

Fox, Julia (ENE)

From: Jack Habib <jhabib@keeganwerlin.com>
Sent: Thursday, October 19, 2023 9:50 AM
To: MA-GMAC (ENE); Edington, Aurora (ENE); Fox, Julia (ENE)
Cc: Tiffany Tisler; Cheryl Kimball; Kevin F. Penders; Ashley Marton; Nancy.Israel@nationalgrid.com; 'taylorp@unitil.com'; Davey, Alice
Subject: EDC Second Set of Proposed Metrics for Consideration by Grid Modernization Advisory Council

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Dear Ms. Edington and Ms. Fox:

As you are aware, Fitchburg Gas and Electric Light Company, d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, and NSTAR Electric Company d/b/a/ Eversource Energy (collectively, the “EDCs”), have been working to develop proposed metrics associated with proposals included in their respective Electric Sector Modernization Plans (“ESMPs”), submitted to the Grid Modernization Advisory Council (“GMAC”) on September 1, 2023. The metrics proposed by the EDCs below cover incremental investments and the benefits delivered in the areas of electrification, Distributed Energy Resource (“DER”) enablement, and resiliency. The EDCs previously submitted proposed stakeholder process metrics to the GMAC on October 5, 2023.

In establishing new metrics proposed below, the EDCs follow the principles that a metric must be objective, measurable by the EDC, and within the control of the EDC. Consistent with these principles, the EDCs have achieved alignment in developing the following additional metrics applicable to the incremental investments proposed in their respective ESMPs:

- Using commercially reasonable efforts, the achievement dates of ready for load (“RFL”) for major ESMP infrastructure projects which will be measured from the time the EDC receives: (1) a final, non-appealable order from the Department of Public Utilities (“Department”) approving a cost recovery mechanism applicable to the project; and (2) all required permits and approvals for such projects through final, non-appealable state or federal orders and local permitting processes.
- The percentage of customers covered by/benefiting from incremental resiliency investments outlined in the EDC’s ESMPs.
- The increase in: (a) DER hosting capacity, and (b) load serving capacity by substation demonstrated by an increase in transformer rating installed. This metric will additionally include reporting information specific to environmental justice communities (“EJCs”), stating what percentage of benefits is located in an EJC. This metric will be measured from the time the EDC receives: (1) a final non-appealable order from the Department approving a cost recovery mechanism applicable to the substation project, and (2) for specific projects at the time when all required permits and approvals for such projects are received, including through final, non-appealable state or federal orders and local permitting processes.
- A measure of the greenhouse gas reduction impact of investments enabled in alignment with statewide greenhouse gas reduction targets. This metric will be measured from the time the EDC receives (1) a final non-appealable order from the Department approving a cost recovery mechanism applicable to the investment, and

(2) for specific projects at the time when all required permits and approvals for such investments are received, including through final, non-appealable state or federal orders and local permitting processes. The EDCs have contracted with an expert consultant to analyze the net benefits of each EDC's incremental investments, which will include greenhouse gas reduction analyses. The EDCs welcome input from the GMAC regarding recommended approaches to analyzing and measuring greenhouse gas reduction benefits.

- For the EDC's distributed energy resources management system ("DERMS"), (a) the number of participating sites, (b) the amount (kW) of non-company owned dispatchable assets that the utility can control, and (c) number of instances sites are dispatched. The EDCs note that this metric is already under consideration by the Department as a proposal through 2025 in D.P.U. 21-80, D.P.U. 21-81, and D.P.U. 21-82. The EDCs propose that the metric would continue for incremental DERMS investments in 2026 and beyond.

Lastly, as the GMAC is aware, the EDCs are currently subject to a wide array of metrics associated with various aspects of investments that are currently being pursued outside of their ESMPs. Such metrics have been approved by the Department (or are pending review by the Department). A link to a spreadsheet describing these metrics is provided here, [Pre-existing Metrics for EDCs](#), for informational purposes, and to demonstrate the broad categories of metrics already tracked by the EDCs, or proposed to be tracked, supporting the goals and policies of the Commonwealth established in other proceedings.

Thank you for your attention to this matter.

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