

**Cape Light Compact JPE
Executive Committee &
Governing Board Meeting**

DATE: Wednesday, June 5, 2024
LOCATION: Cape Light Compact Offices – Martha’s Vineyard Conference
Room: 261 Whites Path, Unit 4, South Yarmouth
TIME: 2:00 – 4:30 p.m.

Note: The meeting will be held as a hybrid meeting (in-person and through remote participation) pursuant to St. 2023, c. 2, which, among other things, extends the temporary provisions pertaining to remote meetings of public bodies under the Open Meeting Law to March 31, 2025. Members of the Public can join in by audio and follow along with Meeting Materials, see the information below. Written public comments should be submitted to Maggie Downey, Compact Administrator, at mdowney@capelightcompact.org by 2:00 PM on Tuesday, April 9, 2024, and should follow the public comment protocol below. Written public comments received after the April 9th deadline will be distributed prior to the Compact’s next Board meeting.

Telephone dial-in: +1 (646) 558-8656

Meeting ID: 862-8965-7502

Passcode: 390856

AGENDA

1. Public Comment
2. Approval of May 8, 2024, Open Session Minutes
3. Chairman’s Report, Martin Culik
4. Discussion on Upcoming Cape & Islands Chapter of the Sierra Club of Massachusetts Off Shore Wind Rally in Barnstable on June 15, 2024, Mallorie Barber, Sierra Club Member Volunteer
5. Discussion and Potential Vote to Authorize the Compact Administrator to Request Issuance of an Irrevocable Standby Letter of Credit for the USDA Rural Utilities Service (RUS) Rural Energy Services Program (RESP), Maggie Downey
6. Presentation/Discussion on the Compact’s 2023 Plan Year Energy Efficiency Report, Miranda Skinner
7. Presentation and Discussion on the Massachusetts Energy Saver Home Loan Program, Dan Schell
8. Continued Discussion and Potential Vote on Development of Recommendations to the Massachusetts Energy Efficiency Advisory Council (EEAC) on the Massachusetts 2025-2027 Energy Efficiency and Decarbonization Plan, Margaret Song
9. Discussion and Potential Vote to Increase the Threshold of Requiring Board Approval on Municipal Projects from \$150,000 to \$300,000, Briana Kane
10. Administrator’s Report, Maggie Downey
 - A. Brief Update on Eversource Electric Sector Modernization Plan, DPU 24-10
 - B. Cape Cod Commission One-Cape Summit, September 18-19, Wychmere Beach Club in Harwich
 - C. July 2024 – January 2025 Power Supply Rates
 - D. Next Board Meeting: July 10, 2024

Board Member Update (Reserved for Updates on Member Activities the Chair Did Not Reasonably Anticipate Would be Discussed – No Voting)

Cape Light Compact Public Comment Protocols
for Governing Board Meeting
(June 2023)

The Cape Light Compact Governing Board has adopted the following protocols to assist the public in effective participation in its Governing Board meetings, where some Board Members, staff and members of the public may be participating remotely:

1. Members of the public are welcome to address the Compact Board during the public comment section of the meeting or in writing.
2. Members of the public addressing the Compact Board at the meeting must state their name, and if appropriate the name of the organization the person is representing. Oral comments must be limited to three minutes.
3. Members of the public may also submit written comments. Written comments shall be submitted in writing to the Compact Administrator, Maggie Downey, at mdowney@capelightcompact.org by 2 p.m. on the Tuesday before a scheduled Compact Governing Board meeting (or such other time as may be established by the Compact Administrator). Written comments must include a person's name and, if appropriate, the name of the organization the person is representing. Public comments received after the deadline will be distributed prior to the Compact's next Board meeting.
4. Members of the public addressing the Compact Board may not use fighting words, slander, unreasonably loud or repetitive speech, or speech so disruptive of the Compact Board meeting that the deliberative process is substantially interrupted or impaired. Speakers may not disrupt others. Speech must be peaceable and orderly.
5. All written public comments submitted in advance consistent with these protocols shall be included in the Compact's Board meeting packet.
6. Board members and staff cannot respond to public comments for topics not on the current agenda during the Board meeting. The Cape Light Compact Board may respond to comments either by putting them on the agenda of a subsequent meeting or by requesting the administrator or staff to respond to the comment.
7. Copies of the Board meeting packet will generally be made available to members of the public in advance of the meeting at the Cape Light Compact JPE's web site at www.capelightcompact.org Documents exempt from disclosure pursuant to the Public Records Law or protected by the attorney-client privilege shall not be included.

**Cape Light Compact JPE
Governing Board
Meeting Minutes
Wednesday, May 8, 2024**

The Cape Light Compact JPE Board of Directors met on Wednesday, May 8, 2024, at 2:00 p.m. The meeting was held as a hybrid meeting (in-person and through remote participation) through a Zoom videoconference for members of the Board with audio call-in available for members of the public, pursuant to St. 2023, c. 2, which, among other things, extends the temporary provisions pertaining to remote meetings of public bodies under the Open Meeting Law to March 31, 2025.

Participating In-Person Were:

1. Robert Schofield, Executive Committee, Bourne
2. Gary Senecal, Eastham Alternate
3. Valerie Bell, Harwich
4. Martin Culik, Chair/Executive Committee, Orleans
5. Bob Higgins-Steele, Truro Alternate
6. Suzanne Ryan-Ishkanian, Wellfleet
7. Joyce Flynn, Vice Chair/Executive Committee, Yarmouth

Participating Remotely Were:

1. David Anthony, Secretary/Executive Committee, Barnstable
2. Bill Doherty, Bourne Alternate
3. Colin Odell, Executive Committee, Brewster
4. Brian Miner, Chatham
5. Alan Strahler, Edgartown
6. Matthew Patrick, Falmouth
7. Wayne Taylor, Mashpee
8. David Jacobson, Orleans Alternate
9. Nathaniel Mayo, Provincetown
10. Leanne Drake, Sandwich
11. Nicola Blake, Executive Committee, West Tisbury

Absent Were:

1. Forrest Filler, Aquinnah
2. Timothy Carroll, Chilmark
3. Brad Crowell, Dennis
4. Meghan Gombos, Dukes County
5. Tom McNellis, Eastham
6. Peter Meleney, Oak Bluffs
7. Russ Hartenstine, Tisbury
8. Jarrod Cabral, Truro

Legal Counsel Participating Remotely:

Erin O'Toole, Esq., KO Law, P.C.

Staff Participation In-Person:

Margaret Song, Energy Efficiency Strategy and Policy Manager

Staff Participating Remotely:

Anneliese Conklin, Data Analyst
Briana Kane, Residential and Commercial & Industrial Program Manager
Dan Schell, Senior Analyst - Retail and Demand Response
Miranda Skinner, Strategy and Regulatory Analyst
Melissa Allard, Senior Administrative Coordinator
Meredith Miller, Senior Analyst – Income Eligible
Phil Moffitt, Chief Financial Officer
Stephen McCloskey, Analyst - Home Energy Services
Tatsiana Nickinello, Energy Efficiency Analyst

Public Participants:

None.

Martin Culik called the meeting to order at 2:00 PM.

Public Comment:

No written comments were received in advance of the meeting and no members of the public were present for public comment.

APPROVAL OF MINUTES:

The Board considered the April 10, 2024 Open Session Meeting Minutes.

Nicola Blake stated that she was listed as both absent and a remote participant. She stated that she was participating remotely and should be removed from the absent list.

Robert Schofield moved the Board to accept the minutes as amended and to release them, seconded by Valerie Bell.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Gary	Senecal	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Matt	Patrick	Falmouth	Yes
Valerie	Bell	Harwich	Yes
Wayne	Taylor	Mashpee	Yes
Martin	Culik	Orleans	Yes
Nate	Mayo	Provincetown	Yes
Leanne	Drake	Sandwich	Yes
Bob	Higgins-Steele	Truro	Yes
Suzanne	Ryan-Ishkanian	Wellfleet	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (15-0-0)

Brian Miner joined the meeting at 2:20PM.

PRESENTATION AND CONTINUED DISCUSSION ON THE MASSACHUSETTS 2025-2027 ENERGY EFFICIENCY AND DECARBONIZATION PLAN, MARGARET SONG:

Margaret Song reviewed the 2025-2027 Energy Efficiency Plan April Draft Update PowerPoint. She stated to recap last month's discussions, the Board supported the Compact enhanced call center, the Compact oversight of our Community First Partnership rather than a statewide oversight, and the HEAT loan adjustment. She stated since the last Board meeting, the Energy Efficiency Advisory Council (EEAC) asked for more detail on the commercial and industrial (C&I) sector in general and for decarbonization in the C&I sector specifically. She stated that as a reminder the Compact supports decarbonization for our commercial customers; however, the majority of our demographics are residential. Therefore, that has been the Compact's primary focus. She stated that another thing is that many of the large commercial buildings are served by natural gas and that the economics for decarbonizing these buildings is currently not favorable. She stated that the EEAC noted there was strong commitments to equity, but more work is needed to assess if it meets EEAC's priority of working toward distributive justice. She stated that statewide, people were focusing on the minimum in terms of the low-income budget allocation. The Compact is proposing that 25% of the residential budget be allocated for low-income customers and the statutory minimum is 10%. She stated lastly the EEAC noted that more work was needed to assess 2025-2027 Energy Efficiency Plan (Plan) costs and potential reductions.

Alan Strahler asked if the Compact will be responding to the EEAC. Margaret Song answered yes. She stated that staff wanted to make sure that the Plan aligns with the Board's priorities. She stated that the Board has been very clear in their support. She stated that if there are specific comments that the Board would like to make there is time to do so until June 7th. Martin Culik stated that there have been two EEAC public comment meetings and there is one more to go. He stated that because comments need to be submitted by June 7th, we are looking to move the Board Meeting to June 5th instead of the 12th. The Board is fine with moving up the next Board Meeting to June 5th.

Valerie Bell stated that on the bill impacts, when this information goes out to the towns, that is going to be the burning question on how this will impact their bills. Margaret Song stated that residential customers will see the the biggest impact. Valerie Bell stated that we will not only be seeing an impact from the Plan but also based on the rates we negotiate for power supply. She asked will customers be able to go to the website and see how their bills will be impacted as we get closer to finalizing? Margaret Song answered yes. She stated that soon we will have a better understanding of outside funding and distribution rates. She stated that the power supply rates will have to be estimated.

Nicola Blake asked if there was any component that addresses smart metering and encourages smart metering, especially for future customer usage. Margaret Song stated that there is a separate DPU proceeding that is going on regarding electric modernization. It is looking at what is going on with smart metering and what improvements would need to be made to infrastructure. She stated that Mariel Marchand has been monitoring that and adding in commentary or questions in terms of how it will affect us. She stated that she will send along a link to the Board where they can find all this information and follow along with the proceedings.

Colin Odell stated that traditionally, the income eligible energy efficiency surcharge (EES) was blended in with the residential, but now it is broken out, with 25% of the residential budget now going to income eligible

programs. He asked is there going to be a chance of producing the income eligible savings, in a way that's going to be palatable politically to get the plan approved. He stated that it seems like it may be something that is going to be a hurdle down the road that we need to be planning for.

Martin Culik stated that during last month's Board Meeting it was talked about how the Compact was going to support an off-Cape trade School. He asked if we have trade schools on the Cape. Briana Kane stated that she was talking about how one of the other Program Administrators (PAs) and their workforce development efforts. Martin Culik asked if the Compact was working with our local trade schools. Briana Kane stated that we do try to reach out as much as possible to our local trade schools, but we don't have an active offer going with them. She stated that another PA had procured some heat pumps and provided that to the HVAC school for training opportunities. Martin Culik stated that it sounds like there is an opportunity and maybe something the Board Members can help with. Briana Kane stated that she would be happy to have any help and that Board Members can reach out to her with any information.

UPDATE ON CAPE LIGHT COMPACT MARKETING ACTIVITIES, JASON BERTRAND:

Jason Bertrand reviewed the Cape Light Compact Marketing Update PowerPoint. He stated that in 2023, across five successful campaigns, Cape Light Compact paid media earned over 30.7 million impressions, 1.5 million total complete listens and emails opened, and 92.3 thousand clicks to Compact and Mass Save websites. He stated that also between April and December of 2023, the Cape Light Compact website saw 100,836 sessions from 78,596 users, an 84% increase in sessions, 112% increase in users, and 25.67% increase in engaged sessions across the site compared to 2022.

Jason Bertrand stated that the focus for 2024 is to position Cape Light Compact as the go-to energy efficiency resource for the Cape and Vineyard for both residential and business customers, as well as optimize paid media to build on the success of 2023's marketing campaigns. He stated that the Compact is also looking to develop new video. He stated that they are looking to create two video ads.

Jason Bertrand stated that what the Compact does is just one small piece of the overall energy efficiency marketing. He stated there are statewide brand and marketing agencies contracted by discipline such as paid search, Google display network, digital and social, emails, and print advertising.

Jason Bertrand reviewed the Compact's organic marketing. He stated that there are the monthly newsletters, which right now we have 4,300 subscribers and a 50% open rate. He stated there is also social media. The Compact uses Facebook, Instagram, Twitter, and LinkedIn. He stated that the Compact also does press releases for larger program announcements. He stated that the Compact just sent one out for the E-Bike incentive program, and it got picked up by the Cape Cod Times.

Jason Bertrand stated that print, paid social, and some digital creatives are rotated monthly to keep content fresh and seasonally appropriate. He stated that February through March is when we run our general energy efficiency brand awareness campaigns and then mix in some advertising for weatherization and home energy and business assessments. For April and May the focus is lawn equipment and appliance rebates. He stated for June it is appliance rebates and general energy efficiency and then general energy efficiency throughout the rest of the summer. He stated that September and October the focus comes back to weatherization to help customers better prepare their homes for winter. He stated that for November and December there will be a big push for heat pumps. Colin Odell stated that the Compact should also push heat pumps in the summertime. He stated that if someone has an air conditioner failure and they replace their air conditioner with a new one instead of a heat pump, we have lost them for 15 to 20 years. He stated that the Compact should create a specific ad that states if

the air conditioner fails, consider putting in a heat pump. Dan Schell stated that as mentioned earlier in the PowerPoint, in addition to what we have in our schedule there is also statewide marketing layered on top of this and we are pushing heat pumps heavy throughout the summer. He stated that he thinks that messaging is a great idea that staff can bring back to the statewide campaigns. He stated that it does not make sense for us to buy the same ads and be pushing out the same stuff.

Jason Bertrand stated the Compact has paid marketing strategies. The Compact has paid social media advertising that runs throughout the year. He stated that the Compact also has ads on the radio on the Cape and Martha's Vineyard. He stated that the Compact likes to stay in the newspapers and that they are great partners. He stated that the Compact also sets money aside for placing additional ads like Council on Aging newsletters or Cape Cod Life magazine. He stated that there is a big push for digital advertising this year which includes social media, Digital ads on CapeCod.com, mvtimes.com, capecodtimes.com, and patch.com, paid newsletters, Google display network, and direct email.

Jason Bertrand stated that there are some other marketing projects that didn't fit under the other sections. There are the mailers we send out to businesses to share information about the Main Street initiative. He stated that there are dehumidifier turn-in events coming up in June. For that we have paid social media and radio ads. He stated that there is also advertising in the Cape Cod Climate Change Collaborative newsletter every month. He stated that the Compact is also doing a lot of community outreach, specifically, to the chambers. He stated that he sends an e-mail every month with relevant business programs. Also, sending updated program materials to libraries and senior centers. The Compact also does presentations and event tabling. He stated that as for the website update, he did receive several quotes and is working with Dan Schell to put together an RFP which should be done by the end of May. He stated that if all goes well the new site should be launched by the end of the year or beginning of 2025.

Valerie Bell stated that the main message is efficiency, and she asked if the Compact should start putting out messaging about decarbonization and climate change. Dan Schell stated that it is something we are working on. He stated that one of the services we offer statewide is the heating and cooling consultations and as part of that discussion there was originally talk about transitioning that to decarbonization consultations. He stated that the discussion then considered what is appropriate language we should be using. For a lot of customers, it may not be energy efficiency, rather it is decarbonization. He stated that the question is whether it is customer friendly and understandable language that we should be using for the general public. He stated that we are assessing but are certainly moving in that direction. Suzanne Ryan-Ishkanian stated DOER has been pushing the decarbonization word and also, her committee has started using it. She stated that it would be great to have that kind of consistency. Dan Schell stated that the Compact's marketing vendor did focus groups on the decarbonization piece and found that that word doesn't really mean much to the general public. He stated that the alternative question is what would mean something to them and what is the word.

Matt Patrick asked if anyone follows up with customers after their assessment to get the recommendations done. Dan Schell stated that we have not had much of an issue with uptake of heat pumps. The Compact has not had an issue with hitting its goals. Briana Kane stated on the weatherization side the specialist that completed the assessment will reach out to see if the customer would like to move forward with the weatherization recommendations. Margaret Song stated that in the Plan, the Compact is introducing a turnkey model to help the customer from start to finish. Matt Patrick stated that he believes it is important we follow up with the customers who we don't hear from and see if they are in need of help. Margaret Song stated that she thinks that's very valuable, and we will certainly take that to heart. She stated that she also encourages Board Members to always send customers that they are getting questions or comments from, to Compact staff.

Valerie Bell asked if National Grid will ever be promoting heat pumps. She stated that she did not understand how National Grid gets money back from the state for promoting heat pumps and how that covers their costs as natural gas consumption reduces. She asked if that is how we are getting them to let go. Margaret Song answered yes, it's called decoupling. She stated that the DPU has stated that at some point we need to examine the role of natural gas companies, but right now there is not an answer to that question. Valerie Bell stated that contractors are resistant to installing heat pumps in customers' homes that have gas because it is difficult to justify financially. She stated that is where the decarbonization or climate aspect may work to get someone to make the switch.

ADMINISTRATOR'S REPORT:

1. USDA Rural Utilities Service (RUS) Loan Through the Rural Energy Services Program (RESP), Solar Loan Program

Margaret Song stated that the contract documents came in for the USDA Rural Utilities Service (RUS) Loan and Maggie Downey will sign and execute that contract when she comes back from vacation. She stated that Maggie Downey does have some meetings scheduled later in the month to go over the details. She stated that the tentative launch is September.

Margaret Song stated that MA Department of Energy Resources announced that it has received federal funds for a low-to-moderate-income solar loan program, called Solar for All. She stated that the goal is to work with the state this summer to help finalize the details so that we are in alignment. She stated that we want to make sure we direct the customer to the program that is best for them. Martin Culik stated that Solar for All is a federal funded for low-income customers. Margaret Song stated that it possibly includes some moderate-income customers as well.

ADJOURNMENT:

Motion to adjourn made at 3:42 PM moved by Robert Schofield, seconded by Valerie Bell.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Brian	Miner	Chatham	Yes
Gary	Senecal	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Matt	Patrick	Falmouth	Yes
Valerie	Bell	Harwich	Yes
Wayne	Taylor	Mashpee	Yes
Martin	Culik	Orleans	Yes
Nate	Mayo	Provincetown	Yes
Leanne	Drake	Sandwich	Yes
Bob	Higgins-Steele	Truro	Yes
Suzanne	Ryan-Ishkanian	Wellfleet	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (16-0-0)

Respectfully submitted,

Melissa Allard

LIST OF DOCUMENTS AND EXHIBITS:

- Meeting Notice/Agenda
- May 10, 2024, Draft Open Session Meeting Minutes
- 2025-2027 Energy Efficiency Plan April Draft Update PowerPoint
- Cape Light Compact Marketing Update PowerPoint

Draft Minutes subject to correction, addition and Committee/Board Approval

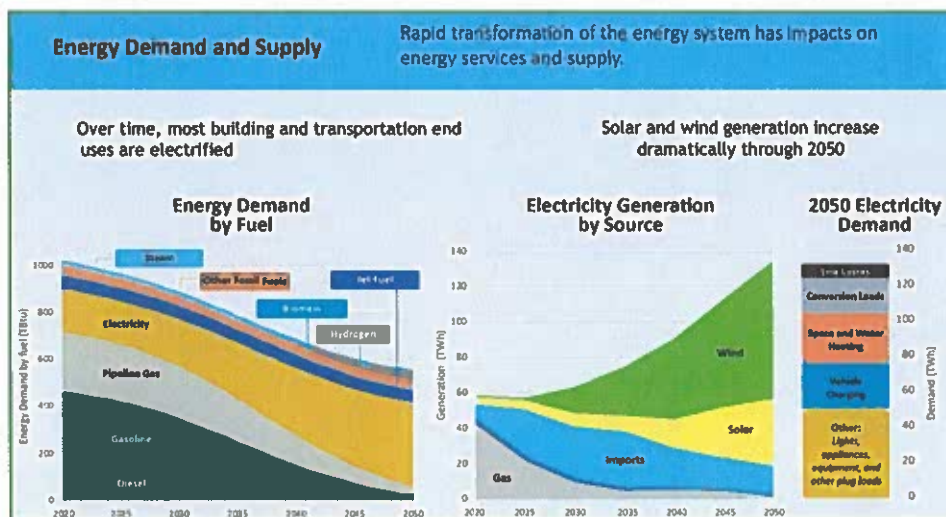
MA is Ready for Offshore Wind

INTRODUCTION

Massachusetts is ready for offshore wind. We believe that through responsible development and authentic community engagement that empowers community members, we can aid and accelerate the transition to renewable energy. This will take advocacy from all levels, and it starts with awareness. This information sheet is designed to get you started with the information you need to understand the issues and begin the conversations. Each one of us has the power to add to our collective voice and move our communities toward equitable, just wind power.

WHY WIND?

Our state has seen the impacts of climate change through increasing heat, pollution-driven health impacts, infrastructure damage from flooding, coastal flooding, and natural resource degradation. These trends will continue to get worse [source]. In alignment with the state's 2050 Decarbonization Roadmap, we must shift off fossil fuels across all energy sectors to stop climate change and roll back pollution in our communities. Massachusetts has amazing wind resources offshore that can not only drive our state's transition off fossil fuels, but also create a strong new industry bringing in jobs and community benefits.



The state's Decarbonization Roadmap focuses on electrification powered by renewable energy to drive down fossil fuel use and harmful emissions. [source]

OFFSHORE WIND'S COMMUNITY IMPACTS

Offshore wind involves turbine arrays and infrastructure deployed in federal waters miles from land with subsea cables exporting energy to the mainland grid and end users, but its development still requires onshore infrastructure (e.g., cable landings, underground cables or overhead lines, and substations). Martha's Vineyard and Nantucket are powered by similar infrastructure delivering energy from the mainland grid to these offshore communities [source].

This new infrastructure should leverage Community Benefits Agreements (CBAs) to ensure that development directly benefits host communities. Further, CBAs should be developed with diverse representation from the community so benefits are properly distributed and meet local needs. Representative committees can articulate the benefits that will best mitigate adverse impacts, improve quality of life for the most impacted residents, and address historical inequities.

For the Vineyard Wind 1 project, community groups and officials on Martha's Vineyard collaborated with the developers throughout the siting and permitting process to secure a range of benefits, including investments in job creation for local residents, port infrastructure, and on-bill energy savings for low-income and traditionally under-represented communities.

In Barnstable, town officials worked closely with the developers to leverage deployment of Vineyard Wind 1's underground cable by installing needed wastewater collection infrastructure at greatly reduced costs, saving taxpayers \$6-8 million to date. Additionally, the town negotiated direct payments from the developer worth "\$1.5 million in any given year...or \$32 million for the first 25 years, plus taxes." [\[source\]](#) However, subsequent projects with cable landings planned in Barnstable are facing headwinds due in part to the lack of direct community engagement in CBA negotiations.

In Salem, frontline community groups came together to demand a seat at the table during the planning of offshore wind port facilities, with great results. This included job development (investments in school), childcare, housing, and more. Salem also included an accountability committee that will meet to ensure that all obligations are fulfilled, an often overlooked piece of CBAs.

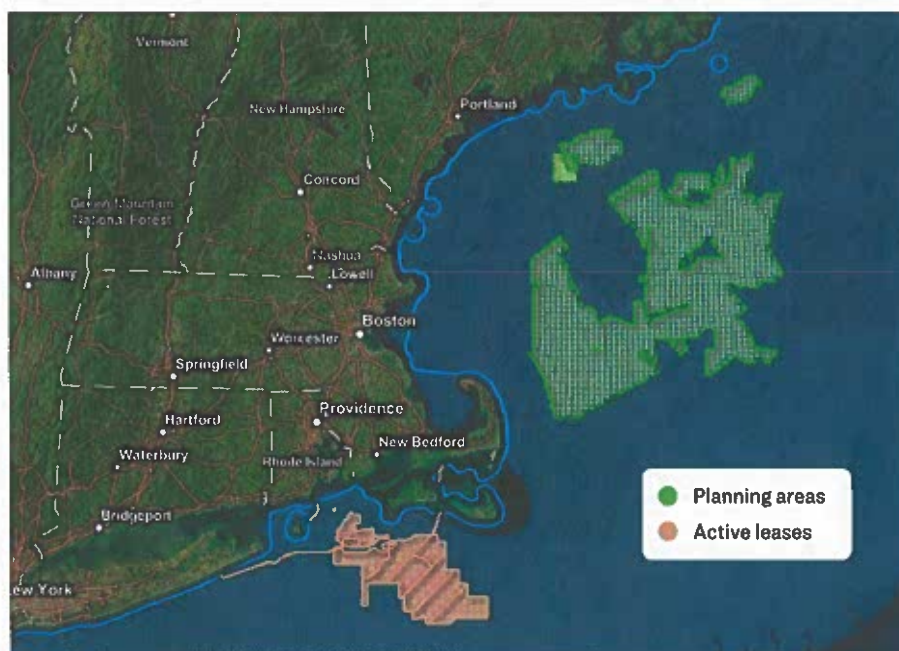
Job development in local communities is a key benefit of offshore wind. The White House assessment of offshore wind impact nationally includes "more than 44,000 workers employed in offshore wind by 2030 and 33,000 additional jobs in communities supported by offshore wind activity" [\[source\]](#). The portion of that claimed by MA's first round of offshore wind sourcing was estimated at "6,800 to 9,800 total job-years employment (a job-year is one full-time job for one year) during construction and installation" [\[source\]](#). This number will expand as wind capacity grows. The Vineyard Wind 1 project, which achieved first power in early 2024 and is scheduled for construction completion in late 2024 or early 2025, has already exceeded its Project Labor Agreement commitment to 500 union jobs, reporting 937 jobs in its first two years of construction [\[source\]](#).

OFFSHORE WIND PLANNING & DEVELOPMENT PROCESS

To meet the goals in the Roadmap, the Commonwealth must contract 5,600 megawatts of offshore wind by 2027 [\[source\]](#). All offshore wind projects must progress through a series of leasing, siting, and permitting processes starting at the federal level and proceeding to state and municipal levels. The Bureau of Ocean Energy Management (BOEM) is the first stop for offshore wind project developers. The Bureau completes reviews of proposed wind resource areas and projects including technical, environmental, and community impact reviews of construction and operations plans, and it issues leases followed by permits [\[overview video\]](#).

To date, BOEM has issued active leases for an area south of Cape Cod including final approvals for operational projects, and is in the planning phase for an area in the Gulf of Maine east of Boston and to the northeast of Cape Cod.

Current projects in the wind resource area south of the Cape include some being developed to supply energy to MA and others serving RI, CT, and NY. The projects are in different phases of development, and the landscape is dynamic. As of mid March 2024, active projects ranged from South Fork Wind (full commercial operation) and Vineyard Wind 1 (partial commercial operation), to Revolution Wind (cable landing construction), to Park City Wind, Commonwealth Wind, SouthCoast Wind, Sunrise Wind, Vineyard Northeast, Beacon Wind, and Bay State Wind (under development and permitting).



Massachusetts is a hub of present and planned offshore wind development activity. [\[source\]](#)

While BOEM leads permitting of project infrastructure in federal waters, portions of subsea export cables, landing sites, and other onshore infrastructure are subject to state permitting and lower-level reviews.

The current process includes:

- Review and approval by the state Energy Facilities Siting Board, including coordination of other state agency reviews
- Review and approval by regional entities where applicable, e.g., the Cape Cod Commission “Development of Regional Impact” (DRI) review [\[link\]](#)
- Review and approval by local authorities, e.g., Conservation Commission

In addition to navigating through multi-level leasing, siting, and permitting processes, offshore wind developers need power purchase agreements with utilities to provide the guaranteed revenue stream needed to secure financing for construction. In Massachusetts, the ongoing offshore wind procurement process is managed by the Department of Energy Resources (DOER), with the Department of Public Utilities (DPU) involved in reviewing any accepted bids and approving the resultant utility contracts. Once a project is selected and its contract is approved, it can seek to close financing and move forward toward construction.

The current bid cycle—which involves Massachusetts, Rhode Island, and Connecticut—allows developers of the Park City, Commonwealth, and South Coast projects to re-bid their pricing and other terms due to economic impacts (supply chain, inflation & interest rates) that made previously approved contract prices no longer viable. The current cycle authorizes procurement of 3,600 new megawatts of wind power by Massachusetts from multiple projects. Winning bidders will be selected on August 7, 2024 ([Bids](#)).

On March 27, 2024, four developers submitted bids in response to the tri-state solicitation, as follows:

- Avangrid: New England 1, 791 MW (formerly Park City Wind), submitted to all three states; and New England 2, 1080 MW (formerly Commonwealth Wind), also submitted to all three states.
- Vineyard Offshore: Vineyard Wind 2, 1200 MW, submitted to all three states.
- Ocean Winds: SouthCoast Wind, 1200 MW, submitted to all three states.
- Orsted: Starboard Wind, 1184 MW, submitted to CT and RI only.

With the exception of Orsted, each of these projects includes preferred or potential cable landing and interconnection sites in Massachusetts.

CONCLUSION

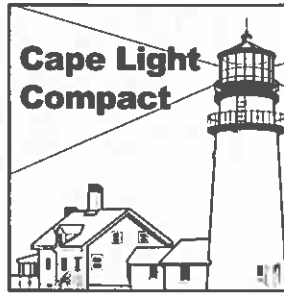
Across all of these review and approval processes, individual agencies, officials, towns, and municipalities retain significant influence and/or control with the ability to enable, delay, or prevent projects from moving forward.

Success or failure in negotiating CBAs can be determinative, which is why continued and visible local support for offshore wind—along with effective advocacy focused on localizing benefits within host communities and regions—is vital for getting offshore wind projects built and for meeting the Commonwealth’s near- and long-term climate policy commitments.

This information sheet was compiled by the Climate Research Team of the Massachusetts Chapter of the Sierra Club. If you have any questions or concerns or would like to connect about this campaign, please contact us at chapter@massachusetts.sierraclub.org

AGENDA ITEM #5

**Agenda Action Request
Cape Light Compact
Meeting Date: 6/5/2024**



- Aquinnah
- Barnstable
- Bourne
- Brewster
- Chatham
- Chilmark
- Dennis
- Dukes County
- Eastham
- Edgartown
- Falmouth
- Harwich
- Mashpee
- Oak Bluffs
- Orleans
- Provincetown
- Sandwich
- Tisbury
- Truro
- Wellfleet
- West Tisbury
- Yarmouth

Vote Authorizing Letter of Credit Related to RUS Loan

REQUESTED BY: *Maggie Downey*

Proposed Motion(s)

I move the CLC/JPE Board of Directors vote to authorize the CLC/JPE Administrator to request the issuance of an irrevocable, renewable standby letter of credit in favor of the USDA Rural Utilities Service (RUS) in the amount of 50% of the first loan advance as set forth in the RUS loan documents.

I further move that that letter of credit be obtained, maintained, collateralized and renewed in accordance with the terms set forth in the commitment letter from The Cape Cod Five Cent Savings Bank dated April 26, 2024, and that the form of letter of credit in the board packet for this meeting is hereby approved.

The CLC/JPE Administrator, Treasurer and Secretary are authorized and directed to take all actions, including approving amendments and revisions to the letter of credit in consultation with legal counsel and RUS, and to execute and deliver all documents necessary or appropriate to implement this vote.

Additional Information

This vote is required by the Rural Utilities Service (RUS) to secure the Compact's obligations pursuant to the loan documents associated with the Rural Energy Savings Program (RESP). The commitment letter and form of LOC are in the board packet.

Record of Board Action

Motion by:	Second by:	# Aye	# Nay	# Abstain	Disposition



Irrevocable Standby Letter of Credit

[Date]

Irrevocable Standby Letter of Credit No. [00000]

Issuer: The Cape Cod Five Cents Savings Bank
1500 Iyannough Rd
Hyannis, MA 02601

Beneficiary: United States Department of Agriculture
Rural Utilities Service
1400 Independence Ave., SW
Washington, D.C. 20250-1500

Account Party/RUS: Cape Light Compact JPE
Borrower 261 Whites Path, #4
South Yarmouth, MA 02664
Attn: Compact Administrator

Amount: \$2,450,000.00

Expiration: [One year with automatic renewals]

We, The Cape Cod Five Cents Savings Bank (the "Bank") hereby issue this irrevocable standby letter of credit (this "Letter of Credit") on behalf of the Cape Light Compact JPE (hereinafter the "Account Party") in favor of the Rural Utilities Service ("RUS") for the sum or sums not to exceed the aggregate amount of TWO MILLION FOUR HUNDRED FIFTY THOUSAND AND 00/100 Dollars (\$2,450,000.00) (hereinafter the "Maximum Amount,") to be made available by your request for payment at sight.

The Bank has been informed by the Account Party that this Letter of Credit is issued to secure obligations as set forth in that certain loan agreement, entered into between the Account Party and RUS, dated as of [date] (as amended from time to time, hereinafter the "Loan Agreement.")

This Letter of Credit shall be valid until the date set forth above provided however; that this Letter of Credit may be terminated at any time with the prior written consent of RUS. After receiving RUS consent, the Bank shall provide written notice of termination by certified mail to: (a) RUS at USDA at the address set forth above, and (b) the Account Party at the address above. The notice required hereunder will be deemed to have been given when received by both of these parties.

Funds under this Letter of Credit are available to RUS in one or more drawings upon the presentation of one or more executed drafts payable at sight, in the form as provided in Exhibit 1 attached hereto, as well as the original of this Letter of Credit (including all amendments thereto,

if any). Such draft(s) shall be presented to our office at the address set forth above, on any business day except those in which banking institutions in the Commonwealth of Massachusetts are authorized or required by law to close. Partial drawings and multiple drawings are permitted under this Letter of Credit.

The Bank hereby agrees to honor one or more drafts drawn under, or demands for payment made under, and in conformity with this Letter of Credit, up to the Maximum Amount, and accompanied by the documents required by this Letter of Credit, and the Bank's honoring of such draft or demand shall not relieve its obligation to so honor any further drafts or demands; provided however, that our aggregate obligation to honor such drafts and demands shall not exceed the Maximum Amount as reduced by prior draws hereunder. This Letter of Credit is not subject to any condition or qualification, and is the obligation of the Bank which is in no way contingent upon reimbursement or likelihood of reimbursement.

This Letter of Credit shall be automatically extended without an amendment for a one year period beginning on the initial expiration date hereof and upon each anniversary of such date, unless at least thirty (30) days prior to any such expiration we have sent you written notice by registered mail or courier service that we elect not to permit this Letter of Credit to be so extended, and that this Letter of Credit will expire on its then current expiration date. No presentation made under this Letter of Credit after such expiration date will be honored.

We certify that neither the Bank nor any of its officers has an ownership interest in the Account Party, nor is an officer or director of the Account Party, and neither the Account Party nor its officers, directors, members, or other owners have more than a five percent (5%) ownership interest in the Bank.

This Letter of Credit sets forth in full the terms of our understanding with you, and this undertaking shall not in any way be modified, amended, amplified, or limited by reference to any document, instrument, or agreement referred to herein, or in which this Letter of Credit is referred to, or to which it relates, except only the drafts referred to herein (the form of which is set forth in Exhibit 1).

This Letter of Credit is not transferable or assignable.

Except as otherwise expressly stated, this letter of credit is issued subject to the Uniform Customs and Practices for Documentary Credits, 2007 Revision, International Chamber of Commerce Publication No. 600.

Very Truly Yours,

The Cape Cod Five Cents Savings Bank

By: _____
Name/Title:

EXHIBIT 1 (Draft presented by RUS)

DRAFT
ON IRREVOCABLE STANDBY LETTER OF CREDIT NO. [00000]

[Date]

Pay to the order of Rural Utilities Service, the sum of [amount in words] and [00]/100 dollars (\$000,000.00), drawn on Cape Cod Five, the issuer of the above-mentioned irrevocable standby Letter of Credit, dated [insert date of issuance of Letter of Credit].

Rural Utilities Service

By: _____
Name/Title:

CERTIFICATE

The undersigned hereby certifies that he/she is authorized to execute this certificate on behalf of the United States of America, acting through the Rural Utilities Service, the Beneficiary under that certain irrevocable standby Letter of Credit No. [00000], issued by The Cape Cod Five Cents Savings Bank. The Beneficiary, as Lender, is entitled to draw the amount stated above pursuant to the terms of the Loan Agreement (as defined in the Letter of Credit).

Rural Utilities Service

By: _____
Name/Title:

CAPE COD 5

April 26, 2024

Margaret Downey, Administrator
Cape Light Compact JPE
261 Whites Path, Unit 4
South Yarmouth, MA 02664

Re: Irrevocable Standby Letter of Credit – USDA Rural Utilities Service

Dear Maggie:

We are pleased to advise you that The Cape Cod Five Cents Savings Bank (the "Bank") has approved your request for an Irrevocable Standby Letter of Credit in the amount of \$2,450,000.00 (the "Standby L/C"). The Standby L/C will be subject to the following terms and conditions:

- BORROWER:** The Borrower will be Cape Light Compact JPE (the "Borrower").
- PURPOSE:** To support the borrowing that the Borrower is entering into with the Rural Utilities Service (the "RUS") in the amount of \$4,900,000.00.
- AMOUNT:** The maximum amount of the Standby L/C will be \$2,450,000.00.
- FEES:** An issuance fee and annual renewal fee (if the Standby L/C is renewed) in the amount of 0.90% (\$22,050.00) will be due at the time of issuance and with each subsequent renewal (if the Standby L/C is renewed).
- TERM/EXPIRATION:** The Standby L/C will have an expiration date of one year from issuance and renewable automatically unless the Bank notifies the beneficiary at least thirty (30) days prior to the annual expiration date which will be set at one year from the date of issuance.
- INTEREST RATE:** If drawn, interest on the unpaid principal balance will accrue at an annual rate equal to the Wall Street Journal Prime Rate, to vary with all changes in the Prime Rate. For purposes hereof, the term "Prime Rate" shall be the rate listed by the Wall Street Journal as the so-called national "Prime Rate". Interest will be charged based on the actual number of days elapsed monthly, with a basis of a 360 day calendar year. Any borrowing would have an interest rate floor of 3.25%.
- REPAYMENT:** If drawn, interest only shall be paid monthly in arrears, with the entire outstanding balance payable on demand by the Bank.
- COLLATERAL:** As collateral for the Standby L/C, the Borrower will assign/pledge a deposit account held at the Bank in the minimum amount of \$2,450,000.00 which will be allocated specifically to the Standby L/C as collateral. The funds pledged will have a hold placed on them, making the funds unavailable to the Borrower.
- CLOSING DATE:** The closing and issuance of the Standby L/C must occur no later than September 30, 2024. If the Standby L/C is not issued on or before then, the Bank may withdraw this commitment without any further obligation on its part or change the terms and interest rate upon application by the Borrowers for an extension of this commitment.

Very truly yours,

Scott D. Vandersall

Scott D. Vandersall
Senior Vice President - Regional Manager

The undersigned hereby accept this commitment and agree to the terms and conditions thereof this 30 day of April, 2024:

Cape Light Compact JPE

By: *Margaret T. Downey*
Margaret T. Downey, Administrator

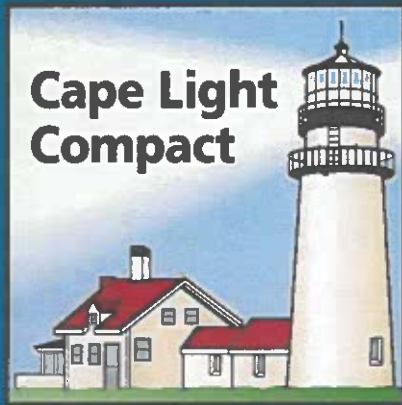
4/30/2024
Date

By: *Valerie S. Silva*
Valerie S. Silva, Treasurer

4/30/24
Date



AGENDA ITEM #6



**Cape Light
Compact**

Your Trusted, Local Energy Resource

2023 Energy Efficiency Plan Year Report (DPU 24-65)

**Miranda Skinner
Strategy and Regulatory Analyst**

June 5, 2024

Overview

- The Compact is on track to reach its three-year goals by the end of 2024

- In 2023 the Compact achieved

- 112% of its lifetime energy savings goal
- 84% of its total benefit goal
- spent 102% of its planned budget



- Based on these results plus the planned values for 2024, over the three-year term, the Compact expects to achieve:

- Cost-effective programs with a benefit-cost ratio of 1.67
- Program costs of \$185 million
- Net benefits of \$138 million
- Total benefits of \$347 million
- Annual energy savings of 45 GWh
- Lifetime energy savings of 566 GWh
- Avoided CO₂ emission reductions of over 28,000 metric tons in 2030



Significant Variances in Residential Programs Compared to Plan Goals

Residential New Homes & Renovations

- Total Benefits were 39% lower due to heat pump installations and electrification

Residential Coordinated Delivery

- Total Program Costs were 41% lower, lifetime savings were 48% lower, and Total Benefits were 45% lower
- These variances were driven by lower adoption of weatherization and air sealing (envelope measures)

Residential Conservation Services

- Total Program Costs were 38% lower due to fewer home energy assessments than originally planned

Residential Retail

- Total Program Costs were 20% higher due to higher participation than expected



Significant Variances in Income-Eligible Programs Compared to Plan Goals

Income
Eligible
Coordinated
Delivery

- Total Program Costs were 95% higher due to the increasing cost of heat pumps
- Compared to the MTM numbers the variance is 26%

Income
Eligible Active
Demand
Reduction

- Total Program Costs were 100% lower due to no costs being assigned to this initiative



Significant Variances in Commercial Programs Compared to Plan Goals



C&I New Buildings & Major Renovations

- Total Program Costs were 50% lower due to most of the measures being lighting measures rather than HVAC measures
- Total Resource Benefits were 70% lower because of evaluation results which found the estimated savings to be lower than anticipated



C&I Existing Building Retrofit

- Total Program Costs were 40% lower
- Total Benefits were 34% lower
- These variances were due to fewer participants than expected
- Compared to the MTM numbers the variance were -25% and -13% respectively



Significant Variances in Commercial Programs Compared to Plan Goals



C&I Active Demand Reduction

- Total Program Costs were 24% lower due to continued issues recruiting customers
- Total Benefits were 61% lower
- These variances were caused by issues recruiting new customers and due to the low number of participants, there were fewer benefits than planned



C&I New & Replacement Equipment

- Total Program Costs were 40% lower due to changes in expected measure mix

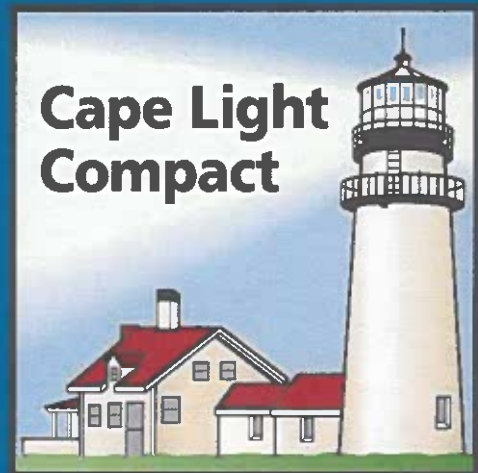


Cost-Effectiveness

2023 Evaluated Total Resource Cost Test (2022\$)	
Program	Benefit-Cost Ratio
A - Residential	1.61
A1 - Residential New Buildings	4.19
A2 - Residential Existing Buildings	1.91
B - Income Eligible	1.00
B1 - Income Eligible Existing Buildings	1.02
C - Commercial & Industrial	1.80
C1 - C&I New Buildings	2.00
C2 - C&I Existing Buildings	1.93
Grand Total	1.52

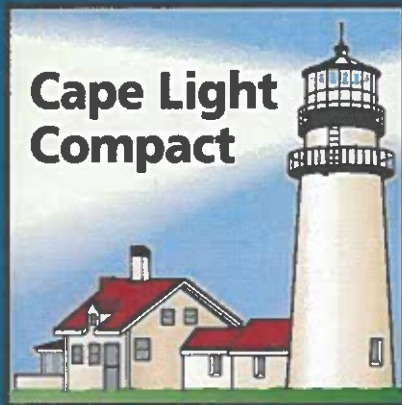


Questions?



*Your Trusted, Local
Energy Resource*

AGENDA ITEM #7



**Cape Light
Compact**

*Your Trusted, Local
Energy Resource*

Energy Saver Home Loan Program

Dan Schell, Customer Service and Outreach Manager



MA Community Climate Bank

- **In June of last year, Governor Healey announced the launch of the Massachusetts Community Climate Bank (MCCB), the first climate bank in the nation with a specific focus on decarbonizing affordable housing.**



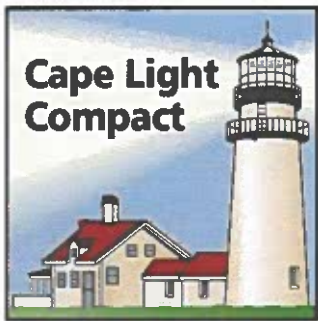
- Strategically placed within the State's Housing Finance Agency, **the MCCB leverages MassHousing's existing capabilities and infrastructure.** MCCB financing will help deliver decarbonization benefits to low-and moderate-income residents and Environmental Justice communities disproportionately burdened by pollution and poor health
- **As part of this undertaking, MassHousing has created a new program called Energy Saver Home Loan Program(ESHLP) which will be funded by the MCCB.**

Energy Saver Home Loan

- The Energy Saver Home Loan Program will **assist homeowners to cut their energy use and reduce or eliminate their reliance on fossil fuels**. The Program will provide financing and technical support to households and/or for measures not covered by other programs such as Mass Save®.
- Homeowners must be **income-qualified (<135% AMI) owner-occupants**, either of a single-family home or of at least one unit in 2-4 family home.



Energy Saver Home Loan



- Energy Saver Home Loans will be initiated through the **Cape Light Compact**, serving as the Concierge Service Provider (CSP) and an Energy Service Provider (ESP), **Abode Energy Management**. The CSPs and ESPs work with participating lenders to assist borrowers through the step-by-step Energy Assessment, Decarbonization Plan, and loan application process.
- The work to be performed (inclusive of all rebates and incentives) must **demonstrate modeled energy savings of at least 20%**.

Eligible Improvements

HVAC

- Air Sealing, Duct Sealing and Ventilation
- Air Source Heat Pumps (heating/cooling)
- Ground Source Heat Pumps (heating/cooling)

Appliances

- Electric Stove, Cooktop, Range, or Oven
- Heat Pump Clothes Dryer

Health and Safety Improvements

- Mold Remediation
- Oil Tank Removal

Clean Energy Technology

- Battery Storage
- Electric Panel Upgrade and Wiring
- Electric Vehicle Charging Station
- Solar PV System

Fixtures

- Low Flow Faucets/Toilets
- LED Lights

Site Work

- Arborist-Approved Shade Trees
- Tree Pruning

Energy Efficiency /Weatherization

- Exterior Doors
- Exterior Insulation and Air Barriers
- Insulation
- Roofing
- Fortified Roofing
- White Roofing
- Thermostats
- Windows

Water Heating

- Heat Pump Water Heaters

ELIGIBLE IMPROVEMENTS WILL BE DETERMINED BY THE ENERGY SERVICE PROVIDER. FOSSIL FUEL EQUIPMENT UPGRADES ARE NOT ELIGIBLE.

Income Limits By County

(Effective May 20, 2024)

Income levels based on The Department of Housing and Urban Development Median Family Income (MFI). Income qualification is based on names on the property deed, not the income of all residents.

County	80%	135%
Barnstable Barnstable, Bourne, Brewster, Chatham, Dennis, Eastham, Falmouth, Harwich, Mashpee, Orleans, Provincetown, Sandwich, Truro, Wellfleet, Yarmouth	\$98,160	\$166,645
Dukes Chilmark, Edgartown, Aquinnah, Gosnold, Oak Bluffs, Tisbury, West Tisbury	\$110,000	\$185,625
Nantucket Nantucket	\$122,480	\$206,685

Loan Model

REBATES/INCENTIVES

Borrower is qualified at the full amortized rate. Rebates are not part of the loan.

Months 1-18 bridging the gap until the Borrower receives the Rebate. We are strongly encouraging Borrowers to paydown their principal balance with the Rebates but they are not required to.

There are no pre-payment penalties and additional payments can be made as a single payment. Loans can be recast with a minimum principal payment of \$2,500 with no fee.

			LOAN AMOUNT	LOAN AMOUNT
			\$50,000	\$100,000
BORROWERS UP TO 80% AMI				
Term	Rate	Amort Type	Payment	Payment
1-18 Months	0.50%	Interest Only	\$20.83	\$41.67
19-240 Months	0.50%	Amortizing	\$235.85	\$471.70
BORROWERS ABOVE 80% AMI- 135% AMI				
Term	Rate	Amort Type	Payment	Payment
1-18 Months	2.00%	Interest Only	\$83.33	\$166.67
19-240 Months	2.00%	Amortizing	\$269.64	\$539.28

Product Overview

Transaction Type	Second Mortgage for Energy Improvements (could go into 3rd position after 1st and DPA)
Loan Limits	Min \$10,000 up to a Max of \$100,000
Contingency Amount	There is a 5% contingency amount required but can be waived by the Lender depending on the loan amount. <i>(The contingency is a part of a project's budget put aside to cover any unforeseen costs, risks, events, or changes in scope that may affect the project's cost over the course of its life.)</i>
Closing Costs and Fees	Borrowers responsible for all closing costs and fees which may be rolled into the loan. Closing Costs may include, but not limited to, Recording Fees, MERs Fee, Credit Report, Attorney/Title Rundown, Flood Cert, Overnight Fees. MassHousing Application Fee \$150 <i>(Lenders will not be able to charge any additional origination charges)</i>
Lender Fee	Lender/CDFI -\$1,500 per loan (upon funding of the loan)
Eligible Borrower	Owner Occupied/Must meet Program Income Limits
Min Credit Score	620 -Anything below 620 to be submitted to MassHousing for review.
Max DTI	50%
Max CLTV	105% of assessed or appraised value, based on a drive-by appraisal with external pictures and comps. Value determined is based on as-complete of expected improvements, including expected rehab.
Property Type	Single Family & 2-4 Units –NO CONDOMINIUMS

Homeownership Participating ESHLP Lenders

Cape Cod Five
www.capecodfive.com



BayCoast Bank
BayCoast.bank



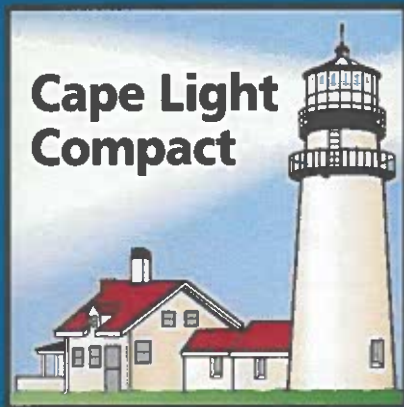
Bristol County Savings Bank
bristolcountysavings.com



Get started:

Email energysaver@capelightcompact.org or call 1-800-797-6699

AGENDA ITEM #8



*Your Trusted, Local
Energy Resource*

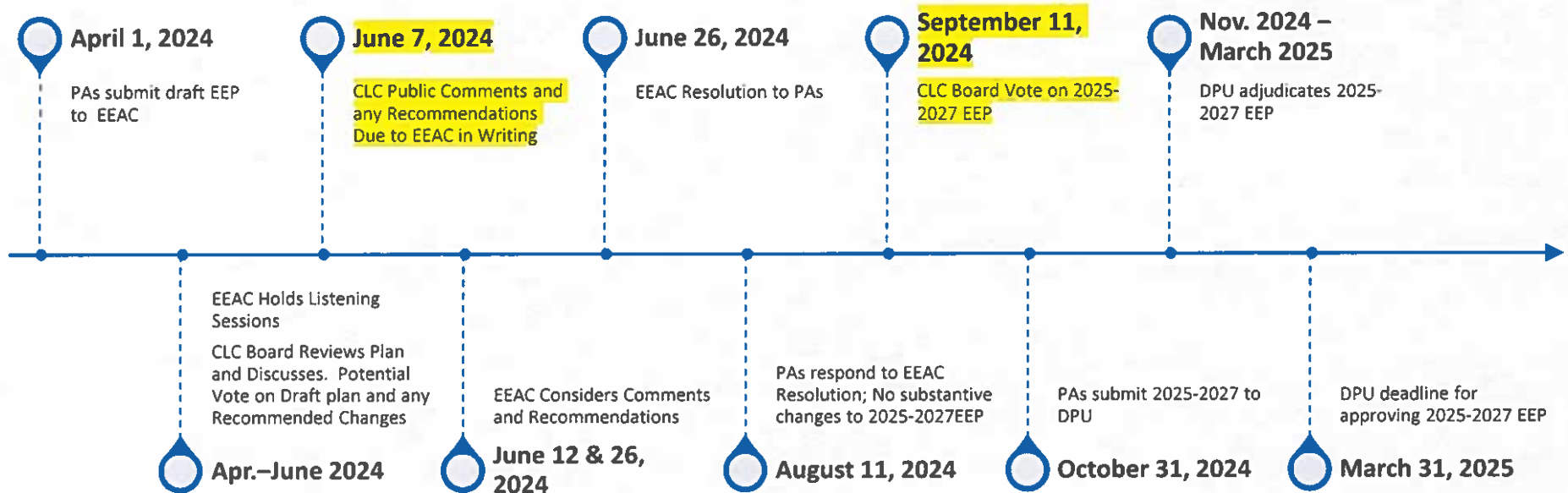
2025-2027 Energy Efficiency Plan April Draft update

**Margaret Song
Evaluation, Policy and Strategy Manager**

June 5, 2024



Timeline for Compact Review of Statewide 2025-2027 Energy Efficiency Plan (EEP)



Purpose of Today's Discussion

- Confirm support on items staff requested direction from the Board
- Identify any new comments from the Board on the Plan
- Discuss Board priority on providing customer service to customers that heat with natural gas and develop next steps



Recap of Discussions – consensus items



Compact enhanced call center



Compact oversight of Community First Partnership



HEAT loan adjustment



History of Compact Serving Natural Gas Heated Homes

2001 – 2021: provided energy efficiency service to all customers regardless of heating source

2015: National Grid objects to Compact serving customers who heat with natural gas

2016: DPU proceeding on this issue but no final DPU ruling

2022 - 2024: DPU Order on Energy Efficiency Plan prohibits Compact from serving customers in gas heated homes



Why Is the Board Discussing?

2023 Board Strategic Planning discussion identifies service to natural gas heated homes as a priority

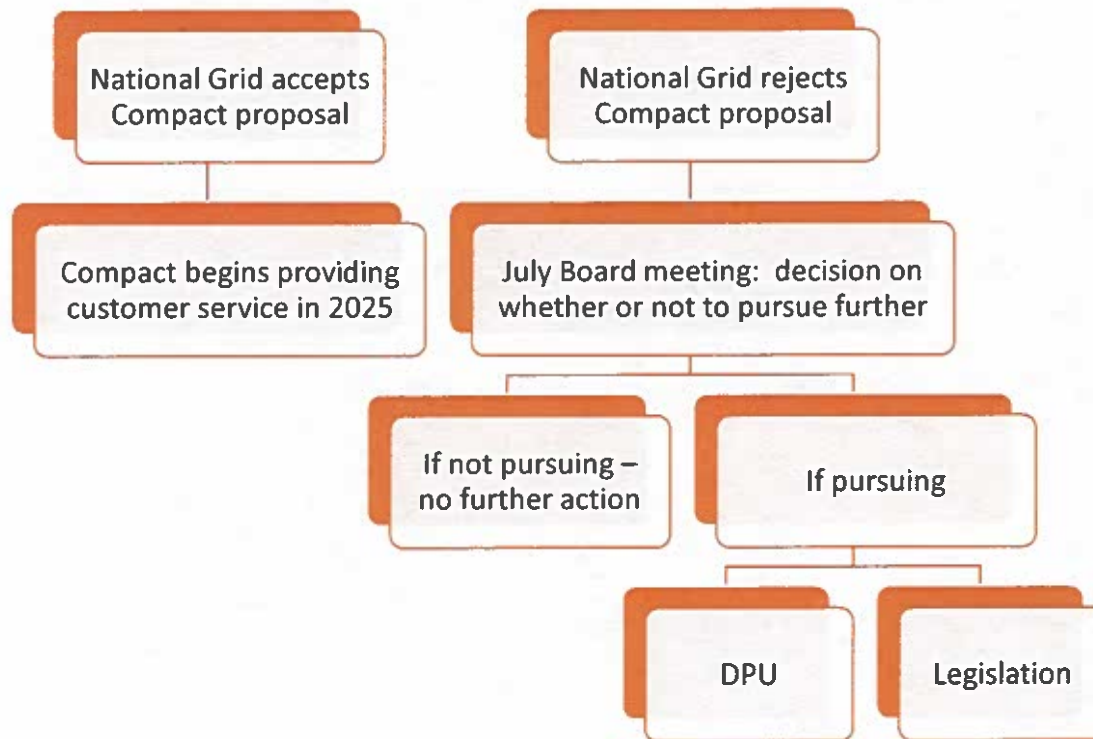
Compact staff engaged National Grid on issue

- Submitted a fee for service proposal to provide customer service to customers who heat with natural gas.

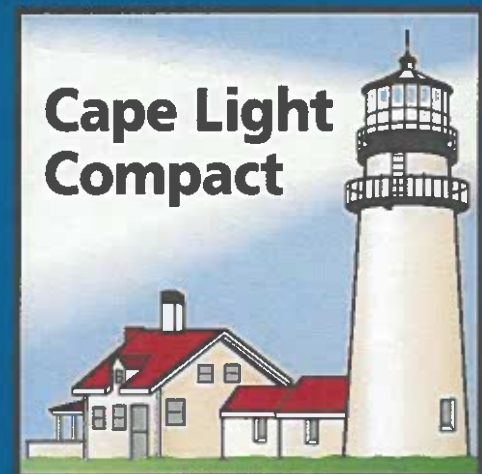
National Grid to respond before June 5 (no response as of May 31)



Next Steps



Questions?



*Your Trusted, Local
Energy Resource*

AGENDA ITEM #9

**Agenda Action Request
Cape Light Compact
Meeting Date: 6/5/24**



- Aquinnah
- Barnstable
- Bourne
- Brewster
- Chatham
- Chilmark
- Dennis
- Dukes County
- Eastham
- Edgartown
- Falmouth
- Harwich
- Mashpee
- Oak Bluffs
- Orleans
- Provincetown
- Sandwich
- Tisbury
- Truro
- Wellfleet
- West Tisbury
- Yarmouth

**Increase Incentive Cap for Individual Municipal Projects
Requiring Board Approval**

REQUESTED BY: *Briana Kane*

Proposed Motion(s)

I move the Board vote to increase the energy efficiency municipal project incentive cap from \$150,000 to \$300,000.

The Compact Administrator is authorized and directed to take all actions necessary or appropriate to implement this vote, and to execute and deliver all documents as may be necessary or appropriate to implement this vote.

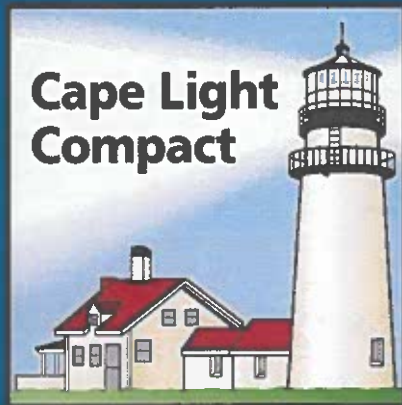
Additional Information

The Cape Light Compact Board caps its incentive for individual energy efficiency municipal projects at \$150,000, with the proviso that the Compact Board may waive that cap as it deems appropriate. The proposed increase to \$300,000 reflects the recent change to Massachusetts General Laws Chapter 25A, exemption for public projects.

Record of Board Action

Motion by:	Second by:	# Aye	# Nay	# Abstain	Disposition

AGENDA ITEM #10



**Cape Light
Compact**

Your Trusted, Local Energy Resource

Update on Eversource Electric Sector Modernization Plan (DPU 24-10)

Cape Light Compact Governing Board
June 5, 2024

Compact Requested the DPU to:

- Urgently approve the Cape Cod capital investment project (CIP) to allow distributed energy resources to interconnect on Cape Cod and Martha's Vineyard
- Approve Eversource's integrated energy planning ("IEP") proposal subject to requiring:
 - DPU supervision over and broad stakeholder representation (including energy efficiency) in the IEP working group
 - Eversource to include the Compact in the IEP working group



Compact Requested DPU to Direct Eversource to:

- Test alternative use parameters of battery energy storage systems (“BESS”) and provide an update on those efforts in an ESMP annual report to inform the GMAC process
- Report on double poles in an ESMP annual report or in ESMP metrics
- Develop its next ESMP as a centralized, whole-of-business strategic planning document for meeting the 2050 climate goals
- Reconsider bill impact analyses to require the next ESMP to include a comprehensive understanding of ESMP investments
- Ensure timely subsequent process for certain deferred issues – i.e., TVR, performance metrics, alternative rate design, and dispatch energy storage technologies – that were not in the scope of this proceeding





ATTORNEYS AT LAW

The Firm has attorneys also admitted to practice in District of Columbia, Idaho and New Hampshire

1337 Massachusetts Ave
Box 301
Arlington, MA 02476
617-644-7681
www.kolawpc.com

May 17, 2024

VIA ELECTRONIC MAIL ONLY (dpu.efiling@mass.gov)

Secretary Mark D. Marini
Department of Public Utilities
One South Station, 3rd Floor
Boston, MA 02110

Re: *NSTAR Electric Company d/b/a Eversource Energy
D.P.U. 24-10, Electric Sector Modernization Plan Approval*

Dear Secretary Marini:

Attached for filing please find the Cape Light Compact JPE's (the "Compact") Initial Brief in the above-referenced proceeding, along with a Certificate of Service.

Thank you for your attention to this matter. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads 'Rebecca F. Zachas'.

Rebecca F. Zachas

RFZ/drb
Enclosures

cc: Kerri Phillips, Esq., DPU Hearing Officer (w/enc.) (via email only)
D.P.U. 24-10 Service Lists (Hearing Officer and Online File Room) (w/enc.) (via email only)
Margaret T. Downey, Compact Administrator (w/enc.) (via email only)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Petition of NSTAR Electric Company)
d/b/a Eversource Energy, pursuant to)
G.L. c. 164, §92B, for approval)
by the Department of Public Utilities)
of its Electric Sector Modernization Plan)

D.P.U. 24-10

INITIAL BRIEF OF THE CAPE LIGHT COMPACT JPE

Audrey Eidelman Kiernan, Esq.
Rebecca F. Zachas, Esq.
KO Law, P.C.
1337 Massachusetts Avenue, Box 301
Arlington, MA 02476
617.644.7681

May 17, 2024

TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY	1
II.	BACKGROUND	3
	A. <u>The ESMP</u>	3
	B. <u>Procedural History</u>	4
III.	STANDARD OF REVIEW	5
IV.	ARGUMENT	7
	A. <u>The Department Should Urgently Approve the Cape Cod CIP in D.P.U. 22-55 Consistent with the Commonwealth’s Climate Goals</u>	7
	B. <u>IEP in the ESMP</u>	10
	1. The DPU should monitor the IEP working group and require broad stakeholder representation, including for energy efficiency	10
	2. The Department should require Eversource to include in its IEP reporting (at least annually) a progress update on IEP electrification planning in areas where the gas and electric providers are different	11
	3. The Department should direct how costs should be allocated between electric and gas in IEP.....	12
	C. <u>The Department Should Recognize the Importance of Collaboration Between the Company and the Compact As Energy Efficiency Program Administrators in Eversource’s Service Territory to Ensure Similar ESMP-Related Efforts</u>	12
	D. <u>Eversource Should Test Alternative Use Parameters of BESS and Annually Report on Those Efforts to Inform the Next ESMP</u>	14
	E. <u>The Department Should Issue Directives to Mitigate Adversities Related to ESMP Construction</u>	16
	1. The CESAG Should be Co-Chaired by the GMAC and the Company	16
	2. The Department Should Confirm that Eversource Will Only Enter Into Community Benefits Agreements In the Context of an EFSB and/or DPU Proceeding and Will Be Transparent in CBAs that the Costs are Ratepayer-Funded	17

3.	The Department should direct Eversource to report on double poles resulting from ESMP-related pole work in an annual report or in ESMP metrics.....	17
F.	<u>Low- and Moderate-Income Solar Programs are Consistent with the 2050 Climate Goals</u>	19
G.	<u>The DPU Should Direct Eversource to Develop the next ESMP as a Centralized, Whole-of-Business Strategic Planning Document</u>	20
1.	Eversource should include transmission planning to a greater extent in the next ESMP	22
2.	The Department should revisit precedent on bill impact analyses to require the next ESMP to include a comprehensive understanding of ESMP investments	24
H.	<u>The Department should require Eversource to work with the other EDCs, stakeholders and the Department to standardize the next ESMPs across EDCs to the extent possible</u>	27
I.	<u>The Department should require process and reporting for the next ESMP and deferred issues</u>	28
1.	Eversource should participate in a GMAC-led process prior to the next ESMP	28
2.	Eversource should develop a comprehensive timeline for the next ESMP	29
3.	The Department should require Eversource to file an ESMP annual compliance report.....	30
4.	The Department should clarify subsequent process for the deferred issues	31
a.	ESMP metrics	32
b.	TVR.....	32
V.	RELIEF REQUESTED.....	34
VI.	CONCLUSION.....	34

TABLE OF AUTHORITIES

Massachusetts Department of Utility Cases

<p><i>Report of the Department of Telecommunications and Energy relative to reducing the number of double utility poles within the Commonwealth, pursuant to Chapter 46 of the Acts of 2003, Section 110,</i> D.T.E./D.P.U. 03-87</p>	<p>3, 18, 19</p>
<p><i>Investigation by the Department of Public Utilities on its own Motion into Modernization of the Electric Grid,</i> D.P.U. 12-76-C, Order (November 5, 2014)</p>	<p>3, 26</p>
<p><i>Investigation by the Department of Public Utilities on its own Motion into the role of gas local distribution companies as the Commonwealth achieves its target 2050 climate goals,</i> D.P.U. 20-80-B, Order on Regulatory Principles and Framework (December 6, 2023)....</p>	<p>10, 11</p>
<p><i>Joint Petition of NSTAR Electric Company d/b/a Eversource Energy, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil, for Approval of Revised Model Solar Massachusetts Renewable Target Program Tariff,</i> D.P.U. 20-145</p>	<p>19</p>
<p><i>Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Grid Modernization Plan for calendar years 2022 to 2025,</i> D.P.U. 21-80, Order (November 22, 2022)</p>	<p>21, 31-33</p>
<p><i>Petition of NSTAR Electric Company d/b/a Eversource Energy, et al., pursuant to G.L. c. 164, § 92B, for approval by the Department of Public Utilities of its Electric Sector Modernization Plan,</i> D.P.U. 24-10, et al., Interlocutory Order on Scope of Proceedings (February 20, 2024)</p>	<p>passim</p>
<p><i>Petition of NSTAR Electric Company d/b/a Eversource Energy, et al., pursuant to G.L. c. 164, § 92B, for approval by the Department of Public Utilities of its Electric Sector Modernization Plan,</i> D.P.U. 24-10, et al., Hearing Officer Memorandum (August 7, 2023)</p>	<p>25</p>
<p><i>Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers,</i> D.P.U. 24-15, Vote and Order Opening Inquiry (January 4, 2024).....</p>	<p>25</p>

Massachusetts Statutes and Regulations

220 CMR §1.11(3).....1

An Act Driving Clean Energy and Offshore Wind, St. 2022, c. 179, §53, codified at G.L. c. 164, §§92B-92C..... passim

Climate Protection and Green Economy Act, G.L. c. 21N.....2, 6, 22

G.L. c. 25, §1A.....2

G.L. c. 40, §4A ½.....1

G.L. c. 164, §34B.....18

G.L. c. 164, §7630

G.L. c. 164, §1341

Other Massachusetts Authorities

Grid Modernization Advisory Council, *Observations and Recommendations of the Grid Modernization Advisory Council Regarding the Electric Distribution Companies' Electric-Sector Modernization Plans* (November 20, 2023) passim

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of NSTAR Electric Company)	
d/b/a Eversource Energy, pursuant to)	
G.L. c. 164, §92B, for approval)	D.P.U. 24-10
by the Department of Public Utilities)	
of its Electric Sector Modernization Plan)	

INITIAL BRIEF OF THE CAPE LIGHT COMPACT JPE

Pursuant to 220 CMR §1.11(3) and the Hearing Officer’s Memorandum dated April 9, 2024, the towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County, organized and operating collectively as the Cape Light Compact JPE, a joint powers entity organized pursuant to G.L. c. 40, §4A ½¹ and G.L. c. 164, §134 (the “Compact”), hereby submit this Initial Brief.

I. EXECUTIVE SUMMARY

On January 29, 2024, NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”) filed its first electric sector modernization plan (“ESMP”) with the Department of Public Utilities (the “Department” or “DPU”) pursuant to *An Act Driving Clean Energy and Offshore Wind*, St. 2022, c. 179, §53, codified at G.L. c. 164, §§92B-92C. The ESMP should be approved with the relief requested listed below which includes directives related to the proposed ESMP and the next ESMP proposal. This ESMP is a case of first

¹ The Compact’s Joint Powers Agreement is available online at <https://3jy14ha9u771r7qzn35g0s6c-wpengine.netdna-ssl.com/wp-content/uploads/2021/09/Second-Amended-and-Restated-JPA-FINAL-9-1-21.pdf>.

impression that the Department will review as a strategic planning document and to determine whether it complies with G.L. c. 164, §92B and G.L. c. 25, §1A and aligns with the Commonwealth's statewide greenhouse gas emissions limits and sublimits under G.L. c. 21N. D.P.U. 24-10, Interlocutory Order on Scope of Proceedings at 15-16 (February 20, 2024) ("Interlocutory Order"). The Department will develop the standards of review on the current and future ESMPs, as well as any additional phases of the proceeding or separate, ESMP-related proceedings. *Id.*

Regarding this proposed ESMP, the Department should:

- Urgently approve the Cape Cod capital investment project ("CIP") in D.P.U. 22-55 consistent with the Commonwealth's climate goals to allow distributed energy resources ("DER") to interconnect on Cape Cod and Martha's Vineyard.
- Approve the Company's integrated energy planning ("IEP") proposal subject to requiring: (1) DPU supervision over and broad stakeholder representation (including energy efficiency) in the IEP working group; (2) Eversource to submit an ESMP annual report starting in 2025 that includes progress on IEP electrification efforts, including in areas where the gas and electric providers are different, and the IEP working group; (3) Eversource to include the Compact in the IEP working group; and (4) a full report on IEP and the IEP working group in the next ESMP. The Department should also direct how IEP costs should be allocated between electric and gas providers.
- Require Eversource to test alternative use parameters of battery energy storage systems ("BESS") and provide an update on those efforts in an ESMP annual report to inform the GMAC process.
- Require Eversource to work: (i) collaboratively with other Program Administrators ("PA") in its service territory where energy efficiency may advance the cause of the 2050 climate goals; and (ii) cooperatively with any PAs in its service territory to ensure that those PAs are able to develop energy efficiency offerings for their customers related to the ESMPs.
- Direct Eversource to file its Affordable Solar Access Program ("ASAP") for consideration in a separate DPU proceeding subject to the requirements that: (1) Eversource will coordinate the program with the Department of Energy Resources ("DOER") and Mass Housing; and (2) customers may not qualify for ASAP and Solar For All or the Energy Saver Home Loan programs.

Related to mitigating adversities from ESMP investment construction, the Department should:

- Direct that the Community Engagement Stakeholder Advisory Group (“CESAG”) should be co-chaired by the GMAC and the Company.
- Confirm that Eversource may enter into Community Benefits Agreements (“CBAs”) only within the context of an Energy Facilities Siting Board and/or DPU proceeding.
- Require Eversource to be transparent in CBAs that the related CBA costs are ratepayer funded.
- Direct Eversource to report on double poles related to ESMP-related pole work in an ESMP annual report or in ESMP metrics. In the alternative, the Department should reopen D.T.E./D.P.U. 03-87 to review double pole accounting in light of the ESMP and incorporate a separate ESMP-double pole category into that reporting.

Regarding the next ESMP, the Department should:

- Direct Eversource to develop its next ESMP as a centralized, whole-of-business strategic planning document.
- Require Eversource to include transmission planning to a greater extent in its next ESMP.
- Revisit D.P.U. 12-76-C precedent on bill impact analyses to require the next ESMP to include a comprehensive understanding of ESMP investments.
- Require Eversource to work with the other electric distribution companies (“EDCs”), stakeholders and the Department to standardize the next ESMPs across EDCs to the extent possible.
- Direct Eversource to participate in a GMAC-led process prior to the next ESMP.
- Require Eversource to develop a comprehensive timeline for the next ESMP, including for time-varying rates (“TVR”).
- Direct Eversource to file an ESMP annual compliance report to keep the Department and stakeholders informed of its progress in the intervening years between ESMP filings.
- Ensure timely subsequent process for certain deferred issues – i.e., TVR, performance metrics, alternative rate design, and dispatch energy storage technologies – that were not in the scope of this proceeding, including commencing a metrics compliance phase.

II. BACKGROUND

A. The ESMP.

Eversource filed a petition for approval of its first ESMP for the period from January 1, 2025, through December 31, 2029. In Exhibit ES-Forecast-1, the proposed ESMP contains forecasts of electric demand on its distribution system over the next five years, ten years, and through calendar year 2050 that take into account energy efficiency and the expected future growth in the adoption of renewable energy, DERs, energy storage, and electrification technologies. Eversource proposed an estimated \$820 million in incremental investments that

the Company found to be necessary to meet the forecasted demand and achieve the requirements of Section 92B, including \$225 million in resiliency investments (undergrounding, reconducting, and storm hardening) and \$50 million for solar investments to support a low- and moderate-income solar program. Exh. ES-ESMP-1 at 432. The engineering analysis in the ESMP assumed that investments already in the Company’s core capital plan, pending CIPs, pending utility-owned solar and energy storage projects, and previously-approved advanced metering infrastructure, grid modernization, and electric vehicle (“EV”) proceedings will move forward. Exh. ES-Policy Solutions-1 at 85, lines 2-6. Sections 3.0 and 11.0 of the ESMP also contain proposals on the CESAG and integrated energy planning.

In addition, the filing sets forth a net benefits analysis to demonstrate both the quantitative and qualitative benefits of each ESMP investment, and some performance metrics for stakeholder engagement and incremental investments. Exh. ES-Net Benefits-1 at 9; Exh. ES-Metrics-1 at 4-5. Eversource further requests that the Department establish standards of review related to future ESMP filings. ESMP Petition for Approval at 13. Eversource also sought approval to defer certain aspects of the ESMP, such as alternative rate design, including TVR, dispatch energy storage technologies, and performance metrics. *Id.* at 14-15.

B. Procedural History.

In 2022, the EDCs in Massachusetts were required to file ESMPs by *An Act Driving Clean Energy and Offshore Wind*, Section 53 of Chapter 179 of the Acts of 2022 (the “2022 Climate Act”), as codified in G.L. c. 164, §§92B and 92C. On September 1, 2023, Eversource filed its draft ESMP with the Grid Modernization Advisory Council (“GMAC”) as required pursuant to G.L. c. 164, §92B(c)(iii). The GMAC reviewed the draft ESMPs and provided recommendations in its final report to the EDCs on November 20, 2023. Grid Modernization

Advisory Council, *Observations and Recommendations of the Grid Modernization Advisory Council Regarding the Electric Distribution Companies' Electric-Sector Modernization Plans* (Nov. 20, 2023) (“GMAC Final Report”).² The GMAC also sought public comment and held public hearings in November 2023. The Compact provided oral comments on November 1, 2023, and written comments on July 13 and November 7, 2023.

On January 29, 2024, Eversource filed with the Department a petition for approval of its first ESMP in the above-referenced proceeding. On February 20, 2024, the Department issued an Interlocutory Order defining the scope of review of the ESMP and deferring review of certain issues to separate Department proceedings or a later phase of this proceeding. D.P.U. 24-10, Interlocutory Order on Scope of Proceedings (February 20, 2024) (“Interlocutory Order”).

Some parties filed testimony by March 5, 2024. The Department held public hearings on March 7 and 12, 2024, and technical conferences on March 8, 11, and 13, 2024. The GMAC Consultants filed comments on February 22, 2024 (“GMAC Consultants Comments”).

On January 30, 2024, the Compact filed a Petition for Leave to Intervene, which was granted by the Department on February 5, 2024. The Compact issued seven sets of discovery and had record requests RR-CLC-1 through RR-CLC-3. The Department conducted evidentiary hearings between April 9 through April 22, 2024.

III. STANDARD OF REVIEW

Pursuant to G.L. c. 164, §92B(d), the Department shall approve, approve with modifications, or reject the ESMP within 7 months of submittal. The ESMP must contain three planning horizons for electric demand – a 5-year forecast, a 10-year forecast, and a demand

² The GMAC noted that the draft ESMP did not include all information necessary (bill impact analyses and benefit-cost analyses to assess net benefits to customers) for the GMAC to meet its statutory requirements. GMAC Consultants Comments at 2.

assessment through 2050 – and account for future trends, such as the adoption of renewable energy, distributed energy resources and energy storage and electrification technologies, to meet the climate goals. Section 92B(d) provides that Eversource shall be permitted to include in base electric distribution rates all prudently incurred plant additions that are used and are useful.

To be approved, an ESMP must identify the net benefits for customers and must “proactively upgrade the distribution and, where applicable, transmission systems to”:

- (i) improve grid reliability, communications and resiliency;
- (ii) enable increased, timely adoption of renewable energy and distributed energy resources;
- (iii) promote energy storage and electrification technologies necessary to decarbonize the environment and economy;
- (iv) prepare for future climate-driven impacts on the transmission and distribution systems;
- (v) accommodate increased transportation electrification, increased building electrification and other potential future demands on distribution and, where applicable, transmission systems; and
- (vi) minimize or mitigate impacts on the ratepayers of the commonwealth, thereby helping the commonwealth realize its statewide greenhouse gas emissions limits and sublimits under chapter 21N.

G.L. c. 164, §92B(a). Eversource must identify customer benefits associated with proposed investments and alternative approaches, including safety, grid reliability and resiliency, integration of distributed energy resources, avoided renewable energy curtailment, reduced greenhouse gas emissions and air pollutants, and minimization or mitigation of impacts on the ratepayers of the commonwealth. Section 92B(b) lists criteria that must be included in the ESMP. Section 92B(e) also requires Eversource to submit two reports per year to the Department and Joint Committee on Telecommunication, Utilities and Energy (“Joint

Committee”) on the deployment of approved investments in accordance with performance metrics in the ESMPs.

IV. ARGUMENT

A. The Department Should Urgently Approve the Cape Cod CIP in D.P.U. 22-55 Consistent with the Commonwealth’s Climate Goals.

DER interconnection of non-simplified projects on Cape Cod and Martha’s Vineyard has been at a standstill for years with the territory saturated. CLC-ES-2-2(c). The projects in the group study queue continue to wait, while the post-group study queue has grown since the initial filing of Eversource’s case in D.P.U. 22-55 from 33 projects to 89 projects as of February 2024. CLC-ES-2-2; Attachment CLC-ES-2-2. Approval of the Cape Cod CIP in D.P.U. 22-55 is urgently needed to get that backlog flowing.³

The ESMP listed the pending CIPs, including the Cape Cod CIP, as solutions for DER penetration constraints. Exh. ES-ESMP-1 at 393-96. The Cape Cod CIP includes upgrades to eight substations including load tap changer controls at three substations and required distribution circuit conductor upgrades on 23kV and 4kV circuits at various stations as part of the Group Study. Those upgrades would allow for the interconnection of 71 MW of Group Study DER applicants and enable 296 MW of future distributed generation (“DG”). Exh. ES-ESMP-1 at 302, Table 6-4; see DPU-3-1.

Eversource did not include the pending Cape Cod CIP in its five- and ten-year forecasts, but the 2050 long-term demand assessment (Exhibit ES-ESMP-1 at 534, Section 8.4) assumes

³ The CIPs are needed after the previous “first-in, first-out (queued) approach” to DER interconnection with cost causation resulted in long queues at certain substations. Exh. ES-ESMP-1 at 153. The CIPs would instead be paid for through the Provisional Program, which proposes a new cost allocation methodology to “equitably share the cost for common system modifications between the beneficiaries: developers and distribution customers.” *Id.*

“that the CIPs pending approval will be built to help enable the state’s climate goals.” CLC-ES-2-3; see GECA-Common-1-3; RR-GECA-ES-1. If the CIPs are not approved, Eversource explained that it could affect those goals:

the forecasted solar capacity may shift to other regions, particularly Western Massachusetts, or not be realized at all. In this case there is a risk of falling short of the solar capacity benchmarks projected by the state. When forecasting solar deployment, the Company also analyzes project economics (Exhibit ES-ESMP-1 at 217) and include CIP considerations.

CLC-ES-2-3(b). If D.P.U. 22-55 is not approved, DER developers will then also be back on the hook for the full upgrade costs required to interconnect, and the standstill will continue:

If the Cape Cod CIP is not approved, the Group Study Customers will be given an option to share entire cost CIP upgrades, resulting in a fee of \$2,750/kW if all Cape Group members participate. ... **This will stagnate solar development in that area as the Cape Cod Group Study revealed that several stations do not have the feeder capacity to interconnect additional DER.**

CLC-ES-2-3(a) (emphasis added); DPU-3-1 (noting that projects would face “major, cost-prohibitive substation upgrades”). Eversource noted that it has “expended significant resources for each CIP upgrade project,” and that much of its work on the pending CIPs “may have to stop if these proposed CIPs are denied or a determination is further delayed.” DPU-Common-8-1.

It is crucial to the 2050 climate goals that D.P.U. 22-55 be approved. The EMA South Sub Region has almost no remaining substation hosting capacity. See Exh. ES-Forecast-1 at 26, line 12-13. If the full Cape Cod CIP is not approved by the Department, the Southeast region may not be in position to provide the DER capacity that Eversource is contemplating for the beyond 2035 time period to meet climate goals. See Exh. ES-Forecast-1 at 26, line 19 to 27, line 2. Further, Eversource would be forced to start fresh requesting DPU approval of a new option. With CIP projects requiring four years to construct, time is of the essence to once again get DER interconnected on Cape Cod and Martha’s Vineyard. See DPU-Common-8-1 at 3.

The recently filed draft Massachusetts 2025-2027 Energy Efficiency and Decarbonization Plan also demonstrated the need for investments to support solar interconnections. That plan was submitted on April 1, 2024, to the Energy Efficiency Advisory Council and included Potential Studies for each statewide PA. Attachment RR-CLC-ES-1 (Appendix N: Potential Study “Potential Study”). The Potential Study Final Report for the Compact “projects a significant uptick in Solar PV installations in the Compact service area, estimating an addition of 66.6 MW DC of Solar PV Generation capacity across the Residential and Commercial sectors in the forecast window of 2023 to 2027.” Attachment RR-CLC-ES-1 (Appendix N Compact Potential Study at 88 (Table 7-9)). The Potential Study “suggests a need for continuous investment in grid modernization to accommodate the rapid pace of Solar [photovoltaic (“PV”)] interconnections.” *Id.* at 89. The Cape Cod CIP is critical to support increases in solar PV, energy efficiency and electrification adoption with significant long-term ratepayer benefits. The inability to pair electrification and solar is not only contrary to the 2022 Climate Act but will result in an increase in energy burden for some customers.

The need for urgent approval of D.P.U. 22-55 was evident in public comment by Kate Warner of the Martha Vineyard’s Commission:

I am speaking to you today to urge you to approve D.P.U. No. 22-55 ... so that the Vineyard can continue to install solar. At present we’re currently producing about 10 percent of our power from solar via about 1500 solar arrays. ... Without this approval of 22-55, we are dead in the water. We can’t add any more solar. We are not able to move forward, which runs counter to the State’s decarbonization goals for 2050.

Tr. Vol. B at 78, line 14 to 79, line 12. Accordingly, D.P.U. 22-55 should be approved on an expeditious basis.

B. IEP in the ESMP.

1. The DPU should monitor the IEP working group and require broad stakeholder representation, including for energy efficiency

Eversource has proposed in its ESMP and begun to develop a coordinated IEP working group that will have “broad stakeholder support.” Exh. ES-ESMP-1 at 649. However, Eversource has not yet released many details about the IEP working group, including whether there will be any DPU oversight or how the selection process will work. *Id.* Eversource has stated that it plans to commence outreach for the working group in summer 2024. Eversource also provided that it “cannot make any final statements as to how directly energy efficiency will influence and be influenced by integrated energy planning.” CLC-ES-7-5.

As an energy efficiency PA in Eversource’s service territory, the Compact requests that the Department require Eversource to include the Compact in the IEP working group. The Compact believes that energy efficiency should play a significant role in any IEP working group and that energy efficiency representatives should be part of the working group. Eversource stated that, if an area in the Compact’s territory is identified for integrated energy planning, Eversource would need to coordinate with the Compact to understand historical energy efficiency and electrification production, specific challenges, etc. CLC-ES-7-6. The Compact also wants to ensure coordination among Eversource, the Compact and National Grid, which is a gas provider (and energy efficiency PA) in the Compact’s service territory.

The Department should also ensure some level of ongoing DPU supervision of IEP and the IEP working group.⁴ Eversource itself described IEP as a “transformative opportunity to

⁴ In D.P.U. 20-80-B, the Future of Gas Order, the DPU required the joint electric and gas utility planning “must occur in a broad stakeholder context so that the LDCs and [EDCs] exclusively are not defining the process and outcome.” *Investigation by the Department of Public Utilities on its own Motion into the role of gas local distribution companies as the Commonwealth achieves its target 2050 climate goals*, D.P.U. 20-80-B, Order on

address the urgent need of climate change” and as “new and challenging questions.” Exh. ES-ESMP-1 at 641-42. Given the importance of IEP in meeting the 2050 climate goals, the Department should monitor the development of the working group and IEP progress. The Company should be required to detail the IEP working group process (including selection) and provide periodic (or at minimum annual) reporting of IEP objectives, lessons learned, and outcomes, as well as progress by the IEP working group. The next ESMP should be required to fully report on IEP and the IEP working group’s efforts.

2. The Department should require Eversource to include in its IEP reporting (at least annually) a progress update on IEP electrification planning in areas where the gas and electric providers are different

The IEP reporting discussed in the previous section should include a progress update on IEP electrification planning in areas where the gas and electric providers are not the same. See Exh. ES-ESMP-1 at 643. In 2024, Eversource will begin IEP electrification efforts by focusing first on ten pilot communities where the EDC and gas local distribution company (“LDC”) are the same entity. Exh. ES-ESMP-1 at 649; DPU-Common-6-2. The same efforts will extend in 2025 to areas with different electric and gas providers. Exh. ES-ESMP-1 at 649; Tr. Vol. 5 at 764-65. The Company confirmed that it can use the same planning tools regardless of providers. Tr. Vol. 5 at 765-66.

These efforts are critical to the 2050 climate goals, so supervising those timelines is important. On Cape Cod, National Grid is the gas provider, so the Compact is looking to ensure that IEP electrification efforts will quickly turn to those areas where the gas and electric

Regulatory Principles and Framework at 131-32 (December 6, 2023) (“Order 20-80-B”). The DPU also provided that the planning process is not Department led but may lead to proposals for Department review. The DPU monitors and may further define the process in the future. Order 20-80-B at 131-32.

providers are different entities. Customers in those areas should not be left behind; all ratepayers should benefit in a timely way from IEP electrification.

Therefore, the Department should require Eversource to file an ESMP annual report commencing in 2025 on lessons learned from the IEP electrification pilots and the progress made on electrification efforts in areas with different providers. That reporting should include progress made on Cape Cod. The Department should also direct that Eversource (a) provide a full report on this electrification progress in the next ESMP and (b) include related dates on the detailed timeline referenced in Section IV.1.2.

3. The Department should direct how costs should be allocated between electric and gas in IEP

The Compact supports the important work to be done in connection with IEP. However, the Company seemed unable to respond to questions regarding cost recovery. Eversource seemed to indicate that initial efforts will be internal with existing staff, but that it “cannot at this time assess the future costs and recovery plans.” DOER-Common-5-5. The Department should ensure a fair and equitable cost recovery process for IEP that properly apportions costs.

C. The Department Should Recognize the Importance of Collaboration Between the Company and the Compact As Energy Efficiency Program Administrators in Eversource’s Service Territory to Ensure Similar ESMP-Related Efforts.

Energy efficiency should play an integral role in the ESMP. The Compact is eager to be a partner in collaborations and/or pilots with Eversource where energy efficiency in the Compact’s service territory can assist with ESMP efforts.⁵ The ESMP included Eversource’s energy efficiency in the five-year and ten-year forecasts.⁶ Tr. Vol. 2 at 265, lines 2-5. As a PA

⁵ The Compact has proposed in its Draft Three Year Plan to complete its Cape and Vineyard Electrification Offering (“CVEO”) during the 2025-2027 term, which supports electrification and PV installation for low- and moderate-income customers on Cape Cod. See Attachment RR-CLC-ES-1 at 13.

⁶ Eversource forecasts continuation of energy efficiency programs at similar funding and impact levels and does not forecast demand response. Exh. ES-ESMP-1 at 249, 250.

in Eversource's service territory, the Compact's data for energy efficiency, active demand response ("ADR"), and heat pumps was likewise included in those ESMP forecasts.⁷ CLC-ES-1-10; CLC-ES-1-11; CLC-ES-1-8. Future ESMPs should similarly include the Compact's data.

Energy efficiency will continue to be administered and funded through the Three-Year Plan. CLC-ES-7-4. Eversource did not include energy efficiency funding as part of its ESMP. *Id.* While that is the case, these two efforts – ESMP and energy efficiency – need to work seamlessly together rather than as two separate endeavors. See GMAC Consultants Comments at 158 (Eversource response to EWG-11 was that the recommendation was better suited for the Energy Efficiency Advisory Council and the energy efficiency PAs).

Eversource's Draft Three Year Plan includes \$70 million related to ESMP infrastructure upgrades. Eversource stated that it is "developing offers that will target communities impacted by infrastructure upgrades, including projects covered under the Integrated Planning Approach" in the ESMP, as well as "low- and moderate-income customers for whom the operating costs of electric technology may be a barrier to adoption." Attachment RR-CLC-ES-1. That \$70 million may also include "additional incentives for adoption of electrification technology or barrier remediation, new incentives for adoption of solar and/or storage, and support for provision of "turnkey" delivery of these measures, among other things." *Id.*

Those funds will presumably not be spent in Eversource's energy efficiency territory, meaning Cape Cod and Martha's Vineyard will (correctly) not benefit from those funds. If at any point the Compact may want to develop similar offers related to these types of ESMP-related energy efficiency efforts on Cape Cod or Martha's Vineyard, the Company should coordinate with the Compact to the extent necessary (e.g., share its lessons learned from its own similar

⁷ It is the Compact's understanding that its heat pump numbers are now added to Eversource's total after originally not being included. CLC-ES-1-8; see Exh. ES-ESMP-1 at 149.

offerings or information that would assist the effort). Such coordination may ensure that the Compact's customers on Cape Cod and Martha's Vineyard are similarly situated to benefit from energy efficiency efforts as Eversource customers in the rest of its service territory.

The Compact has collaborated with Eversource in the past and has every indication of Eversource's willingness to continue to do so. In response to CLC-ES-6-4, the Company stated that it will work with municipal aggregators with energy efficiency and decarbonization plans. See CLC-ES-6-2. Nevertheless, at the outset of the ESMP process, the Compact asks the Department to confirm in its Order that Eversource should work: (i) collaboratively with other PAs in its service territory where energy efficiency may advance the cause of the 2050 climate goals; and (ii) cooperatively with any PAs in its service territory to ensure that those PAs are able to develop energy efficiency offerings for their customers related to the ESMPs. The Compact is enthusiastic to partner with Eversource on pilots or other projects that will help meet the objectives of the 2022 Climate Act.

D. Eversource Should Test Alternative Use Parameters of BESS and Annually Report on Those Efforts to Inform the Next ESMP.

The Company should maximize alternative uses of its battery energy storage facilities, including peak shaving, to ensure that it is getting the most value out of its BESS for ratepayers. See Section 92B(a)(iii). Eversource is testing or considering alternative use parameters for the Provincetown BESS and New Bedford BESS. Tr. Vol. 5 at 751, line 10 to 754, line 4 and 758, lines 2-8. The Provincetown BESS is a 25 MW/38 MWh installation with a "stated use case of improving system reliability and resiliency of the distribution system in the Lower Cape Cod area." CLC-ES-1-7. The New Bedford 5 MW/10 MWh BESS (combined STATCOM) is in the preliminary planning stage at the Industrial Park Substation and is intended "to resolve long-standing power quality issues affecting industrial customers within the New Bedford Business

Park, and to support a higher penetration of DER at the substation.” Exh. ES-ESMP-1 at 402.

Both BESS have peak shaving mode functionality, and Eversource has “discussed peak shaving” for when there is a “local need on the distribution system.” CLC-ES-1-7; CLC-ES-1-16; Tr. Vol. 5 at 752, lines 6-9 and 758, lines 2-4.

Eversource is in the process of “looking to expand the use for alternative use cases” and “maximizing for multiple use cases.” Tr. Vol. 5 at 751, line 20 to 752, line 2. Regarding the Provincetown BESS, the Company stated that:

One, as we gain operational experience, we’re working with engineering and our system operations team to identify the opportunities. And so the process is to first figure out what is -- when is the envelope of time when we feel comfortable that we will not need it for its primary reliability use case -- so let’s just say we’re not anticipating any storm events or we don’t have any other operational needs to kind of keep it for its reliability purposes -- so identifying when an opportunity might be that we could dispatch the battery for peak-shaving.

Tr. Vol. 5 at 753, line 10 to 754, line 4. Eversource also noted that it is “definitely fair” to say that with the next ESMP this is an “area where we might see more development around peak-shaving.” Tr. Vol. 5 at 754, lines 9-12.

Given the significant BESS project investments and the urgency of the 2050 climate goals, to the extent possible, these BESS should be used beyond their primary use cases in the future to derive maximum value for ratepayers. To ensure progress, the Company should periodically report on a description of its efforts, lessons learned, and outcomes of its testing of alternative use parameters of the BESS. The DPU should direct Eversource to (1) test secondary use parameters of its BESS within reliability constraints and (2) include updates on these efforts in its ESMP annual report as well as its next ESMP.

E. The Department Should Issue Directives to Mitigate Adversities Related to ESMP Construction.

ESMP proposals will result in significant construction on system improvements. See Exh. ES-ESMP-1 at 12. The Compact supports Eversource's proposals – with the modifications discussed below – on the CESAG and CBAs, which will assist with outreach to affected communities. Eversource should likewise proactively seek to address the adverse effects of system improvements on its poles, as discussed in Section IV.E.3 below.

1. The CESAG Should be Co-Chaired by the GMAC and the Company

The Company proposed that the CESAG would be co-chaired by an EDC and a community-based organization (“CBO”) that would be voted upon by CESAG members at the first meeting. Exh. ES-ESMP-1 at 53. The GMAC instead recommended that the CESAG be co-chaired by the GMAC Equity Working Group and the EDCs, and that the CESAG operate under the GMAC structure. GMAC Final Report at 17 (R-15 and R-16).

The Compact supports the GMAC's recommendation and agrees with Green Energy Consumers Alliance (“GECA”) that the recommendation would reduce duplication and afford GMAC members greater insight into stakeholder concerns. Exh. GECA-LC-3 at 98, 119-22. Eversource rejected this recommendation because the “CESAG is intended for the EDCs to partner with community-based organizations representing territories across the state. ... The best path towards successful and clear community engagement is to have a governing framework co-developed by those stakeholders that live in and engage with communities daily.” Exh. ES-ESMP-1 at 54. Yet, there would be no need for a CBO to be a co-chair for Eversource to fully engage with that stakeholder. The GMAC's involvement in the EDC/GMAC co-chair structure would provide a different resource and perspective from the EDCs that would benefit

stakeholders, would allow the GMAC to participate in this important process and help inform future ESMPs.

2. The Department Should Confirm that Eversource Will Only Enter Into Community Benefits Agreements In the Context of an EFSB and/or DPU Proceeding and Will Be Transparent in CBAs that the Costs are Ratepayer-Funded

The ESMP proposes to allow the EDCs to negotiate CBAs to ensure that communities that host clean energy infrastructure projects directly benefit from those infrastructure investments.⁸ Exh. ES-ESMP-1 at 55. Eversource intends to fund the CBAs 100% through ratepayers and does not believe there should be funding limits. CLC-ES-1-3.

The Order should confirm that Eversource will only enter into CBAs for infrastructure projects requiring EFSB and/or DPU approval.⁹ Tr. Vol. 7 at 1038. In that way, the CBAs will be part of that EFSB/DPU process and thus should be assured of having reasonable parameters.

In addition, for transparency purposes, all CBAs entered into by Eversource should be required to include a provision that costs of the CBA are ultimately paid by all Eversource ratepayers, including that community. Exhibit CLC-ES-7-1 (e), Attachment A notes how one community felt blindsided to find out after entering into a CBA with Eversource that it would be funded by ratepayers.

3. The Department should direct Eversource to report on double poles resulting from ESMP-related pole work in an annual report or in ESMP metrics

Eversource acknowledged that the ESMP will bring about a significant amount of work

⁸ A recent Siting Board decision directed Eversource to enter into a CBA for the first time, recognizing the environmental justice populations involved in the substation construction. Attachment DPU-Common-9-19.

⁹ In public comment, the City of Boston suggested uniform criteria for CBAs. City of Boston Public Comment at 1, 4 (March 12, 2024). If CBAs are allowed to be considered outside the context of an EFSB and/or DPU proceeding, the Compact agrees some parameters should be required to protect negotiating communities and ratepayers.

on poles.¹⁰ Eversource's poles are rapidly approaching the end of their useful life in all regions. Exh. ES-ESMP-1 at 61. Eversource is replacing these older poles along with others for resiliency and hardening in light of the frequency and intensity of storms from climate change. Exh. ES-ESMP-1 at 61; Tr. Vol. 5 at 611, 613, 771-72 (noting efforts to replace Class 3 and 4 poles with Class 1 and 2 poles). The Compact is concerned that this work, along with construction from ESMP system improvements, will result in an increase of double poles. See Compact GMAC Public Comment at 2 (November 7, 2023) (noting that double poles cause safety concerns and aesthetic eyesores); see D.T.E./D.P.U. 03-87.¹¹

With the ESMP chock full of upgrade projects for years to come, Eversource has recognized that system improvements may cause an increase in the count of double poles¹², which are difficult to remove (e.g., different entities having attachments on the double poles).¹³ See CLC-ES-5-2; D.T.E. 03-87, Eversource's Semi-Annual Double Pole Report at 2-3 (December 20, 2023). As a result, Eversource currently is "in the process of evaluating how the investments proposed as part of the ESMP may impact the numbers of double poles." CLC-ES-5-2.

The Company appears adamant that double poles may only be viewed in the context of D.T.E./D.P.U. 03-87, despite system improvements related to the ESMP itself possibly

¹⁰ The ESMP stated that the Company has developed an "asset health model for poles," and that "the Company is the custodian of 104,734 poles" out of 200,067 poles in EMA South. Exh. ES-ESMP-1 at 163. The asset health model does not account for double poles. CLC-ES-5-1.

¹¹ The Compact supports the Company's undergrounding investment proposals. Attachment CLC-ES-6-1. The Compact had expected that those undergrounding efforts might lead to removal of poles, including double poles. However, Eversource stated that it may not because there are instances where poles are left up as a dual redundant service for customers. Tr. Vol. 5 at 768, lines 3-9.

¹² Eversource reports on double poles in *Report of the Department of Telecommunications and Energy relative to reducing the number of double utility poles within the Commonwealth, pursuant to Chapter 46 of the Acts of 2003, Section 110*, D.T.E./D.P.U. 03-87. CLC-ES-7-9. However, there is currently no process in that docket for stakeholders to comment or participate.

¹³ G.L. c. 164, §34B requires in part, that a utility removing a pole to install a new one "shall complete the transfer of wires, all repairs, and the removal of the existing pole from the site within 90 days of the installation of the new pole."

contributing to increasing double pole numbers.¹⁴ See CLC-ES-5-2. In the event that Eversource's double pole evaluation finds numbers increasing based on system improvements, the Department should direct the Company to include double poles as a reporting-only ESMP metric in the separate metrics phase of this proceeding (or in the ESMP annual report). In the alternative, the Department should reopen D.T.E./D.P.U. 03-87 to review double pole accounting in light of the ESMP and incorporate a separate ESMP-double pole category into that reporting. Finally, the Department should ensure that stakeholders can meaningfully comment on issues related to double poles, either as part of D.P.U. 24-10 or D.T.E./D.P.U. 03-87.

F. Low- and Moderate-Income Solar Programs are Consistent with the 2050 Climate Goals.

In the ESMP, the Company proposed the ASAP, stating that “[d]ependent on a Department directive in this docket, the Company will file a comprehensive program proposal and associated tariff seeking approval of the Affordable Solar Access Program.”¹⁵ Exh. ES-ESMP-1 at 320-21. The Compact supports the ASAP being presented to the DPU and stakeholders for consideration in a separate proceeding. However, the Department should condition that approval in this Order on requiring Eversource in its proposal to: (1) coordinate the ASAP with the Department of Energy Resources (“DOER”) and Mass Housing; and (2) ensure that customers may not qualify for ASAP and Solar For All or the Energy Saver Home Loan programs. The ASAP should not be duplicative of the Solar For All and the Energy Saver

¹⁴ The Compact is focused here on double poles as directly related to the ESMP.

¹⁵ Low- and moderate-income solar programs should be discussed in the ESMPs since they are consistent with the objectives of the 2022 Climate Act and would further 2050 climate goals. As a municipal aggregator, the Compact would like to be able to offer its low-income customers the benefits that an alternative low-income community shared solar program would provide. Those programs have been subject to D.P.U. 20-145, Phase II, which remains pending. Municipal aggregation alternative LICSS programs would increase the number of low-income community solar projects and would deliver meaningful benefits to low-income customers that could help with energy affordability. The Compact respectfully urges the Department to issue an order in D.P.U. 20-145, Phase II.

Home Loan programs; a requirement should be included so that customers may only qualify for one program. See CLC-ES-3-1.

G. The DPU Should Direct Eversource to Develop the Next ESMP as a Centralized, Whole-of-Business Strategic Planning Document.

The ESMP should be the centralized, whole-of-business strategic planning document that will chart the course for meeting the 2050 climate goals. The Compact agrees with parties that Eversource's first ESMP falls short of accomplishing that. Exh. DOER-1 at 9, 38-41; Exh. AG-BF-1 at 14-15.¹⁶ Eversource suggested that its distribution planning is provided in other filings, such as the Annual Reliability Reports. GMAC Consultants Comments at 106. However, Eversource misses the point because those other documents are not intended to respond to the requirements of the 2022 Climate Act, and they do not meet the ESMP goal of "synthesiz[ing] and summariz[ing] these proceedings in an overarching, integrated, and transparent planning document." Exh. DOER-1 at 39, lines 8-12.

At the outset of this proceeding, the Department found that the 2022 Climate Act "established a new regulatory construct for electric sector grid modernization and long-term electric system planning." Interlocutory Order on Scope at 12-13 (citing G.L. c. 164, §92B). The Department found that this new regulatory construct "incorporates an **integrated and comprehensive approach to distribution and transmission system planning** and places at the forefront the achievement of the Commonwealth's clean energy and decarbonizing goals." *Id.* (emphasis added). The GMAC recommended that the ESMP should contain "more detail on **whole-of-business strategic planning, program implementation and investment timelines,**

¹⁶ The GMAC Consultants Comments noted that the bifurcation of ESMP and non-ESMP investments means that the net benefits analysis in this docket only covers those ESMP investments, meaning that Eversource cannot optimize across all categories of investments. GMAC Consultants Comments at 69.

.... The ESMPs should be the central distribution system planning document....” GMAC Final Report at 13.

Such a document would resolve the current difficulty noted by DOER for parties to “track the wide variety of planning processes in which the EDCs engage.” *Id.* Eversource has many DPU proceedings and working groups through which topics are considered piecemeal (e.g., grid modernization, provisional system planning, electric vehicles, energy efficiency, advanced metering infrastructure (“AMI”)/data access, performance-based metrics (“PBR” investments), which does not allow an opportunity to examine how all of those investments or activities interplay and could be optimized. See Compact GMAC Public Comment (July 13, 2023) (citing D.P.U. 21-80, Compact Final Comments at 5 (May 24, 2023) (raising the need for comprehensive and coordinated reporting across all EDC’s activities and dockets to effectively gauge whether the Commonwealth is truly moving towards its clean energy goals)). The ESMP can and should serve that role.

As a case of first impression, the Department recognized in its Interlocutory Order that this proceeding may require transitioning from “the preexisting regulatory framework to the regulatory construct and system planning framework” contemplated by the 2022 Climate Act. Interlocutory Order at 13. The Department found that it may need to interpret the statute given that, where “the Legislature enacts a comprehensive scheme of legislation such as the 2022 Clean Energy Act, there are likely to be gaps in the statutory provisions.” *Id.* The timeframe for developing, reviewing, and filing the first ESMP was extremely tight. Although there remain four deferred issues that still require attention in the short term to comply with the 2022 Climate Act, the Department can now use its experience from this first ESMP as a guide in developing the requirements and process for the next ESMP. See Exh. DOER-1 at 46, lines 8-9 (finding that

the Commonwealth’s “distribution system planning can be further improved upon as the ESMP process evolves”).

Accordingly, the Department should direct Eversource to recast the next ESMP to be a centralized, whole-of-business strategic planning document. As discussed below, that directive should further require the ESMP to include transmission planning related to ESMP investments and more comprehensive bill impacts analysis.

1. Eversource should include transmission planning to a greater extent in the next ESMP

There appears to be disagreement on the extent to which transmission planning should be part of the ESMP, which did not go into detail on the transmission side of the Company’s system. See Exh. ES-ESMP-1 at 291; *cf.* GMAC Final Report at 20-22; Exh. AG-BF-1 at 51-52. Transmission planning should be included in the ESMP because it is inextricably linked to distribution planning, the 2022 Climate Act calls for it, and system inefficiencies will otherwise result for ratepayers if not done.

The 2022 Climate Act requires the EDCs to address transmission investment “where applicable” in their ESMPs and to describe improvements to the transmission or distribution system “to facilitate achievement of the statewide greenhouse gas emissions limits under chapter 21N.”¹⁷ G.L. c. 164, §92B(a) and (b)(vi); see Exh. AG-BF-1 at 51, lines 4-6. Yet, the ESMP neither contains detail on transmission investments nor on how transmission needs affect EDCs’ short- or long-term distribution investments. Exh. ES-ESMP-1 at 291; Exh. AG-BF-1 at 51-52; GMAC Consultants Comments at 9. In fact, Eversource rigidly insisted that “the ESMP focuses on distribution, and distribution only.” Tr. Vol. 2 at 268, line 22 to 269, line 3. At the same

¹⁷ The statute contains other references to transmission as well. G.L. c. 164, §92B(a)(iv-v); G.L. c. 164, §92B(b)(ix).

time, however, the ESMP recognizes at a very general (non-detailed) level that distribution upgrades inevitably require new transmission sources and that transmission planning is necessary to meet the 2050 climate goals.¹⁸ Exh. ES-ESMP-1 at 291-92; see AG-7-4 (identifying transmission system upgrades associated with 2025-2029 project solutions); see Tr. Vol. 5 at 585, lines 16-20 (adding DG distribution capacity can trigger need for transmission upgrades).

In response, the GMAC found that distribution investments unavoidably have an impact on the transmission system¹⁹ and made transmission-related recommendations:²⁰

- R-33 states “the ESMPs should include estimates of transmission level costs that are likely to be driven by distribution level investments.”
- R-44 states “The ESMPs should clarify whether there are any transmission system upgrades included in the plans and, if so, should include timelines and cost estimates for those investments. For any transmission system upgrades that require additional analysis to identify specific upgrades or cost estimates, the ESMPs should provide a description of the analysis that the EDCs will conduct, the process which the EDC or Transmission Owner will seek approval for such upgrades, and the timeline for the analysis through construction and approval process.”
- R-45 states “the ESMPs should make clear the extent to which the delivery of [benefits of ESMPs and specific investments] depends upon and/or assumes the construction of associated transmission upgrades.”

GMAC Final Report at 20-22. The ESMP filed with the DPU did not contain the level of detail recommended. See Exh. AG-BF-1 at 51-52.

The 2050 climate goals require a one system approach to distribution and transmission planning to prevent overbuilding and overspending. During hearings, Eversource noted that “a

¹⁸ Transmission planning should also be included in the ESMP because of the long length of transmission projects (eight to ten years). See Exh. ES-ESMP-1 at 292.

¹⁹ The GMAC Consultants Report also concluded that “given the interdependence of the transmission and distribution systems, the ESMPs should ideally address the implications of transmission needs on the distribution system infrastructure.” GMAC Consultants Comments at 8.

²⁰ Section 92C(b) of the 2022 Climate Act also requires the GMAC to coordinate and cooperate with the Clean Energy Transmission Working Group (“CETWG”), which the GMAC did on October 13, 2023. Thus, the legislature appears to have accounted for the importance of transmission planning in reviewing the ESMPs. The GMAC requested information of the Company on related transmission system investments or impacts but did not receive this information during the GMAC review period. GMAC Public Comment on Process at 2 (March 5, 2024).

separate group” from the panel was addressing the transmission requirements related to offshore wind and other transmission needs.²¹ Tr. Vol. 2 at 269, lines 4-7. The ESMP should be the comprehensive document that demonstrates to the DPU and ratepayers that the Company has an overarching plan to meet the 2050 climate goals. The ESMP should likewise detail the Company’s coordination with ISO-New England on transmission system upgrades related to the ESMP. See Exh. AG-BF-1 at 53-54 (“Coordinated planning will help EDCs avoid distribution system investments that could potentially fail to be fully utilized because of insufficient transmission, as well as open a pathway for EDCs to inform the transmission expansion process.”); GMAC Consultant Comments at 132.

The 2022 Climate Act clearly intends a greater level of transmission detail than in the current ESMP. To ensure that the transmission and distribution systems are built to maximize value to ratepayers as required by the 2022 Climate Act pursuant to G.L. c. 164, §92B(a)(vi), the Department should direct Eversource to include transmission planning to the greatest extent possible so that the next ESMP evolves into the comprehensive, whole-of-business strategic planning document intended by the 2022 Climate Act.

2. The Department should revisit precedent on bill impact analyses to require the next ESMP to include a comprehensive understanding of ESMP investments

The Department should reconsider how the EDCs undertake bill impacts for future ESMPs to ensure that bill impacts—particularly those on low- and middle-income customers—

²¹ The ESMP notes that it anticipates an offshore wind injection of 6.4 GW in the Southeastern Region (“SEMA”) by 2035 which will “significantly accelerate the need to expand the transmission and distribution systems” there. Exh. ES-ESMP-1 at 70. Those offshore wind injections may provide a benefit to the distribution system where they come onshore, but those would not be included in the ESMP forecast because offshore wind is a transmission interconnected resource. Tr. Vol. 2 at 268-69.

can be meaningfully examined.²² The Department directed the EDCs to file documentation on “projected bill impacts with one-year, three-year, and five-year outlooks of implementing the ESMPs, as proposed.” D.P.U. 24-10, Hearing Officer Memorandum at 4 (August 7, 2023). The Company’s bill impacts in the proposed ESMP address only a small portion of grid modernization costs – the incremental investments for 2025-2029 – included in the ESMP.²³ Exh. ES-Bill Impacts-1 at 16.

Eversource’s approach excludes from its bill impacts for 2025-2029 a wide swath of investments, including core capital, AMI, CIP, solar, Grid Mod, EV program, energy efficiency, storm costs, and electric operations. See Exh. ES-Bill Impacts-1 at 735, 738 (Table 7-1 (Planned Investments Capital Recovery by Category (2025-2029) modified) and Table 7-2 (Planned O&M Cost Recovery (2025-2029) modified); RR-GECA-ES-1. The total incremental costs included in the bill impacts are \$820 million. RR-CLC-ES-2. However, the new proposed, planned core, and planned clean energy investment capital expenditures total \$6.1 billion funded by ratepayers over the ESMP five-year term. *Id.* The bill impacts also do not factor in transmission upgrade costs to ratepayers. Exh. ES-ESMP-1 at 735, 738.

For a typical residential customer, the illustrative bill impact associated with the incremental ESMP investments for year one is 0.1% to 0.2% or 27 to 29 cents per month. Exh. ES-Forecast-1 at 24, lines 12-15. Adding in the non-incremental investments for year one results in an illustrative monthly bill impact of \$3.94 or 2.1% for EMA Rate R-1 in 2025, assuming an

²² See *Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers*, D.P.U. 24-15, Vote and Order Opening Inquiry (January 4, 2024) (inquiry into energy burden and energy affordability).

²³ The GMAC was unable to review, ask questions, or make recommendations on the bill impacts, which the Company did not include in its draft ESMP filing with the GMAC on September 1, 2023. The first time the GMAC or any parties saw the bill impacts was with the final ESMP filing on January 29, 2024. See GMAC Final Report at 9 (Recommendation O-17); *cf.* Exh. ES-Bill Impacts-1 at 25, lines 8-15.

average monthly usage of 530 kWh.²⁴ Attachment GECA-ES-1-4 (Bill Impact Summary Tab). The comparison between these bill impacts is marked and needs to be part of the record for the Department's consideration. See Exh. GECA-LC-1 at 7. The overall (rather than just incremental) costs of the ESMP are on an unprecedented scale and the Commonwealth cannot effectively examine this ESMP, nor alternative rate redesigns and energy affordability, without comprehensive bill impacts.²⁵ For example, Eversource has proposed a more than \$1 billion price tag for one single Cambridge substation that has distribution and transmission costs but it is not included in the ESMP bill impacts because it is a "core investment." Tr. Vol. 5 at 760.

Eversource cites Department precedent in D.P.U. 12-76-C for its incremental approach to bill impacts in this case. *Investigation by the Department of Public Utilities on its own Motion into Modernization of the Electric Grid*, D.P.U. 12-76-C, Order at 29 (November 5, 2014). However, that order is outdated as it never could have contemplated the scale of the ESMPs or the 2050 climate goals. The Department found in its Interlocutory Order (at 13) that, in this proceeding, it must "carefully consider how to transition the preexisting regulatory framework to the [new] regulatory construct and system planning framework established in G.L. c. 164, § 92B." The Department should reconsider how the EDCs undertake bill impacts for future ESMPs. 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. At a minimum, the Department should require illustrative bill impacts that incorporate

²⁴ Exh. ES-ESMP-1 at 21 (Figure 1-6) (noting a typical household use today of 700 kWh per month and the typical house in the future of 1,400-2,400 kWh per month).

²⁵ GMAC Recommendation-73 also provided that when "estimating how proposed investments will impact rates, the ESMPs should account for the rate impacts on gas utility customers as well as electric customers, as gas utility impacts are inextricably linked to electric utility investments and rate impacts." The Compact supports this recommendation and asks for the GMAC's bill impact recommendations to be considered here.

incremental and non-incremental investments (in addition to the incremental bill impacts). In that reconsideration, the Department should also consider including transmission-related costs which are inextricably linked to the distribution costs in the ESMP and the 2050 climate goals.

H. The Department should require Eversource to work with the other EDCs, stakeholders and the Department to standardize the next ESMPs across EDCs to the extent possible.

The Compact supports DOER testimony and GMAC recommendations arguing for the standardization of ESMPs across the EDCs. Exh. DOER-1 at 41-42. The GMAC noted that the EDCs, prior to the next ESMP, should work with stakeholders and the Department “to standardize the ESMP analysis and plan process across all three EDCs to achieve as uniform a process as possible.” GMAC Final Report at 30.

The Compact supports the GMAC recommendations calling for standardization, including: O-1 (underlying forecasting methodologies, assumptions, terminology, and presentation); R2 and R11 (terms and definitions (e.g., DG and DER); R-50 (approaches to key elements); R-52 (solution prioritization, selection, and investment-deferral decisions and engaging with stakeholders throughout the investment decision-making process); R-54 (investment summaries); R-56 (long-term electric demand assessment); and R-66 (climate change risk and planning tools and forecasting windows and parameters). In addition, the term “equity” should be defined in the same way across EDCs (i.e., the EWG’s justice-oriented equity definitions) to ensure that customers are given the same consideration no matter where they reside in the Commonwealth. GMAC Final Recommendations at 28.

Further, there are glaring inconsistencies between the EDC’s ESMP proposals, as pointed out by DOER:

- Eversource proposes resiliency investments (including undergrounding, reconductoring and other storm hardening infrastructure upgrades) as part of its incremental ESMP

investments while National Grid does not seem to propose any resiliency investments as part of its ESMP.

- Eversource proposes integrated energy planning investments as a part of its customer investments while National Grid proposes integrated energy planning investments as part of its network investments.
- Eversource does not include any network investments as part of its ESMP for review or approval, while network investments are the largest part of the National Grid and Unitil proposed ESMP investments. These examples demonstrate that the filed ESMPs are not uniform nor are they clear in differentiating approved versus existing investments. This further emphasizes the importance for the ESMPs to have clear and standardized figures and tables of all investments (e.g., approved, and proposed).

Id. The lack of standardization made it harder for the GMAC (and parties) to review the ESMP (Exh. DOER-1 at 18), but also raises concerns about how the differences may result in ratepayers receiving differing experiences through the ESMPs.

Accordingly, for the next ESMP, the EDCs should be required to use the intervening years before the next ESMP to standardize their ESMPs in collaboration with the DPU, GMAC, and stakeholders.

I. The Department should require process and reporting for the next ESMP and deferred issues.

With the next ESMP due in five years, the EDCs and stakeholders have the opportunity to continue discussions over the intervening years and to comply with any Department directives in this Order. See DOER-1 at 25. As noted in Section IV.G., the Department should develop a new regulatory construct which includes the process and reporting discussed below.

1. Eversource should participate in a GMAC-led process prior to the next ESMP

DOER proposed that the Department “direct the EDCs to participate in a GMAC-led process to develop and lead a multiyear collaborative stakeholder effort to develop the next ESMPs in advance of this GMAC filing date.” Exh. DOER-1 at 47, lines 4-7. In public comment, the GMAC sought to require the Company to engage with the GMAC and

stakeholders at least 24 months before submitting a draft ESMP to the GMAC. GMAC Public Comment at 3 (March 5, 2024).

The Compact supports a GMAC-led process prior to filing the next draft ESMPs to, among other things, develop a more comprehensive document (see Section IV.G.) and standardize the ESMP across the EDCs (see Section IV.H.). Eversource could also report on various efforts related to IEP, alternative use parameters of BESS, third-party TVR and other deferred issues, and the detailed timeline development discussed in the previous section. Beginning the process earlier would also likely allow for additional stakeholders to participate and result in a more thoughtful document.

2. Eversource should develop a comprehensive timeline for the next ESMP

The Office of the Attorney General recommends that the EDCs should create at least two timelines—one spanning 2025-29 and one spanning 2025-2034, consistent with the five-year and ten-year demand forecasts. Exh. AG-BF-1 at 20, lines 2-4. A third timeline through 2050 should show projected growth of EVs, heat pumps, and other DERs to meet the 2022 Climate Act's goals. *Id.*

The Compact strongly supports this requirement of a detailed timeline. The timeline should – like the ESMP itself – be a central, whole-of-business timeline that includes details on all significant inputs to the ESMP and key components to meeting the 2050 climate goals (e.g., dates and details on AMI deployment, system build-out completion dates, energy efficiency, integrated energy planning, TVR (in coordination with AMI Stakeholder process), alternative rate redesign, transmission associated with ESMP investments, ESMP-related performance metrics). The dates should include working group timelines and commencement/completion of Department proceedings. For the deferred issues, like TVR, alternative rate design, and metrics,

the Company should be required to add those to the timeline upon the completion of the separate proceedings/phases in which they are or will be considered.

Specific to TVR, the GMAC noted the need for a TVR timeline in R-39, which stated that the ESMPs should provide a “specific timeline for the implementation of TVR (excluded in Eversource’s ESMP) and how the TVRs will maximize customers’ opportunities to control as much of their energy bill as possible, including distribution, transmission, energy, and capacity.” GMAC Final Report at 21. Similarly, the GMAC’s R-40 recommended an AMI and data access timeline, and stated that:

Understanding when and how the data for AMI meters will be available to customers and their retail suppliers will be important and the ESMPs should provide information related to data sharing and meter access for AMI. At a minimum, the protocol should consider the granularity in which customer bills will be settled, how bulk transfers of AMI data will be completed, and how real-time access to data will be implemented to enable demand response participation.

Id. R-44 sought timelines related to transmission system upgrades, and R-65 would include availability of the Company’s final public climate vulnerability assessments. *Id.*

Accordingly, the Department should direct Eversource to develop comprehensive, detailed timelines to meet the 2050 climate goals. Ideally such a timeline would be refined as part of the GMAC-led process discussed in Section IV.1.1.

3. The Department should require Eversource to file an ESMP annual compliance report

As discussed herein, Eversource should pursue some elements of its ESMP in the intervening years before the next ESMP that are critical to the 2050 climate goals. To ensure progress on those issues and to inform ongoing working groups, the Department should require Eversource to file an annual compliance report. G.L. c. 164, §76 (the Department’s supervisory authority over the EDCs); see DOER-1 at 25. Such a filing should include the detailed timeline

(discussed above) and would ensure that parties not participating in every docket or working group could easily continue to monitor progress on the ESMP. The Compact requests that the ESMP annual report include: (a) Eversource's progress on IEP planning related to areas with different electric and gas providers; (b) testing on alternative use parameters on BESS; (c) increases in double poles related to ESMP system improvements (if not otherwise included in the ESMP metrics); and (d) progress on the deferred issues as discussed in the next section.

4. The Department should clarify subsequent process for the deferred issues

The Department approved Eversource's proposal to review certain issues in on-going or new generic proceedings outside the ESMP or in subsequent phases of the ESMP proceeding including: (a) alternative rate design in the Interagency Rates Working Group; (b) TVR in the AMI Stakeholder Group (D.P.U. 21-80); (c) ESMP metrics in a separate phase of this proceeding²⁶; and (d) dispatch energy storage technologies in D.P.U. 23-126. Interlocutory Order at 6, 21-24. The deferred issues are crucial to the ESMP and meeting the 2050 climate goals. While those issues will not be covered substantively in this Order, the Department should consider how those issues will eventually be brought back into the ESMP process; any subsequent process necessary following this Order and the conclusion of those separate proceedings; and how stakeholders can be kept abreast of those issues in the meantime.

The parties in this ESMP proceeding were unable to ask questions about or otherwise raise those issues in this proceeding. Those parties may also not have the resources to participate

²⁶ The 2022 Climate Act does not expressly mention metrics other than to say that any should be included in the reports required to be submitted twice per year by Eversource to the Department and the Joint Committee on Telecommunications, Utilities and Energy. G.L. c. 164, §92B(e). The Department found that the legislature therefore "left it to the Department's discretion to determine if and when to adjudicate performance metrics." Interlocutory Order at 22. The Department stated that it will "address any initial performance metrics in a separate phase of the current proceedings, including whether any current grid modernization or EV performance metrics should be applied to the plans." *Id.* at 23.

in all of the proceedings in which those deferred issues are now being considered. The Company should be required to file the ESMP annual report²⁷ (as discussed in Section IV.1.3.) to update progress on the deferred issues as part of ESMP reporting so that the DPU and stakeholders can stay apprised of them in one docket. In addition, upon conclusion of the separate proceedings, the Department should require Eversource to include the deferred issues, as applicable, in the detailed timeline and in the GMAC-led process. The Department should also consider how it will address ESMP metrics for the deferred issues if those proceedings end after the conclusion of the ESMP metrics phase.

a. ESMP metrics

Regarding metrics, the Department should direct the subsequent phase of ESMP metrics in its Order. Eversource has proposed some metrics for review in its ESMP (Exh. ES-Metrics-1), but a separate phase should allow stakeholders to propose additional metrics and consider whether any current grid modernization metrics (e.g., on AMI deployment) should be carried over into the ESMP metrics. See CLC-ES-5-8 (Eversource stating that grid modernization metrics end in 2025). ESMP metrics are necessary to ensure progress towards the 2050 climate goals.

b. TVR

Specific to TVR, the Compact is concerned with the lack of progress in the AMI Stakeholder Group on third-party TVR and the uncertainty with the process going forward. The AMI Stakeholder Group has concluded its meetings with significant non-consensus items that are identified in the quarterly reports filed in D.P.U. 21-80. See CLC-ES-5-7 at 2-3; Attachment CLC-ES-5-7(a)-(d); D.P.U. 21-80, Quarterly Status Report (May 15, 2024). Those non-

²⁷ In the alternative, if appropriate, the Company could include this information in its biannual report to the Department and Joint Committee or in metrics.

consensus items include major aspects of offering third-party TVR, including utility billing for critical peak pricing (“CPP”) and peak time rebate TVR and AMI data access for municipal aggregators. *Id.* Based on the language in the Department’s Interlocutory Order, the Compact understands that third-party TVR will be fully considered by the DPU in that AMI Shareholder Group (rather than in the ESMP). Interlocutory Order at 21-22. However, the Compact is uncertain about the next steps in that process following the Company’s submittal of its final report in August 2024. The Compact submits that the Department should accept comments on the final report when filed in D.P.U. 21-80 given the nonconsensus items and should set forth additional process.

With the start of AMI deployment rapidly approaching, time is of the essence on third-party TVR, which will help achieve climate goals.²⁸ See CLC-ES-3-2. However, it appears that third-party TVR will need to be subject to much more process. In addition to the lack of agreement in the AMI Stakeholder Group, Eversource provided in this docket that another DPU proceeding will be required because the functionality necessary to offer rate ready critical peak pricing TVR for third parties was not included in the cost approvals in D.P.U. 21-80. CLC-ES-3-2(c). The Company indicated that such costs “would be substantial,” requiring a weighing of the costs and benefits of enabling supplier CPP TVR. *Id.* The Department should ensure that TVR will be on track to allow all customers – not just basic service customers – to take advantage of it as soon as possible after AMI deployment in a region. It would be inequitable for TVR to be offered to basic service customers ahead of customers on municipal aggregation.

²⁸ Third-party TVR and data access were key customer benefits in approval of AMI deployment costs. See *Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Grid Modernization Plan for calendar years 2022 to 2025*, D.P.U. 21-80, Order at 327-29 (November 22, 2022).

Given the importance of TVR and that consideration of TVR may be ongoing for some time still, TVR is particularly ripe for the subsequent process (i.e., inclusion in the ESMP annual report and detailed timeline) discussed above.

V. RELIEF REQUESTED

The Compact requests relief as set forth in the bulleted list in Section I.

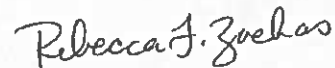
VI. CONCLUSION

For all of the reasons discussed herein, the Compact requests that the Department issue an Order consistent with the arguments and relief requested in this Initial Brief.

Respectfully submitted,

CAPE LIGHT COMPACT JPE

By its attorneys,



Audrey Eidelman Kiernan, Esq.

(akiernan@kolawpc.com)

Rebecca F. Zachas, Esq.

(rzachas@kolawpc.com)

KO LAW, P.C.

1337 Massachusetts Avenue, Box 301

Arlington, MA 02476

617-644-7681 (voice)

Dated: May 17, 2024

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of NSTAR Electric Company d/b/a Eversource)
Energy, pursuant to G.L. c. 164, § 92B, for approval by the) D.P.U. 24-10
Department of Public Utilities of its Electric Sector)
Modernization Plan.)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated this 17th day of May, 2024.

Rebecca F. Zachas

Rebecca F. Zachas, Esq.
rzachas@kolawpc.com
KO Law, P.C.
1337 Massachusetts Avenue, Box 301
Arlington, MA 02476
(617) 644-7681 (Phone)

May 8, 2024

Faith Communities Environmental Network (FCEN)/Waquoit Congregational Church
Mass Save Grant Program: FCEN Energy Café

How the funding supported your initiative:

The Mass Save Community Education grant made it possible to bring Cape Cod residents together, over coffee and refreshments, to participate in energy efficiency education, and learn about the MassSave benefits that were available to them.

The grant supported the logistics and staff time needed to conduct these programs. Faith Communities Environmental Network (FCEN) is an all-volunteer group, and financial support from MassSave took our community education efforts to a whole new level.

The funds allowed us to purchase refreshments and supplies. It also allowed us to experiment with offering Gift Cards to residents who agreed to have us contact them after the Energy Cafe, and to volunteers who served as "Energy Ambassadors" aiding the program coordinators at our Energy Cafes. This was a new expense for us, and we found this more helpful than our initial plan to pay for print advertisements.

The impact your work has had on your community since becoming a recipient of the grant

- *We conducted 32 Energy Cafes and signed up 253 Cape Cod residents for Energy Assessments. We also gained tens of thousands of sustained reaches in local media over the course of the grant.*
- *Between our Café events and the extensive media coverage, we established connections with faith and community groups in environmental justice communities, and invited them to participate in the effort to reduce energy on Cape Cod. We helped residents to tap into Mass Save benefits.*

Would you apply for funds in the future?

At this point, we do not need additional funds, as the ground has been laid for us to continue to offer Energy Cafés to any faith community on Cape Cod that is open to it.

If you had to change one thing about the grant, what it would be and why?

Direct the money to existing organizations with touch points within the community; especially BIPOC and language-isolated.

Going forward, focus on the community aggregators, like Cape Light Compact as well as non-profits like Housing Assistance Corporation (who do the audits for income eligible clients).

Thank you for the opportunity to submit our comments.

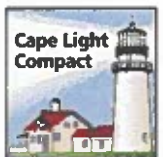
Respectfully submitted,

Susan Starkey, Co-Chair of Faith Communities Environmental Network (FCEN)
Rosemary Dreger Carey and Judith Holt, Co-Directors of FCEN Energy Cafe

Power Supply Rates: July '24 – January '25

	<u>Residential</u>	<u>Commercial</u>	<u>Industrial</u>
	<i>July '24 - Jan '25 cents/kWh</i>	<i>July '24 - Jan '25 cents/kWh</i>	<i>July '24 - Oct '24 cents/kWh</i>
CLC Standard	13.098	12.993	11.127
Local Green 50%	14.398	14.293	12.427
Local Green 100%	16.698	16.593	14.727
Eversource	15.772	15.677	13.556

The Compact's residential rate for the July through January term is 2.67 cents/kWh below Basic Service and approximately 15% lower than the previous term



2024 Operating Budget Expense Report Through 05/31/2024

ORG	OBJECT	ACCOUNT DESCRIPTION	ORIGINAL APPROP	REVISED BUDGET	YTD EXPENDED	AVAILABLE BUDGET	% USED
01001	5110	OP-SALARIES	\$ 136,500.00	\$ 136,500.00	\$ 50,503.80	\$ 85,996.20	37.00
01001	5119	OP-SALARY RESERVE	\$ 5,000.00	\$ 5,000.00	\$ -	\$ 5,000.00	0.00
01001	5171	OP-RETIREMENT	\$ 27,000.00	\$ 27,000.00	\$ -	\$ 27,000.00	0.00
01001	5173	OP-GROUP INSURANCE	\$ 18,500.00	\$ 18,500.00	\$ 6,828.14	\$ 11,671.86	36.90
01001	5174	OP-MEDICARE/OTHER TAXES	\$ 2,000.00	\$ 2,000.00	\$ 688.76	\$ 1,311.24	34.40
01001	5175	STATE UNEMPLOYMENT INSURANCE	\$ 621.00	\$ 621.00	\$ 91.83	\$ 529.17	14.80
01001	5179	OP-MISC FRINGES	\$ 250.00	\$ 250.00	\$ 12.00	\$ 238.00	4.80
01001	5181	OP-OPEB LIABILITY	\$ 16,990.00	\$ 16,990.00	\$ -	\$ 16,990.00	0.00
01001	5210	OP-UTILITIES	\$ 250.00	\$ 250.00	\$ 64.89	\$ 185.11	26.00
01001	5270	OP-MISC RENTALS	\$ 600.00	\$ 600.00	\$ 198.79	\$ 401.21	33.10
01001	5272	OP-RENT	\$ 6,210.00	\$ 6,210.00	\$ 2,587.50	\$ 3,622.50	41.70
01001	5290	OP-CUSTODIAL SERVICES	\$ 2,000.00	\$ 2,000.00	\$ 905.05	\$ 1,094.95	45.30
01001	5301	OP-ADVERTISING	\$ 55,000.00	\$ 55,000.00	\$ 17,326.93	\$ 37,673.07	31.50
01001	5302	OP-PUBLIC MARKETING SUPPORT	\$ 25,000.00	\$ 25,000.00	\$ 5,483.80	\$ 19,516.20	21.90
01001	5309	OP-IT SERVICES	\$ 2,000.00	\$ 2,000.00	\$ 947.48	\$ 1,052.52	47.40
01001	5313	OP-STAFF PROFESSIONAL DEVELOP	\$ 5,000.00	\$ 5,000.00	\$ 55.00	\$ 4,945.00	1.10
01001	5314	OP-PAYROLL SERVICES	\$ 250.00	\$ 250.00	\$ 59.72	\$ 190.28	23.90
01001	5315	OP-LEGAL SERVICES	\$ 310,000.00	\$ 310,000.00	\$ 147,520.11	\$ 162,479.89	47.60
01001	5316	OP-AUDIT FEES	\$ 7,500.00	\$ 7,500.00	\$ -	\$ 7,500.00	0.00
01001	5318	OP-TREASURY SERVICES	\$ 12,000.00	\$ 12,000.00	\$ 3,374.00	\$ 8,626.00	28.10
01001	5319	OP-CONTRACTUAL	\$ 45,000.00	\$ 45,000.00	\$ 4,914.00	\$ 40,086.00	10.90
01001	5320	OP-OUTREACH/MARKETING CONTRACT	\$ 35,000.00	\$ 35,000.00	\$ 1,631.78	\$ 33,368.22	4.70
01001	5341	OP-POSTAGE	\$ 7,500.00	\$ 7,500.00	\$ 3,137.05	\$ 4,362.95	41.80
01001	5343	OP-TELEPHONES	\$ 1,200.00	\$ 1,200.00	\$ 568.13	\$ 631.87	47.30
01001	5344	OP-INTERNET	\$ 2,500.00	\$ 2,500.00	\$ 433.14	\$ 2,066.86	17.30
01001	5345	OP-PRINTING	\$ 12,500.00	\$ 12,500.00	\$ 5,711.12	\$ 6,788.88	45.70
01001	5400	OP-SUPPLIES	\$ 1,600.00	\$ 1,600.00	\$ 367.54	\$ 1,232.46	23.00
01001	5490	OP-FOOD SUPPLIES	\$ 6,500.00	\$ 6,500.00	\$ 1,643.50	\$ 4,856.50	25.30
01001	5710	OP-TRAVEL IN STATE	\$ 5,000.00	\$ 5,000.00	\$ 2,401.76	\$ 2,598.24	48.00
01001	5720	OP-TRAVEL OUT STATE	\$ 8,000.00	\$ 8,000.00	\$ 2,182.22	\$ 5,817.78	27.30
01001	5730	OP-SPONSORSHIPS	\$ 51,000.00	\$ 51,000.00	\$ 46,688.02	\$ 4,311.98	91.50
01001	5731	OP-SUBSCRIPTIONS	\$ 25,000.00	\$ 25,000.00	\$ 21,449.00	\$ 3,551.00	85.80
01001	5732	OP-SOFTWARE LICENSES	\$ 2,100.00	\$ 2,100.00	\$ 558.98	\$ 1,541.02	26.60
01001	5741	OP-INSURANCE	\$ 5,000.00	\$ 5,000.00	\$ -	\$ 5,000.00	0.00
01001	5789	OP-UNPAID BILLS	\$ 500.00	\$ 500.00	\$ -	\$ 500.00	0.00
01001	5850	OP-MISC EQUIPMENT	\$ 1,000.00	\$ 1,000.00	\$ 287.46	\$ 712.54	28.70
<u>01001</u>	<u>5854</u>	<u>OP-FINANCIAL SOFTWARE SYSTEM</u>	<u>\$ 3,900.00</u>	<u>\$ 3,900.00</u>	<u>\$ -</u>	<u>\$ 3,900.00</u>	<u>0.00</u>
		Grand Total	\$ 845,971.00	\$ 845,971.00	\$ 328,621.50	\$ 517,349.50	38.80

January-April 2024 Mil Adder Revenue: \$ 313,948.51