

October 26th GMAC Meeting Written Public Comments

Written Comments Submitted to MA-GMAC@mass.gov

Submitted Comments

1. Michael Savage, Vice President of Business Development of Vergent Power Solutions, (msavage@vergentpower.com) – Received 10/16/23.
2. Advanced Energy Group's Grid Modernization Task Force, Contact: Sarah Sweeney, Advanced Energy Group Fellow, (sarah.sweeney@goadvancedenergy.com) – Received 10/20/23.

1. Michael Savage, Vice President of Business Development of Vergent Power Solutions, (msavage@vergentpower.com) – Received 10/16/23.

1) Eversource has stated its proposed investment to be \$6 billion over the next 5 years. With increased load growth what is the expected incremental impact on a kWh basis? My own calculation based on other Eversource grid mod investments reflect an incremental cost of \$.10/kWh for the next 5 years. They have then said there will be an additional \$6 billion investment for year 6-10.

2) Same question for National Grid. They have proposed to spend \$2 billion over the next 5 years. With increased load growth what is the expected incremental impact on a kWh basis?



To the Grid Modernization Advisory Council and the Equity Working Group,

On August 17, 2023, [Advanced Energy Group](#) convened 40+ public and private leaders at the AEG Boston Stakeholder Challenge on Grid Modernization to address critical climate, health, and equity challenges for Greater Boston. Stakeholders aligned on a critical obstacle to address in 12-months, developed a solution to this challenge, including a 90-day goal, and 12-month goal, and formed a Task Force of 13 leaders to deploy the solution:

Derived 12-Month Critical Obstacle: “Building trust and understanding with customers and communities by implementing equity and health-based metrics into decision-making processes to enable meaningful collaboration and deliver an electrification-based energy transition equitably and affordably.” - Melissa Lavinson, Head of Corporate Affairs, NE, National Grid & Jonathan Buonocore, Assistant Professor, Department of Environmental Health, Boston University

90-Day Goal: Improve our understanding of the Utility Electric Sector Modernization Plans (ESMP) and their investments into EJ communities

12-Month Goal: File ESMP’s with robust Stakeholder Feedback

In working towards the 90-day goal, our Task Force reviewed the ESMPs and developed a draft equity evaluation matrix with guiding questions to serve as the basis of our recommendations related to inclusive decision-making, community impact, equity, and health. To support our electric distribution companies in their commitment to fostering trust, promoting understanding, and advancing equity, these questions include:

1. Do the ESMPs include **plain language** to communicate the impacts and outcomes of the ESMPs?
2. Do the ESMPs include maps and visuals that make it easy for community members to understand the **local impact** of proposed solutions?
3. Do the ESMPs provide and **guarantee opportunities** for **local communities** to engage and provide meaningful input?
4. Do the ESMPs address disparity of wealth and environmental justice in the Commonwealth and provide **measurable relief** in the form of **economic benefits** to communities that have or will be disproportionately impacted?

5. Do the ESMPs address disparity of wealth and environmental justice in the Commonwealth and provide **measurable relief** in the form of **health benefits** to communities that have or will be disproportionately impacted?

As the Equity Working Group considers its recommendations for the Grid Modernization Advisory Council, we wish to specifically highlight some key recommendations and principles for the EWG to consider.

Recommendation: Establish stakeholder engagement requirements within the ESMP process that, at minimum:

- Establish technical advisory resources and funds for communities to have experts they trust chosen by the community who will represent their community interest and serve as their advocate in technical grid infrastructure matters
- Create notification requirements that ensure that communities are notified adequately in advance of infrastructure plans long before regulators are informed
- Create requirements that ensure informational meetings for affected communities are designed to maximize attendance
- Create awareness and intentionally communicate with communities about upcoming electric sector plans early in the process
- Mandate the requirement for language access plans that are representative of the communities impacted
- Create an accountability system for stakeholder engagement that ensures that impacted communities' interests are prioritized
- Can evaluate participation and representation in the process. Are all groups in a community represented in the stakeholder group? How many participated? Third, how meaningful was the stakeholder process?

Recommendation: Articulate commitment to and processes for the advancement of community ownership, control, and collaboration of distributed energy resources (DER):

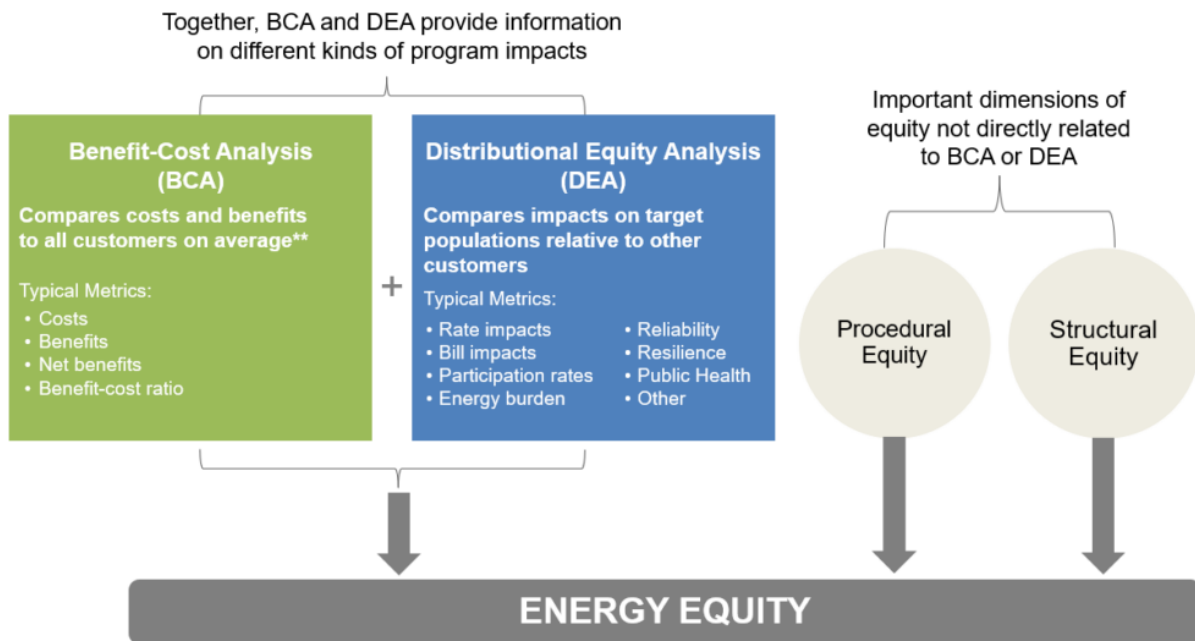
- Utilities should partner with municipalities and community groups to accelerate the installation of DER, including community microgrids, to best support the adoption of critical resilience infrastructure
- Utility-owned DERs, such as Eversource's Provincetown microgrid, help advance grid resilience, however, the exertion of exclusive distribution rights and failure to proactively plan for hosting capacity or ease interconnection costs creates impediments and bottlenecks for wider adoption of community-owned and controlled DER
- Utilities should create plans for how to collaborate with communities on non-utility-owned DER, including the publication of guides for how to engage with the

utility on DER interconnection, and proactively seek opportunities to encourage collaborative or community-owned and controlled microgrid projects

- Collaboration should advance economic, racial, and environmental equity goals as well as repair previous harms

Recommendation: Guide the utilities to assess and implement equity tools such as the [National Energy Screening Project \(NESP\) Energy Equity and Benefit Cost Analyses Framework](#).

- Massachusetts, along with an increasing number of states and jurisdictions, is looking to center energy equity as an overarching goal in the clean energy transition. [The National Energy Screening Project \(NESP\)](#), in partnership with Lawrence Berkeley National Laboratory, is developing a Distributional Equity Analysis (DEA) framework as a companion to the Benefit-Cost Analysis laid forth in NESP’s [National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources \(NSPM\)](#). We encourage the EDCs and the Commonwealth to learn about and seek ways to standardize the implementation of practices laid forth in both the NSPM and the DEA framework, explained in [Chapter 9 of NESP’s Methods, Tools and Resources Handbook](#).



**Non-utility system impacts can be accounted for in BCAs if consistent with the jurisdiction’s policy goals, but inclusion of these impacts in BCA does not provide a measure of equity across target populations.

[Image from NESP Energy Equity and BCA](#)

Recommendation: Establish clear metrics that identify the affordability, health, and economic benefits of these plans to ensure these plans provide the measurable relief communities need.

- Third-party accountability and ownership of the reporting and monitoring of energy burden metrics within the Commonwealth and EJ communities
- Health impact assessments for projects that capture relevant health endpoints and major health-relevant impact pathways
- On affordability, the state or utilities should carry out research that identifies affordability metrics such as household electricity burden, household electricity affordability gap, and others to assess the likely cost burdens that customers will face so that the ESMP's impact can be publicly known and steps to mitigate risk to LMI households can be identified

Recommendation: Monitoring and evaluation of communities pre- and post-implementation to ensure goals are achieved

- Third-party accountability and ownership of monitoring and evaluation of health and equity metrics
- Mechanisms to close gaps if ESMPs do not provide anticipated relief to affected communities

Supporting AEG Boston 23Q3 Attendees and Task Force Volunteers:

[Kathryn Cox-Arslan, New Leaf Energy](#)

[Jonathan Stout, Dana-Farber Cancer Institute](#)

[Jonathan Buonocore, Boston University](#)

[Natalie Hildt Treat, NECEC](#)

[Johannes Epke, Conservation Law Foundation](#)

[Mary Wambui, Planning Office for Urban Affairs \(POUA\)](#)

[Sarah Sweeney, Advanced Energy Group](#)

[Miles Gresham, Neighbor to Neighbor MA](#)

[Caleb Benham, Veregy](#)

[Anthony Buschur, Ameresco](#)

[Audrey Schulman, HEET](#)

For more on this initiative, refer to our [event resource page](#).

About Advanced Energy Group (AEG):

[Advanced Energy Group](#) is a 100% minority-owned business supported by sponsors to design and lead stakeholder engagements that deliver systemic change on energy, equity, and resilience in major cities and vulnerable regions in 12-month sprints.