Event
June 13th	GMAC Meeting	Consultant update on the ESMP dockets
June 21st	ESMP Docket	Reply Briefs filed
June 26th	EWG Meeting	Review and discuss DPU affordability docket (24-15)
August 9th	Executive Committee Meeting	GMAC strategic planning
August 29th	ESMP Docket	Order on ESMPs
September 10th	GMAC Meeting	Discuss next steps for GMAC post ESMP Order
September 25th	EWG Meeting	Review outreach materials and plans. Discuss next steps.
September 27th	Executive Committee Meeting	Review 2025 GMAC Budget Request to DPU

Questions?

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Grid Modernization Advisory Council Stakeholder Engagement Materials

Goals & Scope of Materials

GMAC materials need to be tied to the 2022 Climate Law enabling statute.

"The council shall seek to … ***increase transparency and stakeholder engagement in the grid planning process.***"

GOALS:

1. **Create public awareness of the ESMPs and the GMAC process**
2. **Offer clear and succinct context for the ESMPs, the GMAC, and their role in the clean energy transition**
3. **Encourage sign-ups for a GMAC listserv**
4. **Encourage participation in GMAC-related activities**

In Scope

- The importance of grid planning for stakeholders in the Commonwealth
- What are the ESMPs and GMAC and why stakeholders should care
- What is grid modernization and how does it relate to Massachusetts' climate targets
- How to stay engaged with future GMAC and ESMP activities
- Links to related content

Out of Scope

- How to learn about and access clean-energy-related incentives
  - *The EDCs, MassCEC and Green Energy Consumers Alliance provide resources we can link to instead.*
- Updates on Energy Facilities Siting Board (EFSB) proceedings for specific projects
- Activities related to other state-level advisory groups (EEAC, EVICC, CEISP, etc.)

Proposed Structure of Engagement Materials

1. New Page on GMAC Website:

- **Introductory Information**
  - Concise summary of ESMPs and outcomes of the Order
  - Role of the GMAC and why it is important for the clean energy transition
  - Roles of different grid planning entities (ex. DOER, DPU, EDCs, CESAG)
- **Supplementary Linked Information**
  - GMAC pages, relevant DPU orders, utilities' ESMP pages, MassCEC "Clean Energy Lives Here", EFSB, DOER Office of Community Engagement
  - Resources: incentives, bill assistance, contact information

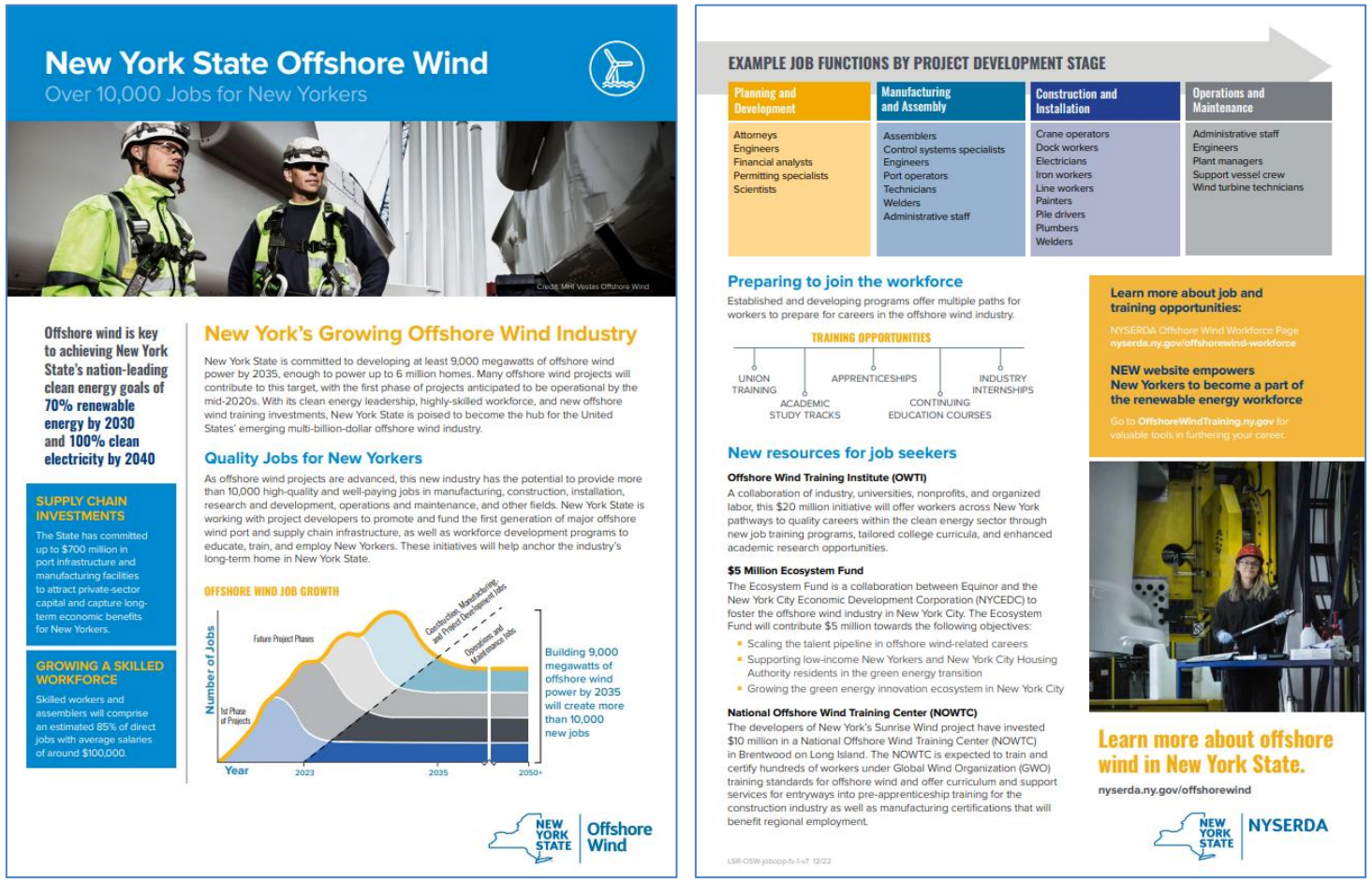
2. ~3 "Grid Impacts" Factsheets: These will be digital and live on a separate GMAC web page dedicated to the ESMPs.

- Primarily fact sheets, incorporating both plain-spoken written language and graphics/images.
- Could include first person narratives and story-telling elements.
- Translated into the top 5 spoken languages in the Commonwealth.

Factsheet Design

Looking to create a product that bridges visual components (ex. CECP graphic) and written components (ex. NYSERDA). The factsheets should be visually engaging, yet informative.

Example: Massachusetts Clean Energy and Climate Plan for 2050



Example: NYSERDA Factsheet on Offshore Wind Jobs

Factsheet Options: Audience & Messages

Option A

3 Factsheets Answering 1 Question at 3 different levels

Question example: What is happening with the grid and why should I care about the GMAC/ESMP process?

Factsheet 1
101 Level

Audiences:
- Ratepayers
- Low-moderate income (LMI) ratepayers

Key Messages:
- Overview of MA Climate goals + relation to grid
- Role of GMAC/ESMP
- Ways for audiences to engage with GMAC/ grid planning

Factsheet 2
201 Level

Audiences:
- Municipal leaders
- Communities hosting infrastructure

Key Messages:
- How do these processes of updating the grid help MA meet climate goals?
- Ways for audiences to engage with GMAC/grid planning

Factsheet 3
301 Level

Audiences:
- Developers: Solar, storage, buildings, EV charging

Key Messages:
- How are ESMPs/GMAC addressing interconnection challenges?
- Ways for audiences to engage with GMAC/grid planning

Option B

Each factsheet answers a different question with information at 101, 201, and 301 levels.

Factsheet 1
Question 1

Question: How is the electric grid related to MA climate goals?

101 Level
- Ratepayers
- LMI ratepayers

201 Level
- Municipal leaders
- Communities hosting infrastructure

301 Level
- Developers

Factsheet 2
Question 2

Question: What is happening with grid planning?

101 Level
- Ratepayers
- LMI ratepayers

201 Level
- Municipal leaders
- Communities hosting infrastructure

301 Level
- Developers

Factsheet 3
Question 3

Question: How does grid planning impact "me"?

101 Level
- Ratepayers
- LMI ratepayers

201 Level
- Municipal leaders
- Communities hosting infrastructure

301 Level
- Developers

Timeline

- DOER staff and GMAC consultants will continue with visioning, drafting, and scoping of factsheets during the **summer**.
  - GMAC member feedback is welcome
- The website will be developed over the summer.
- Plan to **release factsheets post-DPU Order.**
- Push communications through distribution channels:
  - State-level email distribution lists (GMAC listserv, EEA's EJ Office)
  - GMAC member organizations and distribution lists

Discussion Questions

- Are the goals for public-facing communication right?
- Are the proposed structure and materials appropriate for achieving the goals?
- Are the correct audiences identified for developing communications materials?
- Do GMAC members have any example materials they can share as models/inspiration?
- Are any GMAC members interested in greater involvement in material development (any staff with experience to support, limited meetings to review materials)?

Materials Proposal Summary

1. Goal	• Create a *first round* of stakeholder engagement materials to provide awareness and education on the importance of grid planning in the Commonwealth • Specific emphasis on the contributions of the GMAC and ESMP processes.
2. Scope	• Increasing transparency of the grid planning process and the path forward to achieving climate targets
3. Structure	• A newly designed GMAC *website landing page* • **1-3** distinct *factsheets* that cater to energy consumers' concerns related to grid planning.
4. Audience	• Residential customers, LMI customers, Communities hosting infrastructure, Municipal leaders, Developers
5. Messages	• GMAC/ESMP processes • Environment/decarbonization • Interconnection
6. Timeline	• Visioning, drafting, and scoping over the next 3 months. The website will be developed over the summer. Plan to release factsheets post-DPU Order. • *Implementation Team:* DOER staff, GMAC consultant, GMAC members

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Break

Please be ready to start again in ~10 minutes

Wired Group

GREENER U

Synapse Energy Economics, Inc.

Massachusetts Electric Sector Modernization Plans

Summary of EDC & Intervenor Briefs in Dockets DPU 24-10/11/12

Presented to the Grid Modernization Advisory Council

June 13, 2024

GMAC Consultants

Synapse Energy Economics
Wired Group
GreenerU

Outline

- DPU Approval of ESMPs
- Load Forecasts
- Net Benefits Analysis
- Rate Impact Analysis
- Cost Recovery and Cost Allocation
- Integrated Energy Planning
- Equity
- Future ESMP Process
  - ESMP Process
  - Interim ESMP Reports
  - Working Groups
- Additional Issues
- Appendix
  - Detailed slides of intervenor positions

This summary focuses mostly on the recommendations made by each party, with less attention on the findings or the rationale for the recommendations.

These slides include only the positions and recommendations that were provided in the briefs. Intervenors might have positions and recommendations that are not presented here because they were not in the briefs.

For the intervenor summary tables: the page citations can be found in the corresponding detailed slides in the appendix.

For the intervenor summary tables: columns are included only for those intervenors who mentioned the issue being summarized.

Glossary of Acronyms

AMI: Advanced metering infrastructure

ASAP: Affordable solar access program

CBA: Community benefit agreement

BCA: Benefit cost analysis

BESS: Battery energy storage system

CBA: Community benefit agreement

CESAG: Community engagement stakeholder advisory group

CIP: Capital investment project

DERs: Distributed energy resources

DG: Distributed generation

DPU: Department of Public Utilities

EDCs: Electric distribution companies

EE: Energy efficiency

EJ: Environmental justice

ESMPs: Electric sector modernization plans

EV: Electric vehicle

EWG: Equity working group

GHGs: greenhouse gases

GMAC: Grid Modernization Advisory Council

GMF: Grid Modernization Factor

IEP: Integrated energy planning

ISRE: Infrastructure, Safety, Reliability, and Electrification

LDC: Local gas distribution companies

LMI: Low and moderate income

LTFSP: Long-term forecast and system plan

NG: National grid

NWA: Non-wires alternative

PAs: Program administrators

PBR: Performance-based ratemaking

PSP: Provisional system program

RNG: Renewable natural gas

TOU: Time of use

TVR: Time-varying rates

List of Intervenors

Intervenors

- DOER: Department of Energy Resources
- AGO: Attorney General Office
- GECA: Green Energy Consumers Alliance
- CLF: Conservation Law Foundation
- CEC: Clean Energy Coalition
- CLC: Cape Light Compact
- NRG: NRG Retail Companies
- Acadia Center
- EVgo
- Williams College

EDCs

- National Grid
- Eversource
- Unitil

DPU Approval of ESMPs - Intervenors

	Approval Recommendation	Approval Dependent on	Timeline
DOER	Approve the ESMPs	With modifications	Not provided
AGO	Approval implied	Problems should be addressed in compliance filings	Not provided
GECA	Conditional approval	Subject to several conditions	Not provided
Acadia	Approve ESMPs	DPU should correct several flaws	Not provided
CLF	Approve ESMPs	Proposed recommendations	One year from DPU order
CEC	Approval implied	Establishment of a firm, clear and timely plan for the enablement of necessary DG hosting capacity.	File plan within six months from DPU order
CLC	Approve Eversource ESMP	DPU directives	Not provided
NRG	Approval implied	Order should have roadmap on outstanding issues	In the DPU ESMP order
EVgo	Approve just EV proposals	Seeks approval of extension of EV programs	In the DPU ESMP order
Williams College	Disapprove and require revised filing	Filing of a revised ESMP that include several changes	Not provided

DPU Approval of ESMPs - EDCs

The EDCs request approval of the ESMPs, and state:

- They complied with all statutory and DPU-directed filing requirements (pp. 25- 36)
- They provided reasonable, reviewable, and reliable data assumptions and forecasting methodologies (pp. 36-41)
- ESMP investments will enable EV and heat pump adoption, integration of DERs, modernization of distribution system, and encouragement of customers to shift energy consumption to avoid renewable energy curtailment (p. 43)
- A business-as-usual strategy of making investments driven only by known customer needs for electricity in the near term would result in delayed adoption of clean energy technologies (p. 45)

EDCs agree with the DPU that the ESMPs should be strategic plans to proactively upgrade the distribution system, rather than a detailed investment plan (pp. 45, 64)

EDCs do not expect significant changes to projects proposed in ESMPs in the five-year term (p. 65)

- However, EDCs ask for flexibility in when and how projects are implemented (pp. 64-65).
  - Specific investments are not finalized and once ESMPs are approved, EDCs will begin developing projects for implementation and will modify or reprioritize ESMP projects based on updated information (p. 65)
  - EDCs seek flexibility to adapt and reprioritize investments based on community input, emerging technologies, updated annual forecasts, and emerging system needs (p. 67).

Standard of Review – Intervenors (DOER)

Standard of review (pp. 12-13):

- Agrees with the DPU standards, which include strategic plan approach, support of MA GHG requirements, and consistent with Sec 92B of the Climate Act.
- ESMPs maximize the use of load management, DERs, and grid enhancing technologies.
- ESMP forecasts include scenarios.
- ESMPs describe and optimize all ongoing programs and investments.
- GMAC supports the approval of the ESMPs.
- ESMPs incorporate GMAC's recommendations.
- EDCs demonstrate substantial efforts in stakeholder outreach and consideration of feedback.
- EDCs standardize forecasts, assumptions, and ESMPs across companies.
- ESMP forecasts reflect meeting MA GHG limits, including coordination between the EDCs to meet them.

Standard should be applied to all proceedings reviewing investments identified in ESMPs.

Reviews held outside of base rate cases should be held to the same standard and evidentiary burden as rate cases.

Standard of Review - EDCs

The EDCs request the DPU establish a standard of review to inform and guide future ESMP filings and proceedings (p. 24). Standard of review should include:

- The ESMP meets the requirements set forth in G.L. c. 164, § 92B;
- An EDCs' demand forecasts are reviewable, appropriate and derived using a reliable methodology, and provide a sound basis for ESMP planning decisions;
- The ESMP investments are based on an appropriate planning process for analyzing options, making decisions, and re-evaluating decisions in light of changed circumstances;
- The ESMP proposals and associated budgets are reasonably designed to meet system requirements in accordance with the demand assessment; and
- The ESMP provides net benefits based on the reasonably identified quantifiable and qualitative customer benefits. (p.24-25)

Load Forecasts - Intervenors

DPU should require improved forecasting to minimize costs to customers (DOER pp. 43-57).

- EDCs should use consistent assumptions in the load forecasts (AGO pp. 12-14; Acadia pp. 28-29; CLC p. 27).
- Forecasts should account for load management including demand response, VPP, and smart inverter functionality, electrified buildings, NWAs, and electric vehicles (DOER pp. 43-44; AGO pp. 15-17; GECA pp.14-15).
- Forecasts should include sensitivities, which should be consistent across EDCs (AGO pp. 14-15).
- DPU should require EDCs to revise and standardize energy storage forecasts, with stakeholder engagement (DOER p. 49).
- ESMPs should include comprehensive plan for implementing managed charging (DOER p. 52; GECA p. 18).
- ESMPs should include analysis of rate design options for reducing costs and meeting clean energy goals and should include rate design scenario analysis in load forecasts (DOER p. 55).
- Forecasts must include accurate consideration of building codes and energy efficiency (DOER p. 56; AGO p. 16).
- EDCs should use a standardized tool for climate vulnerability assessments (DOER p. 57).
- Forecasts should incorporate real-world customer decision making processes (Williams College p. 4)

Load Forecasts - EDCs

EDCs do not rely on sensitivities for five- and ten-year forecasts

- because they base their forecasts on reliable data points (p. 41)

EDCs used sensitivities for long-term forecasts

- and will work with stakeholders to get feedback on future forecasts (pp. 41-42)

Forecasts are based on reliable data and reasonable methods and provide a sound basis for ESMP investments (p. 12)

Net Benefits Analysis - Intervenors

Issue	DOER	AGO	Acadia	GECA	CLF
Bifurcation of ESMP v. non-ESMP investment is problematic	✓	✓	✓	✓	
BCAs do not indicate whether investments are optimized			✓	✓	
Inadequate picture of real-world costs and benefits			✓	✓	
BCAs should address EJ community concerns	✓				✓
BCAs should be more consistent across EDCs		✓		✓	
BCAs should include sensitivities to account for uncertainties		✓			
BCAs should have more details for jobs analysis		✓			

Bill Impact Analysis - Intervenors

Issue	DOER	AGO	Acadia	GECA	CLF
Bifurcation of ESMP v. non-ESMP investment is: • misleading, • unclear, • threatens public acceptance, • requires assessment in multiple dockets, • creates risk that high prices undermine electrification			✓	✓	
Analyses do not contain alternatives to investments			✓	✓	
Analyses fail to account for downward pressure on rates				✓	
Analyses do not include protections for EJ communities					✓

Note that many of the concerns raised about the BCAs also apply to the bill impact analyses.

Net Benefits Analysis - EDCs

Net benefits analysis methods

- Analysis uses reasonable cost estimates for proposed investments and programs (pp. 71-73)
- The model is based on reasonable assumptions and consistent with best practices (pp.73-76)
- The net benefits of each ESMP are robust (pp. 77-79)
- DPU should assess ESMP investments as a portfolio, rather than by investment or category (p. 79)

Net benefit analysis should be applied just to the incremental ESMP investments (p. 79)

- Including core investments would alter the definition, focus, and purpose of the net benefits analysis (p. 79)
- This would lead to all distribution investments being assessed on a net benefits standard (p. 80)
- This would create a false perception that there is flexibility and optionality between EDC public service obligation and the requirements of the Climate Act to invest proactively in EDC networks (pp. 80-81)
- Core investments are not subject to review prior to deployment and should not be subject to a net benefits analysis. If they were, the EDCs would be encouraged to compromise on its public service obligations (p. 81)
- There is no rational interpretation of the Climate Law that supports expanding the net benefits analysis beyond the proposed investments developed pursuant to 92B.

The EDCs' brief is silent on the rate impact analyses presented in the ESMPs.

Cost Recovery - Intervenors

Issue	DOER	AGO	GECA	CEC
All ESMP investments should be treated as "core" investments	✓	~		
ESMP investments should be recovered primarily through base distribution rates	✓	~		
Preauthorization should be allowed only if: • ESMPs are an integrated, comprehensive, strategy for grid modernization • ESMPs duly consider alternatives • ESMPs demonstrate a transparent, robust and complete determination that investments are justified • Otherwise, preapproval invites excessive expenditures on an accelerated timeframe.		~	✓	
DPU should open a proceeding on export tariffs for interconnection costs		✓		
PSP should not be continued	~	✓		
If PSP is continued, it should be streamlined and paired with long-term planning	✓			✓
Eversource's ASAP should not be reviewed in ESMPs	✓		✓	

~ indicates that a partial position was stated, or a similar position was implied.

Cost Recovery – EDCs (I)

The cost recovery mechanisms authorized by the Department should provide a clear cost recovery pathway for each EDC's capital and non-capital proposals to provide certainty to pursue the ESMP investments, while balancing the flexibility to implement the ESMP. (p. 66)

EDCs are not seeking preauthorization or preapproval of their budgets (p. 66)

- Each EDC will bear the burden of demonstrating prudence when it seeks cost recovery from the DPU (p. 67)
- EDCs propose a cost recovery framework where the EDCs must demonstrate prudence at the time they request cost recovery (p. 67)
- EDCs are seeking budget caps for their proposed incremental ESMP costs (pp. 66-67)

EDCs propose to collect costs through reconciliation factors

- Eversource and Unitil will collect costs through the existing GMF (p. 67-68)
- National Grid will collect costs through the ISRE mechanism proposed in its current rate case (p. 68)

Cost Recovery - EDCs (II)

Revenue collected through base rates is insufficient to implement incremental ESMP investments in a timely and efficient manner (pp. 68-69)

- Base rates are not designed to recover any incremental investments outside the test year (p. 68)
- It is simply not feasible to expect base distribution rates to support incremental programs that were not historically in place, or at a level that will be necessary in the years ahead (p. 68)
- This point has been recognized by the DPU in recent PBR and capital investment recovery mechanisms (p. 69)

While the Climate Act allows for recovery of costs through base rates, it does not preclude recovery of costs through other mechanisms (p. 70).

- Limiting cost recovery to base rates would not be aligned with the Climate Act's objective to encourage proactive investment in the distribution system (p. 70)

The requested cost recovery mechanism is for a limited duration (p. 70)

- The GHG limits end in 2050 because presumably MA will have met its goals
- And distribution system investments will have reached a business-as-usual status by then.

Cost Allocation for Long-Term Integration of DER - EDCs

EDCs propose to continue current CIP cost allocation paradigm in the interim until the DPU, EDCs, and stakeholders develop a long-term approach (p. 62-63)

- EDCs will propose CIPs under Provisional System Planning Program during the 2025-2029 term (pp. 50, 56, 60).

EDCs recommend “a long-term proactive distribution system planning process that could serve to expand GMAC and stakeholder participation planning process of the ESMP” (pp. 84-85)

- EDCs will develop formal proposals for a revised Group Study framework and a proactive long-term cost allocation methodology, informed by stakeholder feedback. (p. 85)

Integrated Energy Planning - Intervenors

Issue	DOER	AGO	Acadia	CLF	CLC
DPU should approve proposed IEP Work Group and establish detailed timeline	✓				✓
EDCs should revise ESMPs to be consistent with Order 20-80-B, especially regarding planning, hybrid heating, RNG, Hydrogen	✓		✓	~	
EDCs should evaluate LDC capital investments for targeted electrification, and develop screening criteria regarding safety and timelines		✓			
LDCs should provide location-based capital forecasts and maps		✓			
Next ESMP should fully report on IEP Work Group efforts					✓
DPU should establish fair and equitable cost allocation between electric and gas					✓
IEP process should protect ratepayers, especially LMI and EJ communities				✓	

~ indicates that a partial position was stated, or a similar position was implied.

Distributive Equity - Intervenors

Issue	DOER	AGO	Acadia	CLF	CLC	GECA	NRG
Ratepayer burden: there is an overall lack of specificity, transparency, consistency, and comprehensive approach to demonstrating a minimization or mitigation of impacts on ratepayers.	✓			✓		✓	✓
CBAs: ESMPs should offer more specificity on how CBAs are developed, how EJ populations will benefit, and how they are funded.			✓	✓			
Benefit-cost analyses: ESMPs should offer more specificity, accuracy, qualitative and quantitative analysis, granularity, and scenarios.	✓	✓	✓				
Access to solar: Eversource's ASAP is duplicative of Solar For All and should not play a gatekeeping role for a program intended to help LMI customers.	✓				✓	✓	
EVs / EV charging: existing off-peak charging rebate is too small and residential demand charges are regressive; EDCs should offer robust managed charging programs, both active and passive (such as TVRs).						✓	
Gas/electric: gas is not a back-up for heat pumps; we should work to avoid EJ/LMI communities bearing the burden of gas pipeline upkeep by helping these communities make the transition to clean heat.				✓			

Procedural Equity - Intervenors

Issue	DOER	AGO	Acadia	CLF	CLC	GECA	NRG
Overall: standardization of the ESMPs and better communications efforts will help make the topic of grid modernization more accessible.	✓			✓		✓	
CESAG: the body should be co-led by a non-utility entity.	✓		✓	✓	✓		
CESAG: CBOs do not have the resources that GMAC has.			✓				
CESAG: participants should be adequately compensated.			✓				
CESAG: the body should be nested within an existing framework (e.g., the GMAC) to avoid working group fatigue.	✓		✓	✓			
CESAG: the body should be co-led by GMAC, specifically the EWG.	✓						

Structural/Recognition Equity - Intervenors

Issue	DOER	AGO	Acadia	CLF	CLC	GECA	NRG
Centering equity: equity should be standardized and operationalized within the utilities.	✓						
Centering equity: equity should be incorporated into a standard of review within ESMP filings.				✓			

Equity and Stakeholder Engagement - EDCs

"The EDCs plan to undertake deliberate steps to increase engagement and communication with communities and identify and balance the specific benefits and burdens that a project may have on a host community" (p. 63)

The EDCs envision the CESAG as a partnership between community-based organizations and EDCs

- CESAG will provide an opportunity to create a framework to guide EDCs on how to engage communities about proposed clean infrastructure project and best practices for soliciting feedback (p. 63)
- EDCs will engage a broad spectrum of experts to join the CESAG (p. 63)

Deferred Issues - EDCs

EDCs' recommendations for the issues that were deferred by the DPU

Issue	EDC Recommendation
Cost allocation for long-term integration of DER (p. 84-85)	Defer to a generic proceeding or other open dockets. Develop a long-term proactive distribution planning process that includes stakeholder input.
Consideration of rate redesign options (p. 86)	Defer to a generic proceeding or other open dockets (not in future ESMP filings) such as: EV TOU (D.P.U. 23-84 and D.P.U. 23-85); energy affordability with a focus on residential customers (D.P.U. 24-15)
Energy storage to improve renewable energy utilization and avoid curtailment (p. 82)	Defer to open dockets addressing new storage tariffs
Alternative approaches to financing ESMP-proposed CIP incremental investments (p. 87)	Defer to a generic proceeding and allow continuation of current cost allocation paradigm for 2025-2029 ESMP term
ESMP performance metrics (p. 88)	Defer to after DPU review of ESMPS, in a different phase of ESMP dockets. Consider existing metric frameworks and reporting constructs.

Future ESMP Process - Intervenors (I)

Issue	DOER	AGO	GECA	Acadia	CLF	CLC
ESMPs should be established through multi-year collaboration with GMAC • GAMC Review period should be extended to 240 days • EDCs should collaborate on a uniform approach to forecasting • EDCs should collaborate on long-term system planning process, including framework for Long-Term Forecast and System Plan (LTFSP) to be included in ESMPs	✓	~	~	~	~	~
ESMPs should be standardized for efficient & effective stakeholder engagement	✓		✓			
DPU should establish comprehensive detailed timelines for input to ESMPs		✓				✓
DPU should align ESMP directives with next steps from AMI Stakeholder WG	✓					
DPU should align ESMP schedule with related proceedings: rate cases, EE plans, reliability planning, IEP	✓					

~ indicates that a partial position was stated, or a similar position was implied.

Future ESMP Process - Intervenors (II)

Issue	DOER	AGO	GECA	Acadia	NRG	CLC
ESMPs should be an efficient, centralized, comprehensive, strategic planning document for achieving MA climate goals			✓	✓		✓
DPU should establish timeline for IEP Work Group	✓					
EDCs should modernize three utility functions: planning & forecasts, operations, market operations		✓				
EDCs should develop data platforms for sharing ESMP data		✓				
DPU should resolve outstanding TVR tariff and AMI and data access issues	✓				✓	

~ indicates that a partial position was stated, or a similar position was implied.

Future ESMP Process – EDCs (I)

Stakeholder participation

- EDCs expect to expand GMAC participation process earlier in the ESMP drafting process, and expect the process to be more streamlined (p. 85, p.94)
- EDCs willing to work with stakeholders to receive feedback on potential sensitivity analysis for long-term demand assessment (p. 42)

EDCs recommend several changes to GMAC procedures (p. 94):

- EDCs should be allowed to directly present a summary of their ESMP to the GMAC members prior to any GMAC consultant presentation regarding the ESMP
- EDCs should have an opportunity during the GMAC meetings, rather than through written responses after the meeting, to engage in an iterative dialog with GMAC members
- Technical sessions should be used to allow the EDCs to answer questions interactively to allow the GMAC to engage with the EDCs

EDCs should not be required to submit a draft ESMP earlier than five months prior to the ESMP filing deadline (p. 90)

- Doing so would reduce time to review forecasts and may force EDCs to use an outdated forecast

Future ESMP Process – EDCs (II)

EDCs disagree with GMAC recommendation to require them to share draft forecasts two years in advance of sending draft ESMPs to GMAC (p. 91-92)

- EDCs develop forecasts on an annual basis and submit as part of Annual Reliability Report and encourage stakeholders to review these forecasts. EDCs do not see value in a parallel process
- Sharing draft forecasts so early would result in using out of date data and less reliable forecasts

EDCs do not agree with updating forecasts to include GMAC input prior to determining the scale and scope of investments in the forthcoming draft ESMP

- GMAC recommendations might not be suitable for each company's situation or sub-region (p. 92)
- EDCs are not confident in the expertise of the GMAC consultant to offer actionable feedback on the forecasts (p. 93)

EDCs recommend limiting scope of future ESMPs to the incremental investments and not expanding to include all aspects of the EDCs' system and planned investment (p. 99).

Future Reporting – Intervenors (DOER)

Report Content	DOER
EDCS should prepare and present public-facing biannual reports and webinars • Integrated into stakeholder engagement efforts • Replace some of the current Grid Modernization Annual Reports	✓
EDC activities and progress, status updates on new or ongoing initiatives, programs, and investments.	✓
Description of future EDC activities for the next six months.	✓
Summary of new infrastructure investments planed, with geographic information and description of how the infrastructure supports DERs and clean energy goals.	✓
New programs or technologies offered to customers to support DERs and electrification.	✓
Progress on joint energy system planning between EDCs and LDCs.	✓
Relevant ongoing regulatory proceedings.	✓
Timeline for the next ESMP.	✓
Opportunities for verbal or written feedback to the EDCs.	✓
Description of how past public feedback has been incorporated by the EDC.	✓

Future Reporting – Intervenors (CLC)

Report Content	CLC
Progress on IEP	✓
Testing on battery storage	✓
Increases in double poles	✓
Progress on deferred issues	✓

Future Reporting - EDCs

EDCs recommend biannual reporting on April 1 and October 1 each year (p. 96)

- April 1 report to cover prior year plan period (January – December)
- October 1 report to cover January-June of current year
- Recommend reporting begins in year two of the ESMPs so EDCs have time to mobilize and initiate investments (p. 97)

EDCs support development of a common reporting template (p. 97)

ESMP Related Working Groups and Committees - Intervenors

	Working Group	EDCs	DOER
Proposed	Community Engagement Stakeholder Advisory Group (CESAG)	✓	
	Integrated Energy Planning (IEP) WG	✓	
	GMAC Forecast WG		✓
	GMAC Long-Term Forecast and System Plan (LTFSP) WG		✓
Existing	• GMAC Equity Working Group • Energy Efficiency Advisory Committee • AMI Stakeholder Working Group • Clean Energy Transmission WG (CETWG) • EV Intergovernmental Coordinating Council (EVICC) • Gas System Enhancement Program (GSEP) • Interconnection Implementation Review Group (IIRG) – DG Industry • Energy Storage Interconnection Review Group (ESIRG) – DG Industry • Technical Standards Review Group (TSRG) – DG Industry		

Long-Term Planning Process for DG – Intervenors

Issue	AGO	DOER	CEC
The EDCs did not provide long-term planning and cost-recovery proposals for DG interconnection	✓	✓	✓
The DPU should order the EDCs to develop a proactive long-term plan for DG interconnection	✓	✓	✓
The DPU should institute a proceeding to develop export tariffs as the interconnection cost allocation model in lieu of the CIP framework	✓		
The long-term planning process for interconnection should include planning for new load electrification (e.g., transportation and building electrification)		✓	
DPU should extend the PSP until a long-term planning process is implemented			✓

Additional Issues - Intervenors

Issue	GECA	Acadia	CLF	CLC	CEC	Williams College
ESMPs did not adequately account for many GMAC recommendations		✓				
ESMPs did not adequately include strategies to support EV adoption	✓					
Eversource and NG proposals for residential demand charges raise concerns	✓					
ESMPs should construct infrastructure to withstand climate change impacts and should incorporate principles of Climate Adaptation Plans			✓			
Eversource should work collaboratively with PAs on EE and meeting GHG goals				✓		
DPU should clarify how deferred issues will be addressed, including rate design, TVR, ESMP metrics, and dispatch of storage technologies				✓		
ESMPs do not include *proactive* upgrades for grid investments					✓	✓

Appendix

Detailed Slides of Intervenor Briefs

DPU Approval of ESMPs

DPU Approval of ESMPs (DOER)

- The DPU should approve the ESMPs with modifications outlined in the brief (p. 80).
- Standard of review (pp. 12-13):
  - Agrees with the DPU standards, which include strategic plan approach, support of MA GHG requirements, and consistent with Sec 92B of the Climate Act.
  - ESMPs maximize the use of load management, DERs, and grid enhancing technologies.
  - ESMP forecasts include scenarios.
  - ESMPs describe and optimize all ongoing programs and investments.
  - GMAC supports the approval of the ESMPs.
  - ESMPs incorporate GMAC's recommendations.
  - EDCs demonstrate substantial efforts in stakeholder outreach and consideration of feedback.
  - EDCs standardize forecasts, assumptions, and ESMPs across companies.
  - ESMP forecasts reflect meeting MA GHG limits, including coordination between the EDCs to meet them.
- Standard should be applied to all proceedings reviewing investments identified in ESMPs.
- Reviews held outside of base rate cases should be held to the same standard and evidentiary burden as rate cases.

DPU Approval of ESMPs (Acadia)

DPU should move forward with ESMPs because Acadia supports many of the proposals in the ESMPs, but require EDCs to correct several flaws (p. 4):

- Provide an accurate picture of bill impacts.
- Better incorporate the GMAC recommendations.
- Be consistent with IEP requirements in 20-80-B.
- More specifics on Community Benefits Agreements.
- Provide a more accurate benefit-cost analysis.
- Revise the Community Engagement Stakeholder Advisory Group to ensure CBOs have full support from GMAC, adequate technical assistance, and adequate compensation.
- Continually refine ESMPs and use consistent choices and assumptions and scenarios for forecasts.

Before approving the ESMPs, the DPU should require the EDCs to provide a better estimate of ratepayer impacts (p. 16).

DPU Approval of ESMPs (Others I)

AGO: Offers several recommendations regarding how the EDCs can improve their ESMPs and recommends the DPU require they be addressed in compliance filings (p. 51).

GECA: DPU should conditionally approve the ESMPs subject to several conditions (p. 1).

CLF: DPU should approve ESMPs with directives relating to the following concerns, with a required date of completion within one year of DPU order (p. 7).

- Additional considerations of equity concerns.
- Further review of EJ principles, especially relating to bill impacts and infrastructure siting.
- Planning for climate change impacts in design and construction of electric grid.

CEC: ESMPs must contain a long-term planning process component for DG interconnection to satisfy the statute (p. 5).

DPU Approval of ESMPs (Others II)

CLC: Eversource's ESMP should be approved, with recommended directives related to proposed and future ESMPs (pp. 1-3).

Williams College: DPU should not approve National Grid's ESMP and should require NG to file a revised ESMP (p. 4). The revised ESMP should include a proactive process for spot loads and customer engagement (p. 11). Further, NG load forecasts are generic and reactive (p. 18) and the process for reviewing load requests is reactive, uncertain, not transparent, and lack opportunity for customer engagement (pp. 18-23).

Load Forecasts

Load Forecasts

DPU should require improved forecasting to minimize costs to customers (DOER pp. 43-57).

- EDCs should use consistent assumptions in the load forecasts (AGO pp. 12-14; Acadia pp. 28-29; CLC p. 27).
- Forecasts should account for load management including demand response, VPP, and smart inverter functionality, electrified buildings, NWAs, and electric vehicles (DOER pp. 43-44; AGO pp. 15-17; GECA pp.14-15).
- Forecasts should include sensitivities, which should be consistent across EDCs (AGO pp. 14-15).
- DPU should require EDCs to revise and standardize energy storage forecasts, with stakeholder engagement (DOER p. 49).
- ESMPs should include comprehensive plan for implementing managed charging (DOER p. 52; GECA p. 18).
- ESMPs should include analysis of rate design options for reducing costs and meeting clean energy goals and should include rate design scenario analysis in load forecasts (DOER p. 55).
- Forecasts must include accurate consideration of building codes and energy efficiency (DOER p. 56; AGO p. 16).
- EDCs should use a standardized tool for climate vulnerability assessments (DOER p. 57).
- Forecasts should incorporate real-world customer decision making processes (Williams College p. 4)

Benefit-Cost Analysis (BCA) and Bill Impacts

Benefit Cost Analysis (I)

DOER: The bifurcation of ESMP and non-ESMP investments results in a separation of the net benefits analysis from the rest of the investments summarized in the ESMPs (p. 37).

DPU should require ESMPs to include distributional equity analyses and net benefit and bill impact analyses that address EJ community concerns (pp. 67-68).

- Including more consideration of customer-sited alternatives in EJ communities.
- Including DERs non-wires alternatives, and resources owned by third parties.

AGO: DPU should order the EDCS to file compliance filings regarding the BCAs (p. 40, 45):

- BCAs should include a more detailed analysis of economic (i.e., job) benefits (p. 41).
- BCAs should include sensitivities to account for uncertainties, e.g. peak forecasts, investment project risks, changes in state or federal policy, reduced GHG emissions (pp. 41-43).
- BCAs should include more consistent approaches across the EDCs, including categorization of investments and investment cost recovery assumptions (p. 43).
- BCAs should account for all planned energy sector modernization investments, not just the "incremental" ESMP investments for which the EDCs seek cost recovery of in the ESMP docket (p. 44).

Benefit Cost Analysis (II)

Acadia: DPU should require EDCs to revise the ESMPs to provide a more accurate benefit cost analysis. Investments should not be split between ESMP and non-ESMP (p. 26).

GECA: EDCs did not undertake a comprehensive BCA of all proposed expenditures (p. 14).

CLF: BCAs do not include enough information to ensure environmental justice populations receive benefits (p. 8). DPU should not rely on EDC BCAs to provide an accurate assessment of benefits (p. 12). BCAs should include a distributional equity analysis (p. 12).

Bill Impact Analysis (I)

GECA:

The EDCs have not offered a clear, consistent, or credible, cogent depiction of all proposed and related ESMP investments and alternatives, as required by the Climate Act (p. 8).

The selective "incremental" cost approach creates many problems with the bill impact analysis.

- The bill impact analyses are unclear and difficult to assess (p. 7).
- It threatens public acceptance of decarbonization measures (p. 12)
  - National Grid & Eversource provided the public ESMP cost estimates for 2025-2029 that are dramatically lower than what it said are all the approved, pending or new ESMP investments (p. 8-11).
- It creates the risk of unduly high prices that will undermine MA decarbonization goals (p. 12).
- The DPU, the GMAC, other stakeholders are left to address ESMP investments in multiple dockets (p. 13).

The bill impact estimates fail to account for the downward pressure on rates from electrification, particularly EV adoption (p. 17).

Bill Impact Analysis (II)

Acadia:

- The bill impact analyses does not contain alternatives to investments (pp. 14-16)
- The bill impact analyses is misleading because they include only “incremental” ESMP investments .

CLC: “The ESMP should act as an umbrella under which all of the Company’s efforts to meet the 2050 climate goals are accounted for, including those spread across various regulatory proceedings, so that the true cost of meeting the 2050 climate goals can be known and evaluated.” (p. 26)

Several parties: The DPU should:

- Require bill impact analyses that include non-incremental investments (i.e., total cost of all investments in ESMP plan) (CLC p. 26; p. 16; GECO p. 2)
- Identify specific factors for inclusion in the EDC’s bill impact analyses and require compliance filings within one year of the DPU’s order. (CLF p. 13)
- Require revised bill impact analysis to improve understanding of necessary protections for environmental justice communities (CLF p. 16).

Cost Recovery and Cost Allocation

Cost Recovery (I)

DOER: Grid modernization and ESMP investments should be treated as core investments that are part of EDCs normal business and strategic planning (p. 60).

DOER: ESMP investments should be recovered primarily through base distribution rates (p. 57).

DOER: If PSP is continued, (a) it must be paired with progress on a long-term planning solution for DG interconnection, and (b) the DPU should streamline the process (p. 61-62).

CEC: The PSP should be temporarily extended and streamlined while the DPU considers the EDC proposals for long-term system planning for DG. (pp. 7-11)

CEC: The DPU should direct the EDCs to file proposals within six months detailing a uniform proactive long-term planning analysis process and companion cost-allocation methodology for the interconnection of DG/enablement of DG hosting capacity. (pp. 11-16)

GECA: DPU should consider preauthorization of investments only if (pp. 14-15):

- The ESMP process promotes an integrated, comprehensive, strategy for grid modernization
- Includes due consideration of alternatives.
- Includes evidence supporting a transparent, robust and complete determination that investments are justified.
- Otherwise, preapproval invites excessive expenditures on an accelerated timeframe.

Cost Recovery (II)

DOER & GECA: Eversource's Affordable Solar Access Program should not be reviewed in the ESMPs (DOER p. 62; GECA pp. 15-17).

AGO: The DPU should not be moved by the EDC's claims that they will have insufficient revenue to fund ESMP investments without an accelerated cost recovery mechanism outside of base distribution rates (pp. 47-48).

- The EDCs should not be granted an additional cost reconciliation mechanism for ESMP investments, without:
  - A convincing demonstrate that exceptional recovery is merited, and
  - The development of safeguards to protect ratepayers from financial risk (p. 48-49).

AGO: The PSP approach for recovering CIPs should not be continued (p. 34).

AGO: The DPU should institute a proceeding to develop export tariffs for future allocation of DER interconnection costs.

- Instead of an upfront cost to interconnect, an "export tariff allocates costs for the use of the system over time just as costs are allocated to load-related ratepayers through rates" (p. 36).

Integrated Energy Planning (IEP)

Integrated Energy Planning (I)

DOER: DPU should establish a concrete timeline for creating IEP Working Group (see ESMP future process slide).

AGO: DPU should direct the EDCs to submit a compliance filing with the following (p. 39):

- EDCs should evaluate all LDC capital investments for targeted electrification.
- EDCs and LDCs should develop screening criteria to quickly filter projects that do not qualify for targeted electrification or non-pipeline alternatives due to safety concerns and limited timelines.
- LDCs should provide location-based capital forecasts and maps of planned projects.

Acadia: DPU should require the EDCs to revise the ESMPs to ensure that they are consistent with order D.P.U. 20-80-B. Especially regarding coordinated gas planning, hybrid heating, renewable natural gas, and hydrogen (pp. 18-21)

Integrated Energy Planning (II)

CLF: DPU should require EDCs to carry out integrated planning, which should plan for electrification and retirement of unnecessary gas resources in a way that protects ratepayers, especially LMI and EJ communities (p. 10).

CLC:

- DPU should approve Eversource's proposal for Integrated Energy Planning (IEP) working group.
- DPU should require Eversource to include the Compact in the working group and to provide periodic reporting including lessons learned and progress made on electrification efforts in areas where gas and electric providers are different entities.
- Next ESMP should fully report on IEP working group efforts. (p. 10-11)
- Department should ensure a fair and equitable cost allocation process between electric and gas (p.12)

Equity

Equity: Distributive

Ratepayer burdens (primarily covered elsewhere)

- There is an overall lack of transparency, consistency, and comprehensive approach to demonstrating a minimization or mitigation of impacts on ratepayers. (GECA: 13–14, Acadia: 14–16)
- The ESMPs should offer more specificity on the timing of advanced metering infrastructure (AMI) rollouts (NRG: 5).
- The process and timetable for DPU's review of proposed time-varying rates (TVR) should be identified. (NRG: 6–7, CLC: 32)
- The DPU should identify specific factors for inclusion in bill impacts analyses and require compliance within a year of issuing their order. (CLF: 7)
- The Interagency Rates Working Group is responsible for rate design. The EDCs have no input or breakdown of rate design objectives accounted for in forecasts. (DOER: 52–54)

Equity: Distributive

Community Benefits Agreements (CBAs)

- Utilities have not done enough to avoid disproportionate energy burdens on LMI customers, specifically regarding information about CBAs to ensure that EJ populations will receive benefits from the plans that are proportional to and commensurate with the costs of implementation. (CLF: 7–8)
- CBAs should only be developed within the context of the EFSB/DPU and with transparency regarding ratepayer funding, as well as guidance on thresholds for which projects require them and what baseline components should be included. (CLC: 17, Acadia: 22, 23, 25)
- CBAs should have identified appropriate measures and not be funded solely by ratepayers. (Acadia: 25)
- BCAs should be reviewed for quantitative, not just qualitative, analyses with a focus on distributional equity. (CLF: 12)

Equity: Distributive

Net benefits / benefit-cost analyses

- There should be more qualitative and quantitative tables of benefits and costs to EJ communities. There should also be a distributional equity analysis. Aggregated data on net benefits and costs does not capture experiences of some customers. (DOER: 67)
- Benefit-cost analyses within the ESMPs lack analytical rigor, assumptions are untested, etc. Emissions and air quality calculations assume peak EV and heat pump loads in 2050 without nuances factored in. (AGO: 42–43)
- Benefit-cost analyses need to be more accurate. (Acadia: 26)

Access to solar

- Eversource's Affordable Solar Access Program (ASAP) duplicates the federal Solar For All program (GECA: 16
- A utility should not be the gatekeeper for solar accessibility; municipalities have an important role in administration of programs like ASAP. (GECA: 16)
- ESMPs are not the place for ASAP. (DOER: 62)
- Homeowners should not double-dip. (CLC: 20)

Equity: Distributive

EVs / EV charging

- National Grid off-peak managed charging rebate is too small relative to the rest of the country. Eversource fails to offer any managed charging program currently. (GECA: 18)
- Residential demand charges, especially for EV charging, are regressive because they impact low-income ratepayers. Time-varying rates are better for EV charging because drivers don't have a lot of control over the power draw of their vehicles. (GECA: 20)
- EDCs should offer robust managed charging programs, both active and passive (such as TVRs) (GECA: 17-18)

Gas/electric

- EDCs are continuing to rely on gas as "back-up" for electric heat pumps based on unproven assertions and an overreliance on hybrid heating systems. This creates a cost burden of maintaining a gas system on top of electrification. EDCs should promote thermal technologies instead, such as ground-source heat pumps (networked geothermal). (CLF: 8–10)
    - Further, if the switch to electric is only by communities that can afford it, the financial burden of fixed costs to maintain gas pipelines will be disproportionately borne by LMI communities. (CLF: 9)
    - EDCs should retire gas resources in a manner that protects ratepayers, especially LMI and EJ communities. (CLF: 9)

Equity: Procedural

Overall

- ESMPs should be standardized, transparent, clear, and consistent to facilitate better decision-making and minimize burdens and costs to consumers. (DOER: 32; GECA: 20–21)
- The EWG's recommendations about accessibility (plainspoken language, language translation) should be adopted (DOER: 66)
- EDCs should host biannual report webinars to increase transparency and accessibility of ESMPs, which can be integrated into other activities regarding stakeholder engagement—should include progress reports, look-aheads, new infrastructure, programs, gas-electric planning, regulations, timeline of next ESMP process, how feedback has been received and incorporated. (DOER: 68–70)
- The ESMP drafting process and GMAC meetings were held during the day and were thereby inaccessible for regular folks. (CLF: 21)

Equity: Procedural

Community Engagement Stakeholder Advisory Group (CESAG)

- CESAG leadership should have a non-utility co-chair. (CLF: 14, Acadia: 27, DOER: 64, CLC: 16)
  - GMAC and/or EWG should co-lead (DOER); community-based organizations (CBOs) may not have the resources that GMAC has. (Acadia: 27)
- Compensation for participants should be guaranteed. (CLF: 14)
- The CESAG should be nested within an existing framework (e.g., GMAC) to ease burden of working group fatigue. (CLF: 14, DOER: 65)

Equity: Structural / Recognition

Centering equity in the ESMPs

- DPU should require EDCs to standardize and operationalize equity within the utilities akin to Eversource's approach. (DOER: 64)
- EJ principles should be incorporated into a standard of review for future ESMP filings that include bill impacts analyses and infrastructure siting proposals that prioritize impacts to environmental justice communities. (CLF: 15)

Future ESMP Processes and Reporting

Future ESMP Process – DOER (I)

ESMPs should be established through a multi-year collaborative process with the GMAC (pp. 19-41):

- DPU should extend the GMAC review period to 240 days (pp. 20-23):
  - 140 days for GMAC review of draft ESMPS, and
  - 100 days for EDCs to respond to GMAC recommendations before filing ESMPs with the DPU.
- EDCs should collaborate with GMAC on a uniform approach to forecasting (pp. 23-28).
  - GMAC Forecasting Work Group should begin immediately following DPU Order in this proceeding.
- EDCs should collaborate with GMAC on a long-term system planning process, including DG interconnection (pp. 28-32).
  - Establish a framework for a Long-Term Forecast and System Plan (LTFSP).
  - Fully replace the PSP.
  - Immediately commence monthly meetings of GMAC subcommittee.
  - Establish an annual process for forecasting interconnection needs, including quarterly meetings with the GMAC.
  - ESMP filings will incorporate LTFSP
  - No further proposals for recovery through CIPs proposed under the PSP.

ESMPs should be standardized to allow efficient and effective stakeholder engagement (pp. 32-41; CLC p.27).

- Include a clear timeline of ongoing and future grid planning and investment activities.
- Include a standardized presentation of investments.

Future ESMP Process - DOER (II)

DPU should establish a timeline for creating the Integrated Energy Planning WG (p. 72-75).

- Form an Integrated Gas and Electric Working Group that includes at least EDCs, LDCs, DOER, the AGO, OET, and invites all intervenors in the ESMP and the DPU 20-80 dockets.
- Conduct monthly meetings of the WG, with the first no later than 60 days after DPU's order in this docket.
- Invite public participation in the WG. Create a publicly available website for posting WG materials.
- Produce a public WG report to be included in the Climate Compliance Plans to be submitted by the LDCs by April 1, 2025.

DPU should align is ESMP directives with the next steps from the AMI Stakeholder Working Group (p.76).

- DPU should establish a statewide data access proceeding to govern data access and uniform requirements.

DPU should align the ESMP schedule with other grid planning proceedings (pp. 78-80):

- Rate case proceedings
- Energy efficiency plans
- Reliability planning
- Joint energy system planning, consistent with DPU Order 20-80

Future ESMP Process - AGO (I)

The EDCs should modernize each of their three utility functions:

- Grid planning and forecasts:
  - Consistency across the 5-year and 10-year forecasts (pp. 12-14).
  - Include sensitivities in 5-year and 10-year forecasts (pp. 14-15).
  - Specific forecasting requirements (pp. 15-17).
- Grid operations:
  - EDCs should make a compliance filing detailing plans to prioritize scaling of flexible grid solutions (pp. 17-18).
    - Flexible interconnection (pp. 18-19).
    - Flexible interconnection plan pp. 19-27):
      - Standard flexible interconnection options across EDCs.
      - Flexible interconnection for both load and generation.
      - Dynamic hosting capacity.
      - Third party control options.
      - Flexible interconnection regardless of system capacity constraints.

Future ESMP Process - AGO (II)

- Market operations:
  - Supports the EDCs proposed grid services program and framework, with additional recommendations (p. 29):
    - EDCs should commit to soliciting comments from stakeholders on grid services study.
    - EDCs should file results of the grid services study for DPU approval.
    - EDCs should work with stakeholders to develop a uniform, statewide market design framework and programs.

DPU should order EDCs to develop data platforms for ongoing sharing of ESMP data:

- Current ESMP data: system, regional, and sub-regional data; modeling data (p. 30).
- Provide EDC data sufficient to enable stakeholders to conduct four ESMP review functions (pp. 31-33):
  - Review ESMP progress towards ESMP goals.
  - Make future ESMP recommendations.
  - Conduct independent technical analyses.
  - Identify opportunities for market-driven clean energy solutions.
  - Should include data on (a) policy goal, (b) systems, (c) modeling, and (d) programs.
- DPU should establish statewide data access proceeding (p. 33).

DPU should establish stakeholder groups for development of future roadmaps, that serve within the body of the GMAC (p. 50).

Future ESMP Process - Others

GECA: DPU should institute process reforms to make the ESMPs an efficient, comprehensive, integrated planning tool for cost-effective achievement of MA climate goals (p. 20).

- DPU should set filing requirements for future ESMPs including (a) standardization of ESMP components, (b) a common glossary of investments, (c) EDC evidentiary showing to support investments, (d) consolidated dockets, (e) DOER-facilitated stakeholder processes, promote stakeholder engagement by leveraging the GMAC work (p. 21).

CLF: GMAC and DPU should work together to improve pre-filing process and ESMP review process, including accessibility for the general public (pp. 5; 20-21)

CLC: DPU should direct Eversource to develop next ESMP as a centralized, whole-of-business strategic planning document include transmission planning (pp. 22-24) and bill impact analysis (pp 24-27).

Acadia: Future ESMPs should include consistent forecasting modeling assumptions and explanations for choices (p.28).

Future ESMP Process - Others

Several: DPU should require the EDCs to:

- Standardize the ESMPs (pp. 32-41 CLC p. 27)
- Participate in a GMAC-led process prior to the next ESMP (p. 47; CLC p. 29)
- Develop comprehensive, detailed timelines showing significant inputs to ESMPs and key components to meet climate goals (CLC p. 29; AG p. 20).

CLC: Future ESMPs should be a centralized, whole-of-business strategic planning document for achieving 2050 climate goals (p.20). Including transmission planning (p. 22). DPU should clarify processes for deferred issues: ESMP metrics and TVR (pp. 31-34).

NRG: The DPU should include in its order a plan for resolving outstanding AMI and data access issues and implementing TVR tariff. The plan should (p. 8):

- Indicate how the DPU will coordinate and integrate findings from other proceedings and working groups;
- Identify processes and schedules to resolve AMI and data-access issues
- Identify a process and timetable for review of proposed TVR rates
- Establish a goal for having TVR tariffs in place within one year or sooner of AMI installation

Future ESMP Interim Reports & Working Groups

Interim ESMP Reports - DOER

DPU should require the EDCs to produce public-facing biannual reports and webinars (pp. 68-71).

- These should be integrated into EDC stakeholder engagement efforts (p. 69).
- These should include (p. 70-71):
  - EDC activities and progress, status updates on new or ongoing initiatives, programs, and investments.
  - Description of future EDC activities for the next six months.
  - Summary of new infrastructure investments planed, with geographic information and description of how the infrastructure supports DERs and clean energy goals.
  - New programs or technologies offered to customers to support DERs and electrification.
  - Progress on joint energy system planning between EDCs and LDCs.
  - Relevant ongoing regulatory proceedings.
  - Timeline for the next ESMP.
  - Opportunities for verbal or written feedback to the EDCs.
  - Description of how past public feedback has been incorporated by the EDC.
- These should replace some of the current Grid Modernization Plan Annual Reports (p. 71).

EDCs should produce an IEP WG report to be included in Climate Compliance Plans (p. 75).

Interim ESMP Reports - CLC

DPU should require annual ESMP compliance reports, including

- progress on IEP,
- testing on alternative parameters on battery storage,
- increases in double poles, and
- progress on deferred issues (p. 31).

Long-Term Planning Process for DG

Long-Term Planning Process for DG

AGO: For the EDCs to fulfill the statutory ESMP objectives and facilitate the Commonwealth's achievement of its climate goals, they must provide a proactive long-term system planning program for DER interconnection. (AGO: p. 33)

DOER:

- The challenges in processing interconnection requests and the resulting size of the interconnection queues pose a significant problem for the Commonwealth to achieve its goals for DG deployment (p. 28)
- The Companies failed to provide a long-term planning solution for the DG interconnection problem in their ESMPs, despite explicit direction from the Department in D.P.U. 20-75 to do so. (p. 28)
- The absence of a substantive proposal from the Companies for a long-term planning and cost recovery proposal for DG interconnection in this proceeding is deeply concerning, runs contrary to the Department's direction in Order D.P.U. 20-75-C, and is a dereliction of one of the central statutory purposes of the ESMPs to "enable increased, timely adoption of renewable energy and distributed energy resources." (pp. 28-29)
- DOER urges the Department to provide clear direction in its Order in this proceeding to expeditiously move forward with a long-term planning solution for DG interconnection. (p. 29)

Additional Issues

Additional Issues - Acadia and Conservation Law Foundation

Acadia: ESMPS did not account for GMAC recommendations (p. 17).

- Many recommendations that were "accepted but modified" by the EDCs did not adhere to the spirit and substance of the recommendation.
- DPU should require EDCs to revise ESMPS to better incorporate GMAC recommendations into current ESMPs and processes moving forward.

CLF: The DPU should:

- Approve ESMPs with requirement that EDCs design and construct infrastructure prepared to withstand climate change impacts (e.g., storms and summer heat waves) (p. 18)
- Require EDCs to incorporate principles of the Hazard Mitigation and Climate Adaption Plans (proposed by CLF in a proposed regulation) into section 10 of ESMPs (p. 20)
- Incorporate environmental justice principles into the standard of review for future ESMP filings (p. 15)
- Require future ESMPs to include infrastructure siting proposals that prioritize impacts to EJ communities (p. 15)

Additional Issues – Green Energy Consumers Alliance

GECA:

ESMPs do not adequately include strategies to support electric vehicle adoption (p. 17).

- Eversource ESMP includes no managed charging program (p. 18)
  - Results in understated benefits.
  - Results in overstated load forecasts.
- Utility investments in EV charging infrastructure should be more clearly explained (p. 19).

Eversource's and National Grid's proposals for residential demand charges raise concerns, especially for EV charging and low-income customers (p. 20).

- Time-varying rates are more actionable and understandable for customers.

Additional Issues - Clean Energy Coalition

Clean Energy Coalition:

ESMPs do not include any *proactive* construction of upgrades to enable hosting capacity for DG. The DPU should:

- Extend the Provisional Program on a streamlined, interim basis until a long-term planning process to enable hosting capacity for DGs is implemented (pp. 7-11)
- Require the EDCs to submit proposals for a uniform long-term system planning process (LTSPP) for the interconnection of DG within six months of DPU order in this proceeding (pp. 11-15).
- Direct the EDCs to work with the Clean Energy coalition and other stakeholders to develop the components of a long-term system planning analysis process for interconnection of DG and associated cost-allocation methodology (p. 15)
- Require the EDCs to submit proposals for capital investments necessary to enable DG consistent with the planning process and within 18 months of the DPU order in this proceeding (p. 15)
- LTSPP should be utilized and incorporated into all future ESMP proceedings (p. 16).

Additional Issues - Cape Light Compact

CLC: The DPU should:

- Approve the Cape Cod capital investment project (CIP) in D.P.U. 22-55 (p. 7)
- Confirm that Eversource should work collaboratively with other PAs on energy efficiency to identify how it will meet MA GHG goals and contribute the ESMPs (p. 14).
- Direct Eversource to test secondary use parameters of its BESS facilities (such as peak shaving) and report on their efforts in the ESMP annual report and the next ESMP (p. 14-15)
- Confirm Eversource will only enter into CBAs for infrastructure projects requiring EFSB and/or DPU approval and ensure transparency by requiring a provision that the costs of the CBA are paid by all Eversource ratepayers, including the community. (p. 17)
- Direct Eversource to include double poles as a reporting-only ESMP metric (if Eversource's evaluation finds increased double poles from system improvements) or reopen DPU 03-87 to review double pole accounting and incorporate a separate ESMP-double pole category in reporting. Allow stakeholders to meaningfully comment on double pole issues. (p. 19)
- Require Eversource in its Affordable Solar Access Program (ASAP) proposal to coordinate with the DOER and Mass Housing and ensure that customers may not qualify for both ASAP and the Solar For All or Energy Saver Home Loan programs (p. 19).
- Clarify how deferred issues will be brought back into the ESMP process, including alternative rate design, TVR, ESMP metrics, and dispatch energy storage technologies (p. 31).
- Direct the subsequent phase of ESMP metrics in its order (p. 32)

Additional Issues - EVgo Services and Williams College

Evgo: The DPU should:

- Approve the proposed extensions of Eversource's EV Phase II programs and National Grid's EV Phase III programs (p. 4)
- Exclude public DC fast charging grom managed charging programs (pp. 4-5)
- Avoid requiring batteries or other DER's to be co-located with DC fast charger stations (p. 7)

Williams College:

National Grid's plan to address spot loads associated with building electrification is reactive, places significant burdens on customers, and is not consistent with requirements of Section 92B (p. 14)

The DPU should:

- Require NG to file a revised ESMP that includes a proactive process for treatment of large spot loads, a transparent review process, and meaningful customer engagement (p. 4)
- Consider disallowing NG's reliance on generic load forecasts and require NG to proactively engage with customers (p. 4)
- Ensure standardization and transparency of interconnection of spot loads to prevent lack of clear rules and standards from becoming barriers to decarbonization (p. 27)

Strategic Planning for 2025 Activities

- **Questions for Discussion:**
  - What would the GMAC like to do in 2025?
  - How often should the GMAC meet in 2025?
  - Does GMAC want to establish new working groups, even before knowing the outcome of the DPU Order?
    - What types of working groups?
    - What support do we need for new working groups?

Close and Next Steps

- **Next GMAC Meeting:** September 10, 2024, from 1 – 4 PM.

- The Equity Working Group will meet on June 26, 2024, from 11 AM – 12 PM.

- Thank you to DOER Legal Counsel, **Sarah McDaniel**, for your tremendous support to the GMAC. Best of luck in your new role at EEA!