

Stakeholder Comments

Received by MA-GMAC@mass.gov by Thursday June 29, 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. Department of Energy Resources (DOER)
2. Green Energy Consumers Alliance
3. New Leaf Energy
4. Solar Energy Business Association of New England (SEBANE)
5. Office of the Attorney General (AGO)



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June 29, 2023

Feedback on the EDC Draft Proposed Structure for the Electric Sector Modernization Plans

The Department of Energy Resources (DOER) thanks the electric distribution companies (EDCs) for their draft proposed structure for the electric sector modernization plans (ESMPs). The GMAC and ESMP system represent an opportunity for transparent and comprehensive integration of distribution system planning that engages a broad set of stakeholders. At the June GMAC meeting, the Council discussed the draft ESMP outline, invited written comments and anticipates continued review and input at the July GMAC meeting. DOER offers the following preliminary comments and questions on the proposed ESMP outline¹, organized by section below.

Section 1: Executive Summary

- Please include a table of contents with page numbers at the start of each ESMP.
- Sub-section 1.5: What investments will be included in this summary? Is the intention to provide a table with all approved, pending, and new proposed investments?

Section 3: Stakeholder Engagement

- The EDCs are required to hold two technical sessions before filing the ESMPs with the DPU in January. It would be useful for the GMAC to know what timeline the EDCs are planning on for these sessions. DOER encourages the EDCs to provide a timeline for these sessions to the Council, for discussion at the July GMAC meeting.
- Given the various stakeholder groups underway, both at the direction of the DPU and legislature or voluntarily, include in this section a list of ongoing and new proposed stakeholder working groups, with summaries of working group goals, objectives, and timelines, that touch distribution system planning areas.

Section 4: Current State of the Distribution System

- Please include a summary of key challenges facing the distribution system in this section.
- DOER understands that each EDC defines sub-regions in their territories differently. Please be sure to clearly introduce sub-regions and how they are determined and defined as clearly as possible.

¹ Version dated June 1, 2023 and accessible online at <https://www.mass.gov/doc/gmac-prereadesmp-draft-outline/download>.

- Accessibility to ESMPs is important to non-technical stakeholders. In this section, and to the greatest extent possible throughout all sections of the ESMPs, please use plain language that is approachable for non-technical audiences. If there are more technical elements that cannot be explained clearly in plain language, we suggest linking to other technical documents to further describe any needed elements.

Section 5: 5- and 10-year Electric Demand Forecast

- All assumptions behind the EDC forecasts should be clearly described. The EDCs should coordinate this section such that they list similar assumptions (or at least similar categories of assumptions) using the same names and in the same order. Where assumptions differ it would be useful to make that clear as well. Please provide a comparison table for forecasting assumptions across the EDCs.
- DOER recommends adding energy storage as a subsection, highlighting the unique challenges for the technology, including interconnection and operational limitations, but also the potential benefits energy storage could provide, including as a non-wires alternative.
- To strengthen coordinating stakeholder engagement and improving processes for the future, DOER recommends identifying a process to engage stakeholders to ensure forecasts and methodologies are aligned across the Commonwealth (and ISO-NE region) and updated to current technologies and processes and technical potential. Where the EDCs have dissimilar forecasting assumptions or methodologies, this kind of process could help unify forecasting methods.

Section 6: 5- and 10-year Planning Solutions: Building for the Future

- The summary of existing investment areas and implementation plans notes the electric vehicle and energy efficiency programs but no other plans. The EDCs should include other future plans, like grid modernization plans, rate case investments, decarbonization, heating and energy efficiency programs, here in this section.
- Under the “Technology platforms we are implementing” subsection, the EDCs should include a summary of each of the mentioned platforms (AMI, VVO, FLISR, ADMS, DERMS, etc.) and a description of the implementation justification and expected benefits to the EDC, the distribution system, ratepayers, and the Commonwealth.
- Sub-region 1 includes sections on “Alternative cost allocation to interconnect solar projects” and “Alternative cost allocation to interconnect battery storage projects” but no other sections include these sub bullets. Clarify why the EDCs do not include those subsections in the other sections and consider alternative approaches.
- The subsection for sub-regions includes non-wires alternatives. Include plans for integrating demand response, virtual power plants, and flexible resources.
- DOER understands the current ESMP outline does not address data access or availability yet because as the EDCs implement all of the abovementioned technology platforms, data will become an integral component of maximizing the benefits of AMI and other grid modernization investments. The EDCs should include a description of what a uniform statewide data access strategy and process might look like for the Commonwealth. Examples include New York, which has a Distribution System Data Portal that transparently displays the utility system capabilities, needs, limitations, and opportunities for DERs, and developing plans in New Hampshire.

Section 7: 5-Year ESMP

- This section includes a sub-section on “Alternatives to proposed investments”. Describe the EDCs’ plans for integrating demand response, virtual power plants, and/or flexible resources. The EDCs should include an estimate for how many megawatts they expect to manage/defer through alternatives to proposed investments.

Section 8: 2035-2050 Policy Drivers: Electric Demand Assessment

- As noted in Section 5, it’s important that all the assumptions behind the EDC forecasts are clearly described. The EDCs should coordinate this section such that they list similar assumptions (or at least similar categories of assumptions) using the same names and in the same order. Where assumptions differ, the ESMPs should make that clear as well. DOER suggests including a comparison table for forecasting assumptions across the EDCs.

Section 9: 2035 - 2050 solution set – Building a decarbonized future

- In sub bullet 9.1 on “Behind the meter incentive design scenarios”, the EDCs should discuss how they plan to implement building demand response or EV demand management at a greater scale. If available, the EDCs should include any studies or findings on what kind of impact BTM design can have on distribution grid operation on substation deferral.
- To the extent possible, DOER requests the EDCs include a description of their vision to incorporate greater demand response, load flexibility, and DER aggregation for the distribution system as well as near term action plans to enable the vision.
- The EDCs should detail what applications and in what quantity decarbonized gas solutions are incorporated in its planning?

Section 10: Reliable and resilient distribution system

- The EDCs should highlight how they plan to maintain and improve their resilience/reliability in light of climate change and the findings from the Asset Climate Vulnerability Assessment.
- DOER recommends the EDCs include the frameworks and/or processes used in thinking about enhancing resilience and reliability of the distribution system.

Section 11: Integrated gas-electric planning

- Please include a summary of key challenges when considering integrated gas-electric planning.
- Please include a list of ongoing and new proposed work related to gas-electric planning, including stakeholder working groups, with summaries of goals, objectives, near- and mid-term actions, and timelines.

Section 12: Workforce, Economic, and Health Benefits

- To the extent identified, include the barriers for building a workforce capable of building, operating, and maintaining the distribution grid up through 2050. Detail what they are and what actionable solutions are the EDCs considering.
- Detail plans to develop pathways for young talent to enter the distribution system/grid modernization workforce. (Connections with trade school programs, specialized community college certificates, student networks, etc.)
- Detail plans to recruit within EJ communities, including the steps available to provide EJ community members with opportunities to enter this field.

Section 13: Conclusion

- Clearly list all existing and ongoing reporting and metrics requirements for the distribution system in the ESMPs, with references or links to ongoing reporting processes. The EDCs should coordinate this section such that they propose a list of metrics and reporting requirements that are similar using the same names and in the same order to the greatest extent possible.

DOER looks forward to further discussions with GMAC members, the electric distribution companies, and other interested stakeholders as the ESMPs are developed and finalized for submission to the Department of Public Utilities.

Signature,

A handwritten signature in black ink, appearing to read "Elizabeth Mahony", with a long horizontal flourish extending to the right.

Elizabeth Mahony

Commissioner

Massachusetts Department of Energy Resources



June 27, 2023

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

Re: Comments on Electric Sector Modernization Plans (ESMP)

Dear Commissioner Mahony and Grid Modernization Advisory Councilors:

Green Energy Consumers Alliance appreciates the work of the Council on the critically important effort to ensure that the Commonwealth's electric grid will contribute to climate change solutions that will enable Massachusetts to equitably meet its ambitious decarbonization goals. Our comments on the ESMP outlines are as follows:

Community Engagement:

Green Energy strongly supports comments of the Barr Foundation and participants in the June 15 meeting that community engagement—specifically outreach to and input from municipalities—is a critical aspect of this work. We also agree with the posted comments by the Barr Foundation dated June 9.

Municipalities and Aggregation:

Municipalities have much to contribute to grid modernization, and should be recognized as important partners in this effort. Many cities and towns have been using Green Communities and Municipal Vulnerability Preparedness grants to increase energy efficiency and prepare for climate change impacts. Frequently these activities include grid-related items such as development of a microgrid to provide shelter and keep the municipal campus running. Some have developed innovative proposals to switch low and moderate-income households to solar power and heat pumps. Municipalities also know and regularly reach out to their citizenry, particularly including middle- and low-income residents and environmental justice communities.

Another critically important aspect of municipalities' involvement concerns Municipal or Community Choice Aggregation of power purchasing on behalf of a jurisdiction's electric consumers. A large and growing number of consumers in Massachusetts obtain their power supply from Municipal Aggregations, which offer greater price stability and increased use of renewable resources. Green Energy Consumers has documented the financial and environmental superiority of aggregation over Basic Service and so we

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believe that grid modernization policy should be designed to enhance, not detract, from aggregation. We see excellent synergies between aggregation and grid modernization.

Transportation:

We agree with the Barr Foundation’s comment with respect to 8.2 that the outline should explicitly cover medium- and heavy-duty vehicles, especially transit buses and school buses.

Regarding 9.1.2, the outline now reads, “: Electric vehicle charging demand management scenarios and associated preliminary incentive designs (discussion of both \$/kW incentives to attract participation and ongoing c/kWh incentives to subsidize O&M especially in targeted EJ communities).” We disagree with that framing and some of the comments made by EDCs in GMAC meetings. There is obviously a strong rationale to offering \$/kW incentives for managed charging. In our view, the values of the per kW and per kWh incentives should be as large as possible for all consumers to incentivize rapid and large-scale adoption without causing a cross-subsidy from non-EV owners to EV owners. An incentive per kWh to charge off-peak should not be automatically assumed to be a cross-subsidy if it is calibrated to reflect a lower cost of service.

We submitted testimony on this issue in dockets 21-90 and 21-91 and can provide further information upon request. To be clear about the need for per kWh incentives, Green Energy Consumers does not believe that it is wise to depend upon MOR-EV purchase rebates as the primary tool for encouraging EV adoption. Funding for MOR-EV will never be sufficient and it should be targeted to LMI consumers. Furthermore, it is not apparent that the Commonwealth will be able to achieve its economy-wide 2030 greenhouse gas target of 50% unless we surpass the transportation electrification target now in the Clean Energy and Climate Plan. Challenges in the building and electricity sectors should cause us to be more aggressive in transportation.

Buildings:

Section 9.4 references decarbonized gas solutions, listing geothermal, hydrogen, and renewable natural gas. Geothermal should definitely be considered, but that is not a decarbonized gas solution. Geothermal ought to be covered in Section 8.1. More importantly, Green Energy Consumers strongly opposes the mixing of hydrogen and renewable natural gas into the pipeline distribution system. Both of those sources are wildly expensive and have dubious greenhouse gas emission benefits to put it mildly. And hydrogen is unsafe. There are going to be sensible uses of hydrogen in industrial applications but, in those cases, the implications for grid modernization would be very small relative to many other issues to consider in the ESMP.

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Granularity and Statewide Coherency:

On one hand, we would continue to see granular projections looking at issues at the local level, rather than just at the EDC level, particularly in areas that show some indication today of reaching critical points with respect to DER adoption or distribution system maintenance. On the other hand, we encourage the EDCs to look for ways to formulate similar policies and programs whenever possible. From the consumer's perspective, we assert that the Balkanization of utility programs impinges on the adoption of energy efficiency and DERs. The Balkanization we have today has made consumer education far more difficult than necessary.

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

Sincerely,

A handwritten signature in black ink that reads 'Larry F. Chretien'.

Larry Chretien, Executive Director



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

New Leaf appreciates the opportunity to provide comments on the Electric Sector Modernization Plan (“ESMP”) outline provided by the Electric Distribution utilities. The outline contains the major elements as required under last year’s Climate Law. New Leaf Energy provides the following additional recommendations to improve the comprehensiveness of the document and the ease of use for stakeholders. We appreciate that much of this may already be in the EDC’s more detailed plan for the completion of the ESMPs but nonetheless want to highlight some desired ESMP components from the perspective of a DG Stakeholder.

- **Section 1.0 5-year Electric Sector Modernization Plan Investment Summary**

We recommend that the EDCs include with the high level summary of investment requests in this section cost estimates and timelines. Full detail of the investment requests with detailed cost estimates and bill impacts should be included in Section 7.0 following explanation of the current state of the Distribution System, compliance with 2022 Climate Act, and forecasting results.

- **Section 4.0 Current State of the Distribution System**

The EDCs have proposed a description of some critical attributes of each subregion. As one of the drivers of the ESMPs is DER enablement it would be helpful for the EDCs to describe in 4.2.4 DG installed and pending (including ongoing group studies within that planning region) and similar information for EVs. It would be helpful for the EDCs to incorporate in each subsection some key metrics. For example, the EDCs could provide some interconnection queue metrics including installed, pending, and withdrawn requests to capture historic DER interest in that sub-region. As a component of this section or 4.2.5 the EDCs should summarize existing substation transformer and feeder hosting capacity.

- **Section 5.0 5- and 10- Year Electric Demand Forecast**

New Leaf agrees with the recommendations made by the Coalition for Community Solar Access (CCSA) regarding breaking down the forecast for PV and battery systems separately. Presumably this section may also represent solar and battery projects presently in queue that will be operational within the 5 year period. The EDCs should provide sufficient insight into how the solar and battery growth components were derived and how they correspond with the current interconnection queue.

- **Section 6.0 5- and 10-Year Planning Solutions**

For each subregional infrastructure project or alternative please include an itemization of benefits. One recommendation to improve the readability of the document is to create a

standardized table that identifies the solution or alternative impact on ESMP drivers such as reliability, resiliency, electrification capacity needs, DER enablement with some relevant metrics. This will improve stakeholders' understanding of the tradeoffs for each option and attribute.

We also recommended that for each sub-region the EDC's identify required enabling transmission infrastructure with cost estimates, indication of expected cost recovery process, and estimated implementation timeline for those investments. For transmission infrastructure investments already proposed in Local System Plans, provide the current status and estimated implementation timelines.

- **Section 6.3 Technology Platforms**

The implementation of technology platforms represent critical milestones for the modernization of the grid, the timeline to integrate Distributed Energy Resources, and the optimization of 5, 10, and outer year infrastructure portfolios. New Leaf recommends that the EDCs specifically include a timeline that details the development and full implementation and integration of these platforms within the ESMP.

- **7.0 5-Year Electric Sector Modernization Plan**

We expect that this section is likely to be detailed and will comprise much of the request for approval to the Department of Public Utilities in regards to specific infrastructure upgrades and rate recovery treatment for the initial 5-year period. If this section is intended to identify specific investment requests for Department approval, it should include at a minimum, (1) a detailed description of the investment, including projected cost, equipment, permitting and licensing requirements, and construction timeline, (2) projected bill impacts; (3) any associated proposed tariffs or revised existing tariffs (4) a detailed description of how the investment will benefit ratepayers and aligns with cost-efficiently meeting the Commonwealth's clean energy policies; and (5) explanation of how the investment will affect low-income and environmental justice populations, including describing any projects that will be constructed in an environmental justice neighborhood.

If the EDCs are proposing alternative finance mechanisms in section 7.1.2 to allocate costs to specific types of customers¹ they should include their proposed methodology, any rate calculation formulas and supporting tariffs as applicable.

This section should also identify and describe required enabling transmission infrastructure with cost estimates, indication of expected cost recovery process, and estimated implementation timeline for those investments.

- **8.0 2035-2050 Policy Drivers: Electric Demand Assessment**

¹ For example interconnection customers receiving service pursuant to the EDC Standards for Interconnection Distributed Generation including simplified, expedited, and standard process customers.

It would be helpful to understand the intention of the offshore wind forecast section and its impact on the ESMP. New Leaf agrees that visibility into current projections for utility-scale resources of all types would be helpful within this document but has a concern that these may quickly stale depending on the outcome of interconnection queue churn, procurements, and legislation and potentially singularly focused on offshore wind. What may be most helpful in this section or Section 9.0 would be the currently projected resource mix and enabling transmission upgrades or bottlenecks, whether identified in the ISO New England 2050 Transmission Study or otherwise, and any outer year investments the EDCs envision they will need related to building, transportation, DER and the timeline they anticipate for those infrastructure investments.

- **Mapping/Visualization**

The EDCs should incorporate regional or sub regional maps where possible to help stakeholders understand the geospatial impact and relationships between various forecast and plan drivers. The heat maps the EDCs presented at the May 2023 GMAC meeting to visually illustrate their forecast results were beneficial for this purpose. Subregional versions of these could benefit local stakeholders to better understand the relevance of specific forecasts or proposed infrastructure upgrades.

I would be happy to answer any questions or expand upon any of these recommendations at our next GMAC meeting and look forward to continued collaboration.

Yours Sincerely,

Kathryn Cox-Arslan

Director, Transmission Policy & Strategy
New Leaf Energy
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June 28, 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 ESMP outline and the prioritization by the GMAC, DOER, and EDCs of stakeholder feedback in the development of plans that are integral to the decarbonization of the Commonwealth's electric grid. On behalf of the Solar Energy Business Association of New England ("SEBANE") and our 86 member companies, we offer the following comment related to the Electric Sector Modernization Plan outline.

The ESMPs require clarity in the area of cost recovery including how costs may be allocated to solar customers as one of many potential funding mechanisms. SEBANE requests the EDCs distinguish in Section 7.0 any specific cost recovery treatment related to DER and establish a consensus-based methodology and fee structure in the ESMP. This would include EDC proposals for system modification cost recovery for simplified, expedited, and standard project sizes and a proposed tariff for implementation.

In past DPU proceedings SEBANE and other stakeholders have identified the need to solidify cost allocation mechanisms so that interconnecting customers can pay an appropriate share for infrastructure upgrades as one of the many beneficiaries and users of the electric grid. SEBANE and industry members have previously vocalized support for some form of common system modification fee to contribute to upgrade costs for secondary transformers and circuit upgrades that would allow entire neighborhoods to electrify¹. Resolving this challenge is a significant opportunity area for the 5-year ESMP. As the GMAC may be aware interconnection costs can be prohibitive for solar projects across the Commonwealth. The Provisional Program and Capital Improvement Projects proposed by National Grid and Eversource have partly addressed how to enable capacity for rooftop solar but not how its paid for affordably. The majority of pending Capital Improvement Projects fees approach or exceed \$500/kW-AC which can potentially be applied to any project greater than 15kW². This presents a challenge for solar installation across the state, especially in the built environment where these \$/kW fees and needed upgrades are a signal of areas where residential and commercial solar installation may not be possible. The EDCs should include in Section 7.0 the entirety of their proposed ratemaking treatment and fees for all customer types.

Please contact us if you have any questions or if SEBANE can be of any assistance to the GMAC.

Sincerely,
Nick D'Arbeloff
Solar Energy Business Association of New England

¹ In addition to comments provided in MA DPU 20-75 the EDCs and GMAC can consider the pending reform in Connecticut in docket 22-06-29 in addition to activities in New York, California, and Minnesota as they consider cost allocation treatment for small system sizes.

² From CIP Tariff: "any Interconnecting Customer whose DG Facility, regardless of facility type or installation location, is located in the CIP Area and is greater than 15 kW on a single-phase circuit or 25 kW on a three-phase circuit. A CIP Fee Customer will be assessed a CIP Fee."





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June 29, 2023

Re: *Grid Modernization Advisory Council*

In addition to the comments offered during the June 15, 2023 Grid Modernization Advisory Council (“GMAC”) Meeting, the Office of the Attorney General (“AGO”) submits the following written comments in response to the Electric Sector Modernization Plan (“ESMP”) outline proposed by the electric distribution companies (“EDCs”). The following comments are not meant to be exhaustive, nor do they include every issue that the AGO may address now or in the future in connection with the development of the ESMPs.

Stakeholder Outreach and Engagement

Section 3: During the June GMAC meeting, the EDCs acknowledged that this type of effort to engage stakeholders is new to the EDCs. The ESMPs should include a discussion of how the EDCs will ensure that they are utilizing best practices with regards to engaging stakeholders (*e.g.*, by hiring professionals or experts in stakeholder outreach, rather than tasking non-experts with trying their best). Sub-section 3.4 or 3.5 should also include a discussion on how the EDCs will explain the specific ways that input from stakeholders affected their filing (or why it did not). This could be referenced in Section 3 and then a full discussion of the input received and what the EDCs did with that input could be attached as an Appendix.

Section 4: For 4.2.8 (siting and permitting), the EDCs should discuss how they will engage local community-based groups and residents of potentially impacted communities (to ensure that proposals are informed by local knowledge and an understanding of perceptions of localized impacts) and how they will make sure that they employ best practices.

Demand-Side Management (“DSM”)

Sections 6, 8, 9: The outline should more proactively address how the EDCs plan to use DER and other demand side management strategies to forestall and reduce capital spending. While there are some references to DSM (*e.g.*, Section 6.5.2 Non-Wires Alternatives; Section 8.1.4 Demand Response Scenarios), this critical component of electric distribution planning is not a central focus, nor is it emphasized at any point in the outline. DSM should be discussed in the 5 and 10 year planning horizon (Section 6, 5- and 10-year Planning Solutions) as well as in the longer term horizon (Sections 8 and 9 cover 2035-2050). In connection with managed charging specifically,

research indicates that transportation electrification with unmanaged charging will be significantly more expensive than with managed charging. State, federal, and private investment in EVs and EV charging infrastructure will be significant in the near-term horizon and EV adoption is expected to increase; waiting until 2035 to actively pursue managed charging may lead to unnecessary and costly grid investments. Incentivizing peak demand reduction in the near term should be a priority.

Cost Concerns

The statute makes clear that the GMAC should encourage “least-cost investment” in the ESMP and also should “maximize net customer benefits and demonstrate cost-effective investments ...”. G.L. c. 164, §92C(b). In order to facilitate the GMAC’s work on this front, the ESMP outline should include a discussion of costs, rate impacts and customer benefits. The ESMP should also identify where the EDCs believe it is necessary to seek approval for additional investments beyond those investments that have already been approved, what the costs are for those additional investments, and why the EDCs believe those costs should be treated as “incremental.”

Transmission System Investments

G.L. c. 164, §92B(a) states: “The department shall direct each electric company to develop an electric-sector modernization plan to proactively upgrade the distribution and, where applicable, transmission systems...” The statute additionally directs the following: “An electric-sector modernization plan developed pursuant to subsection (a) shall describe in detail each of the following elements: (vi) improvements to the transmission or distribution system to facilitate achievement of the statewide greenhouse gas emissions limits under chapter 21N.” G.L. c. 164, §92B(b)(vi).

The statute clearly contemplates transmission as an overall part of the ESMPs. The EDCs’ outline does not include transmission system upgrades. At minimum, the ESMPs should include information about any transmission upgrades that may be triggered by or may be needed to support the ESMP-related distribution system upgrades. The inclusion of transmission is critical for stakeholders to be able to understand the full scope of the investments proposed as part of the ESMPs.

Sincerely,

/s/ Elizabeth A. Anderson

Elizabeth A. Anderson
Assistant Attorney General
GMAC Member