

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

DATE: Wednesday, September 11, 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, July 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: 821-9004-8582

Passcode: 093506

AGENDA

1. Public Comment
2. Approval of July 10, 2024, Open Session Minutes
3. **Open Session Vote on Entry into Executive Session:** Open Session Vote on Entry into Executive Session: pursuant to M.G.L. c. 30A §21(a)(10) to review and approve the July 10, 2024 Executive Session minutes regarding trade secrets and confidential, competitively sensitive or other proprietary power supply information, **to return to Open Session thereafter**
4. Chairman’s Report, Martin Culik
 - A. Introduction of New CLC Staff
 - B. Discussion and Presentation on Municipal Aggregation Guidelines, MA Department of Public Utilities (MA DPU 23-67-A), Mariel Marchand
 - C. Discussion and Presentation on CLC 2022-2024 Energy Efficiency Plan Mid-Term Modification Filing, MA DPU 24-126, Margaret Song
 - D. Discussion and Presentation on Program Changes in the 2025-2027 Energy Efficiency and Decarbonization Plan, Briana Kane
 - E. Administrator’s Report, Maggie Downey
 1. Update on USDA/RUS Rural Energy Services Program (RESP)
 2. Update Net Zero Conference, October 24, 2024
 3. Next Board Meeting: October 9, 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, July 10, 2024**

The Cape Light Compact JPE Board of Directors met on Wednesday, July 10, 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. Tom McNellis, Eastham
3. Gary Senecal, Eastham Alternate
4. Valerie Bell, Harwich
5. Martin Culik, Chair/Executive Committee, Orleans
6. David Jacobson, Orleans Alternate
7. Bob Higgins-Steele, Truro Alternate
8. 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. Timothy Carroll, Chilmark
5. Alan Strahler, Edgartown
6. Matthew Patrick, Falmouth
7. Wayne Taylor, Mashpee
8. Nathaniel Mayo, Provincetown
9. Nicola Blake, Executive Committee, West Tisbury

Absent Were:

1. Forrest Filler, Aquinnah
2. Brian Miner, Chatham
3. Brad Crowell, Dennis
4. Meghan Gombos, Dukes County
5. Peter Meleney, Oak Bluffs
6. Leanne Drake, Sandwich
7. Russ Hartenstine, Tisbury
8. Jarrod Cabral, Truro
9. Suzanne Ryan-Ishkanian, Wellfleet

Legal Counsel Participating Remotely:

Audrey Eidelman-Kiernan, Esq., KO Law, P.C.

Staff Participation In-Person:

Maggie Downey, Chief Administrative Officer

Staff Participating Remotely:

- Briana Kane, Residential and Commercial & Industrial Program Manager
- Dan Schell, Senior Analyst - Retail and Demand Response
- David Botelho, Senior IT Services & Data Management Analyst
- Laure Selmer, Energy Efficiency Analyst
- Mariel Marchand, Power Supply Planner
- Margaret Song, Energy Efficiency Strategy and Policy Manager
- Miranda Skinner, Strategy and Regulatory Analyst
- Melissa Allard, Senior Administrative Coordinator
- Phil Moffitt, Chief Financial Officer
- Tatsiana Nickinello, Energy Efficiency Analyst

Public Participants:

None.

Martin Culik called the meeting to order at 2:04 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 June 5, 2024 Open Session Meeting Minutes.

David Anthony stated that the date in the footer needs to be corrected and to add “Senior RUS staff” after “Bob Coates” on page four.

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

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Tim	Carroll	Chilmark	Yes
Tom	McNellis	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Matt	Patrick	Falmouth	Yes
Wayne	Taylor	Mashpee	Yes
Martin	Culik	Orleans	Yes
Nate	Mayo	Provincetown	Yes
Bob	Higgins-Steele	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (13-0-0)

CHAIRMAN’S REPORT, MARTIN CULIK

Martin Culik stated that the Compact Administrator, Maggie Downey’s annual performance review is coming up next month, and consistent with Massachusetts Open Meeting protocols, he will be reaching out to select Board Members to see if they have anything to contribute to the review. He noted that participating Board members input would be anonymous. He stated that as required the Administrator’s annual review would be conducted by Vice Chair Joyce Flynn, Secretary David Anthony, and him.

DISCUSSION AND PROPOSED VOTE FOR A SUPPLEMENTAL BUDGET INCREASE FOR OPERATING BUDGET LEGAL EXPENSES, MAGGIE DOWNEY:

Maggie Downey stated that when the 2024 legal budget was presented in November of 2023 there were several items where the costs were unknown and/or dockets were not filed at the Department of Public Utilities (DPU). As a result, she requested an increase to the existing legal operating service budget from \$310,000 to \$485,000 for this calendar year. She stated that the amount of time it has taken to review and negotiate the US Department of Agriculture Rural Energy Saving Program (USDA RESP) loans has been a big factor and additional work remains. \$145,000 in legal expenses should be recovered from the USDA RESP solar loan program. She stated that there are also two dockets that went beyond our planned expenditures for legal services: the Eversource Electric Modernization Plan docket and the Municipal Guidelines docket.

Robert Schofield moved the CLCJPE Board of Directors to approve the proposed supplemental budget request of \$175,00.00 for legal services in the Operating Budget.

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. Seconded by Joyce Flynn.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Tim	Carroll	Chilmark	Yes
Tom	McNellis	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Matt	Patrick	Falmouth	Yes
Wayne	Taylor	Mashpee	Yes
Martin	Culik	Orleans	Yes
Nate	Mayo	Provincetown	Yes
Bob	Higgins-Steele	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (13-0-0)

Valerie Bell joined the meeting at 2:16PM.

OPEN SESSION VOTE ON ENTRY INTO EXECUTIVE SESSION PURSUANT TO M.G.L. c. 30A §§21(A)(10) TO DISCUSS MATTERS BELOW, TO RETURN TO OPEN SESSION:

Martin Culik at 2:18 PM moved to enter into Executive Session pursuant to M.G.L. c. 30A §21(a)10, to discuss trade secrets and confidential, competitively sensitive or other proprietary power supply information related to the Compact's procurement of municipal aggregation power supply, to return to open session thereafter. Seconded by Valerie Bell.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Tim	Carroll	Chilmark	Yes
Tom	McNellis	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
Bob	Higgins-Steele	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (14-0-0)

RETURN TO OPEN SESSION:

Motion to return to open session made at 3:52 PM moved by Robert Schofield, seconded by Valerie Bell.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Tim	Carroll	Chilmark	Yes
Tom	McNellis	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
Bob	Higgins-Steele	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (14-0-0)

ADMINISTRATOR’S REPORT:

1. Update on USDA/RUS Rural Energy Services Program (RESP)

Maggie Downey stated that we are waiting for the debt-to-income ratio and once we get that we will be ready to start the program. She stated that the interest rate should be below 3%, but that is not finalized yet.

2. Scheduling Meetings with Select Boards/Town Council and Energy/Climate Committees

Maggie Downey stated that we are working on scheduling presentations to the town Select Boards or Council and their Energy Committees in the upcoming months to give an update and get feedback.

3. Conferences

Maggie Downey reminded the Board that the Net Zero Conference was postponed until October 24th. She stated that One Cape conference is coming up in September and if any Board Members would like the Compact to register them, email her and let her know. Otherwise, they can get reimbursed if they register themselves.

4. Executive Session Minutes Update

Maggie Downey stated that every six months she and counsel review the executive session minutes to determine if any of the executive session minutes can be released as a whole or partially redacted. She stated that the following sets of executive session minutes will continue to be withheld with partial redaction as continued non-disclosure of the redacted material is warranted under the open meeting law: March 10, 2021, June 9, 2021, September 29, 2021, January 9, 2019, October 8, 2014, and August 14, 2023. She stated that December 11, 2023 executive session minutes will continue to be withheld in their entirety as continued non-disclosure is warranted.

Maggie Downey stated that while reviewing the executive session minutes, an error in the January 2024 executive session minutes, stating that the Board voted to accept the December 2023 executive session minutes and release them, was discovered. The release language was an error and will be corrected as they were not released. She stated that counsel does not believe any additional Board action is needed.

5. Next Board Meeting: September 11, 2024

Maggie Downey stated that there is no August Board Meeting, and the next one will be on September 11th.

ADJOURNMENT:

Motion to adjourn made at 4:08 PM moved by Robert Schofield, seconded by Joyce Flynn.

David	Anthony	Barnstable	Yes
Robert	Schofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Tim	Carroll	Chilmark	Yes
Tom	McNellis	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
Bob	Higgins-Steele	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (14-0-0)

Respectfully submitted,

Melissa Allard

LIST OF DOCUMENTS AND EXHIBITS:

- Meeting Notice/Agenda
- June 5, 2024, Draft Open Session Meeting Minutes
- 2024 Operating Budget

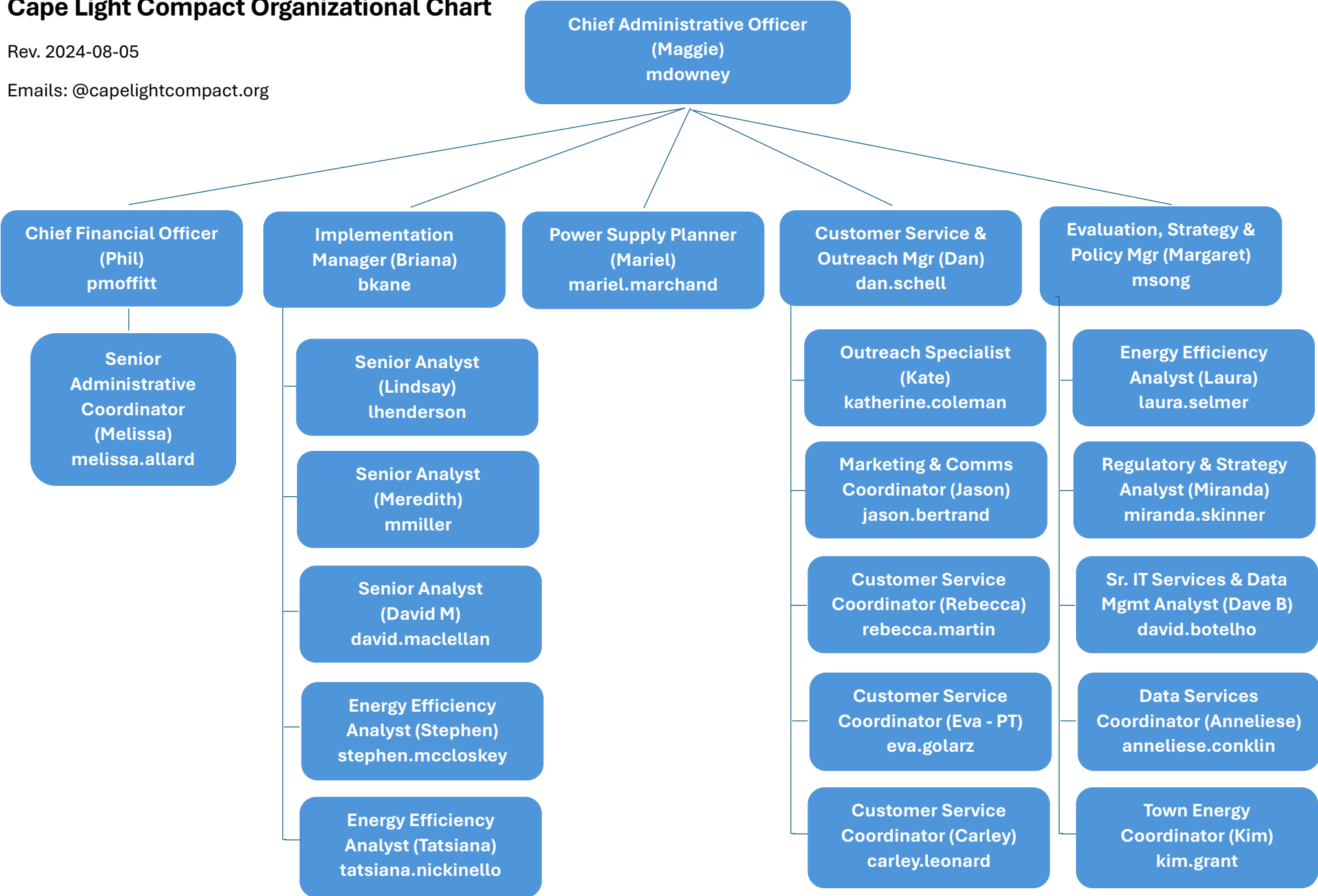
Draft Minutes subject to correction, addition and Committee/Board Approval

AGENDA ITEM #4A

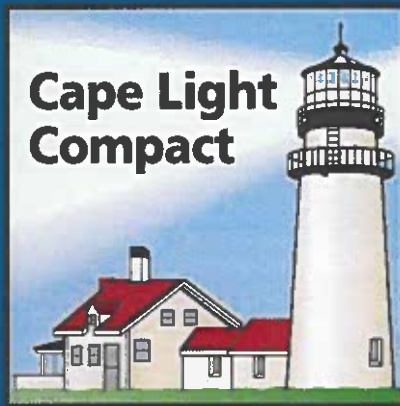
Cape Light Compact Organizational Chart

Rev. 2024-08-05

Emails: @capelightcompact.org



AGENDA ITEM #4B



**Cape Light
Compact**

Your Trusted, Local Energy Resource

Municipal Aggregation Investigation Update (DPU 23-67)

Cape Light Compact Governing Board
September 11, 2024

DPU 23-67 Timeline

August 15, 2023: DPU issued Order opening investigation

October 6, 2023: Compact submitted Compact specific and joint comments to DPU

October 23, 2023: Municipal Aggregators (including Compact) submitted joint request for Technical Session

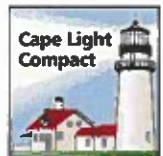
November 6, 2023: Compact submitted reply comments to DPU

December 2023 – May 2024: Compact staff and counsel participated in in-person and virtual technical sessions, working group meetings, and meetings with aggregation stakeholders

AKO

June 4, 2024: Stakeholders (including Compact) submitted Joint Motion requesting approval of Guidelines

July 9, 2024: DPU issued Order approving Final Guidelines



DPU 23-67 Summary

- Department of Public Utilities (DPU) investigation into Municipal Aggregation guidelines
- The purpose of the investigation was to:
 1. Establish guidelines governing the filing requirements and the process by which the Department reviews and evaluates municipal aggregation plans, as well as the rules governing operation of a municipal aggregation program (“Guidelines”)
 2. Set forth a template plan (“Template Plan”)
- The Compact had numerous concerns with the DPU’s original proposal
- Ultimately, the DPU listened to public comment, changed course, and provided significantly more flexibility to municipalities, with the requirement of added transparency/public facing information



Key Compact Concerns and Outcomes

The aggregation plan should not be a living document

- Guidelines allow for sufficient flexibility such that plan updates are generally not required, so long as ongoing program information is available to the public
- Municipality may modify its Plan consistent with Guidelines, allow for public review, and submit to DPU for informational purposes only

Draft Guidelines Erode Important Distinctions Between Competitive Supply and Municipal Aggregation Customers

- Guidelines continue to exempt suppliers of Municipal Aggregations from the requirement to mail information disclosure labels
- Also from the requirements established in DPU 19-07-A (competitive supplier rules) except for the website initiative

DPU Should Ensure Continued Due Process for Municipal Aggregators

- Guidelines contain all requirements for plan approval filings and continued operations going forward
- A change to the Guidelines requires notice to interested stakeholders and opportunity for comment



Concerns and Outcomes cont.

Guidelines Should Allow for Alternative Approaches to Certain Customer Notifications

- Guidelines allow for flexibility in timing and method of customer notification when the price or renewable energy content of a product changes
- Guidelines do not require mailing a product change notification to customers 30 days before price change (original DPU proposal)

The Draft Guidelines Should Include a Waiver Provision

- DPU may, where appropriate, grant an exception or waiver from any provision of the Guidelines

Applicability of Guidelines is Not Clear

- Municipalities whose Plans were approved prior to issuance of Guidelines don't need to file a revised Plan
- Must comply with Customer Notifications, Access to Ongoing Program Information, and Annual Reports requirements set forth in Guidelines



Next Steps

- Compact staff is in process of drafting Annual Report (due November 1st according to newly designed format
- This includes a number of tables that will also be posted to the Compact's website
- Also updated price change notification and opt-out notice in compliance with Guidelines
- DPU opened 23-67-A to investigate Low Income Community Shared Solar programs offered through Municipal Aggregation – Compact will be participating



MUNICIPAL AGGREGATION GUIDELINES

- I. PURPOSE
- II. DEFINITIONS
- III. PROCEDURAL REQUIREMENTS
- IV. PLAN ELEMENTS
- V. DEPARTMENT REVIEW OF MUNICIPAL AGGREGATION PLANS
- VI. ANNUAL REPORTS
- VII. APPLICABILITY OF RULES GOVERNING THE RESTRUCTURING OF THE ELECTRIC INDUSTRY (220 CMR 11.00)
- VIII. NOTIFICATIONS TO ELECTRIC DISTRIBUTION COMPANIES
- IX. PLAN AND PROGRAM CHANGES
- X. IMPLEMENTATION OF GUIDELINES
- XI. WAIVER

Attachments

1. Attachment III.C - Public Access
2. Attachment IV.A - Organizational Structure
3. Attachment IV.B.1.c - Equitable Treatment of Customer Classes
4. Attachment IV.B.2 - Procurement of Supply
5. Attachment IV.B.3 - Product Information
6. Attachment IV.B.6.a – Representative Opt-Out Notification
7. Attachment IV.B.6.b – Representative Notification of Product Change
8. Attachment IV.B.7.b.i - Annual Product Information
9. Attachment IV.B.7.b.ii - Annual Rate Component Information
10. Attachment IV.B.7.b.iii - Annual Voluntary Renewable Energy Content Information
11. Attachment VI. - Annual Report (Excel file, attached separately)

I. PURPOSE

These Guidelines set forth (1) the information to be included by a Municipality in its Plan, (2) the information that a Municipality shall provide on an ongoing basis regarding the operation of its Program, (3) the requirements that apply to Electric Distribution Companies related to facilitating the successful operation of Programs, and (4) the Department's review of Plans, pursuant to G.L. c. 164, § 134(a).

II. DEFINITIONS

Annual Report – means the report that Municipalities shall file annually with the Department that includes Program information for the previous year (see Section VI, below).

Auto-Enroll Customer – means an Electric Customer who is eligible to be enrolled in a Program on an opt-out basis, specifically all Basic Service customers except for those customers who (1) have informed the Electric Distribution Company they do not want their account information shared with their municipality, or (2) are participating in an optional “green power” program that requires them to remain on Basic Service.

Basic Service – means the electric supply product that the Electric Distribution Companies provide to Electric Customers in their service territory that are not receiving an electric supply product from a Competitive Supplier or through participation in a Program.

Competitive Supplier – means an entity licensed by the Department to sell electric supply products to Electric Customers, as defined in 220 CMR 11.02.

Consultant – means an entity retained by a city or town (or a group of cities or towns) to assist with the development and operation of a Plan and Program.

DOER – means the Massachusetts Department of Energy Resources.

Default Product – means the Product that participants in a Program receive unless they affirmatively select an alternate Product.

Department – means the Massachusetts Department of Public Utilities.

Electric Customer – means the customer of record of an account with an Electric Distribution Company.

Electric Distribution Company – means an investor-owned entity that provides electric distribution service as a monopoly service to Electric Customers in their specified service territories. The Electric Distribution Companies are Fitchburg Gas and Electric Light Company d/b/a Unitil, NSTAR Electric Company d/b/a Eversource Energy, and Massachusetts Electric Light Company and Nantucket Electric Light Company each d/b/a National Grid.

Electricity Broker – means an entity that is licensed by the Department to facilitate or otherwise arrange for the purchase and sale of electric supply and related services to customers, as defined in 220 CMR 11.02.

Environmental Justice Population – in Massachusetts, an environmental justice population is a neighborhood that meets one or more of the following criteria:

- the annual median household income is not more than 65 percent of the statewide annual median household income;
- minorities comprise 40 percent or more of the population;
- 25 percent or more of households lack English language proficiency;
or
- minorities comprise 25 percent or more of the population and the annual median household income of the Municipality in which the neighborhood is located does not exceed 150 percent of the statewide annual median household income.¹

Guidelines – means these Municipal Aggregation Guidelines.

Municipality – means a city or town (or group of cities or towns) that (1) operates a Program pursuant to G.L. c. 164, § 134(a), or (2) has filed a Plan for Department approval.

Opt-In Product - means those Products that Participants in a Program must affirmatively select to receive.

Opt-Out Notice – means the document sent to Auto-Enroll Customers to inform them of their right to opt-out of such enrollment (see Section IV.B.6.a, below).

Participant – means an Electric Customer that is participating in a Program.

Petition – means a petition submitted by a Municipality to the Department for review and approval of a Plan.

Plan – means the document that a Municipality submits to the Department for approval to administer a Program pursuant to G.L. c. 164, § 134(a).

Product – means an electric supply product available to Participants in a Program.

Program – means a program in which a Municipality aggregates Electric Customers located within its municipal boundaries for the purpose of procuring electric supply and energy-related products and services, pursuant to G.L. c. 164, § 134(a).

Program Supplier – means the Competitive Supplier that is providing electric supply and, if applicable, energy-related products and services to Participants.

¹ See Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs (Updated June 24, 2021) available at <https://www.mass.gov/doc/environmental-justice-policy6242021-update/download>.

III. PROCEDURAL REQUIREMENTS

- A. Initiation of the Process – The initial step pursuant to which a town or city may seek to develop a Program is by obtaining local approval pursuant to G.L. c. 164, § 134(a) as follows: (1) a town may initiate a process to aggregate electrical load upon authorization by a majority vote of the town meeting or town council; and (2) a city may initiate a process to aggregate electrical load upon authorization by a majority vote of the city council, with the approval of the mayor/city manager. A Municipality’s Petition shall include documentation of how local approval was obtained.
- B. Consultation with DOER – A town or city (or group of towns or cities) seeking to develop a Program shall consult with DOER in developing its Plan. The consultation should take place prior to public review of the Plan (as set forth below) and shall include review and discussion of the DOER Recommended Best Practices for Advancing Clean Energy in Municipal Aggregation Plans (“DOER Best Practices”), as discussed further in Section IV.B.3.b.iii. The Petition shall include documentation of completion of a consultation with DOER.
- C. Public Review – A town or city (or group of towns or cities) seeking to adopt a Plan shall allow for public review of such proposed Plan for a minimum of 30 calendar days. The Petition shall:
1. identify the dates during which the proposed Plan was available for public review;
 2. identify and describe the ways by which the public could access the Plan, in the format shown in Attachment III.C (“Public Access”);
 3. describe how the Municipality provided access to the Plan for those who:
(1) are hard to reach, have limited English proficiency, require aural or visual assistance, and/or may not routinely access the Municipality’s website; and/or
(2) reside in an Environmental Justice Population; and
 4. describe the process by which the Municipality incorporated public feedback.
- Recommended practice - Municipalities should provide access to the Plan through a link prominently displayed on the municipal website. If a Municipality did not, or does not expect to do so, the Plan shall provide an explanation.

IV. PLAN ELEMENTS

Pursuant to G.L. c. 164, § 134(a), a Plan shall include the following elements:

A. Organizational Structure

A Plan shall identify the entity or entities (i.e., Municipality, Consultant, Program Supplier) that will perform core functions of the Program. For each such function, the Plan shall identify where in the Plan the tasks are described or provide a description of such tasks. A Plan shall provide this information in the format shown in Attachment IV.A.

B. Program Operations

1. Statutory Requirements

Pursuant to G.L. c. 164, § 134(a), a Plan shall provide for:

- a. Universal Access – A Plan shall specify that all Electric Customers residing or located in the Municipality are eligible to participate in the Program, whether through an automatic enrollment process or upon request of the customer to join the Program (see Section IV.B.5, below). The Plan shall describe all proposed conditions or restrictions on participation in the Program.
- b. Reliability – A Plan shall describe the steps the Municipality will take to ensure a continuous power supply for Participants, thus ensuring that the Program can serve Participants without interruption (see Section IV.B.2, below). The Plan shall demonstrate that the Municipality has the technical expertise necessary to operate and manage the Program, for example, through retaining a Consultant that is an Electricity Broker licensed to provide municipal aggregation consulting services. The Department deems that those entities that are (1) Electricity Brokers and (2) providing consulting services to Department-approved Programs in the Commonwealth on or before the date of issuance of these Guidelines, are licensed to provide municipal aggregation consulting service.
- c. Equitable Treatment of Customer Classes – A Program shall treat all Participants that are similarly situated equitably. A Plan shall identify those Plan elements for which there may be variances in treatment between customer classes or subclasses, in the format shown in Attachment IV.B.1.c, and explain why the varied treatment is reasonable and appropriate in consideration of the disparate characteristics of each customer class or subclass.

2. Procurement of Supply - A Plan shall identify:
- a. the steps by which the Municipality intends to procure supply for the Program, including (but not limited to) issuance of a request for quotes and proposals, evaluation/selection of bids or proposals, and negotiating and executing contracts with selected Competitive Suppliers; and
 - b. an expected timeline for each step.

Within fourteen days of Department approval of its Plan, a Municipality shall file updated expected timelines for the procurement of supply in its docketed proceeding and with the Electric Distribution Companies serving Electric Customers within the Municipality. A Municipality shall file such updates monthly until the Municipality has provided notification of contract execution to the applicable Electric Distribution Company, as set forth in Section VIII.B.

A Plan shall provide this information in the format shown in Attachment IV.B.2.

3. Product Information
- a. Rate Setting
 - i. A Plan shall identify the components that will comprise the rates to be charged to Participants, including but not limited to, costs associated with: (1) supply and renewable energy content, (2) Consultant services, (3) Municipality services, and (4) other services related to the Program. The Plan shall provide this information in the format set forth in Attachment IV.B.3.
 - ii. If, at the time of a Plan filing, a Municipality has not determined (1) the number of Products, (2) the value of a rate component of a Product, or (3) whether to include a rate component for Consultant, Municipality, or other Program-related services, the Plan shall identify and describe the factors/criteria that the Municipality will consider in making such determinations.
 - iii. The Plan shall specify that all funds collected through rates will be used specifically for the benefit of the Program.
 - b. Renewable Energy Content
 - i. A Plan shall identify and describe the renewable energy content for each Product, in the format shown in Attachment IV.B.3.
 - ii. If, at the time of a Plan filing, a Municipality has not determined

the number of Products or the level of renewable energy content of a Product, the Plan shall identify and describe the factors/criteria that the Municipality will consider in making such determinations.

- iii. Clean Energy Best Practices – Municipalities should consider the best practices set forth in DOER Best Practices, as may be updated periodically after consultation with the Department and stakeholders. A Plan shall discuss if the Municipality intends to pursue clean energy through its Program and, if so, what factors and criteria the Municipality will use to guide its final decision-making regarding clean energy programming for the aggregation, with reference to the DOER Best Practices and the Municipality’s consultation with DOER.

c. Other Energy-Related Products and Services

A Plan shall identify and describe other energy-related products and services that the Municipality will offer to Participants. If, at the time of a Plan filing, a Municipality has not determined whether to offer such products and services, the Plan shall identify and describe the factors/criteria that the Municipality will consider in making such a determination.

4. Other Funding Sources/Other Costs to Participants

- a. A Plan shall identify:
 - i. the sources of Program funding other than Product rates, and explain how the funding will be used for the benefit of the Program; and
 - ii. the types of costs that Participants will incur outside of Product rates.

5. Customer Enrollment

a. Initial Enrollment

- i. Pursuant to G.L. c. 164, § 134(a), a Municipality may enroll Auto-Enroll Customers within 30 days after its Plan becomes operational, provided that, prior to enrollment, the Municipality shall provide such customers the opportunity to opt out (see Section IV.B.6.a, below).
- ii. Auto-Enroll Customers that do not opt out will be enrolled in the Default Product unless they affirmatively select an Opt-In Product.
- iii. If a Municipality does not begin the initial enrollment of

Participants within two years of Department approval, the Department will deem the Program to be terminated. A Municipality that seeks to reinstate its Program must comply with the procedural requirements set forth in Section III, above.

b. Ongoing Enrollment

A Plan shall identify the way in which the Municipality intends to provide:

- i. new Electric Customers with the opportunity to enroll in the Program. If the Municipality intends to automatically enroll new Auto-Enroll Customers, the Plan shall specify that the Municipality will provide these customers with the opportunity to opt out that is consistent with the opt-out provisions for initial enrollments; and
- ii. Electric Customers that are not eligible for automatic enrollment with the opportunity to enroll in the Program on an opt-in basis.

c. Opt-In Products

- i. A Plan shall identify the actions a Participant must take to enroll in an Opt-In Product;
- ii. A Plan shall specify that the Municipality will notify Participants enrolled in an Opt-In Product prior to any change in the product's rates and/or renewable energy content. At the commencement of the new price/renewable energy content, Participants will continue to receive their current Product, subject to the new applicable price and renewable energy content, unless the Participant informs the Municipality otherwise; and
- iii. A Plan shall specify that a Participant enrolled in an Opt-In Product that is being discontinued must affirmatively select another Product. If the Participant does not make such a selection, the Participant will be enrolled in the Default Product.

6. Customer Notifications

a. Opt-Out Notice

- i. A Plan shall specify that the Municipality will (1) deliver an Opt-Out Notice to all Auto-Enroll Customers prior to enrollment, and (2) provide these customers with at least 30 calendar days, plus an additional six days to account for delivery, to opt out.

- ii. Pursuant to G.L. c. 164, § 134(a), the Opt-Out Notice shall inform Auto-Enroll Customers, in advance of automatic enrollment: (1) that they are to be automatically enrolled in the Program; (2) that they have the right to opt out of the Program without penalty; and (3) of the actions that a customer must take to opt out. The Opt-Out Notice shall (1) prominently state all charges to be made, and (2) include full disclosure of the Basic Service rate, how to access it, and the fact that it is available to them without penalty.
- iii. A Plan shall include a representative form of the Municipality's proposed Opt-Out Notice. Such notice shall include the information required by statute, as well as: (1) Product information related to price, term, and renewable energy content for both the Default and Opt-In Products; and (2) the actions that an Auto-Enroll Customer must take to select an Opt-In Product. The Plan shall identify the steps the Municipality will take to address residents with limited English proficiency.
- iv. The Opt-Out Notice shall present the Product information as set forth in Attachment IV.B.6.a.
- v. Recommended practice – Municipalities should:
 - (a) send Opt-Out Notices in a clearly marked municipal envelope that identifies it contains important information regarding participation; and
 - (b) include a self-addressed, postage-paid envelope for the opt-out reply card.

If a Municipality does not expect to follow these practices, the Plan shall provide an explanation.

b. Notification of Product Change

A Plan shall specify that the Municipality will notify Participants of changes in price or renewable energy content of Products. The notification shall identify both the existing and new price and renewable energy content, and identify the actions Participants must take if they no longer seek to purchase the existing Product. The notification of product change shall present the Product information as set forth in Attachment IV.B.6.b.

c. Other Notifications

- i. General Program Information - After obtaining approval of its

Plan, a Municipality may deliver information and educational materials regarding its Program to each Electric Customer within the Municipality. The Electric Distribution Company serving Electric Customers within the Municipality shall use best efforts to provide the Municipality, upon request but no more often than quarterly, with the customer name, mailing address (and service address, if different), and rate class to facilitate such notifications. The Electric Distribution Companies shall not include information for Electric Customers that have informed the Electric Distribution Company they do not want their account information shared with their municipality. A Plan shall specify that the Municipality will not share this information with Program Suppliers.

1. Recommended practice – To the extent that a Municipality expects to send such notifications to competitive supply customers, the notification should inform those customers that, if they enroll in the Program, they may incur an early cancellation fee, and that they should check with their supplier on this matter before enrolling. If a Municipality did not, or does not expect to do so, the Plan shall explain why.
- ii. Program Supplier Communications - Upon consultation with and approval from the Municipality, a Program Supplier under an active contract with the Municipality may communicate with Participants regarding the Program and, if applicable, energy-related products or services.

7. Access to Ongoing Program Information

A Municipality shall make the Program-related information listed in (a) through (c) below publicly available. A Plan shall identify and describe the ways in which the Municipality will make this information available to the public, in the format shown in Attachment III.C. The Plan shall describe how the Municipality will provide access for those who:

- (1) are hard to reach, have limited English proficiency, require audial or visual assistance, and/or may not routinely access the Municipality's website; and/or
- (2) reside in Environmental Justice Populations.

Recommended practice – Municipalities should provide access to ongoing Program information through a link prominently displayed on the municipal website. If a Municipality does not expect to do so, the Plan shall provide an explanation.

a. Updated Product Information

Upon any change in price or renewable energy content of a Product, a Municipality shall provide the updated Product information as set forth in Attachment IV.B.3.

b. Annual Program Information for the Previous Year

A Municipality shall provide the following information for the previous calendar year:

- i. Product rate components, renewable energy content, and participation, as forth in in Attachment IV.B.7.b.i;
- ii. For each Product rate component identified in Attachment IV.B.7.b.i, the revenue collected, as set forth in Attachment IV.B.7.b.ii. For each rate component, the Municipality shall provide a detailed accounting of the services provided;
- iii. For each renewable energy category identified in Attachment IV.B.7.b.i, the number of megawatt-hours of electricity provided through the Program that will be matched to voluntary renewable energy certificates, as set forth in Attachment IV.B.7.b.iii. For each renewable energy category, the Municipality shall identify the mechanism (e.g., NEPOOL Generation Information System) by which the purchases/retirements of renewable energy certificates was tracked;
- iv. Organizational structure, in the format shown in Attachment IV.A;
- v. Equitable treatment of customer classes, in the format shown in Attachment IV.B.1.c;
- vi. Procurement of supply, in the format shown in Attachment IV.B.2;
- vii. Ways in which the Municipality made ongoing Program information available to the public during the previous year, in the format shown in Attachment III.C; and
- viii. *[if applicable]* Other Funding Sources/Other Costs to Participants.

A Municipality shall also provide representative copies of customer notifications sent during the previous year (see Section IV.B.6, above).

c. General Program Information

A Municipality shall provide Program-related (1) documents (e.g., Plan, press releases, Department Orders) and (2) information (e.g., Program description, information about consumer choices, continuing role of the

Distribution Company, etc.).

8. Program Termination

- a. A Plan shall describe: (1) the circumstances that would cause the Municipality to terminate the Program; (2) the actions the Municipality will take to minimize the chances of these circumstances arising; (3) the steps the Municipality will take to ensure that Participants are returned to Basic Service in an orderly fashion in the event of Program termination under each circumstance; and (4) the notification process to Participants, the Electric Distribution Companies serving Electric Customers within the Municipality, and the Department.
- b. A Municipality that has terminated a Department-approved Program and seeks to file a new Plan for Department approval may not file such Plan with the Department for a minimum of two years from the date of termination, defined as the date by which the Municipality has returned all Participants to Basic Service. A Municipality must comply with the procedural requirements set forth in Section III, above. The new Plan must provide a full explanation of the circumstances that led to the termination and the steps the Municipality has taken to protect against a recurrence of such termination.

C. Rights and Responsibilities of Program Participants

The Plan shall provide that Participants may: (1) select any of the Products offered to the applicable customer class or subclass; (2) switch from one Product to another by contacting the Municipality; and (3) leave the Program at any time by contacting the Municipality or the Electric Distribution Company.

Recommended practice – Municipalities should allow Participants to leave the Program at any time without penalty. If a Municipality does not intend to follow this practice, the Plan shall provide an explanation.

V. DEPARTMENT REVIEW OF MUNICIPAL AGGREGATION PLANS

- A. Pursuant to G.L. c. 164, § 134(a), a Municipality shall submit its Plan to the Department for review and approval. The Department may schedule a conference with the Municipality or its representative to discuss any aspect of the Petition or Plan that may need revision or clarification. The Department may request supplemental information to better determine whether the Plan complies with the statutory requirements addressed above. The Department will include the Municipality official(s) identified in Attachment IV.A on all correspondences.
- B. The Department will issue a written Order with its decision on all Plans within 120 days of the date on which a Plan was filed, except as set forth below. If, upon review, the Department finds that a Plan includes the information requirements set forth above

(including supplemental information provided by the Municipality at the request of the Department), the Department will approve the Plan as filed. Conversely, if upon review, the Department finds that a Plan does not include the required information (including supplemental information requested by the Department), the Department will not approve the Plan and will identify the information the Plan must include to warrant Department approval.

- C. The Department's review of a Plan submitted by a Municipality that previously terminated its Department-approved Program may exceed 120 days, reflecting the fact that the Department may need additional time to investigate whether:
- (1) the Plan sufficiently explains the circumstances that led to the termination; and
 - (2) the steps the Municipality has taken to protect against another termination are sufficient.

VI. ANNUAL REPORTS

A Plan shall specify that the Municipality will submit an Annual Report to the Department, on a date to be specified, that includes Program information for the previous year. The Annual Report shall consist of two components: (1) an Excel spreadsheet, in the format specified in Attachment VI; and (2) a document that includes the following attachments:

- (a) Attachment III.C (Public Access)
- (b) Attachment IV.A (Organizational Structure);
- (c) Attachment IV.B.1.c (Equitable Treatment of Customer Classes);
- (d) Attachment IV.B.2 (Procurement of Supply);
- (e) Attachment IV.B.6.a (Representative Opt-Out Notification);
- (f) Attachment IV.B.6.b (Representative Notification of Product Change);
- (g) Attachment IV.B.7.b.i (Annual Product Information);
- (h) Attachment IV.B.7.b.ii (Annual Product Rate Component Information); and
- (i) Attachment IV.B.7.b.iii (Annual Renewable Energy Content Information).

VII. APPLICABILITY OF RULES GOVERNING THE RESTRUCTURING OF THE ELECTRIC INDUSTRY (220 CMR 11.00)

- A. Municipalities – Department rules applicable to Aggregators and Electricity Brokers, as defined in 220 CMR 11.02, do not apply to Municipalities. Specifically, Municipalities are exempt from the requirement:
1. to obtain a license as an Electricity Broker, pursuant to 220 CMR 11.05(2);

2. to obtain customer authorization to enroll customers in the Program, pursuant to G.L. c. 164, § 1F(8)(a) and 220 CMR 11.05(4).
- B. Program Suppliers – Program Suppliers will be subject to the rules and regulations that apply to Competitive Suppliers, subject to the following waivers and clarifications:
1. Program Suppliers are exempt from the requirement to mail information disclosure labels to Participants as set forth in 220 CMR 11.06.
 2. Of the requirements set forth in D.P.U. 19-07-A (2020), Municipalities and Program Suppliers shall be subject only to the Website initiative. The subject matter of these requirements is addressed by Section IV.B.6 (Customer Notifications) and Section VI (Annual Reports) of these Guidelines.

VIII. NOTIFICATIONS TO ELECTRIC DISTRIBUTION COMPANIES

- A. Plan Filing – A Municipality shall notify each Electric Distribution Company serving Electric Customers within the Municipality upon (1) submitting its proposed Plan to DOER for consultation, (2) filing its initial Plan with the Department, and (3) receiving a Department Order approving its Plan.
- B. Electric Supply Agreement Signing – A Municipality shall (1) notify each Electric Distribution Company serving Electric Customers within the Municipality when the Municipality has executed an agreement with a Program Supplier, and (2) direct the Program Supplier to provide the Electric Distribution Company with the information necessary to enroll customers with the Program Supplier. Customer enrollment shall begin no sooner than 60 days from when the Program Supplier provides the necessary information. The Municipality shall file the notification in its docketed proceeding.

IX. PLAN AND PROGRAM CHANGES

- A. A Municipality may modify its Plan in a manner consistent with these Guidelines provided that it allows at least 30 calendar days for public review of the revised Plan. Following public review, the Municipality shall make the Plan publicly available (see Section IV.B.7, above) and submit the revised Plan to the Department for informational purposes. If a Municipality is uncertain whether a proposed revision is consistent with these Guidelines, it may request a consultation with the Department.
- B. Program Consultant – A Municipality shall notify the Department in writing in the event it hires a new Consultant. Such notice shall (1) identify the new Consultant and (2) include documentation that the Consultant is an Electricity Broker licensed to provide municipal aggregation consulting services (see Section IV.B, above).

X. IMPLEMENTATION OF GUIDELINES

Municipalities whose Plans were approved by the Department prior to the issuance date of these Guidelines do not need to file a revised Plan for Department approval. However, such Municipalities must comply with the requirements set forth in Sections IV.B.6 (Customer Notifications), IV.B.7 (Access to Ongoing Program Information), and VI (Annual Reports), above, in place of the corresponding requirements in their Plans.

XI. WAIVER

The Department may, where appropriate, grant an exception or waiver in writing from any provision of the Guidelines.

Attachment III.C Public Access

Table III.C sets forth the format by which a Plan should present information related to public access to: (1) the proposed Plan, pursuant to Guidelines, Section III.C; and (2) ongoing Program information, pursuant to Guidelines, Sections III.C and IV.B.7.

Table III.C - Public Access to Plan/Ongoing Program Information	
Location (i)	Description
Municipal website	
Program website	
Communication vehicles/ Outreach activities	
Social media accounts	
Municipal cable access TV	
Municipal listserv	
Announcement to local/ regional media	
Physical posting in municipal buildings	
Municipal departments, boards, and committees	
Community organizations	

Notes

- (i) The locations and outreach activities identified in Table III.C are provided for illustrative purposes. A Municipality should identify locations and outreach activities that are specific to the Municipality.

Attachment IV.A Organizational Structure

Table IV.A sets forth the format by which: (1) a Plan shall present information related to the Program’s organizational structure, pursuant to Guidelines, Section IV.A; and (2) a Municipality shall present this information for the previous year, pursuant to Guidelines, Section IV.B.7.b.iv.

Table IV.A – Organizational Structure				
Core Functions	Performing Entity (i)			Plan section in which tasks are described (ii)
	Municipality	Consultant	Supplier	
Liaisons/Representatives/Agents				
Municipal Representative/Agent before Department (iii)				<i>Section V</i>
Liaison with DOER				<i>Section III B</i>
Liaison with Electric Distribution Companies				<i>Section VIII</i>
Plan Elements				
Procurement of Supply				<i>Section IV.B.2</i>
Product Determination				<i>Section IV.B.3</i>
Other Funding/Costs				<i>Section IV.B.4</i>
Customer Enrollment				<i>Section IV.B.5</i>
Customer Notifications/Outreach/Education				<i>Section IV.B.6</i>
Ongoing Program Information				<i>Section IV.B.7</i>
Program Termination				<i>Section IV.B.8</i>
Annual Reports				<i>Section VI</i>
Customer Service (iv)				
Other (<i>description</i>)				

Notes

- (i) For Programs in which multiple Municipalities participate, these columns may be adjusted to better reflect the way in which the Municipalities operate the Program.
- (ii) Municipalities should include this column only when submitting Table IV.A as part of the Plan.
- (iii) Provide contact information (name, phone number(s), and email address) for a municipal official that the Department will include on all correspondences with the entity identified as the liaison.
- (iv) Provide customer service contact information (name, phone number(s), and email address) for the Municipality, Consultant, and Supplier

Attachment IV.B.2 Procurement of Supply

Table IV.B.2 sets forth the format by which: (1) a Plan shall present information related to the expected timeline for the procurement of supply, pursuant to Guidelines, Sections IV.B.2; and (2) a Municipality shall present supply procurement information for the previous year, pursuant to Guidelines, Section IV.B.7.b.vi.

Table IV.B.2 - Procurement of Supply	
Procurement Steps (i)	Expected Timeline (ii)
Issue RFQs/RFPs	
Evaluate/Select Bids	
Negotiate/Execute Contracts	
Other (description)	

Notes

- (i) The Procurement Steps identified in Table IV.B.2 are provided for illustrative purposes. A Plan/Municipality shall identify those procurement steps that are specific to the Program.
- (ii) (a) For the purpose of the Plan, the expected timeline shall be expressed as the number of days after Department approval on Day 0.
(b) For the purpose of providing updated expected timelines upon Department approval of the Plan, a timeline shall use actual dates (or range of dates).
(c) For the purpose of providing annual Program information for the previous year, a Municipality shall identify the actual timeline (and delete the term “Expected”).

Attachment IV.B.3 Product Information

Table IV.B.3 sets forth the format by which a Plan shall present information related to Product rates and renewable energy content, pursuant to Guidelines, Section IV.B.3. When presenting updated Product information pursuant to Guidelines, Section IV.B.7.a, a Municipality may modify the table to provide the information in what it considers to be a more useful format.

Table IV.B.3 - Product Information			
		Product # 1	Product # 2
Rate Components (in \$/kWh)			
Supply and Renewable Energy Content			
Consultant Services			
Municipality Services			
Other Services (description)			
TOTAL			
Renewable Energy Content (in % of total)			
Required			
Voluntary	RPS Class I		
	National Wind		
	Other (description)		
TOTAL			
Supplier Name			
Effective Dates			

**Attachment IV.B.6.a
Representative Opt-Out Notification**

Table IV.B.6.a identifies the Product information that an Opt-Out Notice shall include, pursuant to Guidelines, Section IV.B.6.a. A Municipality may modify the table to provide this information in what it considers to be a more useful format.

Table IV.B.6.a - Product Information						
			Municipal Aggregation Products		Basic Service	
			Product # 1 (Default)	Product # 2 (Opt-In)	Existing	Upcoming (if known)
Price (in \$/kWh)						
Renewable Energy Content (in % of total)						
Required						
Voluntary	RPS Class I					
	National Wind					
	Other (describe)					
TOTAL						
Supplier Name						
Effective Dates					<i>(Feb – Jul)</i>	<i>(Aug – Jan)</i>

**Attachment IV.B.6.b
Representative Notification of Product Change**

Table IV.B.6.b sets forth the Product Information that a Notification of Product Change shall include, pursuant to Guidelines, Section IV.B.6.b. A Municipality may modify the table to provide this information in what it considers to be a more useful format.

Table V.B.6.b - Product Information		
	Product Name	
	Current	New
Price (in \$/kWh)		
Renewable Energy Content (in % of total)		
Required		
Voluntary	RPS Class I	
	National Wind	
	Other (<i>describe</i>)	
TOTAL		
Supplier Name		
Effective Dates		

**Attachment IV.B.7.b.i
Annual Product Information**

Table IV.B.7.b.i sets forth the Program information a Municipality shall include in presenting Product information for the previous year, pursuant to Guidelines, Section IV.B.7.b.i. A Municipality may modify the table to provide this information in what it considers to be a more useful format. [*Note – This table should not be included in Plans.*]

Table IV.B.7.b.i Annual Product Information – Residential (i)					
		Product # 1 (Default)	Product # 2 (Opt-In)		
Rate Components (in \$/kWh)					
Supply and Renewable Energy Content					
Consultant Services					
Municipality Services					
Other Services					
TOTAL					
Renewable Energy Content (in % of total)					
Required					
Voluntary	RPS Class I				
	National Wind				
	Other (describe)				
TOTAL					
Participants		#	kWh	#	kWh
Residential					
Low-Income					
Small Commercial & Industrial					
Large Commercial & Industrial					
TOTAL					
Supplier Name					
Effective Dates					

Notes

- (i) Municipalities should provide Product information for all customer classes.

Attachment IV.B.7.b.ii
Annual Product Rate Component Information

Table IV.B.7.b.ii sets forth the format by which a Municipality shall present information related to Product rate components identified in Table IV.B.7.b.i during the previous year, pursuant to Guidelines, Section IV.B.7.b.ii. [*Note – This table should not be included in Plans.*]

Rate Component (i)	Revenue (in \$)
Supply and Renewable Content	
Consultant Services	
Municipality Services	
Other Services	

Notes

- (i) For each rate component identified in Table IV.B.7.b.ii, the Municipality shall provide a detailed accounting of the services provided.

Attachment IV.B.7.b.iii
Annual Voluntary Renewable Energy Content Information

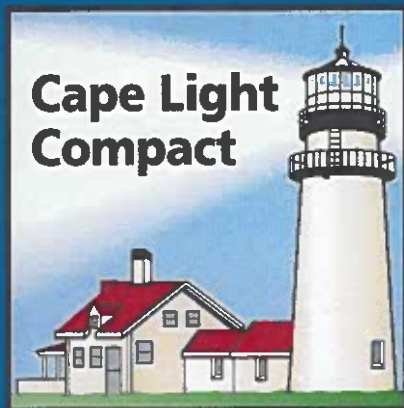
Table IV.B.7.b.iii sets forth the format by which a Municipality shall present information related to the megawatt-hours of electricity provided through the Program during the previous year that will be matched to voluntary renewable energy certificates (i.e., the certificates issued to renewable energy resources for each megawatt-hour of electricity they produce) purchased/retired during that year, pursuant to Guidelines, Section IV.B.7.b.iii. [*Note – This table should not be included in Plans.*]

Table IV.B.7.b.iii – Voluntary Annual Renewable Energy Information	
Category of Renewable Energy (i)	MWh/Certificates (ii)
RPS Class I	
National Wind	
Other	

Notes

- (i) For each category, the Municipality shall identify the mechanism (e.g., NEPOOL Generation Information System) by which the purchases/retirements were tracked.
- (ii) A Municipality shall identify, with explanation, instances in which the number of renewable energy certificates purchased/retired exceeds the megawatt-hours of electricity provided through the Program.

AGENDA ITEM #4C



*Your Trusted, Local
Energy Resource*

Cape Light Compact

Mid-Term Modification (MTM)
for Board

September 2024

Terminology reminder

Sector (gray)

- Residential, Income Eligible, Commercial & Industrial

Program (purple)

- i.e. Residential New Buildings, Residential Existing Buildings

Hard-to-Measure

- Efforts with cost but “hard-to-measure” savings

Program
A - Residential
A1 - Residential New Buildings
A1a - Residential New Homes & Renovations
A2 - Residential Existing Buildings
A2a - Residential Coordinated Delivery
A2b - Residential Conservation Services (RCS)
A2c - Residential Retail
A2d - Residential Behavior
A2e - Residential Active Demand Reduction
A3 - Residential Hard-to-Measure
A3a - Residential Statewide Marketing
A3b - Residential Statewide Database
A3c - Residential DOER Assessment
A3d - Residential Sponsorships & Subscriptions
A3e - Residential Workforce Development
A3f - Residential Evaluation and Market Research
A3g - Residential EEAC Consultants
A3h - Residential R&D and Demonstration
A3i - Residential HEAT Loan
A3j - Residential Education
B - Income Eligible
B1 - Income Eligible Existing Buildings
B1a - Income Eligible Coordinated Delivery
B1b - Income Eligible Active Demand Reduction
B2 - Income Eligible Hard-to-Measure
B2a - Income Eligible Statewide Marketing
B2b - Income Eligible Statewide Database
B2c - Income Eligible DOER Assessment
B2d - Income Eligible Sponsorships & Subscriptions
B2e - Income Eligible Workforce Development
B2f - Income Eligible Evaluation and Market Research
B2g - Low-Income Energy Affordability Network (LEAN)
C - Commercial & Industrial
C1 - C&I New Buildings
C1a - C&I New Buildings & Major Renovations
C2 - C&I Existing Buildings
C2a - C&I Existing Building Retrofit
C2b - C&I New & Replacement Equipment
C2c - C&I Active Demand Reduction
C3 - C&I Hard-to-Measure
C3a - C&I Statewide Marketing
C3b - C&I Statewide Database
C3c - C&I DOER Assessment
C3d - C&I Sponsorships & Subscriptions
C3e - C&I Workforce Development
C3f - C&I Evaluation and Market Research
C3g - C&I EEAC Consultants
C3h - C&I R&D and Demonstration

Quick MTM history

DPU 11-120A
(2013)

“without approval by the Department or the Council, to change a program budget or hard-to-measure program budget (over the three-year term) by up to 20 percent, and to change a program design that is projected to result in a reduction in program benefits (over the three-year term) of up to 20 percent”

DPU 20-150A
(May 2021)
EE Guidelines

permitting a Program Administrator to “overspend a sector level budget by ten percent without the need for prior Department approval”

CLC and other PAs file Plan 11/1/2021

2022-2024
Plan Order
(Jan 2022)

“a Program Administrator may not exceed its planned program budget without approval by the Department”



CLC MTMs

9/14/2023

- CLC files 1st MTM (DPU 23-58)

3/14/2024

- DPU 23-58 stamp approved

8/12/2024

- PAs, DOER, AGO and LEAN seek waiver of \$1 over directive and note interpretation of 10% over sector (inclusive of previous MTMs)

8/15/2024

- CLC files 2nd MTM (DPU 24-126)
- Noted that MTMs would be withdrawn if Joint Motion approved fully
- Program pause for HEAT Loan (8/26/24) and IE (Sept 2024)

9/3/2024

- Joint Motion for waiver approved fully

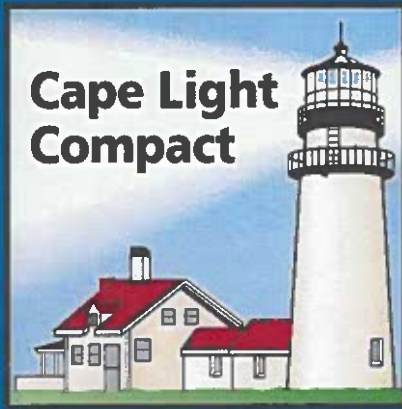
DPU = Department of Public Utilities

DOER = Department of Energy Resources

AGO = Attorney General's Office

LEAN = Low-Income Energy Affordability Network





*Your Trusted, Local
Energy Resource*

Cape Light Compact

Mid-Term Modification (MTM)
reference slides as presented
for the EEAC

August 2024

Summary

Residential New Buildings is seeking additional funding of **\$255,988** or **2%** more than the approved MTM. The increase is driven primarily by the demand for all-electric homes.

Income-Eligible Existing Buildings is seeking additional funding of **\$6,675,133** or **18%** more than the approved spending. The increase is driven primarily by higher than expected costs for heat pumps and other comprehensive projects

Residential Hard-to-Measure is seeking additional funding of **\$6,603,134** or **44%** more than the approved MTM. The increase is driven primarily by HEAT loan.

Income-Eligible Hard-to-Measure is seeking additional funding of **\$134,750** or **12% more** than the approved MTM. The increase is driven primarily by unplanned costs for the DOER Assessment and Workforce Development.

2% ↑
Res New Buildings

44% ↑
Res HTM

18% ↑
IE Existing Buildings

12% ↑
IE HTM



Summary

Residential New Buildings is seeking additional funding of **\$255,988** or **2%** more than the approved MTM. The increase is driven primarily by the demand for all-electric homes.

Income-Eligible Existing Buildings is seeking additional funding of **\$6,675,133** or **18%** more than the approved spending. The increase is driven primarily by higher than expected costs for heat pumps and other comprehensive projects

Residential Hard-to-Measure is seeking additional funding of **\$6,603,134** or **44%** more than the approved MTM. The increase is driven primarily by HEAT loan.

Income-Eligible Hard-to-Measure is seeking additional funding of **\$134,750** or **12% more** than the approved MTM. The increase is driven primarily by unplanned costs for the DOER Assessment and Workforce Development.

2% ↑
Res New Buildings

44% ↑
Res HTM

18% ↑
IE Existing Buildings

12% ↑
IE HTM



Summary continued

Income-Eligible Sector is seeking additional funding of **\$6,806,867** or **18%** more than the approved spending. Please see other IE MTMs.

C&I Existing Building Retrofit is seeking additional funding of **\$1,424,006** or **4%** more than the approved MTM. The increase is driven primarily by HEAT loan.

C&I New Buildings is seeking additional funding of **\$22,808** or **1%** more than the approved MTM. The increase is driven primarily by the demand for all-electric homes.

C&I Hard-to-Measure is seeking additional funding of **\$58,084** or **2% more** than the approved MTM. The increase is driven primarily by unplanned costs for the DOER Assessment and Evaluation.

IE Sector **18%** ↑

C&I New Buildings **1%** ↑

C&I Existing Bldgs **4%** ↑

C&I HTM **2%** ↑



MTM Table (part 1)

Program	2022-2024 Budget (5)						2022-2024 Lifetime Savings (MWh)			2022-2024 Total Lifetime Savings (MMBTU)			2022-2024, 2030 Avoided CO2e (Metric Tons)		
	DPU 21-126 Approved Plan	DPU 23-58 Approved MTM	DPU 24-126 Proposed MTM (Incremental to Approved MTM)	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan	Proposed MTM / Approved MTM	DPU 21-126 Approved Plan	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan	DPU 21-126 Approved Plan	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan	DPU 21-126 Approved Plan	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan
	(a)	(b)	(c)	(d)	(d) - (a)	(d) - (b)	(e)	(f)	(f) - (e)	(g)	(h)	(h) - (g)	(i)	(j)	(j) - (i)
A - Residential	121,990,120	123,515,106	6,859,122	130,374,228	107%	106%	(68,481)	(68,481)	100%	5,400,180	5,400,180	100%	25,112	25,112	100%
A1 - Residential New Buildings	13,912,091	13,912,091	255,988	14,168,079	102%	102%	9,662	53,469	553%	450,448	402,680	89%	1,286	986	77%
A1a - Residential New Homes & Renovations	13,912,091	13,912,091	255,988	14,168,079	102%	102%	9,662	53,469	553%	450,448	402,680	89%	1,286	986	77%
A2 - Residential Existing Buildings	94,663,428	94,663,428	-	94,663,428	100%	100%	(78,143)	(78,143)	100%	4,949,733	4,949,733	100%	23,827	23,827	100%
A2a - Residential Coordinated Delivery	51,032,032	51,032,032	-	51,032,032	100%	100%	171,912	171,912	100%	3,160,932	3,160,932	100%	8,369	8,369	100%
A2b - Residential Conservation Services (RCS)	5,779,853	5,779,853	-	5,779,853	100%	100%	-	-	-	-	-	-	-	-	-
A2c - Residential Retail	36,039,075	36,039,075	-	36,039,075	100%	100%	(250,033)	(250,033)	100%	1,788,994	1,788,994	100%	15,458	15,458	100%
A2d - Residential Behavior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A2e - Residential Active Demand Reduction	1,812,468	1,812,468	-	1,812,468	100%	100%	(23)	(23)	100%	(193)	(193)	100%	-	-	-
A3 - Residential Hard-to-Measure	13,414,601	14,999,586	6,605,134	21,542,720	161%	144%	-	-	-	-	-	-	-	-	-
B - Income Eligible	20,481,103	38,727,531	6,806,867	45,534,398	222%	118%	45,505	15,330	34%	525,209	885,317	169%	1,279	3,561	279%
B1 - Income Eligible Existing Buildings	19,482,802	37,644,662	6,672,117	44,316,779	227%	118%	45,505	15,330	34%	525,209	885,317	169%	1,279	3,561	279%
B1a - Income Eligible Coordinated Delivery	19,478,639	37,641,646	6,675,133	44,316,779	228%	118%	45,505	15,330	34%	525,214	885,317	169%	1,279	3,561	279%
B1b - Income Eligible Active Demand Reduction	4,163	3,016	(3,016)	-	0%	0%	(1)	-	0%	(5)	-	0%	-	-	-
B2 - Income Eligible Hard-to-Measure	998,301	1,082,869	134,750	1,217,619	122%	112%	-	-	-	-	-	-	-	-	-
C - Commercial & Industrial	56,915,139	43,322,721	1,504,897	44,827,618	79%	103%	233,720	198,470	85%	1,845,186	1,528,505	83%	5,747	2,954	79%
C1 - C&I New Buildings	2,383,055	1,993,272	22,808	2,016,079	85%	101%	36,208	6,353	18%	205,655	121,950	59%	174	438	251%
C1a - C&I New Buildings & Major Renovations	2,383,055	1,993,272	22,808	2,016,079	85%	101%	36,208	6,353	18%	205,655	121,950	59%	174	438	251%
C2 - C&I Existing Buildings	50,694,856	37,856,119	1,424,006	39,280,125	77%	104%	197,512	192,117	97%	1,639,531	1,406,555	86%	3,572	2,516	70%
C2a - C&I Existing Building Retrofit	38,763,743	30,877,141	(3,548,634)	27,328,507	71%	89%	159,087	141,260	89%	1,233,554	942,377	76%	2,403	1,218	51%
C2b - C&I New & Replacement Equipment	10,870,641	6,359,062	4,945,654	11,304,716	104%	178%	38,484	50,857	132%	406,517	464,179	114%	1,169	1,298	111%
C2c - C&I Active Demand Reduction	1,060,472	619,916	26,986	646,902	61%	104%	(59)	-	0%	(540)	-	0%	-	-	-
C3 - C&I Hard-to-Measure	3,837,228	3,473,330	58,084	3,531,414	92%	102%	-	-	-	-	-	-	-	-	-
Grand Total	199,386,361	205,565,357	15,170,886	220,736,243	111%	107%	210,744	145,319	69%	7,770,575	7,814,003	101%	30,138	31,627	105%



MTM Table (part 2)

Program	2022-2024 Benefits (\$)			2022-2024 Total Resource Cost (\$)			2022-2024 BCR
	DPU 21-126 Approved Plan	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan	DPU 21-126 Approved Plan	DPU 24-126 Proposed MTM (Total)	Proposed MTM / Approved Plan	DPU 24-126 Proposed MTM (Total)
	(k)	(l)	(l) ÷ (k)	(m)	(n)	(n) ÷ (m)	(l) ÷ (n)
A - Residential	270,078,934	270,078,934	100%	135,058,638	135,058,638	100%	2.00
A1 - Residential New Buildings	22,972,317	13,972,985	61%	13,030,361	10,862,449	83%	1.29
A1a - Residential New Homes & Renovations	22,972,317	13,972,985	61%	13,030,361	10,862,449	83%	1.29
A2 - Residential Existing Buildings	247,106,617	247,106,617	100%	108,879,286	108,879,286	100%	2.27
A2a - Residential Coordinated Delivery	133,374,977	133,374,977	100%	51,931,663	51,931,663	100%	2.57
A2b - Residential Conservation Services (RCS)	-	-	-	5,668,735	5,668,735	100%	-
A2c - Residential Retail	110,196,694	110,196,694	100%	49,505,105	49,505,105	100%	2.23
A2d - Residential Behavior	-	-	-	-	-	-	-
A2e - Residential Active Demand Reduction	3,534,947	3,534,947	100%	1,773,784	1,773,784	100%	1.99
A3 - Residential Hard-to-Measure				13,148,990	21,047,708	160%	-
B - Income Eligible	32,908,048	52,686,090	160%	20,065,468	44,500,026	222%	1.18
B1 - Income Eligible Existing Buildings	32,908,048	52,686,090	160%	19,086,792	43,309,342	227%	1.22
B1a - Income Eligible Coordinated Delivery	32,847,499	52,656,297	160%	19,082,716	43,309,342	227%	1.22
B1b - Income Eligible Active Demand Reduction	60,549	29,793	49%	4,076	-	0%	-
B2 - Income Eligible Hard-to-Measure				978,677	1,190,684	122%	-
C - Commercial & Industrial	88,072,195	70,786,432	80%	57,222,324	47,283,601	83%	1.50
C1 - C&I New Buildings	9,409,482	8,365,024	89%	2,205,367	2,767,148	125%	3.02
C1a - C&I New Buildings & Major Renovations	9,409,482	8,365,024	89%	2,205,367	2,767,148	125%	3.02
C2 - C&I Existing Buildings	78,662,713	62,421,408	79%	51,254,856	41,066,645	80%	1.52
C2a - C&I Existing Building Retrofit	54,887,844	38,295,615	70%	38,690,298	31,779,174	82%	1.21
C2b - C&I New & Replacement Equipment	19,525,996	22,950,827	118%	11,527,770	8,652,495	75%	2.65
C2c - C&I Active Demand Reduction	4,248,872	1,174,966	28%	1,036,789	634,975	61%	1.85
C3 - C&I Hard-to-Measure				3,762,101	3,449,808	92%	-
Grand Total	391,059,176	393,551,456	101%	212,346,430	226,842,264	107%	1.73



Implementation implications

... if the Joint Motion, which requests relief from the \$1 over rule is not granted....

August 26, 2024

Residential Hard-to-Measure pause needed



September 2024

Income-Eligible sector pause needed





THANK YOU

Questions?



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

August 19, 2024

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

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

Re: D.P.U. 24-126, *Cape Light Compact JPE Petition for Approval of Mid-Term Modifications of its 2022-2024 Three-Year Energy Efficiency Plan*

Dear Secretary Marini:

At the Department's request, enclosed for filing please find the Cape Light Compact JPE's (the "Compact"), Revised Exhibit CLC-3 (Bill Impacts and Energy Efficiency Surcharge Calculations), along with a certificate of service.

The Compact is filing a Revised Exhibit CLC-3 to show bill impacts that compare the Compact's 2024 budget approved in *Cape Light Compact JPE*, D.P.U. 21-126 and *Cape Light Compact JPE*, D.P.U. 22-137, plus all budget changes approved in *Cape Light Compact JPE*, D.P.U. 23-58 to a 2024 budget that also includes the revised budget proposed by the Compact in D.P.U. 24-126.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Audrey Eidelman Kiernan'.

Audrey Eidelman Kiernan

AEK/drb
Enclosures

Mark D. Marini, Secretary

August 19, 2024

Page 2

cc: Jeffrey Leupold, Esq., DPU Hearing Officer (w/enc.) (via email only)
Stephanie Mealey, Esq., DPU Hearing Officer (w/enc.) (via email only)
Krista Hawley, Esq., DPU Hearing Officer (w/enc.) (via email only)
Jeanne Voveris, Esq., DPU Hearing Officer (w/enc.) (via email only)
Elizabeth Anderson, Esq., Office of the Attorney General (w/enc.) (via email only)
Rachel Graham Evans, Esq., Department of Energy Resources (w/enc.) (via email only)
Gretchen Calcagni, Senior Consultant, NV5 (w/enc.) (via email only)
Jerrold Oppenheim, Esq., LEAN (w/enc.) (via email only)
Energy Efficiency Advisory Council (w/enc.) (via email only)
D.P.U. 21-126 Service List (w/enc.) (via email only)
Margaret T. Downey, Compact Administrator (w/enc.) (via email only)

CAPE LIGHT COMPACT JPE
Summary of Bill Impact Analysis

Rate Class Information				Total Bill Comparison	
Rate		Month		2024 MTM 1 vs. 2024 MTM 2	
		Avg kWh	Avg kW	Total Change	% Change
Rate R-1 Residential	R-1	516		4.92	2.67%
Rate R-2 Residential Assistance	R-2	488		0.88	0.90%
Rate R-3 Residential Space Heating	R-3	740		7.06	2.83%
Rate R-4 Residential Assistance Space Heating	R-4	874		1.59	0.97%
Rate G-1 Small General Service	G-1	400	2	2.61	2.23%
Rate G-1 Small General Service	G-1	5,700	19	40.13	2.43%
Rate G-1 Small General Service	G-1	10,800	27	76.03	2.49%
Rate G-1 Seasonal Small General Service	G-1S	450	9	3.16	1.99%
Rate G-1 Seasonal Small General Service	G-1S	1,200	8	8.45	2.04%
Rate G-1 Seasonal Small General Service	G-1S	2,700	9	19.01	2.18%
Rate G-2 Medium General Time-of-Use	G-2	81,500	205	432.96	2.04%
Rate G-2 Medium General Time-of-Use	G-2	85,600	214	602.62	2.10%
Rate G-2 Medium General Time-of-Use	G-2	128,500	253	890.56	2.15%
Rate G-3 Large General Time-Of-Use	G-3	373,100	1,066	2,626.62	2.15%
Rate G-3 Large General Time-Of-Use	G-3	354,800	788	2,496.38	2.20%
Rate G-3 Large General Time-Of-Use	G-3	614,900	1,118	4,328.90	2.25%
Rate G-4 General Power	G-4	7,800	52	54.91	2.49%
Rate G-4 General Power	G-4	6,750	27	47.52	2.63%
Rate G-4 General Power	G-4	9,450	27	66.53	2.70%
Rate G-5 Commercial Space Heating	G-5	1,472		10.37	2.29%
Rate G-6 All Electric Schools	G-6	60,748		427.67	2.69%
Rate G-7 Optional General Time-of-Use	G-7	7,000	20	49.28	2.45%
Rate G-7 Optional General Time-of-Use	G-7	15,500	31	109.12	2.58%
Rate G-7 Optional General Time-of-Use	G-7	11,700	18	82.37	2.66%
Rate G-7 Optional Seasonal General Time-of-Use	G-7S	450	9	3.16	1.50%
Rate G-7 Optional Seasonal General Time-of-Use	G-7S	1,500	10	10.56	2.13%
Rate G-7 Optional Seasonal General Time-of-Use	G-7S	3,900	13	27.46	2.38%

The 2024 EES rates are provided for informational purposes, for effect January 1, 2024 through December 31, 2024.
MTM 1 rates include Planned budget plus approved MTM.
MTM 2 rates include Planned budget plus approved MTM plus requested MTM.

Cape Light Compact JPE
Calculation of Monthly Typical Bill
Illustrative

Rate R-1 Residential

1	Money	2024 MTM 1			2024 MTM 2			Yrld Bill Impact	
		Delivery	Supplier	Total	Delivery	Supplier	Total	Change	% Change
2	WAD								
3	100	\$24.32	\$17.00	\$41.32	\$25.28	\$17.00	\$42.28	\$0.96	2.3%
4	200	\$41.64	\$34.00	\$75.64	\$43.55	\$34.00	\$77.55	\$1.91	2.5%
5	300	\$58.95	\$51.00	\$109.95	\$61.43	\$51.00	\$112.43	\$2.47	2.2%
6	400	\$76.26	\$68.00	\$144.26	\$80.10	\$68.00	\$148.10	\$3.84	2.6%
7	500	\$93.57	\$85.00	\$178.57	\$98.38	\$85.00	\$183.38	\$4.81	2.7%
8	600	\$110.88	\$101.00	\$211.88	\$116.05	\$101.00	\$217.05	\$5.17	2.4%
9	700	\$128.19	\$116.00	\$244.19	\$134.33	\$116.00	\$250.33	\$6.14	2.5%
10	800	\$145.50	\$135.00	\$280.50	\$152.20	\$135.00	\$287.20	\$6.70	2.4%
11	900	\$162.81	\$152.00	\$314.81	\$171.48	\$152.00	\$323.48	\$8.67	2.7%
12	1,000	\$180.12	\$169.00	\$349.12	\$189.75	\$169.00	\$358.75	\$9.63	2.7%
13	1,250	\$223.51	\$212.49	\$436.00	\$235.44	\$212.49	\$447.93	\$11.93	2.7%
14	1,500	\$266.90	\$254.99	\$521.89	\$281.13	\$254.99	\$536.12	\$14.23	2.7%
15	2,000	\$353.42	\$339.96	\$693.38	\$372.50	\$339.96	\$712.46	\$19.08	2.8%
16	Avg	\$16.38	\$17.71	\$184.08	\$101.30	\$17.71	\$189.01	\$4.92	2.7%

	2024 MTM 1	2024 MTM 2	Change	
17				
18	Rate	Rate	Change	
19	Customer Charge	\$7.00	\$7.00	\$0.00
20	Distribution Energy	\$0.05165	\$0.05165	\$0.00000
21	Revenue Decoupling	\$0.00267	\$0.00267	\$0.00000
22	Solar Massachusetts Renewable Target	\$0.00341	\$0.00341	\$0.00000
23	Residential Assistance Adjustment Factor	\$0.00572	\$0.00572	\$0.00000
24	Pension Adjustment Factor	\$0.00120	\$0.00120	\$0.00000
25	Net Metering Recovery Surcharge	\$0.00758	\$0.00758	\$0.00000
26	Long Term Renewable Contract Adjustment	(\$0.00045)	(\$0.00045)	\$0.00000
27	AG Consulting Expense	\$0.00000	\$0.00000	\$0.00000
28	Storm Cost Recovery Adjustment Factor	\$0.00000	\$0.00000	\$0.00000
29	Storm Reserve Adjustment	\$0.00000	\$0.00000	\$0.00000
30	Basic Service Cost True Up Factor	(\$0.00011)	(\$0.00011)	\$0.00000
31	Solar Program Cost Adjustment Factor	(\$0.00001)	(\$0.00001)	\$0.00000
32	Solar Expansion Cost Recovery Factor	\$0.00101	\$0.00101	\$0.00000
33	Vegetation Management	\$0.00159	\$0.00159	\$0.00000
34	Tax Act Credit Factor	(\$0.00163)	(\$0.00163)	\$0.00000
35	Grid Modernization	\$0.00172	\$0.00172	\$0.00000
36	Transmission	(\$0.00177)	(\$0.00177)	\$0.00000
37	Transmission Energy	\$0.04437	\$0.04437	\$0.00000
38	Energy Efficiency Reconciliation Factor	\$0.00006	\$0.00006	\$0.00000
39	System Benefits Charge	\$0.00250	\$0.00250	\$0.00000
40	Renewable Energy Charge	\$0.00050	\$0.00050	\$0.00000
41	Supply Charge	\$0.16999	\$0.16999	\$0.00000

Capex Light Compact JPE
 Calculation of Monthly Typical Bill
 Worksheet

Rate R-2 Residential Assessor

1	Monthly	2024 MTM 1			2024 MTM 2			Total Bill Impact	
		Delivrs	Subscr	Total	Delivrs	Subscr	Total	Change	% Change
2	Wtd.								
3	100	\$12.00	\$10.88	\$23.88	\$12.98	\$10.88	\$23.86	\$0.18	0.8%
4	200	\$21.12	\$21.76	\$42.88	\$21.49	\$21.76	\$43.25	\$0.37	0.9%
5	300	\$29.44	\$32.84	\$62.28	\$32.80	\$32.84	\$65.63	\$3.35	5.4%
6	400	\$37.77	\$43.52	\$81.29	\$38.48	\$43.52	\$82.01	\$0.72	0.9%
7	500	\$46.09	\$54.40	\$100.49	\$47.00	\$54.40	\$101.40	\$0.91	0.9%
8	600	\$54.41	\$65.28	\$119.69	\$56.50	\$65.28	\$121.78	\$1.09	0.9%
9	700	\$62.73	\$76.16	\$138.89	\$64.00	\$76.16	\$140.16	\$1.27	0.9%
10	800	\$71.05	\$87.03	\$158.08	\$72.50	\$87.03	\$159.53	\$1.45	0.9%
11	900	\$79.37	\$97.91	\$177.28	\$81.01	\$97.91	\$178.92	\$1.64	0.9%
12	1,000	\$87.69	\$108.79	\$196.48	\$89.51	\$108.79	\$198.30	\$1.82	0.9%
13	1,250	\$108.50	\$135.99	\$244.49	\$110.77	\$135.99	\$246.76	\$2.27	0.9%
14	1,500	\$129.30	\$163.19	\$292.49	\$132.03	\$163.19	\$295.22	\$2.73	0.9%
15	2,000	\$170.91	\$217.59	\$388.50	\$174.54	\$217.59	\$392.13	\$3.63	0.9%
16	Avg	488	\$45.09	\$53.00	\$98.10	\$45.97	\$53.09	\$0.88	0.9%
17			2024 MTM 1	2024 MTM 2					
18			Rate	Rate			Change		
19	Customer Charge		\$7.00	\$7.00			\$0.00		
20	Distribution Energy		\$0.05165	\$0.05165			\$0.00000		
21	Revenue Decoupling		\$0.00267	\$0.00267			\$0.00000		
22	Solar Incentive/Retire Renewable Target		\$0.00341	\$0.00341			\$0.00000		
23	Residential Assistance Adjustment Factor		\$0.00572	\$0.00572			\$0.00000		
24	Penalty Adjustment Factor		\$0.00120	\$0.00120			\$0.00000		
25	Net Metering Recovery Surcharge		\$0.00756	\$0.00756			\$0.00000		
26	Long Term Renewable Contract Adjustment		(\$0.00343)	(\$0.00343)			\$0.00000		
27	AQ Consulting Expense		\$0.00000	\$0.00000			\$0.00000		
28	Storm Cost Recovery Adjustment Factor		\$0.00000	\$0.00000			\$0.00000		
29	Storm Reserve Adjustment		\$0.00000	\$0.00000			\$0.00000		
30	Basic Service Cost True Up Factor		(\$0.00011)	(\$0.00011)			\$0.00000		
31	Solar Program Cost Adjustment Factor		(\$0.00001)	(\$0.00001)			\$0.00000		
32	Solar Expansion Cost Recovery Factor		\$0.00101	\$0.00101			\$0.00000		
33	Vegetation Management		\$0.00159	\$0.00159			\$0.00000		
34	Tax Act Credit Factor		(\$0.00163)	(\$0.00163)			\$0.00000		
35	Grid Modernization		\$0.00172	\$0.00172			\$0.00000		
36	Transmission		(\$0.00173)	(\$0.00173)			\$0.00000		
37	Transmission Energy		\$0.04437	\$0.04437			\$0.00000		
38	Energy Efficiency Rebate/Incentive Factor		\$0.00887	\$0.00887			\$0.00000		
39	System Benefits Charge		\$0.00250	\$0.00250			\$0.00000		
40	Renewable Energy Charge		\$0.00050	\$0.00050			\$0.00000		
41	Supply Charge		\$0.18999	\$0.18999			\$0.00000		
42	Low Income Discount		36%	36%			0%		

Case Light Compact JPE
Calculation of Monthly Typical Bill
Murshelton

Rate R-3 Residential Space Heating

1	Monthly	2024 MTM 1			2024 MTM 2			Total Bill Impact	
		Deliver	Supplier	Total	Deliver	Supplier	Total	Change	% Change
2	100	\$22.75	\$17.00	\$39.75	\$23.71	\$17.00	\$40.71	\$0.96	2.4%
4	200	\$38.51	\$34.00	\$72.51	\$40.41	\$34.00	\$74.41	\$1.90	2.6%
5	300	\$54.26	\$51.00	\$105.26	\$57.12	\$51.00	\$108.12	\$2.86	2.7%
6	400	\$70.01	\$68.00	\$138.01	\$73.83	\$68.00	\$141.83	\$3.82	2.8%
7	500	\$85.77	\$85.00	\$170.77	\$89.54	\$85.00	\$174.54	\$4.77	2.8%
8	600	\$101.52	\$101.00	\$202.52	\$107.24	\$101.00	\$208.24	\$6.72	2.8%
9	700	\$117.27	\$118.00	\$235.27	\$123.85	\$118.00	\$241.85	\$6.58	2.8%
10	800	\$133.02	\$135.00	\$268.02	\$140.66	\$135.00	\$275.66	\$7.64	2.8%
11	900	\$148.78	\$152.00	\$300.78	\$157.35	\$152.00	\$309.35	\$8.57	2.8%
12	1,000	\$164.53	\$169.00	\$333.53	\$174.07	\$169.00	\$343.07	\$9.54	2.9%
13	1,250	\$203.81	\$212.49	\$416.30	\$215.84	\$212.49	\$428.33	\$11.03	2.9%
14	1,500	\$243.10	\$254.99	\$498.09	\$257.61	\$254.99	\$512.60	\$14.51	2.9%
15	2,000	\$322.08	\$338.98	\$661.06	\$341.14	\$338.98	\$680.12	\$19.06	2.9%
16	Avg	\$123.57	\$125.79	\$249.36	\$130.63	\$125.79	\$256.42	\$7.06	2.8%

17		2024 MTM 1		2024 MTM 2		Change
		Rate	Rate	Rate	Rate	
18	Customer Charge	\$7.00	\$7.00	\$7.00	\$7.00	\$0.00
20	Distribution Energy	\$0.04484	\$0.04484	\$0.04484	\$0.04484	\$0.00000
21	Revenue Decoupling	\$0.00211	\$0.00211	\$0.00211	\$0.00211	\$0.00000
22	Solar Massachusetts Renewable Target	\$0.00270	\$0.00270	\$0.00270	\$0.00270	\$0.00000
23	Residential Assistance Adjustment Factor	\$0.00452	\$0.00452	\$0.00452	\$0.00452	\$0.00000
24	Person Adjustment Factor	\$0.00115	\$0.00115	\$0.00115	\$0.00115	\$0.00000
25	Fair Metering Recovery Surcharge	\$0.00568	\$0.00568	\$0.00568	\$0.00568	\$0.00000
26	Long Term Renewable Contract Adjustment	(\$0.00045)	(\$0.00045)	(\$0.00045)	(\$0.00045)	\$0.00000
27	AJ Consulting Expense	\$0.00000	\$0.00000	\$0.00000	\$0.00000	\$0.00000
28	Storm Cost Recovery Adjustment Factor	\$0.00254	\$0.00254	\$0.00254	\$0.00254	\$0.00000
29	Storm Reserve Adjustment	\$0.00000	\$0.00000	\$0.00000	\$0.00000	\$0.00000
30	Basic Service Cost True Up Factor	(\$0.00008)	(\$0.00008)	(\$0.00008)	(\$0.00008)	\$0.00000
31	Solar Program Cost Adjustment Factor	\$0.00000	\$0.00000	\$0.00000	\$0.00000	\$0.00000
32	Solar Expansion Cost Recovery Factor	\$0.00080	\$0.00080	\$0.00080	\$0.00080	\$0.00000
33	Vegetation Management	\$0.00153	\$0.00153	\$0.00153	\$0.00153	\$0.00000
34	Tar Act Credit Factor	(\$0.00129)	(\$0.00129)	(\$0.00129)	(\$0.00129)	\$0.00000
35	Grid Modernization	\$0.00140	\$0.00140	\$0.00140	\$0.00140	\$0.00000
36	Transmission	(\$0.00177)	(\$0.00177)	(\$0.00177)	(\$0.00177)	\$0.00000
37	Transmission Energy	\$0.04039	\$0.04039	\$0.04039	\$0.04039	\$0.00000
38	Energy Efficiency Reconciliation Factor	\$0.05008	\$0.05008	\$0.05008	\$0.05008	\$0.00000
39	System Benefits Charge	\$0.00250	\$0.00250	\$0.00250	\$0.00250	\$0.00000
40	Renewable Energy Charge	\$0.00050	\$0.00050	\$0.00050	\$0.00050	\$0.00000
41	Supply Charge	\$0.16999	\$0.16999	\$0.16999	\$0.16999	\$0.00000

Cape Light Compact JPE
 Calculation of Monthly Typical Bill
 Worksheet

Rate R-4 Residential Assistance Space Heating

1	Monthly	2024 MTR 1			2024 MTR 2			Total Bill Impact	
		Debtors	Subsidy	Total	Debtors	Subsidy	Total	Change	% Change
2	kWh								
3	100	\$11.80	\$10.88	\$22.68	\$11.98	\$10.88	\$22.68	\$0.18	0.8%
4	200	\$19.12	\$21.76	\$40.88	\$19.48	\$21.76	\$41.24	\$0.36	0.9%
5	300	\$26.43	\$32.84	\$59.07	\$26.88	\$32.84	\$59.82	\$0.55	0.9%
6	400	\$33.75	\$43.52	\$77.27	\$34.48	\$43.52	\$78.00	\$0.73	0.9%
7	500	\$41.07	\$54.40	\$95.47	\$41.88	\$54.40	\$96.38	\$0.91	1.0%
8	600	\$48.39	\$65.26	\$113.67	\$49.48	\$65.26	\$114.78	\$1.09	1.0%
9	700	\$55.70	\$76.16	\$131.86	\$56.98	\$76.16	\$133.14	\$1.28	1.0%
10	800	\$63.02	\$87.03	\$150.05	\$64.48	\$87.03	\$151.51	\$1.46	1.0%
11	900	\$70.34	\$97.91	\$168.25	\$71.98	\$97.91	\$169.89	\$1.64	1.0%
12	1,000	\$77.66	\$108.79	\$186.45	\$79.48	\$108.79	\$188.27	\$1.82	1.0%
13	1,250	\$99.95	\$135.99	\$231.94	\$98.22	\$135.99	\$234.21	\$2.27	1.0%
14	1,500	\$114.25	\$163.19	\$277.44	\$116.97	\$163.19	\$280.16	\$2.72	1.0%
15	2,000	\$150.84	\$217.59	\$368.43	\$154.47	\$217.59	\$372.06	\$3.63	1.0%
16	Avg	\$74	\$86.44	\$160.09	\$70.03	\$86.09	\$156.12	\$1.56	1.0%
17			2024 MTR 1	2024 MTR 2					
18			\$1,008	\$1,013	Change				
19	Customer Charge		\$7.00	\$7.00			\$0.00		
20	Distribution Energy		\$0.0484	\$0.0484			\$0.0000		
21	Revenue Decoupling		\$0.0021	\$0.0021			\$0.0000		
22	Solar Massachusetts Renewable Target		\$0.00270	\$0.00270			\$0.0000		
23	Residential Assistance Adjustment Factor		\$0.00452	\$0.00452			\$0.0000		
24	Pension Adjustment Factor		\$0.00115	\$0.00115			\$0.0000		
25	Net Metering Recovery Surcharge		\$0.00588	\$0.00588			\$0.0000		
26	Long Term Renewable Contract Adjustment		(\$0.00045)	(\$0.00045)			\$0.0000		
27	AG Consulting Expense		\$0.00000	\$0.00000			\$0.00000		
28	Storm Cost Recovery Adjustment Factor		\$0.00254	\$0.00254			\$0.00000		
29	Storm Reserve Adjustment		\$0.00000	\$0.00000			\$0.00000		
30	Basic Service Cost True Up Factor		(\$0.00008)	(\$0.00008)			\$0.00000		
31	Solar Program Cost Adjustment Factor		\$0.00000	\$0.00000			\$0.00000		
32	Solar Expansion Cost Recovery Factor		\$0.00080	\$0.00080			\$0.00000		
33	Vegetation Management		\$0.00193	\$0.00193			\$0.00000		
34	Tax Aid Credit Factor		(\$0.00129)	(\$0.00129)			\$0.00000		
35	Grid Modernization		\$0.00140	\$0.00140			\$0.00000		
36	Transition		(\$0.00177)	(\$0.00177)			\$0.00000		
37	Transmission Energy		\$0.04039	\$0.04039			\$0.00000		
38	Energy Efficiency Reconciliation Factor		\$0.00887	\$0.00887			\$0.00284		
39	System Benefits Charge		\$0.00250	\$0.00250			\$0.00000		
40	Renewable Energy Charge		\$0.00060	\$0.00060			\$0.00000		
41	Supply Charge		\$0.18899	\$0.18899			\$0.00000		
42	Low Income Discount		3%	3%			0%		

Cape Light Compact JPE
 Calculation of Monthly Typical Bill
 Illustrative

South Shore, Cape Cod, and Martha's Vineyard Service Area
 95-to-99-1 Small General Service

1	2	Monthly kW	Monthly MWh	2024 MTM 1			2024 MTM 2			Total Bill Impact	
				Delivery	Subscriber	Total	Delivery	Subscriber	Total	Change	% Change
3		Hours Use 200									
4	5	1,000	\$137.17	\$189.10	\$326.27	\$144.21	\$180.40	\$324.61	\$7.64	2.3%	
5	10	2,000	\$268.34	\$338.20	\$606.54	\$282.42	\$338.20	\$620.62	\$14.08	2.3%	
6	15	3,000	\$403.56	\$507.30	\$910.86	\$424.08	\$507.30	\$931.38	\$21.12	2.3%	
7	25	5,000	\$653.50	\$845.50	\$1,499.00	\$688.70	\$845.50	\$1,534.20	\$35.20	2.3%	
8	50	10,000	\$1,278.26	\$1,691.00	\$2,969.26	\$1,345.75	\$1,691.00	\$3,036.75	\$70.40	2.4%	
9	100	20,000	\$2,528.05	\$3,382.00	\$5,910.05	\$2,668.85	\$3,382.00	\$6,050.85	\$140.80	2.4%	
10	Avg	2	400	\$58.47	\$67.64	\$126.11	\$61.28	\$67.64	\$128.92	\$2.81	2.2%
11		Hours Use 300									
12	5	1,500	\$202.78	\$253.85	\$456.63	\$213.32	\$253.85	\$467.17	\$10.54	2.3%	
13	10	3,000	\$375.61	\$507.30	\$882.91	\$396.73	\$507.30	\$904.03	\$21.12	2.4%	
14	15	4,500	\$548.09	\$760.95	\$1,309.04	\$580.77	\$760.95	\$1,341.72	\$31.68	2.4%	
15	25	7,500	\$908.05	\$1,268.25	\$2,176.30	\$948.05	\$1,268.25	\$2,216.30	\$40.00	1.8%	
16	50	15,000	\$1,763.45	\$2,536.50	\$4,299.95	\$1,855.05	\$2,536.50	\$4,391.55	\$91.60	2.1%	
17	100	30,000	\$3,498.25	\$5,073.00	\$8,571.25	\$3,709.45	\$5,073.00	\$8,782.45	\$211.20	2.5%	
18	Avg	19	5,700	\$987.87	\$1,311.74	\$2,299.61	\$1,023.00	\$1,311.74	\$2,334.74	\$35.13	1.5%
19		Hours Use <400									
20	5	2,000	\$368.34	\$338.20	\$706.54	\$282.42	\$338.20	\$620.62	\$14.08	2.0%	
21	10	4,000	\$727.63	\$676.40	\$1,404.03	\$564.84	\$676.40	\$1,241.24	\$162.79	11.4%	
22	15	6,000	\$1,091.45	\$1,014.60	\$2,106.05	\$847.26	\$1,014.60	\$1,861.86	\$244.19	11.4%	
23	25	10,000	\$1,738.90	\$1,691.00	\$3,429.90	\$1,209.00	\$1,691.00	\$2,900.00	\$529.90	15.3%	
24	50	20,000	\$3,477.80	\$3,382.00	\$6,859.80	\$2,418.00	\$3,382.00	\$5,799.99	\$1,059.81	15.3%	
25	100	40,000	\$6,955.60	\$6,764.00	\$13,719.60	\$4,836.00	\$6,764.00	\$11,599.99	\$2,119.61	15.3%	
26	Avg	27	10,800	\$1,727.39	\$1,826.26	\$3,553.65	\$1,303.42	\$1,826.26	\$3,129.68	\$423.97	13.3%
27					2024 MTM 1		2024 MTM 2				
28					Rate		Change				
29		Customer Charge			\$6.00		\$6.00	\$0.00			
30		Distribution Demand <=10 kW			\$0.00		\$0.00	\$0.00			
31		Distribution Demand >10 kW			\$5.99		\$5.99	\$0.00			
32		Distribution Energy <=2,300 kWh			\$0.0654		\$0.0654	\$0.0000			
33		Distribution Energy >2,300 kWh			\$0.01269		\$0.01269	\$0.00000			
34		Revenue Decoupling			\$0.00179		\$0.00179	\$0.00000			
35		Solar Massachusetts Renewable Target			\$0.00228		\$0.00228	\$0.00000			
36		Residential Assistance Adjustment Factor			\$0.00383		\$0.00383	\$0.00000			
37		Pension Adjustment Factor			\$0.00087		\$0.00087	\$0.00000			
38		Net Metering Recovery Surcharge			\$0.00597		\$0.00597	\$0.00000			
39		Long Term Renewable Contract Adjustment			(\$0.00045)		(\$0.00045)	\$0.00000			
40		AG Consulting Expense			\$0.00000		\$0.00000	\$0.00000			
41		Storm Cost Recovery Adjustment Factor			\$0.00215		\$0.00215	\$0.00000			
42		Storm Reserve Adjustment			\$0.00000		\$0.00000	\$0.00000			
43		Basic Service Cost True Up Factor			(\$0.00007)		(\$0.00007)	\$0.00000			
44		Solar Program Cost Adjustment Factor			\$0.00000		\$0.00000	\$0.00000			
45		Solar Expansion Cost Recovery Factor			\$0.00087		\$0.00087	\$0.00000			
46		Vegetation Management			\$0.00129		\$0.00129	\$0.00000			
47		Tax Act Credit Factor			(\$0.00109)		(\$0.00109)	\$0.00000			
48		Grid Modernization			\$0.00115		\$0.00115	\$0.00000			
49		Transmission			(\$0.00177)		(\$0.00177)	\$0.00000			
50		Transmission Energy			\$0.03572		\$0.03572	\$0.00000			
51		Energy Efficiency Reconciliation Factor			\$0.02979		\$0.02979	\$0.00704			
52		System Benefits Charge			\$0.00250		\$0.00250	\$0.00000			
53		Renewable Energy Charge			\$0.00050		\$0.00050	\$0.00000			
54		Supply Charge			\$0.15910		\$0.15910	\$0.00000			

Cape Light Compact JPE
Calculation of Monthly Typical Bill
Waste Only

South Shore, Cape Cod, and Martha's Vineyard Service Area
 Rate O-1 Seasonal (Small General Service)

1	2	Monthly kW	Monthly kWh	2024 MTM 1			2024 MTM 2			Total Bill Impact	
				Delivery	Subscriber	Total	Delivery	Subscriber	Total	Change	% Change
3		Hours Use: 50									
4	5	750	\$48.83	\$47.28	\$91.11	\$50.98	\$42.28	\$92.87	\$1.76	1.9%	
5	10	500	\$81.65	\$64.55	\$178.20	\$80.17	\$64.55	\$178.72	\$3.52	2.0%	
6	20	1,000	\$226.80	\$169.10	\$395.70	\$233.64	\$169.10	\$402.74	\$7.04	1.8%	
7	50	2,500	\$589.91	\$422.75	\$1,012.66	\$607.51	\$422.75	\$1,030.26	\$17.60	1.7%	
8	Avg	9	480	\$83.99	\$78.10	\$159.19	\$86.25	\$78.10	\$162.35	\$3.16	2.0%
9		Hours Use: 150									
10	5	750	\$134.48	\$126.83	\$261.31	\$139.76	\$126.83	\$266.59	\$5.28	2.0%	
11	10	1,500	\$282.95	\$253.65	\$516.80	\$273.51	\$253.65	\$527.16	\$10.36	2.0%	
12	20	3,000	\$487.99	\$357.30	\$1,005.29	\$518.11	\$357.30	\$1,026.41	\$21.12	2.1%	
13	50	7,500	\$1,143.71	\$1,068.25	\$2,417.96	\$1,202.51	\$1,068.25	\$2,460.76	\$42.80	2.2%	
14	Avg	8	1,200	\$211.56	\$202.82	\$414.48	\$220.01	\$202.82	\$422.83	\$8.35	2.0%
15		Hours Use: 300									
16	5	1,500	\$282.95	\$253.65	\$516.80	\$273.51	\$253.65	\$527.16	\$10.36	2.0%	
17	10	3,000	\$488.99	\$357.30	\$895.99	\$469.61	\$357.30	\$897.11	\$21.12	2.2%	
18	20	6,000	\$883.87	\$1,014.80	\$1,848.47	\$876.11	\$1,014.80	\$1,890.71	\$42.24	2.3%	
19	50	15,000	\$1,968.41	\$2,536.50	\$4,525.91	\$2,095.01	\$2,536.50	\$4,631.51	\$105.60	2.3%	
20	Avg	9	2,700	\$415.10	\$456.57	\$871.67	\$434.11	\$456.57	\$890.68	\$19.01	2.2%
21						2024 MTM 1	2024 MTM 2				
22						Rates	Rates	Change			
23		Customer Charge				\$6.00	\$5.00	\$(1.00)			
24		Distribution Demand <= 10 kW				\$0.00	\$0.00	\$0.00			
25		Distribution Demand > 10 kW				\$4.93	\$4.93	\$0.00			
26		Distribution Energy <= 1,800 kWh				\$0.0899	\$0.0897	\$(0.0002)			
27		Distribution Energy > 1,800 kWh				\$0.02763	\$0.02763	\$0.0000			
28		Revenue Decoupling				\$0.0119	\$0.0119	\$0.0000			
29		Solar Massachusetts Renewable Target				\$0.0228	\$0.0228	\$0.0000			
30		Residential Assistance Adjustment Factor				\$0.0363	\$0.0363	\$0.0000			
31		Pension Adjustment Factor				\$0.0097	\$0.0097	\$0.0000			
32		Net Metering Rate Recovery Surcharge				\$0.0050	\$0.0050	\$0.0000			
33		Long Term Renewable Contract Adjustment				(\$0.0041)	(\$0.0045)	\$(0.0004)			
34		AG Consuming Expense				\$0.0000	\$0.0000	\$0.0000			
35		Storm Cost Recovery Adjustment Factor				\$0.0219	\$0.0215	\$(0.0004)			
36		Storm Reserve Adjustment				\$0.0000	\$0.0000	\$0.0000			
37		Basic Service Cost True Up Factor				(\$0.0000)	(\$0.0000)	\$0.0000			
38		Solar Program Cost Adjustment Factor				\$0.0000	\$0.0000	\$0.0000			
39		Solar Expansion Cost Recovery Factor				\$0.0067	\$0.0067	\$0.0000			
40		Vegetation Management				\$0.0129	\$0.0129	\$0.0000			
41		Tax Act Credit Factor				(\$0.0209)	(\$0.0209)	\$0.0000			
42		Grid Modernization				\$0.0111	\$0.0115	\$0.0004			
43		Transmission				(\$0.0017)	(\$0.0017)	\$0.0000			
44		Transmission Energy				\$0.0357	\$0.0367	\$0.0010			
45		Energy Efficiency Reconciliation Factor				\$0.0299	\$0.0368	\$0.0069			
46		System Benefits Charge				\$0.0290	\$0.0290	\$0.0000			
47		Renewable Energy Charge				\$0.0050	\$0.0050	\$0.0000			
48		Supply Charge				\$0.1691	\$0.1691	\$0.0000			

Cape Light Compact JPE
Calculation of Monthly Typical Bill
Illustrative

South Shore, Cape Cod, and Martha's Vineyard Service Area
Rate G-2 Medium General Time-of-Use

1	2	Monthly kVA	Monthly kWh	2024 MTM 1		2024 MTM 2		Total Bill Impact		
				Deliver	Subsidy	Deliver	Subsidy	Change	% Change	
3	Hours Use: 300									
4	100	30,000	\$3,355.38	\$7,199.10	\$10,554.48	\$3,578.58	\$7,199.10	\$10,778.68	\$211.20 2.0%	
5	150	45,000	\$4,063.04	\$10,798.85	\$15,861.89	\$5,179.84	\$10,798.85	\$15,978.49	\$516.80 2.0%	
6	200	60,000	\$8,360.72	\$14,368.20	\$22,728.92	\$6,783.12	\$14,368.20	\$21,151.32	\$427.40 2.0%	
7	300	90,000	\$9,356.09	\$21,567.30	\$30,923.39	\$9,889.69	\$21,567.30	\$31,456.99	\$633.80 2.0%	
8	500	150,000	\$15,346.81	\$35,995.50	\$51,342.31	\$18,402.81	\$35,995.50	\$54,398.31	\$1,056.00 2.1%	
9	Avg	205	61,500	\$8,910.49	\$14,756.16	\$23,666.65	\$8,943.45	\$14,736.16	\$21,701.81	\$432.96 2.0%
10	Hours Use: 400									
11	100	40,000	\$3,980.82	\$8,598.80	\$12,579.62	\$4,282.42	\$8,598.80	\$13,881.22	\$261.60 2.1%	
12	150	60,000	\$5,769.22	\$14,368.20	\$20,137.42	\$6,198.82	\$14,368.20	\$20,567.02	\$427.60 2.1%	
13	200	80,000	\$7,561.63	\$18,187.60	\$25,749.23	\$8,154.83	\$18,187.60	\$26,342.43	\$593.20 2.1%	
14	300	120,000	\$11,202.45	\$28,796.40	\$39,998.85	\$12,047.25	\$28,796.40	\$40,843.65	\$846.80 2.1%	
15	500	200,000	\$19,424.08	\$47,994.00	\$67,418.08	\$19,832.08	\$47,994.00	\$67,826.08	\$1,408.00 2.1%	
16	Avg	214	83,800	\$8,087.15	\$20,541.43	\$28,628.58	\$8,899.77	\$20,541.43	\$29,441.20	\$802.82 2.1%
17	Hours Use: 500									
18	100	50,000	\$4,598.27	\$11,998.50	\$16,596.77	\$4,948.27	\$11,998.50	\$16,946.77	\$352.00 2.1%	
19	150	75,000	\$6,709.41	\$17,997.75	\$24,707.16	\$7,231.41	\$17,997.75	\$25,229.16	\$528.00 2.1%	
20	200	100,000	\$8,822.54	\$23,997.00	\$32,819.54	\$9,538.54	\$23,997.00	\$33,535.54	\$716.00 2.1%	
21	300	150,000	\$13,046.81	\$35,995.50	\$49,042.31	\$14,104.81	\$35,995.50	\$50,100.31	\$1,058.00 2.2%	
22	500	250,000	\$21,501.33	\$58,992.50	\$80,493.83	\$23,261.33	\$58,992.50	\$82,253.83	\$1,762.00 2.2%	
23	Avg	253	128,500	\$11,062.48	\$30,356.21	\$41,418.69	\$11,953.33	\$30,356.21	\$42,309.23	\$890.56 2.2%
24					2024 MTM 1	2024 MTM 2				
25					Rate	Rate	Change			
26	Customer Charge				\$370.00	\$370.00	\$0.00			
27	Distribution Demand				\$17.8	\$17.8	\$0.00			
28	Transmission Demand				\$97.1	\$97.1	\$0.00			
29	Distribution Energy - Peak				\$0.02076	\$0.02076	\$0.00000			
30	Distribution Energy - Low A				\$0.01747	\$0.01747	\$0.00000			
31	Distribution Energy - Low B				\$0.01133	\$0.01133	\$0.00000			
32	Revenue Decoupling				\$0.00118	\$0.00118	\$0.00000			
33	Solar Massachusetts Renewable Target				\$0.00150	\$0.00150	\$0.00000			
34	Residential Assistance Adjustment Factor				\$0.00292	\$0.00292	\$0.00000			
35	Person Adjustment Factor				\$0.00065	\$0.00065	\$0.00000			
36	Net Metering Recovery Surcharge				\$0.00333	\$0.00333	\$0.00000			
37	Long Term Renewable Contract Adjustment				(\$0.00049)	(\$0.00049)	\$0.00000			
38	AG Consulting Expense				\$0.00000	\$0.00000	\$0.00000			
39	Storm Cost Recovery Adjustment Factor				\$0.00141	\$0.00141	\$0.00000			
40	Storm Reserve Adjustment				\$0.00000	\$0.00000	\$0.00000			
41	Basic Service Cost True Up Factor				(\$0.00004)	(\$0.00004)	\$0.00000			
42	Solar Program Cost Adjustment Factor				\$0.00000	\$0.00000	\$0.00000			
43	Solar Expansion Cost Recovery Factor				\$0.00044	\$0.00044	\$0.00000			
44	Vegetation Management				\$0.00087	\$0.00087	\$0.00000			
45	Tax Act Credit Factor				(\$0.00072)	(\$0.00072)	\$0.00000			
46	Grid Modernization				\$0.00078	\$0.00078	\$0.00000			
47	Transmission				(\$0.00173)	(\$0.00173)	\$0.00000			
48	Transmission Energy				\$0.00357	\$0.00357	\$0.00000			
49	Energy Efficiency Rehabilitation Factor				\$0.02979	\$0.03883	\$0.00704			
50	System Benefits Charge				\$0.00290	\$0.00290	\$0.00000			
51	Renewable Energy Charge				\$0.00050	\$0.00050	\$0.00000			
52	Supply Charge				\$0.23987	\$0.23987	\$0.00000			
53	Peak Use						29%			
54	Low A Use						25%			
55	Low B Use						47%			

Cape Light Compact JPE
Calculation of Monthly Typical Bill
Weather

South Shore, Cape Cod, and Martha's Vineyard Service Area
Rate G-3 Large General Time-Of-Use

1	2	Monthly kVA	Money kWh	2024 MTM 1			2024 MTM 2			Total Bill Impact		
				Delivery	Subscriber	Total	Delivery	Subscriber	Total	Change	% Change	
3	4	Hours Use 350										
	5	500	175 000	\$15 836.53	\$41 994.75	\$57 831.28	\$11 070.53	\$41 994.75	\$53 065.28	\$1 232.00	2.1%	
	6	750	242 500	\$23 292.78	\$42 992.13	\$66 284.92	\$25 140.79	\$42 992.13	\$68 132.92	\$1 848.00	2.1%	
	7	1 000	350 000	\$30 747.08	\$43 999.50	\$74 746.58	\$33 211.08	\$43 999.50	\$77 210.58	\$2 464.00	2.1%	
	8	2 000	700 000	\$60 564.11	\$167 979.00	\$228 543.11	\$65 497.11	\$167 979.00	\$233 476.11	\$4 932.00	2.2%	
	9	3 000	1 050 000	\$90 381.17	\$251 968.50	\$342 349.67	\$97 773.17	\$251 968.50	\$349 741.67	\$7 392.00	2.2%	
	9	Avg	1 065	373 100	\$32 714.98	\$48 533.81	\$81 248.79	\$30 341.60	\$48 533.81	\$78 875.41	\$2 626.62	2.1%
10	11	Hours Use 450										
	12	500	225 000	\$18 292.39	\$53 991.29	\$72 283.64	\$19 879.39	\$53 991.29	\$73 870.64	\$1 586.00	2.2%	
	13	750	337 500	\$26 973.59	\$60 989.88	\$87 963.47	\$28 349.59	\$60 989.88	\$89 339.47	\$1 366.00	2.2%	
	14	1 000	450 000	\$38 654.79	\$107 988.50	\$146 643.29	\$39 827.79	\$107 988.50	\$147 816.29	\$1 162.00	2.2%	
	15	2 000	900 000	\$77 309.57	\$215 977.00	\$293 286.57	\$79 655.57	\$215 977.00	\$297 632.57	\$4 346.00	2.2%	
	16	3 000	1 350 000	\$115 964.36	\$323 965.50	\$439 929.86	\$119 483.36	\$323 965.50	\$443 448.86	\$3 519.00	2.2%	
	16	Avg	788	354 600	\$28 293.13	\$85 093.36	\$113 386.49	\$30 789.51	\$85 093.36	\$115 882.87	\$2 496.38	2.2%
17	18	Hours Use 550										
	19	500	275 000	\$20 746.26	\$45 991.75	\$66 738.01	\$22 667.26	\$45 991.75	\$68 659.01	\$1 920.00	2.2%	
	20	750	412 500	\$30 894.39	\$98 987.83	\$129 882.22	\$33 559.39	\$98 987.83	\$132 547.22	\$2 665.00	2.2%	
	21	1 000	550 000	\$40 562.52	\$131 983.50	\$172 546.02	\$44 434.52	\$131 983.50	\$176 418.02	\$3 872.00	2.2%	
	22	2 000	1 100 000	\$80 125.03	\$263 967.00	\$344 102.03	\$88 869.03	\$263 967.00	\$352 836.03	\$5 734.00	2.2%	
	23	3 000	1 650 000	\$119 827.55	\$395 950.50	\$515 778.05	\$133 443.55	\$395 950.50	\$529 394.05	\$13 616.00	2.3%	
	23	Avg	1 118	614 900	\$45 239.15	\$147 557.55	\$192 796.70	\$48 958.05	\$147 557.55	\$196 515.60	\$3 718.90	2.2%
24	25					2024 MTM 1	2024 MTM 2					
	26	Customer Charge				\$830 00	\$830 00	\$0.00				
	27	Distribution Demand				\$1 01	\$1 01	\$0.00				
	28	Transmission Demand				\$11 63	\$11 63	\$0.00				
	29	Distribution Energy - Peak				\$0 01443	\$0 01443	\$0 00000				
	30	Distribution Energy - Low A				\$0 01328	\$0 01328	\$0 00000				
	31	Distribution Energy - Low B				\$0 00919	\$0 00919	\$0 00000				
	32	Revenue Decoupling				\$0 00067	\$0 00067	\$0 00000				
	33	Solar Massachusetts Renewable Target				\$0 00086	\$0 00086	\$0 00000				
	34	Residential Incentive Adjustment Factor				\$0 00144	\$0 00144	\$0 00000				
	35	Pension Adjustment Factor				\$0 00041	\$0 00041	\$0 00000				
	36	Net Metering Recovery Surcharge				\$0 00191	\$0 00191	\$0 00000				
	37	Long Term Renewable Contract Adjustment				(\$0 00049)	(\$0 00049)	\$0 00000				
	38	AG Consulting Expense				\$0 00000	\$0 00000	\$0 00000				
	39	Storm Cost Recovery Adjustment Factor				\$0 00061	\$0 00061	\$0 00000				
	40	Storm Reserve Adjustment				\$0 00000	\$0 00000	\$0 00000				
	41	Basic Service Cost True Up Factor				(\$0 00002)	(\$0 00002)	\$0 00000				
	42	Solar Program Cost Adjustment Factor				\$0 00000	\$0 00000	\$0 00000				
	43	Solar Expansion Cost Recovery Factor				\$0 00025	\$0 00025	\$0 00000				
	44	Vegetation Management				\$0 00055	\$0 00055	\$0 00000				
	45	Tax Aid Credit Factor				(\$0 00041)	(\$0 00041)	\$0 00000				
	46	Grid Modernization				\$0 00041	\$0 00041	\$0 00000				
	47	Transmission				(\$0 00177)	(\$0 00177)	\$0 00000				
	48	Transmission Energy				\$0 00000	\$0 00000	\$0 00000				
	49	Energy Efficiency Reasonableness Factor				\$0 02979	\$0 03683	\$0 00704				
	50	System Benefits Charge				\$0 00290	\$0 00290	\$0 00000				
	51	Renewable Energy Charge				\$0 00050	\$0 00050	\$0 00000				
	52	Supply Charge				\$0 22997	\$0 22997	\$0 00000				
53	54	55	Peak Use	27%								
			Low A Use	25%								
			Low B Use	48%								

Cape Light Compact JPE
 Calculation of Monthly Typical Bill
 Illustrative

South Shore, Cape Cod, and Martha's Vineyard Service Area
 Rate B-4 General Power

1	Monthly kWh	Monthly kWh	2024 MTM 1			2024 MTM 2			Total Bill Impact		
			Delivery	Supplier	Total	Delivery	Supplier	Total	Change	% Change	
3	Hours Use 150										
4	20	3,000	\$145.85	\$507.30	\$653.15	\$366.77	\$507.30	\$874.07	\$21.12	2.5%	
5	30	4,500	\$155.48	\$760.95	\$916.43	\$347.18	\$760.95	\$1,108.13	\$31.68	2.9%	
6	40	6,000	\$165.30	\$1,014.60	\$1,180.00	\$372.54	\$1,014.60	\$1,387.14	\$42.24	2.9%	
7	70	10,500	\$1,194.78	\$1,775.55	\$2,970.33	\$1,268.70	\$1,775.55	\$3,044.25	\$73.92	2.5%	
8	100	15,000	\$1,704.25	\$2,536.50	\$4,240.75	\$1,809.85	\$2,536.50	\$4,346.35	\$105.60	2.5%	
9	Avg	52	7,800	\$889.00	\$1,318.98	\$2,208.07	\$344.00	\$1,318.98	\$2,262.98	\$54.91	2.5%
10	Hours Use 250										
11	20	5,000	\$43.15	\$845.50	\$1,338.65	\$526.35	\$845.50	\$1,371.85	\$33.20	2.6%	
12	30	7,500	\$73.73	\$1,268.25	\$1,342.00	\$789.53	\$1,268.25	\$2,057.78	\$52.80	2.6%	
13	40	10,000	\$104.30	\$1,801.00	\$1,905.30	\$1,050.70	\$1,801.00	\$2,741.70	\$70.40	2.6%	
14	70	17,500	\$1,711.03	\$2,959.25	\$4,670.28	\$1,834.23	\$2,959.25	\$4,793.48	\$123.20	2.6%	
15	100	25,000	\$2,441.75	\$4,227.50	\$6,669.25	\$2,617.75	\$4,227.50	\$6,845.25	\$176.00	2.6%	
16	Avg	27	6,750	\$83.65	\$1,141.43	\$1,805.08	\$711.17	\$1,141.43	\$1,852.60	\$47.52	2.6%
17	Hours Use 350										
18	20	7,000	\$64.85	\$1,183.70	\$1,248.55	\$689.93	\$1,183.70	\$1,873.63	\$48.28	2.7%	
19	30	10,500	\$107.88	\$1,775.55	\$1,883.43	\$1,031.90	\$1,775.55	\$2,807.45	\$73.92	2.7%	
20	40	14,000	\$1,275.30	\$2,387.40	\$3,662.70	\$1,313.88	\$2,387.40	\$3,741.28	\$78.58	2.7%	
21	70	24,500	\$2,227.28	\$4,142.95	\$6,370.23	\$2,399.78	\$4,142.95	\$6,542.73	\$172.50	2.7%	
22	100	35,000	\$3,179.25	\$5,918.50	\$9,097.75	\$3,425.85	\$5,918.50	\$9,344.35	\$246.60	2.7%	
23	Avg	27	9,450	\$162.78	\$1,598.00	\$2,460.78	\$929.31	\$1,598.00	\$2,527.31	\$66.53	2.7%
24					2024 MTM 1		2024 MTM 2				
25					Rate		Rate		Change		
26	Customer Charge				\$6.00		\$6.00	\$0.00			
27	Distribution Demand				\$1.99		\$1.99	\$0.00			
28	Transmission Demand				\$3.93		\$3.93	\$0.00			
29	Distribution Energy				\$0.02282		\$0.02282	\$0.00000			
30	Revenue Decoupling				\$0.00151		\$0.00151	\$0.00000			
31	Solar Massachusetts Renewable Target				\$0.00183		\$0.00183	\$0.00000			
32	Residential Assistance Adjustment Factor				\$0.00323		\$0.00323	\$0.00000			
33	Person Adjustment Factor				\$0.00094		\$0.00094	\$0.00000			
34	Fuel Hedging Recovery Surcharge				\$0.00427		\$0.00427	\$0.00000			
35	Long Term Renewable Contract Adjustment				(\$0.00049)		(\$0.00049)	\$0.00000			
36	AD Consulting Expense				\$0.00000		\$0.00000	\$0.00000			
37	Storm Cost Recovery Adjustment Factor				\$0.00179		\$0.00179	\$0.00000			
38	Storm Reserve Adjustment				\$0.00000		\$0.00000	\$0.00000			
39	Basic Service Cost True Up Factor				(\$0.00008)		(\$0.00008)	\$0.00000			
40	Solar Program Cost Adjustment Factor				\$0.00000		\$0.00000	\$0.00000			
41	Solar Expansion Cost Recovery Factor				\$0.00007		\$0.00007	\$0.00000			
42	Vegetation Management				\$0.00126		\$0.00126	\$0.00000			
43	Tax Act Credit Factor				(\$0.00092)		(\$0.00092)	\$0.00000			
44	Grid Modernization				\$0.00095		\$0.00095	\$0.00000			
45	Transmission				(\$0.00173)		(\$0.00173)	\$0.00000			
46	Transmission Energy				\$0.00489		\$0.00489	\$0.00000			
47	Energy Efficiency Reconciliation Factor				\$0.00298		\$0.00283	\$0.00704			
48	System Benefits Charge				\$0.00250		\$0.00250	\$0.00000			
49	Renewable Energy Charge				\$0.00050		\$0.00050	\$0.00000			
50	Supply Charge				\$0.18910		\$0.18910	\$0.00000			

**Cape Light Contract JPE
Calculation of Monthly Typical Bill
Illustrative**

**South Shore, Cape Cod, and Martha's Vineyard Service Area
Rate G-4 Commercial Space Heating**

1	Monthly	2024 MTM 1			2024 MTM 2			Total Bill Impact		
		Decemr	Summr	Total	Decemr	Summr	Total	Change	% Change	
2	WDL									
3	100	\$19 47	\$16 91	\$36 38	\$20 18	\$16 91	\$37 09	\$0 71	2 0%	
4	200	\$32 95	\$33 82	\$66 77	\$34 35	\$33 82	\$68 17	\$1 40	2 1%	
5	300	\$48 42	\$50 73	\$99 15	\$48 53	\$50 73	\$99 26	\$2 11	2 2%	
6	500	\$73 37	\$84 55	\$157 92	\$78 88	\$84 55	\$163 44	\$3 52	2 2%	
7	750	\$107 05	\$126 83	\$233 88	\$112 33	\$126 83	\$239 16	\$5 28	2 3%	
8	1,000	\$140 73	\$189 10	\$329 83	\$147 77	\$189 10	\$336 87	\$7 04	2 3%	
9	1,500	\$208 10	\$253 85	\$461 95	\$219 85	\$253 85	\$473 31	\$10 36	2 3%	
10	2,000	\$410 19	\$507 30	\$917 49	\$431 31	\$507 30	\$938 61	\$21 12	2 3%	
11	5,000	\$678 65	\$885 50	\$1,564 15	\$714 83	\$885 50	\$1,600 33	\$35 20	2 3%	
12	Avg	1,472	\$204 32	\$248 92	\$453 24	\$214 88	\$246 92	\$483 41	\$10 37	2 3%

13		2024 MTM 1	2024 MTM 2	Change
14		Rate	Rate	
15	Customer Charge	\$0 00	\$0 00	\$0 00
16	Distribution Energy	\$0 04120	\$0 04120	\$0 00000
17	Revenue Decoupling	\$0 00231	\$0 00231	\$0 00000
18	Solar Massachusetts Renewable Target	\$0 00295	\$0 00295	\$0 00000
19	Renewable Assistance Adjustment Factor	\$0 00495	\$0 00495	\$0 00000
20	Parson Adjustment Factor	\$0 00206	\$0 00206	\$0 00000
21	Net Metering Recovery Surcharge	\$0 00654	\$0 00654	\$0 00000
22	Long Term Renewable Contract Adjustment	(\$0 00045)	(\$0 00045)	\$0 00000
23	AG Consulting Expense	\$0 00000	\$0 00000	\$0 00000
24	Storm Cost Recovery Adjustment Factor	\$0 00277	\$0 00277	\$0 00000
25	Storm Reserve Adjustment	\$0 00000	\$0 00000	\$0 00000
26	Basic Service Cost True Up Factor	(\$0 00009)	(\$0 00009)	\$0 00000
27	Solar Program Cost Adjustment Factor	\$0 00000	\$0 00000	\$0 00000
28	Solar Expansion Cost Recovery Factor	\$0 00087	\$0 00087	\$0 00000
29	Vegetation Management	\$0 00274	\$0 00274	\$0 00000
30	Tax Credit Factor	(\$0 00141)	(\$0 00141)	\$0 00000
31	Grid Modernization	\$0 00164	\$0 00164	\$0 00000
32	Transmission	(\$0 00177)	(\$0 00177)	\$0 00000
33	Transmission Energy	\$0 00783	\$0 00783	\$0 00000
34	Energy Efficiency Reconciliation Factor	\$0 00979	\$0 00983	\$0 00704
35	System Benefits Charge	\$0 00250	\$0 00250	\$0 00000
36	Renewable Energy Charge	\$0 00000	\$0 00000	\$0 00000
37	Supply Charge	\$0 18910	\$0 18910	\$0 00000

Cape Light Compact JPE
Calculation of Monthly Typical Bill
 Illustrative

South Shore, Cape Cod, and Martha's Vineyard Service Area
 Rate G-4 All Electric Schools

1	Monthly	2024 MTM 1			2024 MTM 2			Total Bill Impact		
		Delivry	Services	Total	Delivry	Services	Total	Change	% Change	
2	WDL									
3	25 000	\$2,323.50	\$4,227.50	\$6,551.00	\$2,499.50	\$4,227.50	\$6,727.00	\$176.00	2.7%	
4	40 000	\$3,699.60	\$6,764.00	\$10,463.60	\$3,961.20	\$6,764.00	\$10,745.20	\$281.60	2.7%	
5	50 000	\$4,617.00	\$8,455.00	\$13,072.00	\$4,999.00	\$8,455.00	\$13,454.00	\$382.00	2.7%	
6	40 000	\$3,534.40	\$7,145.00	\$10,679.40	\$3,956.80	\$7,145.00	\$11,101.80	\$422.40	2.7%	
7	150 000	\$13,791.00	\$25,385.00	\$39,176.00	\$14,647.00	\$25,385.00	\$40,032.00	\$856.00	2.7%	
8	Avg	60,748	\$5,603.02	\$10,272.49	\$15,875.51	\$6,030.69	\$10,272.49	\$18,303.18	\$427.67	2.7%
9			2024 MTM 1	2024 MTM 2						
10			Rate	Rate	Change					
11	Customer Charge		\$30.00	\$30.00	\$0.00					
12	Distribution Energy		\$0.01867	\$0.01867	\$0.00000					
13	Revenue Decoupling		\$0.00076	\$0.00076	\$0.00000					
14	Solar Massachusetts Renewable Target		\$0.00087	\$0.00087	\$0.00000					
15	Renewable Assistance Adjustment Factor		\$0.00163	\$0.00163	\$0.00000					
16	Penalty Adjustment Factor		\$0.00075	\$0.00075	\$0.00000					
17	Net Metering Recovery, But Charge		\$0.00216	\$0.00216	\$0.00000					
18	Long Term Renewable Contract Adjustment		(\$0.00043)	(\$0.00043)	\$0.00000					
19	AG Consulting Expense		\$0.00000	\$0.00000	\$0.00000					
20	Storm Cost Recovery Adjustment Factor		\$0.00000	\$0.00000	\$0.00000					
21	Storm Reserve Adjustment		\$0.00000	\$0.00000	\$0.00000					
22	Basic Service Cost True Up Factor		(\$0.00003)	(\$0.00003)	\$0.00000					
23	Solar Program Cost Adjustment Factor		\$0.00000	\$0.00000	\$0.00000					
24	Solar Expansion Cost Recovery Factor		\$0.00028	\$0.00028	\$0.00000					
25	Vegetation Management		\$0.00100	\$0.00100	\$0.00000					
26	Tax Act Credit Factor		(\$0.00048)	(\$0.00048)	\$0.00000					
27	Grid Modernization		\$0.00047	\$0.00047	\$0.00000					
28	Transmission		(\$0.00177)	(\$0.00177)	\$0.00000					
29	Transmission Energy		\$0.03407	\$0.03407	\$0.00000					
30	Energy Efficiency Reconciliation Factor		\$0.02979	\$0.03683	\$0.00704					
31	System Benefits Charge		\$0.00250	\$0.00250	\$0.00000					
32	Renewable Energy Charge		\$0.00050	\$0.00050	\$0.00000					
33	Supply Charge		\$0.16910	\$0.16910	\$0.00000					

Cape Light Compact JPE
Calculation of Monthly Typical Bill
Worthwhile

South Shore, Cape Cod, and Martha's Vineyard Service Area
 Rate G.7 Optional General Time-of-Use

	Monthly kWh	Monthly kWh	2024 RTM 1			2024 RTM 2			Total Bill Impact		
			Delivery	Supplier	Total	Delivery	Supplier	Total	Change	% Change	
3	Hours Use 350										
4	5	1,750	\$215.44	\$295.83	\$511.27	\$227.76	\$295.83	\$523.59	\$12.32	2.4%	
5	10	3,500	\$420.80	\$591.66	\$1,012.46	\$445.52	\$591.66	\$1,037.18	\$24.74	2.4%	
6	20	7,000	\$831.76	\$1,183.70	\$2,015.46	\$881.05	\$1,183.70	\$2,064.76	\$49.28	2.4%	
7	50	17,500	\$2,064.45	\$2,959.25	\$5,023.70	\$2,187.65	\$2,959.25	\$5,146.90	\$123.20	2.5%	
8	75	26,250	\$3,091.67	\$4,438.88	\$7,530.55	\$3,276.47	\$4,438.88	\$7,715.35	\$184.80	2.5%	
9	Avg	20	7,000	\$831.76	\$1,183.70	\$2,015.46	\$881.05	\$1,183.70	\$2,064.76	\$49.28	2.4%
10	Hours Use 500										
11	5	2,500	\$267.09	\$422.75	\$689.84	\$284.89	\$422.75	\$707.64	\$117.80	2.8%	
12	10	5,000	\$534.17	\$845.50	\$1,379.67	\$569.77	\$845.50	\$1,415.27	\$35.20	2.8%	
13	20	10,000	\$1,068.34	\$1,691.00	\$2,759.34	\$1,139.54	\$1,691.00	\$2,830.54	\$71.40	2.8%	
14	50	25,000	\$2,670.85	\$4,227.50	\$6,898.35	\$2,756.85	\$4,227.50	\$6,984.35	\$86.00	2.8%	
15	75	37,500	\$3,856.28	\$6,341.25	\$10,207.53	\$4,130.28	\$6,341.25	\$10,471.53	\$264.00	2.8%	
16	Avg	31	15,500	\$1,605.93	\$2,621.05	\$4,227.98	\$1,713.05	\$2,621.05	\$4,334.10	\$106.12	2.6%
17	Hours Use 850										
18	5	3,250	\$318.73	\$549.58	\$868.31	\$341.61	\$549.58	\$891.19	\$22.88	2.8%	
19	10	6,500	\$637.46	\$1,099.15	\$1,736.60	\$683.21	\$1,099.15	\$1,782.38	\$45.78	2.7%	
20	20	13,000	\$1,274.90	\$2,198.30	\$3,473.20	\$1,366.42	\$2,198.30	\$3,564.72	\$91.52	2.7%	
21	50	32,500	\$3,097.26	\$5,495.75	\$8,593.01	\$3,320.06	\$5,495.75	\$8,815.81	\$222.80	2.7%	
22	75	48,750	\$4,645.88	\$8,243.63	\$12,889.51	\$4,964.08	\$8,243.63	\$13,207.71	\$318.20	2.7%	
23	Avg	18	11,700	\$1,121.41	\$1,978.47	\$3,099.88	\$1,203.78	\$1,978.47	\$3,182.25	\$82.37	2.7%
24					2024 RTM 1		2024 RTM 2				
25					Rate		Rate		Change		
26	Customer Charge				\$10.00		\$10.00	\$0.00			
27	Distribution Demand				\$3.81		\$3.81	\$0.00			
28	Transmission Demand				\$13.18		\$13.18	\$0.00			
29	Distribution Energy - Pass				\$0.02621		\$0.02621	\$0.00000			
30	Distribution Energy - Low Load				\$0.01836		\$0.01836	\$0.00000			
31	Revenue Decoupling				\$0.00119		\$0.00119	\$0.00000			
32	Solar Massachusetts Renewable Target				\$0.00226		\$0.00226	\$0.00000			
33	Residential Assistance Adjustment Factor				\$0.00383		\$0.00383	\$0.00000			
34	Penalty Adjustment Factor				\$0.00087		\$0.00087	\$0.00000			
35	Net Metering Recovery Surcharge				\$0.00587		\$0.00587	\$0.00000			
36	Long Term Renewable Contract Adjustment				(\$0.00349)		(\$0.00349)	\$0.00000			
37	AG Consulting Expense				\$0.00000		\$0.00000	\$0.00000			
38	Storm Cost Recovery Adjustment Factor				\$0.00215		\$0.00215	\$0.00000			
39	Storm Reserve Adjustment				\$0.00000		\$0.00000	\$0.00000			
40	Basic Service Cost True-Up Factor				(\$0.00000)		(\$0.00000)	\$0.00000			
41	Solar Program Cost Adjustment Factor				\$0.00000		\$0.00000	\$0.00000			
42	Solar Expansion Cost Recovery Factor				\$0.00087		\$0.00087	\$0.00000			
43	Vegetation Management				\$0.00129		\$0.00129	\$0.00000			
44	Tax Act Credit Factor				(\$0.00109)		(\$0.00109)	\$0.00000			
45	Grid Modernization				\$0.00115		\$0.00115	\$0.00000			
46	Transition				(\$0.00117)		(\$0.00117)	\$0.00000			
47	Energy Efficiency Reconciliation Factor				\$0.00279		\$0.00263	\$0.00784			
48	System Benefits Charge				\$0.00250		\$0.00250	\$0.00000			
49	Renewable Energy Charge				\$0.00050		\$0.00050	\$0.00000			
50	Supply Charge				\$0.18911		\$0.18910	\$0.00000			
51	Peak Use		24%								
52	Low A Use		76%								

**Cape Light Compact JPE
Calculation of Monthly Typical Bill
Overview**

South Shore, Cape Cod, and Martha's Vineyard Service Area
Rate G-7 Optional Seasonal General Time-of-Use

1	Monthly kWh	Monthly kWh	2024 MTM 1			2024 MTM 2			Total Bill Impact	
			Deliver	Supplier	Total	Deliver	Supplier	Total	Change	% Change
2										
3	Hours Use 50									
4	5	250	\$79.37	\$42.28	\$121.65	\$81.13	\$42.28	\$123.41	\$1.76	1.4%
5	10	500	\$148.74	\$84.55	\$233.29	\$152.28	\$84.55	\$236.81	\$3.52	1.5%
6	20	1,000	\$287.48	\$169.10	\$456.58	\$294.52	\$169.10	\$463.62	\$7.04	1.5%
7	50	2,500	\$703.70	\$422.75	\$1,126.45	\$721.30	\$422.75	\$1,144.05	\$17.60	1.6%
8	75	3,750	\$1,050.55	\$634.13	\$1,684.68	\$1,078.95	\$634.13	\$1,713.08	\$28.40	1.7%
9	Avg	9	\$134.87	\$76.10	\$210.97	\$138.03	\$76.10	\$214.13	\$3.16	1.5%
10	Hours Use 150									
11	5	750	\$126.11	\$126.83	\$252.94	\$131.39	\$126.83	\$258.22	\$5.28	2.1%
12	10	1,500	\$242.22	\$253.65	\$495.87	\$252.78	\$253.65	\$506.43	\$10.56	2.1%
13	20	3,000	\$474.44	\$507.30	\$981.74	\$495.56	\$507.30	\$1,002.86	\$21.12	2.2%
14	50	7,500	\$1,171.10	\$1,268.25	\$2,439.35	\$1,223.90	\$1,268.25	\$2,492.15	\$52.80	2.2%
15	75	11,250	\$1,751.65	\$1,902.38	\$3,654.03	\$1,830.85	\$1,902.38	\$3,733.23	\$79.20	2.2%
16	Avg	10	\$242.22	\$253.65	\$495.87	\$252.78	\$253.65	\$506.43	\$10.56	2.1%
17	Hours Use 300									
18	5	1,500	\$198.22	\$253.65	\$449.87	\$206.76	\$253.65	\$460.41	\$10.54	2.3%
19	10	3,000	\$392.44	\$507.30	\$899.74	\$403.56	\$507.30	\$910.86	\$21.12	2.4%
20	20	6,000	\$784.88	\$1,014.60	\$1,799.48	\$797.12	\$1,014.60	\$1,811.72	\$42.24	2.4%
21	50	15,000	\$1,972.20	\$2,536.50	\$4,508.70	\$1,977.80	\$2,536.50	\$4,514.30	\$105.60	2.4%
22	75	22,500	\$2,958.30	\$3,804.75	\$6,763.05	\$2,961.70	\$3,804.75	\$6,766.45	\$158.40	2.4%
23	Avg	13	\$484.17	\$858.46	\$1,342.63	\$521.63	\$858.46	\$1,380.09	\$27.46	2.4%
24					2024 MTM 1	2024 MTM 2				
25					Rate	Rate	Change			
26	Customer Charge				\$10.00	\$10.00	\$0.00			
27	Distribution Demand				\$3.86	\$3.86	\$0.00			
28	Transmission Demand				\$5.34	\$5.34	\$0.00			
29	Distribution Energy - Peak				\$0.05113	\$0.05113	\$0.00000			
30	Distribution Energy - Low Load				\$0.04300	\$0.04300	\$0.00000			
31	Revenue Credit/Charge				\$0.00119	\$0.00119	\$0.00000			
32	Solar Massachusetts Renewable Target				\$0.00228	\$0.00228	\$0.00000			
33	Residential Assistance Adjustment Factor				\$0.00383	\$0.00383	\$0.00000			
34	Pension Adjustment Factor				\$0.00097	\$0.00097	\$0.00000			
35	Net Metering Recovery Discharge				\$0.00507	\$0.00507	\$0.00000			
36	Long Term Renewable Contract Adjustment				(\$0.00448)	(\$0.00448)	\$0.00000			
37	AG Consulting Expense				\$0.00000	\$0.00000	\$0.00000			
38	Storm Cost Recovery Adjustment Factor				\$0.00215	\$0.00215	\$0.00000			
39	Storm Reserve Adjustment				\$0.00000	\$0.00000	\$0.00000			
40	Basic Service Cost True Up Factor				(\$0.00007)	(\$0.00007)	\$0.00000			
41	Solar Program Cost Adjustment Factor				\$0.00000	\$0.00000	\$0.00000			
42	Solar Expansion Cost Recovery Factor				\$0.00067	\$0.00067	\$0.00000			
43	Vegetation Management				\$0.00129	\$0.00129	\$0.00000			
44	Tax Act Credit Factor				(\$0.00109)	(\$0.00109)	\$0.00000			
45	Grid Modernization				\$0.00115	\$0.00115	\$0.00000			
46	Transition				(\$0.00177)	(\$0.00177)	\$0.00000			
47	Energy Efficiency Reconciliation Factor				\$0.02919	\$0.02919	\$0.00000			
48	System Benefits Charge				\$0.00250	\$0.00250	\$0.00000			
49	Renewable Energy Charge				\$0.00050	\$0.00050	\$0.00000			
50	Supply Charge				\$0.18910	\$0.18910	\$0.00000			
51	Peak Use		23%							
52	Low A Use		77%							

**Cape Light Compact JPE
 2022-2024 Residential Energy Efficiency Reconciliation Factor
 \$ in Thousands**

Year	EE Savings	EE Charge Revenues	FCM, RGGI, & Other Revenues	Past Period Reconciliation with Interest	Interest on Deferral	Total EERF	Billed Disbursement (\$/Wh)	EE Reconciliation Factor (cents/kWh)	Low Income Reconciliation Factor (cents/kWh)	EE Reconciliation Factor (cents/kWh)
Col A	Col B	Col C	Col D	Col E	Col F	Col G	Col H	Col I	Col J	Col K
	EEE	EEC	OR	PPRA	I		FcWh		EERFu	EERFa
2024	\$ 54,834,458	\$ (7,564,155)	\$ (1,235,540)	\$ -	\$ 136,287	\$ 51,171,045	1,025,682	4.989	0.971	5.960

Col A Effective years (January 1, 2022 - December 31, 2022; January 1, 2023 - December 31, 2023; January 1, 2024 - December 31, 2024)
 Col B Consistent with the Cape Light Compact JPE's 2022-2024 Three-Year Plan (D P U 21-126)
 Col C 2022-2024 Residential Monthly Deferral, Lines 1, Cols N
 Col D 2022-2024 Residential Monthly Deferral, Lines 3, Cols N + Lines 4, Cols N + Lines 5, Cols N
 Col E 2022-2024 Residential Monthly Deferral, Lines 10, Cols A
 Col F 2022-2024 Residential Monthly Deferral, Lines 9, Cols N
 Col G Col B + Col C + Col D + Col E + Col F
 Col H Evarsource forecast of Cape Light Compact JPE sales through December 31, 2024 Residential sales only
 Col I Col G / Col H divided by 10
 Col J Low-Income Energy Efficiency Reconciliation Factor, Cols J
 Col K Col I + Col J
 Note that per D P U 10-06, at 2-3 (June 24, 2010), level base revenue is not applicable to the Cape Light Compact JPE

Cape Light Compact JPE
2024 Residential Monthly EES Deferral
\$ in Thousands

Line Description	Col A Period Oct-23	Col B Period Jan-24	Col C Period Feb-24	Col D Period Feb-24	Col E Period Mar-24	Col F Period Apr-24	Col G Period May-24	Col H Period Jun-24	Col I Period Jul-24	Col J Period Aug-24	Col K Period Sep-24	Col L Period Oct-24	Col M Period Nov-24	Col N Total
1 SBC Revenues	\$ -	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (213 880)	\$ (427 358)
2 EES Revenues	\$ -	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (4 264 254)	\$ (8 528 508)
3 FCM Revenues*	\$ -	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (102 962)	\$ (205 924)
4 RGD Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 Other Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6 Total Energy Efficiency Revenues	\$ -	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (4 580 895)	\$ (9 161 731)
7 Total Energy Efficiency Expenses	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 4 569 538	\$ 54 824 458
8 Deferral (Over)/Under Recovery	\$ 4 569 538	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (11 357)	\$ (4 582 253)
9 Interest on Deferral Balance	\$ 8 188	\$ 12 377	\$ 12 380	\$ 12 382	\$ 12 385	\$ 12 388	\$ 12 391	\$ 12 394	\$ 12 397	\$ 12 400	\$ 12 403	\$ 12 407	\$ 12 412	\$ 136 287
10 Over/Under Ending Balance	\$ 4 575 726	\$ 4 578 746	\$ 4 577 769	\$ 4 578 794	\$ 4 579 813	\$ 4 580 834	\$ 4 581 857	\$ 4 582 884	\$ 4 583 914	\$ 4 584 945	\$ 4 585 978	\$ 4 586 011	\$ 4 586 051	\$ 6 000
11 Surplus Revenue Annual Interest Rate	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
12 Borrowing Annual Interest Rate	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%

*Sector portion of revenues are allocated based on 2024 forecasted kWh sales

Cape Light Compact JPE
2022-2024 Low-Income Energy Efficiency Reconciliation Factor
 \$ in Thousands

Year	EE Expenses	EE Charge Revenues	FCM, ROGGL & Other Revenues	Post-Period Reconciliation with Interest	Interest on Deferral	Total EERF	Billed Distribution (GWh)	Res-LI Rev Req Allocation	EE Reconciliation Factor (cents/kWh)
	Col A	Col B	Col C	Col D	Col E	Col F	Col G	Col H	Col J
2024	\$ 23,499,305	\$ (177,134)	\$ (85,357)	\$ -	\$ 58,408	\$ 23,295,225	1,098,516	\$ 10,650,577	0.671

Col A Effective years (January 1, 2022 - December 31, 2022; January 1, 2023 - December 31, 2023; January 1, 2024 - December 31, 2024)
 Col B Consistent with the Cape Light Compact JPE's 2022-2024 Three-Year Plan (D.P.U. 21-126)
 Col C 2022-2024 Low-Income Monthly Deferral, Lines 1, Cols. H
 Col D 2022-2024 Low-Income Monthly Deferral, Lines 3, Cols. H + Lines 4, Cols. H + Lines 5, Cols. H
 Col E 2022-2024 Low-Income Monthly Deferral, Lines 10, Cols. A
 Col F 2022-2024 Low-Income Monthly Deferral, Lines 9, Cols. H
 Col G Col. B + Col. C + Col. D + Col. E + Col. F
 Col H Evidence forecast of Cape Light Compact JPE sales through December 31, 2024. Sum of residential and low-income sales.
 Col I Consistent with EverSource's rate making practices - 44.6% of Col. G in 2022, 43.7% of Col. G in 2023, and 46.7% of Col. G in 2024.
 Col J Col. I / Col. H divided by 10

Note that per D.P.U. 18-06, at 2-3 (June 24, 2018), lost base revenue is not applicable to the Cape Light Compact JPE.

Cape Light Compact JPE 2024 Low-Income Monthly EES Deferral \$ in Thousands														
Line Description	Col A Planned Dec-23	Col B Planned Jan-24	Col C Planned Feb-24	Col D Planned Feb-24	Col E Planned Mar-24	Col F Planned Apr-24	Col G Planned May-24	Col H Planned Jun-24	Col I Planned Jul-24	Col J Planned Aug-24	Col K Planned Sep-24	Col L Planned Oct-24	Col M Planned Nov-24	Col N Planned Total
1 SRC Revenue	\$ -	\$ -	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)	\$(14,761)
2 EES Revenue	\$ -	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)	\$(1,941,269)
3 FCM Revenue*	\$ -	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)	\$(7,113)
4 RGGI Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 Other Revenue	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6 Total Energy Efficiency Revenue	\$ -	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)	\$(1,963,143)
7 Total Energy Efficiency Expenses	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275	\$ 1,958,275
8 Deferral (Over)/Under Recovery	\$ 1,958,275	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)	\$(4,867)
9 Interest on Deferral Balance	\$ 2,652	\$ 5,304	\$ 5,306	\$ 5,307	\$ 5,308	\$ 5,309	\$ 5,310	\$ 5,311	\$ 5,312	\$ 5,313	\$ 5,314	\$ 5,315	\$ 5,316	\$ 5,317
10 (Over)/Under Ending Balance	\$ -	\$ 1,980,927	\$ 1,961,384	\$ 1,961,802	\$ 1,962,242	\$ 1,962,693	\$ 1,963,125	\$ 1,963,569	\$ 1,964,012	\$ 1,964,457	\$ 1,964,904	\$ 1,965,352	\$ 1,965,800	\$ 1,966,248
11 Surplus Revenue Annual Interest Rate		0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
12 Borrowing Annual Interest Rate		3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%

*Sector portion of revenues are allocated based on 2024 forecasted kWh sales.

Cape Light Compact JPE
2022-2024 Commercial & Industrial Energy Efficiency Reconciliation Factor
\$ in Thousands

Year	EE Expenses	EE Charge Revenues	FCM, RGOA & Other Revenues	Past Period Reconciliation with Interest	Interest on Deferral	Total EERF	Billed Distribution (DWh)	EE Reconciliation Factor (cents/kWh)	CI-LI Rev. Req. Allocation	Low Income Reconciliation Factor (cents/kWh)	EE Reconciliation Factor (cents/kWh)
Col A	Col B	Col C	Col D	Col E	Col F	Col G	Col H	Col I	Col J	Col K	Col L
2024	\$ 17,353,152	\$ (1,852,888)	\$ (892,829)	\$ -	\$ 43,130	\$ 14,650,804	741,148	1.977	12,844,648	1.708	3.683

Col A Effective years (January 1, 2022 - December 31, 2022; January 1, 2023 - December 31, 2023; January 1, 2024 - December 31, 2024)
Col B Consistent with the Cape Light Compact JPE's 2022-2024 Three-Year Plan (D.P.U. 21-128)
Col C 2022-2024 Commercial & Industrial Monthly Deferral Lines 1 Cols N
Col D 2022-2024 Commercial & Industrial Monthly Deferral Lines 3 Cols N + Lines 4 Cols N + Lines 5 Cols N
Col E 2022-2024 Commercial & Industrial Monthly Deferral Lines 10 Cols A
Col F 2022-2024 Commercial & Industrial Monthly Deferral Lines 9 Cols N
Col G Col B + Col C + Col D + Col E + Col F
Col H Eversource forecast of Cape Light Compact JPE sales through December 31, 2024. CI sales only
Col I Col G / Col H divided by 10
Col J Consistent with Eversource's rate making practice. 55.4% of Low-Income Energy Efficiency Reconciliation Factor. Col G in 2022, 54.3% of Low-Income Energy Efficiency Reconciliation Factor. Col G in 2023, and 54.3% of Low-Income Energy Efficiency Reconciliation Factor. Col G in 2024
Col K Col J / Col H divided by 10
Col L Col I + Col K
Note that per D.P.U. 10-08, at 2-3 (June 24, 2010), list base revenue is not applicable to the Cape Light Compact JPE

Line Description	Cape Light Compact JPE 2024 Commercial & Industrial Monthly EES Deferral \$ in Thousands														Total		
	Col A Planned Dec-23	Col B Planned Jan-24	Col C Planned Feb-24	Col D Planned Mar-24	Col E Planned Apr-24	Col F Planned May-24	Col G Planned Jun-24	Col H Planned Jul-24	Col I Planned Aug-24	Col J Planned Sep-24	Col K Planned Oct-24	Col L Planned Nov-24	Col M Planned Dec-24				
1 EEC Revenue	\$ -	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (154,408)	\$ (1,652,809)
2 EES Revenue	\$ -	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (1,220,884)	\$ (14,450,604)
3 FCM Revenue*	\$ -	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (74,401)	\$ (892,809)
4 RQCI Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5 Other Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6 Total Energy Efficiency Revenues	\$ -	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (1,449,096)	\$ (17,306,267)
7 Total Energy Efficiency Expenses	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 1,448,096	\$ 17,353,152
8 Deferral (Over)/Under Recovery	\$ 1,448,096	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (3,584)	\$ (43,130)
9 Interest on Deferral Balance	\$ 1,958	\$ 3,917	\$ 3,918	\$ 3,918	\$ 3,918	\$ 3,920	\$ 3,920	\$ 3,921	\$ 3,922	\$ 3,922	\$ 3,922	\$ 3,922	\$ 3,922	\$ 3,922	\$ 3,922	\$ 3,922	\$ 43,130
10 (Over)/Under Ending Balance	\$ 1,448,054	\$ 1,448,377	\$ 1,448,701	\$ 1,449,025	\$ 1,449,351	\$ 1,449,677	\$ 1,450,004	\$ 1,450,332	\$ 1,450,661	\$ 1,450,991	\$ 1,451,322	\$ 1,451,653	\$ 1,451,985	\$ 1,452,317	\$ 1,452,650	\$ 1,452,983	\$ (6,000)
11 Surplus Revenue Annual Interest Rate		0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%	0.20%
12 Borrowing Annual Interest Rate		3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%

*Sector portion of revenues are allocated based on 2024 (forecasted) kWh sales

Line	Description	Cape Light Compact JFE 2024 Total Monthly EES Deferral \$ in Thousands													Total	
		Col A Period Dec-23	Col B Period Jan-24	Col C Period Feb-24	Col D Period Feb-24	Col E Period Mar-24	Col F Period Apr-24	Col G Period May-24	Col H Period Jun-24	Col I Period Jul-24	Col J Period Aug-24	Col K Period Sep-24	Col L Period Oct-24	Col M Period Nov-24		
1	SRC Revenue	\$ -	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (302,847)	\$ (785,693)	\$ (4,594,158)
2	EES Revenue	\$ -	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (7,426,406)	\$ (14,852,813)	\$ (89,119,875)
3	FCM Revenue*	\$ -	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (184,475)	\$ (368,951)	\$ (2,213,705)
4	ROG1 Revenue†	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5	Other Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6	Total Energy Efficiency Revenue	\$ -	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (7,993,728)	\$ (15,987,456)	\$ (95,924,730)
7	Total Energy Efficiency Expenses	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 7,973,910	\$ 85,686,916
8	Deferral (Over)/Under Recovery	\$ 7,973,910	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (19,819)	\$ (8,013,547)	\$ -
9	Interest on Deferral Balance	\$ 19,780	\$ 21,588	\$ 21,603	\$ 21,606	\$ 21,613	\$ 21,618	\$ 21,623	\$ 21,628	\$ 21,632	\$ 21,637	\$ 21,642	\$ 21,647	\$ 21,652	\$ 10,822	\$ 237,823
10	(Over)/Under Ending Balance	\$ -	\$ 7,984,788	\$ 7,986,487	\$ 7,988,272	\$ 7,990,062	\$ 7,991,856	\$ 7,993,655	\$ 7,995,450	\$ 7,997,260	\$ 7,999,067	\$ 8,000,801	\$ 8,002,724	\$ 8,004,600	\$ 0,000	\$ -

*Sector portion of revenues are allocated based on 2024 forecasted kWh sales

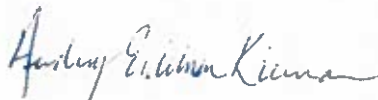
**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of the Cape Light Compact JPE for Approval by)
the Department of Public Utilities of its Proposed Mid-) D.P.U. 24-126
Term Modifications for the 2022-2024 Three Year Energy)
Efficiency 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 19th day of August, 2024.



Audrey Eidelman Kiernan, Esq.
akiernan@kolawpc.com
KO Law, P.C.
1337 Massachusetts Avenue, Box 301
Arlington, MA 02476
(617) 644-7681 (Phone)



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

August 23, 2024

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

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

Re: D.P.U. 24-126, *Cape Light Compact JPE Petition for Approval of Mid-Term Modifications of its 2022-2024 Three-Year Energy Efficiency Plan*;
D.P.U. 21-126, *Cape Light Compact JPE 2022-2024 Three-Year Energy Efficiency Plan*

Dear Secretary Marini:

On January 31, 2022, the Department of Public Utilities (the "Department") approved the Cape Light Compact JPE's ("Compact") petition, pursuant to G.L. c. 25, §21, for approval of its Three-Year Energy Efficiency Plan for the period of 2022 through 2024 ("D.P.U. 21-126 Order"). Included in the D.P.U. 21-126 Order, at 225, the Department directed that "for the 2022-2024 Three-Year Plans term, a Program Administrator may not exceed its planned program budget without approval by the Department." It is with regret that the Compact finds itself, for the reasons highlighted below, in the position to notify the Department that it has expended the dollars approved for the current term's Residential Hard-to-Measure Program (the "Program"). As a result, the Compact will, effective close of business August 26, 2024, need to temporarily pause the Program offerings, specifically with respect to implementation of the HEAT Loan, until such time that further funding is made available and approved for expenditure by the Department.

On August 15, 2024, the Compact filed its request with the Department for mid-term modifications ("MTMs") to address, among other things, greater than forecasted interest in the current term's Program, which the Department docketed as D.P.U. 24-126. At its meeting on August 21, 2024, the Energy Efficiency Advisory Council unanimously approved the Compact's MTM requests, including its request for additional funding for the Program. As stated in the

Secretary Mark D. Marini

August 23, 2024

Page 2

Compact's pre-filed testimony to support the MTM request, the Compact has seen greater interest in the Program, specifically the HEAT Loan offering, where customers are financing higher amounts through the HEAT Loan than in previous years and higher interest rate amounts than the Compact expected when planning the HEAT Loan budget for the 2022-2024 term. In its MTM filing, the Compact noted that at the end of July, 2024, the Compact had fully expended its Department approved budget for the Program and would need to temporarily pause the program effective August 26, 2024, pending Department consideration of the Compact's MTM request. The Compact also noted in its MTM filing, Exhibit CLC-1 at 11-12, that the Department's consideration of the Joint Motion for Waiver ("Joint Motion") filed on August 12, 2024 in D.P.U. 21-120 through D.P.U. 21-129 by August 26, 2024 (as requested in the Joint Motion) may obviate the need for the temporary Program pause.

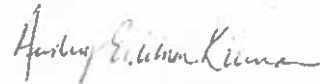
This week, the Compact has notified its implementation vendors and participating HEAT Loan lenders that it has exhausted its budget and that, subject to a ruling on the Joint Motion by August 26, 2024 that may obviate the need for a Program pause, the Compact will issue a formal announcement on that day that it is unable to continue the HEAT Loan offering (i.e., it is unable to buy down the interest on new customer loans related to energy efficiency projects), until it has the requisite authorization from the Department.

Given the design, implementation and cost recovery of the Compact's energy efficiency programs are subject to the jurisdiction of the Department under the provisions of G.L. c. 164, §134 and G.L. c. 25, §§19 and 21, the Department's review and approval is necessary before further expenditures by the Compact can be undertaken for this Program.

The result of the current budget constraints faced by the Compact for its Program has led to the need to temporarily pause any additional new HEAT Loan expenditures. The Compact views this as an unfortunate effect on the Compact's customers, who have robustly sought to participate in the energy efficiency measures made available as a result of the 2022-2024 term plan. The Compact appreciates the Department's urgent consideration for and approval of its MTM requests, as well as its ongoing consideration of the Joint Motion.

Please contact me if you have any questions. Thank you for your time and attention to this matter.

Sincerely,



Audrey Eidelman Kiernan

Secretary Mark D. Marini

August 23, 2024

Page 3

cc: Krista Hawley, Esq., DPU Hearing Officer (via email only)
Jeffrey Leupold, Esq., DPU Hearing Officer (via email only)
David Lyons, Esq., DPU General Counsel (via email only)
Jeanne Voveris, Esq., DPU (via email only)
D.P.U. 24-126 Service List (via email only)
Margaret T. Downey, Compact Administrator (via email only)



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

September 6, 2024

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

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

Re: Notice of Withdrawal of Pleadings
D.P.U. 24-126, *Cape Light Compact JPE Petition for Approval of Mid-Term Modifications of its 2022-2024 Three-Year Energy Efficiency Plan*

Dear Secretary Marini:

On August 15, 2024, consistent with Section 3.8.2(c) of the Energy Efficiency Guidelines (“Guidelines”) and the Order issued by the Department of Public Utilities (the “Department”) in D.P.U. 21-126, the Cape Light Compact JPE (“Compact”) filed a Petition for Approval of Mid-Term Modifications of its 2022-2024 Three-Year Energy Efficiency Plan, together with supporting exhibits, docketed as D.P.U. 24-126 (“Petition”). The Compact noted in supporting Exhibit CLC-1, that the Department’s approval of the Joint Motion for Waiver filed on August 12, 2024 in D.P.U. 21-120 through D.P.U. 21-129 (“Joint Motion”), including the Department’s consent to the Program Administrators’ interpretation of the Guidelines Section 3.8.2(c) described therein, would obviate the Compact’s need for the mid-term modifications requested in the Petition. On September 3, 2024, the Department approved the Joint Motion and agreed to the Program Administrators’ interpretation of the Guidelines Section 3.8.2(c) for the remainder of the Three-Year Energy Efficiency Plan term.

Therefore, in accordance with 220 C.M.R. § 1.04(4) (Withdrawal of Pleadings), the Compact hereby withdraws its Petition and supporting exhibits. The Compact has notified the Department of Energy Resources, the Office of the Attorney General (“AGO”) and the Low-Income Energy Affordability Network (“LEAN”) regarding this notice of withdrawal of pleadings and is authorized to represent that the AGO and LEAN do not object to the Compact’s withdrawal of the Petition.

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of the Cape Light Compact JPE for Approval by)
the Department of Public Utilities of its Proposed Mid-) D.P.U. 24-126
Term Modifications for the 2022-2024 Three Year Energy)
Efficiency Plan.)

CERTIFICATE OF SERVICE

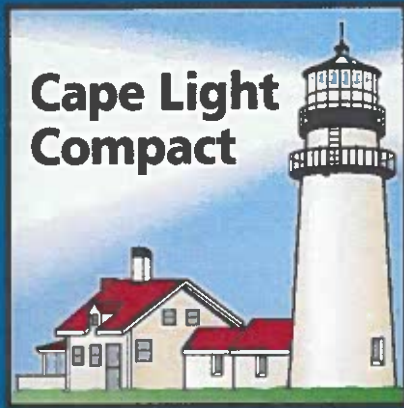
I hereby certify that I have this day served the foregoing documents upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated this 6th day of September, 2024.



Audrey Eidelman Kiernan, Esq.
akiernan@kolawpc.com
KO Law, P.C.
1337 Massachusetts Avenue, Box 301
Arlington, MA 02476
(617) 644-7681 (Phone)

AGENDA ITEM #4D



*Your Trusted, Local
Energy Resource*

Cape Light Compact

2025-2027 Plan updates

September 2024



Core Requirements for the 2025-2027 Plan

Executive Office of
Energy and
Environmental
Affairs

Green House Gas
Emissions
Reduction
Requirements for
Mass Save

- Requires the Plan to achieve 1 million metric tons of CO₂e reductions
- "At an assumed budget of less than \$5 billion"
- With an emphasis on equitable delivery of programs and improved customer experience, while meeting the above objectives
- Recommends sector level savings allocations for gas and electric
- "Balancing the deployment of these various programs requires consideration of cost-effectiveness, ratepayer affordability, and the Commonwealth's equity priorities"



With a focus on



Decarbonization



Equity



Customer experience



Data

Commitments

shift resources out of market rate programs and into programs focused on underserved customer groups and communities

energy efficiency and electrification improvements for, and efforts to reach and serve, low- and moderate-income customers, renters, small businesses, and customers that primarily speak a language other than English (“LOTE customers”)

commitments to provide no-cost weatherization, barrier remediation, and electrification to rental properties in designated equity communities



Commitments continued

increased Low- and Moderate-Income (LMI) heat pump production, along with increases in weatherization and barrier mitigation to ensure that LMI homes are electrification-ready

aspirational benchmark to spend 15% of dollar volume of direct Mass Save contracts with diverse suppliers

enhanced language support for LOTE customers, including material translations, interpreter services, and multilingual staff



Residential Heat Pump Rebate Offers

Offer Name	Scenario	Offer		
		2025	2026	2027
Tier 1 ASHP: Base Heat Pump Rebate	Previously unconditioned space Heat pump or central AC replacement	\$250/ton	\$250/ton	\$250/ton
Tier 2 ASHP: Hybrid Heat Pump Rebate	Partial displacement with wx bonus and full heating load bonus (no disconnection required)	\$1,250/ton \$500 wx bonus \$500 full heating load bonus	\$1,125/ton \$500 wx bonus \$500 full heating load bonus	\$1,000/ton \$500 wx bonus \$500 full heating load bonus
Tier 3 ASHP: Whole Home Rebate	Whole home w/disconnection requirement (also includes air-to-water heat pumps)	\$3,000/ton up to \$10k	\$2,700k/ton up to \$9k	\$2,500/ton up to \$8k
Ground Source Heat Pump Rebate	Ground source heat pumps	\$15k Whole Home	\$13.5k Whole Home	\$12k Whole Home
		\$2k/ton Partial	\$2k/ton Partial	\$2k/ton Partial



HEAT Loan Updates

Proposed 25-27 Update:

- Adopted means-testing and allow customers:
 - Earning 81-135% of SMI to access a 7-year loan at 0% interest
 - Earning 135-300% of SMI to access a 5-year loan at 0%
 - Earning above 300% of SMI to access a 3-year loan at 0%
- HEAT Loan amounts are capped at \$25k
- PAs committed to negotiating an interest rate reduction and further evaluating the HEAT Loan offering



C&I Long-term approach to electrification



- **Drive volume growth where near-term opportunity exists**
 - Smaller buildings
 - Delivered fuel displacement
 - New construction
- **Existing Building Commissioning**
 - Process with focus on HVAC systems and associated controls
 - Budgeted \$40 million for 200 to 300 EBCx investigation reports
 - Support for investigation, commissioning, and measure implementation
 - Oversight of qualified EBCx service providers
 - Developing resources to streamline process (report templates, calculators, guidance, etc.)



Data Access



New metrics and KPIs designed to give a clearer indication of progress against goals



Measure-level data on a quarterly basis



Streamlined quarterly reports focusing on priority metrics and highlights



Mass Save Data enhancements to simplify user experience and highlight priority stats



Key Dates

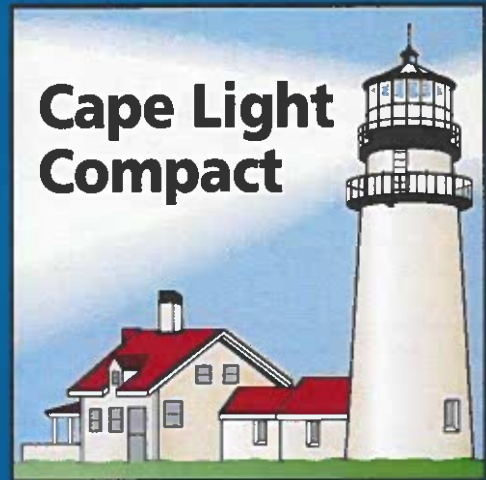
- ❑ **Revised Draft of Plan**
September 25, 2024
- ❑ **Final Plan filed with the Department**
October 31, 2024
- ❑ **Plan Discovery**
awaiting Procedural Schedule
- ❑ **Plan Order**
February 2025



THANK YOU

Questions?

**Cape Light
Compact**



*Your Trusted, Local
Energy Resource*



August 15, 2024

Elizabeth Mahony
Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA 02114

Re: 2025-2027 Energy Efficiency and Decarbonization Plan

Dear Commissioner Mahony:

The Program Administrators (or “PAs”)¹ respectfully submit the enclosed update with attachments (“August Update”) to the April Draft of the 2025-2027 Energy Efficiency and Decarbonization Plan (“April Draft”).² This August Update highlights the key changes to the April Draft, largely in response to the Massachusetts Energy Efficiency Advisory Council’s (“Council”) Resolution regarding the April Draft (the “July Resolution”). We thank the Massachusetts Department of Energy Resources (“DOER”), the Attorney General’s Office (“AGO”), Council members, the Council’s consultants (“Consultants”), our implementation and community partners, and other interested stakeholders for their efforts and valued input as we developed this August Update. We have fully, or in part, adopted over 90% of the Council’s recommendations.

We propose an almost \$5 billion investment, including approximately \$1.73 billion in equity-related investment, and will reduce greenhouse gas emissions by over 1 million metric tons as required by the Secretary of Energy and Environmental Affairs.³ The holistic suite of efforts proposed in this response represents a significant step towards the achievement of the

¹ The Berkshire Gas Company, Eversource Gas Company of Massachusetts, d/b/a Eversource Energy, Fitchburg Gas and Electric Light Company, d/b/a Unitil (Gas Division), Liberty Utilities (New England Natural Gas Company) Corp., d/b/a Liberty Utilities, Boston Gas Company, d/b/a National Grid, NSTAR Gas Company, d/b/a Eversource Energy, Cape Light Compact JPE, Fitchburg Gas and Electric Light Company, d/b/a Unitil (Electric Division), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and NSTAR Electric Company d/b/a Eversource Energy.

² This August Update constitutes the Program Administrators’ written response to the Council’s recommendations as required by the Department. [Three Year Plans Order for 2022-2024](#), D.P.U. 21-120 through D.P.U. 21-129, at 32. The August Update can also be accessed, along with all appendices and bulk attachments, here: [August 15, 2024 Submission](#).

³ See Letter from Rebecca Tepper, Secretary of Energy and Environmental Affairs, to Program Administrators (Mar. 1, 2024). The emissions reduction goals are set pursuant to G.L. c. 21N § 3B.



Massachusetts 2030 climate goals for the building sector and in support of our efforts to ensure that all eligible residents and businesses across the Commonwealth benefit from the Mass Save® programs. The August Update provides unprecedented levels of investment in, and support for, achieving environmental, equity, economic, and job creating benefits for residents, businesses, communities, and institutions in the Commonwealth.

The August Update accomplishes these goals by expanding on our commitment to equity and incorporating distributive justice as a key element of program design and implementation. The Update proposes to invest almost \$1.73 billion in energy efficiency and electrification improvements for, and efforts to reach and serve, low- and moderate-income customers, renters, small businesses, and customers that primarily speak a language other than English (“LOTE customers”). This effort includes weatherizing over 66,100 and installing heat pumps at more than 22,200 low- and moderate-income households. Additionally, the Update also includes new commitments to provide no-cost weatherization, barrier remediation, and electrification to rental properties in designated equity communities—resulting in a record investment of almost \$615 million dedicated to renters over the next three years. A critical strategy for achieving these goals will be to continue and deepen efforts to partner with communities and local community action agencies to provide multilingual, culturally sensitive messaging and outreach, and drive greater awareness and uptake of available offerings for underserved groups. We will also provide enhanced language support for LOTE customers, including material translations, interpreter services, and multilingual staff.

The August Update also includes significant commitments to increase workforce diversity. It doubles annual funding to MassCEC from \$12 million to \$24 million for these purposes, which will include training for contractors and job seekers who speak languages other than English and creation of a “contractor development pathway” to provide business development support for Minority- and Women-owned Business Enterprises. Additionally, we are setting an aspirational benchmark using 15 percent of dollar volume of direct Mass Save contracts to diverse suppliers for the 2025-2027 Term and are supporting many new efforts designed to achieve that benchmark.

We are also working with DOER on new efforts targeting decarbonization of select schools in underserved communities in coordination with other agencies. The goal is for these decarbonization efforts to stand as a model for other schools in the Commonwealth to reduce their carbon footprint. There is also a roadmap for a best-in-class retrocommissioning program for large commercial and industrial customers.

Data transparency and reporting are also being improved. Frequently requested operational metrics will be regularly provided in summary tables. Quarterly reporting has been simplified and streamlined to make these updates more valuable and easier to understand. Finally, we will publish the measure-level outputs of a subset of each PA’s benefit-cost models also on a quarterly basis, including production and incentives for major measures such as weatherization and heat pump



installations. We will also provide ZIP Code level data on weatherization and heat pump production on a biannual basis.

Additionally, we are implementing several strategies for controlling costs to keep within their budgets throughout the 2025-2027 term. These include, for example, the adoption of declining heat pump incentives for non-income qualified customers over the term; significant reductions to the HEAT loan budget and associated changes to the offering; as well as creation of a turnkey heat pump and barrier remediation delivery model, which will allow for a high degree of cost control. We have also worked with DOER to secure almost \$73 million of federal Inflation Reduction Act funding for barrier remediation and electrification of low- and moderate-income customers and with Generac to secure federal funding from the Department of Energy to deploy up to 2,000 batteries for low- and moderate-income households over the next two terms. We are grateful for the feedback and cooperation with DOER, the AGO, Council, and Consultants to help make this August Update reflective of the Commonwealth's climate and energy goals.

We look forward to providing an updated draft 2025-2027 Three-Year Plan with data tables to the Council on September 25, 2024, and working with the Council for its approval in October ahead of final submission to the Department of Public Utilities on October 31, 2024. We are confident that when the final plan is submitted, it will represent the most innovative and ambitious three-year plan ever presented.



Sincerely,

The Massachusetts Program Administrators

A handwritten signature in black ink, appearing to read 'Katherine Peters', written over a horizontal line.

Katherine Peters
Director, Massachusetts Implementation
Eversource Energy

A handwritten signature in black ink, appearing to read 'Christopher Porter', written over a horizontal line.

Christopher Porter
Director, Customer Energy Management
National Grid

A handwritten signature in black ink, appearing to read 'Cindy L. Carroll', written over a horizontal line.

Cindy L. Carroll
Vice President, Customer Energy Solutions
Unitil Service Corp.

A handwritten signature in black ink, appearing to read 'Hammad Chaudhry', written over a horizontal line.

Hammad Chaudhry
Senior Manager
The Berkshire Gas Company

A handwritten signature in black ink, appearing to read 'Stephanie Terach', written over a horizontal line.

Stephanie Terach
Manager, Energy Efficiency and
Customer Solutions
Liberty Utilities

A handwritten signature in black ink, appearing to read 'Margaret T. Downey', written over a horizontal line.

Margaret T. Downey
Administrator
Cape Light Compact JPE

**Massachusetts Program Administrators' Update to the April Draft of
the 2025-2027 Energy Efficiency and Decarbonization Plan**

August 15, 2024

I. Introduction

The Program Administrators (“PAs”)¹ are pleased to provide this update to the April Draft of the 2025-2027 Energy Efficiency and Decarbonization Plan. This update also comprises our written response to the Massachusetts Energy Efficiency Advisory Council (“EEAC”) Resolution regarding the April Draft (the “July Resolution”).²

We propose an almost \$5 billion investment, including approximately \$1.73 billion in equity-related investment, in order to achieve the most ambitious greenhouse gas emissions reductions ever set for the Commonwealth. The holistic suite of efforts proposed in this response represents a significant step towards the achievement of the Massachusetts 2030 climate goals for the building sector and in support of our efforts to ensure that all eligible residents and businesses across the Commonwealth benefit from the Mass Save® programs. The collaboratively developed activities and offerings within this revised Plan represent a powerful commitment to equity and to continuous improvement.

We are deeply grateful to the EEAC, including the Equity Working Group (“EWG”), the public, our implementation and community partners, and our trade allies for their feedback and support in refining and improving the first draft of the Plan.³ Stakeholder feedback culminated in the July Resolution, which incorporates approximately 380 recommendations related to development of the 2025-2027 Energy Efficiency and Decarbonization Plan (“Plan”). The PAs have fully or in part adopted over 90% of these recommendations.

This memorandum highlights key changes to the Plan since April, largely in response to these recommendations. It also includes summary tables and an Appendix describing each Council recommendation, whether and how the PAs intend to address the issue as part of the Three-Year Plan, and a description of all program design changes from the April draft that the PAs intend to incorporate in the Three-Year Plan to be filed with the Department of Public Utilities

¹ The Berkshire Gas Company, Eversource Gas Company of Massachusetts, d/b/a Eversource Energy, Fitchburg Gas and Electric Light Company, d/b/a Unitil (Gas Division), Liberty Utilities (New England Natural Gas Company) Corp., d/b/a Liberty Utilities, Boston Gas Company, d/b/a National Grid, NSTAR Gas Company, d/b/a Eversource Energy, Cape Light Compact JPE, Fitchburg Gas and Electric Light Company, d/b/a Unitil (Electric Division), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and NSTAR Electric Company d/b/a Eversource Energy.

² See “Massachusetts Energy Efficiency Advisory Council Resolution Regarding the April 1st Draft of the 2025-2027 Energy Efficiency Plan,” adopted June 26, 2024 and issued in final form on July 1, 2024.

³ Feedback was provided through three public listening sessions; approximately 100 written public comments; multiple meetings of the EEAC, EWG, and Commercial and Industrial Working Group; at least 17 “deep dive” sessions with the Council’s consultant team, the Department of Energy Resources (“DOER”), and the Attorney General’s Office (“AGO”); and many additional meetings with implementation partners and other stakeholders.

("Department") on October 31, 2024. This memorandum constitutes the Program Administrators' final, written response to the Council's recommendations as required by the Department.⁴ Per Department directive, the PAs are not allowed to make further substantive changes to the Plan.⁵ As a next step, the PAs will integrate the changes described here into the Plan draft and tables for submission to the EEAC on September 25, 2024 to support Council action on a Final Resolution in October. As required by statute, the PAs will file a Final Three-Year Plan for approval with the Department on October 31, 2024.

II. Revised Plan Targets

The revised Plan lays out ambitious goals that meet the requirements established by the Secretary of the Executive Office of Energy and Environmental Affairs ("EEA") to reduce greenhouse gas emissions ("GHGs") by 1 million metric tons at a budget of less than \$5 billion, while prioritizing equitable delivery of decarbonization measures and an improved customer experience.

2025-2027 Revised Plan Targets

- Weatherize approximately 174,900 homes, including over 66,100 low- and moderate-income households and just under 46,700 rental units.
- Support the installation of heat pumps in over 115,100 households, including over 22,200 low- and moderate-income households and over 12,900 rental units.
- Invest almost \$1.73 billion in energy efficiency and electrification improvements for, and efforts to reach and serve, low- and moderate-income customers, renters, customers who primarily speak a language other than English ("LOTE customers"), and small businesses. This includes almost \$615 million dedicated to serving renters.
- Reduce GHG emissions by just over 1.0 million metric tons of CO₂e.
- Deliver 183 million lifetime MMBtus in energy savings and just under \$12.6 billion in total benefits to customers.

For a comparison of changes to plan targets since the April draft, please see Table 1 below. A detailed breakdown of equity-related investments is also included in Table 2 in the Equity Section.

⁴ In its Order approving the 2022-2024 Three Year Plans, the Department required the Program Administrators to

submit a final written response to the Council's comments or recommendations no later than 45 days after the Council issues the July resolution required by G.L. c. 25, § 21(c). In this response, the Program Administrators shall include a summary of each Council recommendation or comment, and specify whether and how the Program Administrators intend to address the issue in the Three-Year Plans. The Program Administrators also shall include a description of any program design changes from the draft Statewide Plan that they intend to incorporate in the Three-Year Plans filed with the Department, regardless of whether these changes were prompted by the Council's comments. The Program Administrators shall not be permitted to make any further substantive changes to the Statewide Plan after submitting their final written response to the Council.

Three Year Plans Order for 2022-2024, D.P.U. 21-120 through D.P.U. 21-129, at 32.

⁵ *Id.*

TABLE 1: 25-27 PLAN TARGETS		April Draft	August Draft
2030-GHG s	MTCO_{2e}	1.06 Million metric tons	1.02 million metric tons
Energy Savings	NLMMBTU s	196 Million MMBtus	183 Million MMBtus
Benefits	2025\$	\$13.8 Billion	\$12.6 Billion
--Equity Benefits	2025\$		\$3.8 Billion
Total Investment	Nominal\$	\$4.99 Billion	\$4.99 Billion
--Equity Investment	Nominal\$	\$1.4 Billion	\$1.73 Billion
Weatherization Jobs	Homes	174,000	174,900
--Low- and Moderate-income	Homes	48,000	66,100
--Renter*	Homes	38,000	46,700
Heat Pump Installs	Homes	115,000	115,100
--Low- and Moderate-Income	Homes	15,800	22,200
--Renter*	Homes	11,500	12,900

*Note: Renter totals include low-, moderate- and non-income qualified households and therefore there is overlap between the low- and moderate-income targets and the renter targets noted above.

** All numbers provided in this response remain subject to quality assurance review and corrections. Definitive, final numbers will be provided in the October 31, 2024 filing of the final Plan.

III. Equity⁶

Equity remains a foundational principle of our decarbonization efforts during the 2025-2027 Term. In the revised Plan, we expand on our commitment to equity and incorporate distributive justice as a key element of program design and implementation. Recognizing that there can be multiple definitions and uses of these terms, in the context of the decarbonization and energy efficiency services provided through the Mass Save programs, we define ‘distributive justice’ as a commitment to promoting fair and equitable distribution of benefits and burdens across all customers, upholding and prioritizing the needs of historically underserved customers burdened with economic challenges, racial inequality, negative environmental impacts, and justice disparities. The PAs are cognizant of their responsibility to enable a just energy transition for all and will continue to engage with our stakeholders, including the Equity Working Group, in this ongoing process of adopting distributive justice in the implementation of Mass Save programs. The PAs are deeply grateful to all stakeholders for their time, efforts and engagement during the Plan development process. We recognize that distributive justice is a work in progress and that stakeholders and the Equity Working Group have high expectations for achievement. While they do not fully meet all recommendations, the activities and offerings proposed within this Plan represent a strong and meaningful commitment to Equity and to continuous improvement. The PAs will remain engaged with stakeholders during the coming term in order to meet the goals that we have laid out and to identify additional improvements in promoting the fair and equitable distribution of the benefits of energy efficiency.

The PAs are working to achieve more equitable participation for historically underserved customer groups, including renters, moderate-income households, LOTE customers, and small businesses.⁷ Additionally, serving low-income customers remains a core focus of the programs, and the PAs and our partner Community Action Agencies (CAPs) remain focused on increasing service to this vulnerable customer group. The Equity Working Group continues to provide invaluable feedback on how to prioritize delivery to these groups and recommendations for achieving more equitable delivery of the programs. The PAs thank them for their support and look forward to continued collaboration during the 2025-2027 term.

In the revised 2025-2027 Three-Year Plan, the PAs have outlined a community-based approach to implementing equitable strategies targeted towards historically underserved groups and low-income customers to increase access to Mass Save programs:

- **Significantly Increased Investment in Underserved Customer Groups and Low-Income Customers:** The revised Plan proposes to invest almost \$1.73 billion in energy efficiency and electrification improvements for, and efforts to reach and serve, low- and moderate-income

⁶ This section incorporates an abbreviated draft of the Equity section for the revised Plan.

⁷ See Residential Nonparticipant Customer Profile Study (MA19X06-B-RESNONPART), produced for the Massachusetts PAs by DNV GL, Feb. 6, 2020. Residential Nonparticipant Market Characterization and Barriers Study (MA19X06-B-RESNONPART), produced for the Massachusetts PAs by Navigant, Illume, and Cadeo, Feb. 27, 2020. Commercial and Industrial Small Business Nonparticipant Customer Profile Study (MA18X11-B-SBNONPART), produced for the Massachusetts PAs by DNV GL, Apr. 15, 2020. Massachusetts Limited English Proficient and English-isolated Customer Journey Mapping and Barriers Study (MA21R37-B-LEPJM), produced for the PAs by Guidehouse, Illume, and Cadeo, Oct. 25, 2023.

customers, renters, LOTE customers, and small businesses as described further below. This marks, by a substantial margin, the largest investment in these customer groups made as part of a three-year plan in the Commonwealth. For further details on these equity investments, see Table 2 below.

- **Increased focus on electrification and expanded access for Low-Income Customers:** As the Commonwealth transitions towards high-efficiency electric heating, it is critical that low-income customers—especially those that heat with delivered fuels—have an opportunity to electrify. Since the April draft, the PAs have revised the Plan to provide a greater focus on electrification of low-income households, aiming to install heat pumps in over 16,500 low-income homes over the 2025-2027 term. This target represents approximately 50 percent year-over-year growth in low-income heat pump installations during the term and will require significant additional investment in weatherization and barrier mitigation to make these homes electrification-ready. The PAs and their partner CAPs aim to weatherize over 41,200 low-income homes in support of these efforts. To ensure that the workforce is sufficient to drive these increases in service, the PAs and their low-income lead vendors, ABCD and Action, will continue to leverage the capabilities and resources of Home Performance Contractors (“HPCs”) by onboarding new HPCs. They will also contract with additional market rate vendors to provide service within the low-income programs. For example, market rate vendors are being brought on to support QA/QC of projects delivered by other vendors and deliver energy efficiency and electrification improvements in mixed-income buildings. Local CAPs will also increase capacity through additional staffing to meet customer demand. The PAs, ABCD, and Action will also continue to review and optimize workflow processes, including with these new vendors, to ensure that projects are managed as efficiently as possible while also ensuring quality installations for this vulnerable customer group. For further details on these workforce and workflow efforts, see the Low-Income Section below.
- **100% Incentives and Enhanced Accessibility for Moderate-Income Customers:** The 2025-2027 Plan includes no-cost weatherization, barrier remediation, and electrification for all moderate-income customers. The Plan also includes several program design changes to reduce financial and logistical barriers for these customers. These include expanded eligibility through the adoption of area median income (“AMI”) as an alternative qualifier to state median income; the ability to qualify for weatherization improvements by attesting to household income; the creation of a facilitated (or “turnkey”) delivery model for improvements; and elimination of out-of-pocket costs for these customers. The PAs aim to weatherize approximately 24,900 and electrify just under 5,700 moderate-income households, and provide significant additional investments in barrier mitigation necessary to meet these targets.
- **A Record Level of Support for Renters:** Since the April draft, the plan has been updated to provide no-cost weatherization, barrier remediation, and electrification for rental properties in designated equity communities⁸ (where electrification will not increase renters’ energy

⁸ The PAs worked collaboratively with DOER and the EWG to establish the criteria and select designated equity communities for the 2025-2027 Plan. With the exception of communities located in Cape Light Compact territory, which has a unique territory with different characteristics, the PAs selected communities in which: (1) more than 35 percent of the population are renters; (2) there were greater than 8,000 renters; and (3) more than 50 percent of the

burdens), coupled with automatic qualification. This will include coordination of (or “turnkey”) delivery of services to address time constraints, manage costs, and improve the customer experience, as well as outreach to landlords. To help protect against increased energy burdens, landlords will be required to sign a form—similar to what is currently required in the low-income program—committing not to raise rent or evict tenants for a period following the receipt of program incentives. Plan budgets have been updated to reflect these increased offers and our efforts to support this underserved group. These budgets reflect a record investment of almost \$615 million dedicated to serving renters.

- **Enhanced Access for Small Businesses:** The PAs are implementing several efforts to address equity considerations for our small business customers. For example, the PAs are launching two new offers focused on a) equitable participation of leased commercial space, which targets both the renters and their landlords, and b) small charitable nonprofit organizations. Both of these efforts will include increased incentives, enhanced outreach and marketing, and individualized approaches for supporting participation. To improve access for small business customers, the PAs will also provide concierge services through existing pathways via lead vendors and QA/QC vendors. The lead vendors will assist in scheduling small business assessments, explain the measures and costs associated with them, assist customers in obtaining financing when needed, and help choose a contractor when the lead vendor is not able to implement recommended measures themselves. The third-party QA/QC vendor will ensure the work is completed thoroughly and to a high quality. Additionally, the PAs will ensure that LOTE customers are able to participate in the programs by running marketing campaigns in multiple languages, providing program materials in multiple languages, and offering translation services when needed. With the additional funding proposed for Community First Partners (“CFPs”) (described below), the PAs will provide support and training for the CFP lead vendor and energy advocates on small business incentives and opportunities to drive more small business assessments from CFP efforts. Lastly, the PAs also strive for equity with the vendors that deliver energy efficiency work. Recognizing that not all vendors and contractors offer comprehensive services or are large enough to win the small business services contract, the PAs are expanding the Customer Directed Option and will actively recruit smaller vendors and contractors to bring in more projects through that pathway. This will have the impact of bringing in a wider and more diverse set of contractors than ever before that can deliver energy efficiency services to small business customers and grow their businesses by engaging with the PAs.
- **Additional Support for Schools in Underserved Communities:** The PAs will work with DOER and other stakeholders to support energy efficiency and decarbonization improvements at schools in underserved communities. Since the April draft, the PAs and DOER have determined that these efforts will be two-fold.

population are low- or moderate-income. The process resulted in selection of 21 communities, including: Boston, Brockton, Chelsea, Everett, Fall River, Framingham, Fitchburg, Lawrence, Lowell, Lynn, Malden, New Bedford, Oak Bluffs, Pittsfield, Quincy, Revere, Salem, Springfield, Tisbury, Woburn, and Worcester. Until, Berkshire Gas, and Liberty may further limit eligibility within these communities in their service territories by focusing on certain EJ census blocks.

First, the PAs will have a special offer to fully decarbonize five schools in underserved communities that will be selected by DOER. These decarbonization projects will serve as models for supporting a clean, equitable transition for our public schools. For the decarbonization of these five schools, the PAs are proposing to provide approximately \$47 million across multiple terms, which will supplement funding from other state agencies. Additional PA funding will go toward supporting the creation of municipal energy manager roles in the communities where the five schools are located where such a role does not yet exist. Funding will also support a) technical assistance, such as building decarbonization assessments of these school buildings, to help them determine their path to decarbonization, b) engineering design assistance and c) implementation of identified energy efficiency and electrification upgrades. Furthermore, the PAs will support DOER's lead in selection of the five schools, messaging to stakeholders, and recruiting other funding, such as MA School Building Authority's ("MSBA") heat pump program and MassCEC Green School Works grant—both of which are due to launch in January 2025.

Second, the PAs are launching an offer to assist all participating K-12 schools on their path to decarbonization. That offer will include:

- A competitive grant to create municipal energy manager roles in communities that want to pursue school decarbonization and where such a full-time role does not yet exist. This grant will be launched in September 2025 in coordination with the Mass Save Community First Partnership so that communities have the opportunity to plan both applications simultaneously where they choose to do so.
- Portfolio Planning and Project Planning assistance in the form of Portfolio Prioritization Plans, Building Decarbonization Assessments, and Decarbonization Master Plans designed to work together with MassCEC's Green School Works program and be part of the PAs' increased technical assistance for commercial customers.
- Implementation funding in the form of an enhanced incentive for energy efficiency and electrification of school buildings that takes into account the particular budget constraints faced by school districts and municipalities.
- Staff Training and Teacher Curriculum, including both targeted training for facilities staff on building codes and decarbonization technologies for their school buildings as well as the integration of Mass Save K-12 education teacher training and student workshops that can maximize the opportunity for schools to integrate clean energy into learning outcomes and educational offerings while engaging in building upgrades.

The PA approach to school decarbonization acknowledges the array of, sometimes overlapping, funding available for schools from different state entities and sources. Alongside the leadership efforts of DOER, the PAs are collaborating with a cross-agency working group that also includes the Climate Office, the MSBA, and MassCEC, to align the various program priorities and offers, participation requirements, application processes and other logistics to provide municipalities and school districts with a clear and more streamlined experience for accessing this much-needed decarbonization support.

- **Community Partnership Enhancements:** The 2025-2027 Plan significantly strengthens our commitment to working with community partners by deepening our efforts to provide multilingual, culturally sensitive outreach and engagement. This approach is crucial in raising awareness and participation in energy efficiency programs, particularly in designated equity communities with substantial populations of low- and moderate-income customers, renters, and LOTE customers. In response to the recommendations from the EWG, we are increasing both the budget and flexibility for CFPs. This will enable CFPs to tailor their outreach strategies more effectively, retain skilled staff, and design marketing initiatives that resonate deeply with their residents. We recognize the unique knowledge that these community-based organizations and municipalities possess and are committed to empowering them further by enhancing data sharing between vendors and communities, supporting more targeted outreach, and driving a significant increase in participation among underserved groups. These initiatives bolster support for CFPs and are integral to our commitment to distributive justice, ensuring that all communities have the opportunity to participate fully in the energy efficient future that we are co-creating. This enhanced partnership model not only acknowledges the importance of local expertise but is also critical to delivering on the broader principles of distributive justice by ensuring that the benefits of energy efficiency are more equitably distributed, particularly among those who have historically been underserved. The 2025-2027 Plan’s equity initiatives, informed by the Equity Working Group, represent a concerted effort to address both new challenges and ongoing needs.

- **Equitable Workforce Development:** The Plan doubles annual funding to MassCEC from \$12 million to \$24 million to support workforce diversity, including training for contractors and job seekers who speak languages other than English and creation of a “contractor development pathway” to provide business development support for Minority- and Women-owned Business Enterprises (“M/WBEs”). Additionally, the PAs are also committed to reviewing background check requirements and addressing opportunities for returning citizens to work in the programs while appropriately protecting the safety and security of participants. To that end, the PAs will:
 - meet with workforce advocates, including Browning the Green Space and Action for Equity, as well as the Office of the Attorney General and the Department of Energy Resources, in order to solicit input, suggestions, and ideas; and
 - develop a common set of principles for addressing opportunities for returning citizens on or before January 2026. These principles will be guided by applicable legal requirements and guidance from jurisdictional authorities, as well as the PAs’ own policies and procedures. The PAs will publish these principles on or before January 2026.⁹

⁹ As a part of this effort, the PAs will consider examples of common fact patterns provided in legal guidance and how they may address them. Each PA is ultimately responsible for making its own decisions regarding individual applicants—consistent with its corporate policies, the principles noted above and the law, and its own internal review and determination based upon the matter specific facts. Each PA’s decision will also take into account the context of the specific situation and business interest. For example, what was the nature of the conviction, what is the position being applied for, and does it entail unsupervised customer contact, etc.?

- **Increasing Supplier Diversity:** The PAs are strongly committed to increasing supplier diversity and have been working across the energy efficiency and global supplier diversity teams to identify all of the ways that we can achieve this mutual goal. As a new effort and informed by the Council’s recommendations, the PAs will set an aspirational benchmark¹⁰ using 15% of dollar volume of direct Mass Save contracts to diverse suppliers for the 2025-2027 Term. To achieve enhanced supplier diversity, we will work diligently to build the pipeline of diverse suppliers, support them in responding to requests for proposals (“RFPs”), and enhance our tracking so that we can measure progress towards this benchmark. These efforts will include establishment of the following set of key performance indicators to be reported on annually, as part of our Q4 reports:
 - The total amount of dollars spent on direct contracts with Mass Save and the subset of these dollars spent on diverse suppliers, with detailed breakouts by diverse supplier type (including MBEs, WBEs, Disadvantaged Business Enterprises, LGBTQ+ Business Enterprises, and Veteran-owned Business Enterprises). Diverse supplier spend will be based on both prime and subcontractor spending. The 15% aspirational benchmark will be clearly noted as part of the reporting;
 - The total number and percent of diverse suppliers directly invited to participate in statewide RFPs, with detailed breakouts by the same diverse supplier types; and
 - The total number and percent of diverse suppliers that respond to these RFPs, with detailed breakouts by the same diverse supplier types.

Separately, the PAs will also survey our contractor community on a regular basis to identify which of them are diverse and we will make this information publicly available on the Mass Save website for interested customers.

Additionally, we are committing to increase diverse supplier participation through the following initiatives:

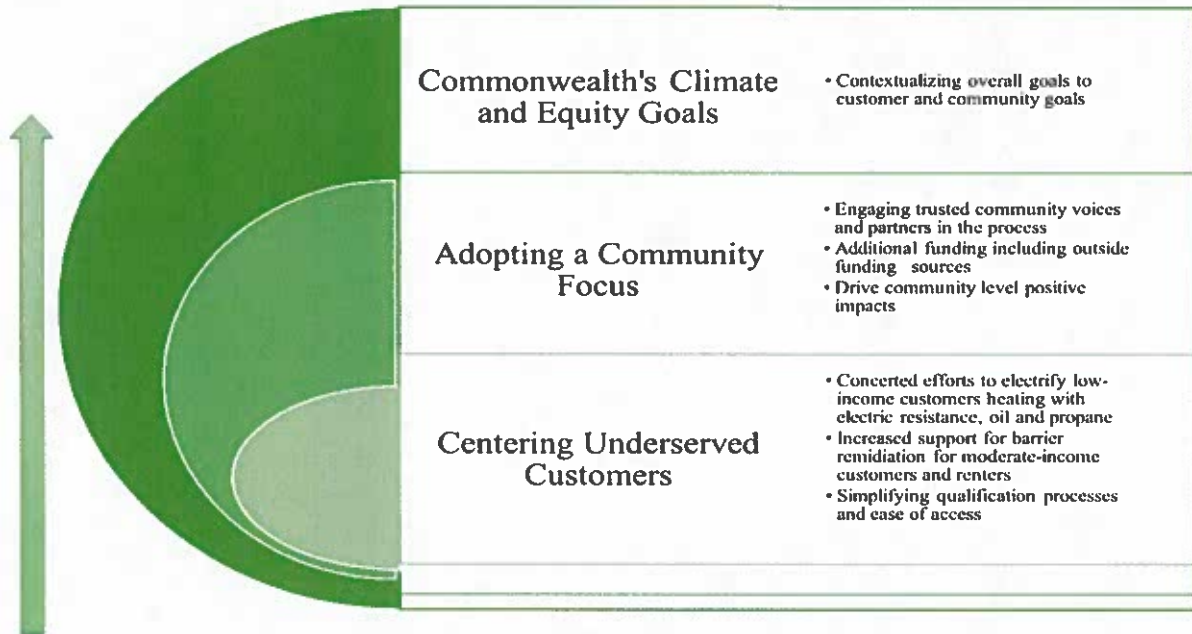
- Providing greater advance notice of opportunities by posting them on the MA Goods and Services website, [MassSave.com](https://www.mass.gov/info-details/mass-save), and with diverse supplier organizations, such as BECMA, and reaching out proactively to directly invite diverse suppliers to respond to specific RFPs;
- Reaching out and educating diverse suppliers on opportunities to work with Mass Save through annual Supplier Diversity Summits;
- Facilitating quarterly and RFP-specific matchmaking opportunities to connect diverse suppliers with lead vendors;
- In some cases, individual PAs are asking vendors to voluntarily provide a percent that they can commit to spend on diverse subcontractors. Where those vendors are selected, those voluntary commitments will become part of the terms and conditions on the contract with that vendor that the PA is able to track against;

¹⁰ The PAs will not use the benchmark as a means to preference or disadvantage certain suppliers based on race, gender, or sexuality in our individual procurement decisions. The benchmark is aspirational and expressly does not require a certain percentage of spending or quota be spent on diverse suppliers.

- Working closely with MassCEC, with its greatly expanded workforce diversity budget, to establish a contractor development pathway to provide a pipeline of skilled diverse workers; and
 - Providing support to diverse suppliers and creating and funding a diverse vendor network to help coordinate upcoming RFP opportunities and share best practices among diverse suppliers.
- **Operationalizing Language Access:** The Plan provides enhanced support for LOTE customers by improving language access throughout the customer journey, including material translations, interpreter services, and multilingual staff. The PAs worked with their vendors to develop language access strategies for residential and small business programs in the five most commonly spoken languages in Massachusetts other than English, including Spanish, Portuguese, Mandarin, Cantonese, and Haitian Creole. These materials were released in draft in June and for certain documents, such as the technical glossary, also include simplified English. The PAs have committed to implementing the recommendations and are working to operationalize them within the programs. CFPs will also provide additional language support in communities where other languages are spoken. As part of these efforts, the LEAN Statewide Client Services Center and the Mass Save Statewide Contact Center will be positioned to comprehensively serve LOTE customers.
 - **Data-Driven Approaches:** The plan includes improved data collection and reporting to better target investments and assess the effectiveness of energy efficiency programs in underserved communities and for underserved customer groups across different building types. Each of the equity-related targets in the Plan, such as the number of heat pumps targeted to low- and moderate-income customers and the aspirational benchmark to spend 15% of dollar volume of direct Mass Save contracts with diverse suppliers, were developed based on significant feedback from the EEAC, EWG, and stakeholders. These targets are fully funded in the revised Plan and are supported with underlying implementation strategies designed to meet and hopefully exceed the established goals. The PAs also worked with DOER, the EWG, and stakeholders to develop metrics that will be used to report performance against those targets and at a high level of granularity across communities, customer groups and building types.¹¹ The metrics also include indicators necessary to understand potential barriers to performance. Each of these metrics is also supported by reporting pipelines, primarily through the Benefit-Cost models, which will ensure timely and accurate reporting on performance. Further details on equity metrics and reporting are included below in the Cross-Cutting section.
 - **Enhanced Customer Experience:** The plan includes establishment of a new Mass Save Statewide Contact Center, in addition to the LEAN Statewide Client Services Center, to provide holistic, multilingual support for all customers, ensuring they receive the guidance and

¹¹ Equity metrics were presented and discussed at the March, April, and August EWG meetings and a nearly complete list of operational metrics were included in the April draft and presented at the April and June EEAC meetings.

information needed to participate in energy efficiency and decarbonization programs effectively.



A bottom-up approach to decarbonization through an equity lens

TABLE 2: EQUITY INVESTMENT	<u>April Draft</u>	<u>August Draft</u>
Total Equity Investment	\$1.4 Billion	\$1.73 Billion
--Low- and Moderate-Income Incentives	\$919 Million	\$1.3 Billion
--Renter Incentives*	\$479 Million	\$615 Million
--Small Business Turnkey Incentives	\$83 Million	\$95 Million
--Community Engagement	\$18 Million	\$20 Million
--Language access	\$30 Million	\$24 Million
--Workforce Development	\$77 Million	\$94 Million
--Program Support (includes low-income and small business turnkey support)	\$214 Million	\$237 Million

*Note. Renter incentive include incentives to low-, moderate- and non-income qualified renter households and therefore there is overlap between the LMI incentives and the renter incentives noted above.

** All numbers provided in this August 15 response remain subject to quality assurance review and corrections. Definitive, final numbers will be provided in the October 31, 2024 filing of the final Plan.

The equity investments in the 2025-2027 Plan reflect new approaches informed by the EWG, such as significant investments for renters in designated equity communities, as well as continued and increased support for existing programs, such as the Community First Partnership. They are also indicative of a broader and meaningful commitment to principles of distributive justice and equity.

IV. Cost control strategies

Given the increased cost of the programs, the Department directed the PAs to identify additional strategies to control costs for the 2025-2027 term.¹² The PAs have worked closely with DOER, the AGO, the Council consultants, and the EEAC to identify and commit to the following additional strategies for controlling costs, while ensuring that program resources are prioritized for our most vulnerable customers. These strategies, which are described in further detail in the Residential and Low-Income section below, include:

- Declining heat pump incentives for non-income qualified customers over the course of the term;
- Significant reductions to the HEAT loan offering through establishment of a \$25,000 cap on the loan amount, efforts to seek a 1.5% reduction in the interest rate buydown paid to lenders, and establishment of shorter repayment terms for customers at higher income levels;
- Creation of a turnkey heat pump and barrier remediation delivery model, starting with moderate income customers and renters in designated equity communities, which includes managed pricing;
- Support for greater price transparency for heat pump installation jobs through the creation of an enhanced heat pump calculator;
- Establishment of an outside funding working group with DOER, the AGO, and other stakeholders to continue pursuing additional sources of funding for the programs and program participants; and
- Continuation of the PAs' existing efforts, including collaboration and sharing of resources, use of competitive procurements, and rigorous quality control and inspection efforts.

V. Residential and Low-Income Sectors

The Residential and Low-Income sector programs drive energy efficiency and electrification improvements for new and existing homes across Massachusetts. In the 2025-2027 term, the PAs and their partner CAPs aim to weatherize approximately 174,900 homes, including over 66,100 low- and moderate-income households and 46,700 rental units, and support the installation of heat pumps in over 115,100 households, including more than 22,200 low- and moderate-income households and 12,900 rental units.

The PAs and their partner CAPs will aim to drive greater adoption of residential and low-income decarbonization measures and simplify the customer experience through four key enhancements: (1) expanding residential Home Energy Assessments to include decarbonization opportunities, (2) providing seamless customer experiences by expanding turnkey installations to include facilitation of barrier mitigation and heat pump installations, (3) a commitment to key customer segments including moderate-income customers and renters, and (4) expanding the capacity of the workforce serving low-income customers and other efforts to improve efficiencies in the low-income sector. These enhancements will be delivered through a suite of services that enable customer access and

¹² Fitchburg Gas and Electric Light Company d/b/a Unitil, D.P.U. 24-47-A, 15 (2024).

allow them to participate on their terms. The remainder of this section highlights notable changes from the April Draft designed to control costs and shift resources to underserved customer groups and put in place the capacity necessary to meet the ambitious goals established for the low-income sector.

A. Residential Cost Control Measures

HEAT Loan Considerations

The HEAT Loan has been a key component in the success of the PAs' energy efficiency plans. Customers consistently identify the HEAT Loan as a reason why they installed measures and affirm that the HEAT Loan enabled them to make more improvements than they would have without the loan.¹³ Recognizing the importance of the HEAT Loan, but also the desire to reduce costs associated with the HEAT Loan and allocate additional budget to equity priorities, the PAs have proposed a number of changes to the HEAT Loan for the upcoming term. At the highest level, the PAs have reduced the overall three-year budget for the HEAT Loan to \$190 million. The PAs will continue to offer a 7-year repayment term at 0% interest for households earning from 81% up to 135% of state median income ("SMI").¹⁴ Customer households earning 135% up to 300% of SMI and those earning above 300% of SMI will be eligible for 5-year and 3-year loan terms respectively at 0% interest rate. There will also be a cap of \$25,000 per loan.

In an effort to keep HEAT Loan costs down, the PAs will also undertake cost saving efforts such as cross promoting other financing opportunities with the MA Climate Bank in order to reduce the number of HEAT Loans. The PAs will also explore opportunities to negotiate an interest rate reduction with lenders relative to current levels and consider the potential for establishing risk mitigation mechanisms (including, but not limited to, a loan loss reserve) to help support such reductions. Further, the PAs will also establish a stakeholder working group, which includes the AGO, DOER, and the Council Consultant team, to explore options for bringing down HEAT loan costs, including the potential for accessing outside capital. Finally, the PAs have committed to completing a HEAT Loan Study to evaluate the importance of the HEAT loan in driving uptake of improvements and the sensitivity of those decisions to customers of different income levels at different interest rates, with a goal of determining whether the PAs can make further modifications to the HEAT loan that will reduce costs without impacting the effectiveness of this vital program.

Heat Pump Incentives

In response to EEAC feedback and the need to further control program costs, the PAs incorporated several changes to the design of heat pump incentives for the 2025-2027 Plan. First, the PAs have adopted a declining incentive structure for heat pump incentives over the term, recognizing that as heat pumps become a more mainstream technology it should not be necessary to provide incentives at the current levels in order to foster consumer adoption. These declining reductions will help control costs and free up budget for other equity-related Plan priorities. Second, the PAs designed a multi-tier incentive structure in order to better accommodate customers in different places on

¹³ See HEAT Loan Assessment (RES 37), Table 2, at 9 (available at [MA-RES-37-HEAT-Loan-Evaluation-Report_FINAL_01AUG2018.pdf](#) (ma-eeac.org)). For further background on the HEAT Loan and how it operates, please see Section 3.4.5 of the April Draft.

¹⁴ Note: this bracket roughly aligns with income requirements for energy saver loan offered by MA climate bank.

their heat pump journey and to encourage all customers to install a heat pump regardless of their situation. Third, as part of the multi-tier incentive structure, the PAs have introduced incentives for heat pump scenarios that were not previously addressed, including providing incentives to replace central air conditioning units and inefficient heat pumps with more efficient models and providing incentives to install heat pumps in previously unconditioned spaces. Lastly, the PAs designed incentives to encourage sizing and installation of heat pumps that can support full heating load, even for customers who are not yet ready to disconnect their fossil fuel system.

Since the April draft, the PAs have also decided to continue offering incentives on a per-ton basis for partial home displacements in order to minimize disruption to the market. This offer also aligns with how the C&I heat pump incentives are structured. The calculation of partial home incentives will be based on cooling tons. This is being done to minimize confusion for customers that might be doing their own research, as system sizes are often shown in terms of tons of cooling capacity. Another potential point of confusion is that Air-Conditioning, Heating and Refrigeration Institute (“AHRI”) ratings may provide three different heating capacities for the same unit. Using cooling tons as the basis for calculating the incentive minimizes these potential points of confusion. See Table 3 below for further details on revised heat pump incentives.

The PAs have also decided not to impose a requirement that customers weatherize as a prerequisite to receive a partial home heat pump incentive. Requiring weatherization in order to be eligible for a partial home heat pump rebate may constitute a significant barrier to participation. However, the PAs want to continue to actively encourage the installation of weatherization in combination with heat pumps. To that end, the PAs are proposing a \$500 customer bonus for customers who weatherize prior to or within 6 months of a partial home heat pump installation. The PAs also plan to offer differentiated marketing for contractors based on certain capabilities, including those who are able to offer both weatherization and heat pump installations.

Table 3: Overview of Residential Heat Pump Incentives (2025-2027 Plan Term)

Offer name	Scenario	Offer		
		2025	2026	2027
Tier 1 ASHP: Base Heat Pump Rebate	Previously unconditioned space, heat pump, or central AC replacement	\$250/ton	\$250/ton	\$250/ton
Tier 2 ASHP: Hybrid Heat Pump Rebate	Partial displacement with Wx bonus and full heating load bonus (no disconnection required)	\$1,250/ton \$500 wx bonus \$500 full heating load bonus	\$1,125/ton \$500 wx bonus \$500 full heating load bonus	\$1,000/ton \$500 wx bonus \$500 full heating load bonus
Tier 3 ASHP: Whole Home Rebate	Whole home w/disconnection requirement (also includes air-to-water heat pumps)	\$3,000/ton up to \$10,000	\$2,700/ton up to \$9,000	\$2,500/ton up to \$8,000
Ground Source Heat Pump Rebate	Ground source heat pumps	\$15,000 Whole Home	\$13,500 Whole Home	\$12,000 Whole Home
		\$2,000/ton Partial	\$2,000/ton Partial	\$2,000/ton Partial

Transparency on Heat Pump Pricing

The PAs acknowledge the importance of creating heat pump pricing transparency, so customers are better informed when soliciting and reviewing heat pump installation quotes from Heat Pump Installer Network (“HPIN”) contractors. The PAs will support price transparency in two ways. First, the PAs will create a public facing, geographically based heat pump pricing guide using anonymized data from program participants. This guide is meant to be a reference for customers as they solicit and review heat pump bids from HPIN contractors, so they have visibility into the average installation costs in their area and can better ensure that they are receiving competitive pricing. Second, the PAs will be launching a quote comparison service through which customers will have access to specialists who will walk them through each bid they have received, so they are more educated when it comes time to decide which quote and HPIN contractor is the best fit for them.

Residential Turnkey Delivery Model

The Residential Turnkey Solutions (“RTS”) initiative will expand its turnkey delivery model to address pre-weatherization and electrification barriers and to support heat pump installation, starting first with moderate-income customers. Building off the existing model for weatherization, turnkey delivery will simplify and streamline the customer experience by supporting customers from project origination to completion with a single vendor managing the multiple steps and subcontractors throughout the process. The turnkey delivery model provides a high level of quality assurance from the design phase through installation and post-work inspection—ensuring that installations perform well and customers are satisfied with the process and outcomes. The turnkey delivery approach also allows the PAs to provide instant incentives to the customer, reducing or eliminating out-of-pocket costs and potential incentive fulfillment delays. Finally, turnkey delivery will allow the PAs to control costs for these installations through the development of a PA- and vendor-managed pricing structure. Under this pathway, the lead vendor will collect bids from its network of subcontractors for each portion of the scope. The lead vendor will award work based on factors including equipment selection, technical capabilities, work quality, quoted cost, and LOTE proficiency. This approach will ensure high-quality installations, equitable access for customers, and competitive pricing.

B. Measures to Further Scale Low-Income Sector Operations

Expansion of Low-Income Sector Workforce Capacity

A core theme of the 2025-2027 Plan is to increase low-income customer participation in the Mass Save programs and therefore, it will be crucial to expand the workforce capable of serving low-income households. In order to achieve greater low-income participation, high degrees of customer satisfaction, and ensure that customers are served in a timely manner, low-income lead vendors, ABCD and Action and local CAPs, have deployed several strategies to increase program capacity to serve more customers. Local CAPs are adding capacity through additional staffing to meet customer demand. ABCD and Action will continue to leverage the capabilities and resources of more HPCs to provide low-income services. Additionally, ABCD and Action are finalizing contracts with market rate vendors so that they can also provide services in the low-income program. For example, market rate vendors are being brought on to support QA/QC of projects delivered by other vendors, as well as delivery of energy efficiency and electrification improvements in mixed-income buildings. This strategy was developed so that vendors already

operating in and familiar with the Mass Save programs could be trained to also provide low-income services; thus reducing or eliminating the need for handoffs and referrals, which can negatively impact the customer experience and delay implementation timelines. The PAs, ABCD, and Action believe that this will allow the low-income programs to meet customers at all points of entry into the Mass Save offerings and also help address prior challenges associated with mixed income properties by enabling one vendor to serve a property with mixed income levels. Utilizing the existing workforce will also help to add the level of near-term capacity necessary to achieve the ambitious year-over-year production goal growth.

Review Low-Income Sector Workflow to Achieve Efficiencies and Manage Workflows

The increase in Low Income Sector production goals, and the subsequent expansion of the delivery network necessary to achieve them, introduce new challenges to the operational efficiency, workflow management, and data availability standards of the programs. The integration of new and existing sources of federal funding (and the additional requirements those funding sources introduce) intensify these challenges. The PAs, Action and ABCD are pursuing several efforts to achieve efficiencies and better manage workflows. First, the PAs, ABCD and Action are committed to better leveraging existing technologies, such as Monday.com, to boost operational efficiency and inter-agency communications, and provide greater transparency around program trends and progress before production is reported. Monday.com is a statewide digital workflow management platform used by all implementing agencies (CAP agencies, Home Performance Contractors, RTS vendors) to input, manage, and report projects or project referrals. As part of these efforts, the PAs, ABCD and Action are working to utilize new features and establish new reporting requirements within this platform to enhance visibility into the pipeline and timing of various projects before production is reported. These new reporting requirements respond to recent in-the-field experience with surges in invoices from low-income contractors. Second, ABCD and Action are contracting with RTS lead vendors to increase collective program delivery capacity and reduce bottlenecks, initially in QA/QC, with designs to expand the range of services as needed to meet demand. Third, the PAs, ABCD, and Action are also exploring field tool technologies that can satisfy the reporting requirements of both Mass Save and federal funding sources and allow for greater digital integration with Monday.com. These efforts, once completed, will greatly reduce the administrative burden of switching between tools or duplicating data entry at the implementing agency level.

Increase Planned Weatherization for Low-Income Customers by 5% per Year; Market Rate Weatherization Concerns

The increase in the planned number of heat pumps installed at low- and moderate-income homes has driven a corresponding increase in the number of weatherization jobs. Combining weatherization and heat pumps ensures that heat pumps are right-sized, and that customers' residences are as energy efficient as possible. Because the number of planned low- and moderate-income heat pump installations has increased by more than 5% per year, so too has the number of associated weatherization jobs.

The PAs do not believe it will be practical to increase market rate weatherization jobs by more than 5% per year due to a number of issues. In an effort to devote as much funding as possible to equity commitments, the PAs will need to prioritize those market rate opportunities with the highest impact and savings opportunities. Recent EM&V studies have shown that many market

rate jobs are not necessarily high impact and/or do not have high savings potential. In response to these evaluation studies, the PAs are considering programmatic changes that would reduce the number of low-impact jobs. Some options under consideration include pre-screening prior to audits to determine whether the job has high savings potential and changing program qualification criteria so that program resources are focused on the most inefficient homes. The net impact of these constraints and changes is that fewer market rate weatherization jobs are likely to be completed in the 2025-2027 timeframe compared to the 2022-2024 term.

VI. Commercial and Industrial Sector

Electrification is central to the PAs' delivery of services to C&I customers for the 2025-2027 term. Strategies for the next term will include ensuring energy assessments explore both energy efficiency and electrification measures, as well as anticipated steps needed for full electrification. The PAs will actively promote energy recovery measures, including those installed in conjunction with dedicated outdoor air systems, and weatherization. The New Construction pathway will require all-electric buildings and there will be new prescriptive heat pump measures, such as rooftop units. The PAs aim to engage as many gas customers as possible, including those not yet in a position to electrify in the near term. The PAs will encourage full electrification where feasible but will also support those customers where partial electrification is the more attainable short-term strategy. While these strategies are outlined in various sections of the April Draft Plan, the PAs are adding details and combining them into a single electrification overview for the C&I segment. More details regarding electrification and efficiency strategies enhanced or developed since the April Draft are discussed below.

Electrification and Energy Efficiency Assessments

A central strategy for electrification includes ensuring energy assessments explore both energy efficiency and electrification measures. The Comprehensive Building Assessment ("CBA") will be the building block of this approach, which establishes a standardized process and set of requirements for exploring both efficiency and electrification measures, as well as anticipated steps needed for full electrification. New technical assistance ("TA") studies will be introduced that are oriented toward decarbonizing entire building portfolios. The Portfolio Prioritization Plan will rely on a light-touch version of the CBA that helps customers identify buildings and systems with the most attractive near-term decarbonization opportunities. The PAs will also introduce a more in-depth Decarbonization Roadmap offering, which provides assistance for customers ready to invest in fully decarbonizing their portfolios, especially those working to comply with BERDO¹⁵ and BEUDO.¹⁶ These Decarbonization Roadmaps will also include an option to study geothermal network potential.¹⁷ The PAs will also develop customer-facing information to enable them to

¹⁵ Building Emissions Reduction and Disclosure, City of Boston Code, Ordinances, Chapter VII, § 7-2.2

¹⁶ Building Energy Use Disclosure Ordinance, City of Cambridge, Ordinance No. 2021-26.

¹⁷ Geothermal networks can be supported through the energy efficiency programs if they are owned by customers or third-party vendors and comply with all program rules. Utility-owned networks are supported through other non-energy efficiency programs led by the utilities.

easily understand ventilation deficiencies, the benefits of code compliant ventilation and the costs likely associated with increased ventilation levels.¹⁸ The PAs will make this information non-technical and graphic in nature. The PAs will improve tracking of a customer's progress on electrification studies through standardized study templates and enhancements to internal PA tracking systems. Additionally, the PAs have agreed to store results of decarbonization studies of large customers in a database, as well as limited structured data on opportunities identified. This will be a static database to share studies among PAs and the customers for whom the studies were completed.

Market Pull Towards Comprehensive Approach

The intent for C&I sector is to create market pull towards a comprehensive approach for energy use in commercial buildings, which includes heat pumps, control systems, ventilation, and weatherization. The Deep Energy Retrofit offering is designed to achieve this for large C&I customers. The CBA will be the standard for large C&I customers and is designed to identify a comprehensive suite of measures. Small Business Turnkey vendors complete a comprehensive assessment for smaller customers. The PAs recently solicited Turnkey vendors equipped to deliver this broader portfolio of measures and will complete a procurement for a deeper bench of TA vendors to provide these services to large C&I customers by the end of 2024.

Promoting Full Conversion Electrification in C&I

The C&I sector is comprised of a very diverse group of building types, each with unique challenges and opportunities. Across this entire segment, the PAs will promote full conversions where it is technically feasible. To help increase customer demand and understanding of these technologies, the PAs will leverage the new technical assistance offerings described above, to help customers feel comfortable with the steps needed to fully convert from fossil fuel systems over the long term, while being transparent about project economics, which often have limited or negative lifetime cost savings.

Standard Packages for C&I Electrification

The PAs offer a host of standard measures via the prescriptive pathways. These prescriptive measures offer standard specifications for equipment enabling streamlined project delivery. Equipment incentivized ranges from air-source heat pumps to geothermal systems and associated control systems, and weatherization. The PAs continually explore opportunities to expand the menu of equipment supported and are currently exploring opportunities to include prescriptive or custom express offerings for heat recovery equipment (to reduce energy use from heating equipment) and air-to-water heat pumps. The PAs will leverage Comprehensive Building Assessments to help customers identify packages of measures that could be implemented at their facilities. The PAs will also lead a "Cash for Clunkers" style marketing campaign to encourage customers to replace old, inefficient, and unreliable heating systems running on oil or propane with heat pumps.

Existing Building Commissioning ("EBCx")

The PAs engaged a consultant to help craft and launch a revised EBCx offering that takes lessons learned from some of the leading programs in the nation. Initially, the PAs intend to concentrate

¹⁸ The PAs are also working with evaluation stakeholders to establish a framework to allow baseline energy use to reflect code compliant ventilation levels in buildings that are under ventilated prior to engagement.

heavily on HVAC and associated controls. The PAs' approach will include guidance on participation (documentation requirements, templates, M&V protocols, etc.) by end use. This approach will allow for clear and specific requirements for commissioning different systems, which customers or vendors could access to optimize one or more systems within a building. The PAs will continue to support other end uses like process loads via the custom pathway and develop greater structure, with increased guidance over time.

The PAs will use the common industry terms "Existing Building Commissioning" and "Monitoring Based Commissioning" to build market knowledge and understanding of the services. The PAs will develop a pool of prequalified EBCx providers and work with customers to identify the providers best suited to commission their facilities. The PAs intend to manage the pool of qualified service providers to ensure consistency and high-quality outcomes. Additionally, the PAs will assist customers in identifying their commissioning scope and facilitate the connections between customers and qualified EBCx providers. The PAs will also provide partial payment of EBCx study costs up-front, providing the remainder of the study funding upon implementation of a percentage of EBCx measures identified. This funding structure alleviates the risk that customers will undertake studies at no cost but then not implement the recommendations and realize the energy savings.

To further encourage implementation of recommendations, the PAs will ensure that the investigation report findings include sufficient information for the customer to provide a scope of work to an implementation vendor as well as the estimated costs for implementation. During implementation planning, customers will work with the qualified service providers and the PA project team to identify contractors appropriate for the project scope to ensure a smooth transition for project onboarding. The PAs will also ensure qualified service providers are available to follow up with the implementation contractor to minimize customer burden and maintain project momentum after the EBCx investigation phase. Finally, the PAs will ensure verification of any measures implemented.

The PAs are committed to launching the EBCx offer in 2025 and are likely to leverage a third-party vendor to help improve consistency and scale across the state. The Strategic Evaluation Plan has included EBCx as an area for embedded evaluation.

Municipal Lighting

As presented in the April Draft, only small business customers were eligible for lighting fixture incentives; for medium and large customers, including municipalities, the PAs would only incentivize and claim savings for lighting controls. However, in the revised Plan, the PAs will treat all municipal customers similarly to small business customers and allow them to continue receiving both non-controlled and controlled lighting incentives for their buildings. This change is being proposed in support of C&I Existing Buildings Enhancement #9 ("Support energy efficiency and electrification improvements in schools in equity communities") and to align with DOER Green Communities program design.

Municipal customers face unique challenges compared to other commercial building owners because they lack reserve funding for energy efficiency upgrades. Without PA incentives and additional grants, energy efficiency upgrades in municipal buildings often do not progress. Many

municipal customers still have outstanding lighting opportunities that can only be realized through a combination of PA incentives and DOER Green Communities funding.

The DOER Green Communities program bi-annual grantmaking process includes support for high-efficiency lighting in K-12 school buildings, for which municipalities must submit Mass Save Sponsors' incentive offer letters as part of their Green Communities' applications. Allowing incentives for fixtures for all municipal buildings will reduce confusion and align the lighting offering with the objectives of the DOER Green Communities program. Removing fixture incentives for municipal customers would burden any municipality that has applied for the DOER Green Communities Spring Block because Spring Block applications that include lighting would need to be revised or withdrawn.

VII. Cross Cutting Issues

Revised Performance Metrics and Reporting

The PAs worked in collaboration with DOER to provide the EWG, the Council, the public, and interested stakeholders with valuable and easy-to-understand information on the programs that help measure progress toward our Plan goals.¹⁹ While a significant volume and variety of data is currently published on regular intervals as noted in Section 5 of the April Draft, existing reporting can be difficult to interpret. Reformatting and refining the structure and interface for that information will better serve the Council, the public, and interested stakeholders, streamline data administration processes, and thus minimize the administrative costs of responding to *ad hoc* data requests as required by G.L. c. 25, §§ 19(a), (b).

During the 2025-2027 term, the PAs will publish the measure-level outputs of a subset of each PA's benefit-cost models on a quarterly basis and provide ZIP Code level production and incentives for major measures, including weatherization and heat pump installations, on a biannual basis. These granular datasets will enable stakeholders the flexibility to conduct a variety of analyses.

Further, the PAs will provide summary tables, primarily derived from the above-mentioned data, for frequently requested operational metrics. Progress on each of the metrics will be reported against the plan targets or a baseline, as appropriate. In addition, the PAs will report extensive supplier diversity information as described in Section III above.

The operational metrics for the 25-27 Plan include:

- GHG reductions impacting 2030 compared with the EEA Secretary's goals.
- Weatherization and heat pump installations and incentives by income-qualification status, single-family/multifamily buildings, renter status, and specifically for heat pumps, the displaced fuel and full/partial displacements, both statewide and within the designated equity communities.

¹⁹ Equity metrics were discussed at the March, April, and August EWG meetings and a nearly complete list of operational metrics were included in the April draft and presented at the April and June EEAC meetings.

- The number of homes receiving weatherization recommendations with barriers, and the number of barrier mitigation jobs and incentives by income-qualification and renter status, both statewide and in the designated equity communities.
- Average conversion rate on weatherization recommendations and time-to-serve for Home Energy Assessments.
- Total spending in the designated equity communities, including incentives, technical assistance, and community funding, by income-qualification status and renter status for Residential sector programs and isolating small business weatherization investment for C&I sector programs.
- Community First Partnership communities and awards by partner organizations.
- Total number and spending on contracts directly between PAs and vendors, as well as the number and percentage of diverse suppliers who were directly informed of RFPs and who responded to RFPs.
- Total number of customers indicating preference for a language other than English at intake and, of those, how many ultimately receive HEAs and weatherization by their language of preference.
- Number of thermostats participating through market-rate and low-income offerings.
- ConnectedSolutions participants and savings by measure.
- C&I Custom electrification and non-electrification projects, energy savings, and GHG savings.
- C&I existing building commissioning and decarbonization planning study enrollments, completions, and resulting projects, grouped by small, medium, and large buildings by square footage.

A table outlining the reporting cadence and describing these metrics is provided in Appendix C.

The PAs have also worked with DOER to simplify quarterly reporting to make these updates more valuable and user friendly. Finally, the PAs will establish a working group with DOER and other key stakeholders to streamline and improve the accessibility of reported data on an ongoing basis.

Performance Incentives²⁰

The Program Administrators have worked with DOER, the AGO, and the EEAC consulting team extensively on structuring a Performance Incentive (“PI”) approach that is consistent with Department precedent and that is responsive to stakeholder goals for the 2025-2027 term, including a focus on achieving equitable outcomes. The PAs, DOER, and the AGO have agreed upon the following overall structure and pool for 2025-2027.

The structure of the PI mechanism will be very similar to the 2022-2024 PI mechanism, but with a greater emphasis on equity. There will be three components: equity, standard, and value. The equity component will be comprised of benefits flowing from measures in the following segments: low-²¹ and moderate-income customers, C&I turnkey, and renters (including C&I multi-family).

²⁰ The Compact, as a municipal aggregator, does not receive a performance incentive. See D.P.U. 08-50-A at 51.

²¹ While the PAs will, as needed, provide incentives for fossil fuel equipment within the low-income sector, those measures will not be included in equity PI, instead appearing in the standard component.

The standard component will include all benefits that are not included in equity, including electrification. Finally, as directed by the Department, the value component is calculated as total portfolio benefits less total program costs. Non-controllable costs, such as MassCEC's workforce development funding and other statutory assessments, will be excluded from this calculation of net benefits.

The total amount of PI available for the PAs to earn will be \$190 million. This statewide total will be allocated across all utility PAs and divided among the three components accordingly: 50 percent will be for the equity component, 30 percent will be for the standard component, and 20 percent will be for the value component, each with a specific payout rate.²² Each component will have an associated threshold that each PA will need to achieve before beginning to earn PI. The thresholds are calculated as a percentage of benefits planned for each component. For example, the threshold for equity is 65 percent. If a PA plans to have \$20 million in benefits that would fall within the equity component,²³ then to begin earning PI in the equity component, they will need to attain 65 percent of \$20 million in benefits, or \$13 million. The threshold for the value component is 75 percent and for the standard component is 60 percent.

The threshold for the standard component, however, is nuanced in that it is based on the entire portfolio of benefits, not just the benefits within the standard component. This, again, highlights the emphasis on equity within the PI mechanism. Including equity benefits in the standard component threshold ensures that the PAs continue pursuing equity benefits even if they are running behind on non-equity benefits because all benefits contribute to the total.

Finally, a PA will be limited to earning the planned amount of PI for each component unless the PA attains certain goals related to that component. Once a PA attains these goals, it will be able to earn more than the design-level PI as the delivered benefits surpass their planned amount. For example, using the scenario above with design level benefits for the equity component of \$25 million, that PA can only earn more than design level PI for equity if it has both exceeded the \$25 million in benefits (100 percent of design level benefits) and met the specific goals related to the equity component.

For the equity component, there are two goals that the PA needs to attain in order to earn more than 100 percent of design level PI (in addition to achieving greater than 100 percent of planned equity benefits): (1) its planned number of low- and moderate-income customers who received heat pumps;²⁴ and (2) its planned benefits delivered to renters. For the standard component, the goals each PA needs to achieve in order to earn more than 100 percent of planned PI (in addition to achieving greater than 100 percent of planned portfolio benefits) are: (1) achievement of the PA's planned C&I non-turnkey benefits; and (2) achievement of the PA's planned C&I turnkey benefits. For the value component, the goal each PA needs to achieve in order to earn more than 100 percent of planned PI (in addition to achieving greater than 100 percent of net benefits) is the PA's planned

²² Each of these amounts is referred to that PAs' design level PI.

²³ Under this scenario, the PA's planned \$25 million in benefits within the equity component is referred to as design level benefits for the equity component.

²⁴ The number of heat pumps is measured by housing units.

total non-incentive spend (excluding assessments) as a percentage of total planned portfolio benefits.

A summary of the agreed upon PI approach for 2025-2027 is as follows:

Total Pool: \$190,000,000

Component	Measures	% of Pool	Threshold %	Locks to exceed 100% of design PI (125% cap)
Equity	LMI, Renters (incl. C&I MF renters), C&I Turnkey, no FF	50%	65%	<ul style="list-style-type: none"> • LMI Heat Pumps • Renter Benefits
Standard	Non-Equity	30%	60% Portfolio-based	<ul style="list-style-type: none"> • Total (non-turnkey) C&I Benefits • C&I Turnkey Benefits
Value	Normal value component, excluding non-controllable assessment	20%	75%	<ul style="list-style-type: none"> • Total Non-Incentive Spend (Excluding assessments) / Total Benefits

Evaluation, Measurement, and Verification

Evaluation, Measurement, and Verification (“EM&V”) has been an integral component of the Mass Save programs since their inception. Massachusetts has invested heavily in EM&V research and is a leader in the country in terms of comprehensive, in-depth evaluation. Since the April Draft, there have been twenty-one completed EM&V studies across residential and income-eligible, C&I, special and cross-cutting, and demand response. Descriptions of each completed study are provided in Appendix D. In addition, there have been three important updates for EM&V since April: (1) the EEAC EM&V Policy memo; (2) an updated Strategic Evaluation Plan (“SEP”); and (3) refinement of the market transformation models.

- **EEAC EM&V Policy Memorandum:** Since the enactment of the Green Communities Act²⁵ establishing the framework for the delivery of energy efficiency programs for the benefit of the Commonwealth, several legislative amendments have transformed the vision for energy

²⁵ G.L. c. 25, s. 19, 21 and 22.

efficiency programs to focus on equitable delivery of all cost-effective energy efficiency and to achieve greenhouse gas emissions reduction in compliance with the emission-reduction targets set by the Secretary of Energy and Environmental Affairs. Given these recently enacted laws and the precedent that the PAs have established in leading the nation in well-designed and effective energy efficiency programs, there are great expectations for balanced, equitable, cost-effective, bold, and innovative statewide electric and natural gas, and individual PA efficiency investment plans for the 2025-2027 term.

It is critical, however, that the energy efficiency programs be evaluated, measured, and verified in a way that enables the PAs to clearly report those savings to the public at large and to the Department. There is a need to ensure the independence and objectivity, both real and perceived, of evaluation activities, as well as ensure consistency, timeliness, and credibility of the results.

To that end, the EEAC adopted a revised EM&V Policy Memorandum during its regular meeting on July 17, 2024, that articulates “climate forward” EM&V principles and policies to guide the development of the 2025-2027 SEP and application of EM&V study results, as well as considerations for the work of the Evaluation Management Committee. A complete copy of the EM&V Policy Memorandum is provided in Appendix E.

- **Strategic Evaluation Plan:** As part of the statewide planning process, the Evaluation Management Committee (“EMC”) reflects on lessons learned from past research, seeks input from stakeholders, and identifies research priorities for the coming term. The Strategic Evaluation Plan (“SEP”) summarizes these findings and will guide EM&V activities for the next three years in alignment with the objectives of the Plan. This updated version has some noticeable differences, the most significant change being that this version includes summaries of memorandums on how EM&V practices might evolve in response to EEAC’s EM&V Policy Memorandum. These memorandums detail the policy directive, current EM&V practices, and the consideration and final resolution of the working groups were developed regarding:
 - Attribution;
 - Stipulated Baselines; and
 - Protocols for Market-Driven vs. Program Driven Renovations and Infrastructure Investments.

In addition, this version of the SEP groups all lessons learned and research priorities into their own distinct sections rather than designating them by research area. Finally, there are over twenty Stage I plans for studies that are anticipated to start in early 2025. It is not a comprehensive list of all the work that will be conducted during the 2025-2027 term, however, in order to maintain flexibility with respect to changing priorities. The updated SEP is provided in Appendix F.

- **Market Transformation Models:** The robust EM&V framework has supported the development and continuous improvement of cost-effective energy efficiency programs as they adapted to changing markets. A strategy of the 2025-2027 Plan is to initiate an explicit market transformation goal for certain portions of the programs; that is, areas where the PAs believe that their efforts will lead to long-term, permanent changes in the adoption of an efficiency

measure. These identified areas include Non-Residential New Construction, Residential Multifamily New Construction, 1-4 Unit New Construction, Residential Renovations and Additions, and electrification of residential heating equipment. The PAs also continue to work on finding additional areas appropriate for this type of work.

An initial step to effectuating, demonstrating, and evaluating market transformation is the creation of market transformation logic models. The PAs are committed to refining the existing market transformation logic models to reflect current understanding of the heat pump market. Refining and updating the logic models in a thoughtful and deliberate way can be a time intensive process. It may not be possible to have the logic models fully updated for the September Draft. As an interim step, the PAs have worked with the Council consultants to review the objectives, barriers, strategies, and expected actions to be taken in relation to heat pump market transformation activities.

The heat pump logic models will be updated to reflect the PAs' approach to transform the heat pump market by addressing lack of customer awareness and confidence, lack of market actor experience, high first cost of heat pumps and associated home upgrades, high operating costs, and the difficulty of electrifying when multiple trades are required. The logic models will also reflect the PAs' plans to address the previously listed barriers through a series of strategies and corresponding actions such as increasing the availability of contractor training opportunities around heat pumps, engaging with manufacturers/ distributors, supporting code changes to require heat pumps in place of central air conditioners, offering incentives and loans for all required work for heat pump installations, offering comprehensive decarbonization audits, providing tools to customers to evaluate system costs and better understand heat pumps, and providing turnkey project assistance. The logic models will be updated and refined to reflect these changes as soon as practicable.

Embodied Carbon; Innovative New Approaches

Since the April draft was filed, the PAs have been researching and seeking market input on program options for supporting embodied carbon reductions across both C&I New Construction and Residential New Construction. The PAs' overall goal is to influence customer and design team/builder project decisions while dovetailing proposed program support with existing standards and tools (*i.e.*, LEED, RESNET) and local policy direction, and at the same time weighing reliable ways to establish baselines and ease of participation. For commercial new construction/major renovation and multi-family high rise, the PAs propose a materials-based approach to embodied carbon reduction that focuses on encouraging project teams to select lower global warming potential products within the highest-impact material categories and would offer customers incentives on a \$/kgCO₂e reduction basis. The PAs are considering incentive adders for customers who also conduct Whole Building Life-Cycle Assessments ("WBLCAs") to address embodied carbon and/or who reuse a certain percentage of materials in major renovations. For single family (1-4 unit) properties, the PAs are supporting an effort led by MassCEC and the Northeast HERS Alliance to establish an embodied carbon baseline for Massachusetts. Once established, the PAs' will utilize RESNET standard 1550 to target incentives based on percent reductions of embodied carbon from the established baseline.

VIII. Conclusion

This submission marks the latest iteration of the most ambitious three-year energy efficiency and decarbonization plan proposed to date. The revised Plan provides unprecedented levels of investment in, and support for, achieving environmental, equity, economic, and job creating benefits for residents, businesses, communities, and institutions in the Commonwealth. We are grateful to the EEAC, DOER, EWG, the AGO, and every stakeholder who collaborated and contributed feedback on the April Draft Plan. We look forward to providing a revised Plan with tables on September 25, 2024, incorporating these updates.

Appendices

Appendix A – Spreadsheet template with PA responses to all EEAC recommendations and resolution items

Appendix B – Statewide Summary Data Tables

Appendix C – Proposed Operational Metrics for 2025-2027 Plan

Appendix D – EM&V Studies completed since April Draft Plan

Appendix E – EEAC EM&V Policy Memo

Appendix F – Strategic Evaluation Plan

Appendix A

Attachment: Spreadsheet template with PA responses to all EEAC recommendations and resolution items

Appendix B
Statewide Summary Data Tables

**Statewide Adjusted Net Lifetime Savings All Fuels (MMBtu),
excluding active demand response programs**

	2025	2026	2027	2025-2027
Residential	29,125,274	31,958,036	36,582,072	97,665,382
Low Income	11,212,001	11,881,934	12,924,243	36,018,179
Commercial & Industrial	15,740,829	17,138,148	16,520,333	49,399,311
Total	56,078,105	60,978,118	66,026,649	183,082,871

Statewide Benefits (\$)

	2025	2026	2027	2025-2027
Residential	\$1,843,160,292	\$2,001,076,069	\$2,304,814,977	\$6,149,051,338
Low Income	\$827,664,061	\$870,063,507	\$939,848,703	\$2,637,576,272
Commercial & Industrial	\$1,213,560,605	\$1,304,900,207	\$1,247,443,526	\$3,765,904,337
Total	\$3,884,384,958	\$4,176,039,783	\$4,492,107,206	\$12,552,531,947

Statewide Budgets (\$)

	2025	2026	2027	2025-2027
Residential	\$833,486,955	\$889,590,448	\$1,000,345,930	\$2,723,423,333
Low Income	\$348,027,622	\$383,572,647	\$439,029,955	\$1,170,630,224
Commercial & Industrial	\$334,744,569	\$378,747,592	\$381,725,761	\$1,095,217,922
Total	\$1,516,259,146	\$1,651,910,687	\$1,821,101,646	\$4,989,271,480

Statewide GHG Emissions Reductions (C02e)

	2025	2026	2027	2025-2027
Residential	186,491	207,120	242,744	636,355
Low Income	49,351	53,477	59,650	162,477
Commercial & Industrial	68,930	76,445	78,211	223,587
Total	304,772	337,043	380,604	1,022,419

Statewide Renter Incentives (\$)

	2025-2027
Market Rate Residential	\$96,249,307
Moderate Income	\$52,301,312
Low Income	\$453,990,852
Commercial & Industrial	\$12,151,579
Total	\$614,693,050

Appendix C
Proposed Operational Metrics for 2025-2027 Plan

Cadence	Operational Metric or Dataset
Quarterly	GHG reductions in 2030 by residential and commercial sectors (tracked against the EEA Secretary’s goal as expressed in approved plan)
Quarterly Dataset	Measure-level production results, including incentives, savings, and benefits, in the format of the “Calcs” tab from each program administrator’s benefit-cost model.
Residential Metrics (including equity)	
Quarterly	<p>HEAs: Total number of home energy assessments broken out by (1) those with insulation recommendations that have barriers, (2) those with insulation recommendations that have no barriers, and (3) those with no insulation recommendations broken out by income qualification (low-income vs non-income qualified income at the time of assessment); renters vs. Non-renters; and statewide vs. Designated Equity Communities</p> <p>Barriers: Number of barrier mitigation projects and incentives broken out by income qualification (low-income, mod-income, non-income qualified/market-rate); Renters vs. Non-Renters; and Statewide vs. Designated Equity Communities.</p> <p>Weatherization: Number of weatherization projects and incentives broken out by SF and MF, across income qualification (low-income, mod-income, non-income qualified/market-rate); Renters vs. Non-Renters; and Statewide vs. Designated Equity Communities.</p> <p>Note: The combination of these metrics will enable the assessment of rolling conversion rates from assessment to recommendation to barrier remediation and insulation.</p>
Quarterly	Time to serve/assess HEAs for residential sector, shown by county and comparing lead vendors and HPCs. Time to serve for the low-income sector, shown by CAP territory (and based on a combined TTS for local CAP and HPCs).
Quarterly	Quantities and incentives for households installing heat pumps, broken down by measure type (existing fuel and by full vs partial displacement), program pathway (rebates vs turnkey, with turnkey distinguishing 1-4 unit and 5+ unit buildings), income qualification (low-income, mod-income, non-income qualified/market-rate), Renters vs. Non-renters, and Statewide vs Designated Equity Communities.

Bi-annual Dataset	For each zip code (with select community zip codes denoted): number of households that install heat pumps (broken out by whole home and partial) and weatherization jobs broken out by income qualification (low-income, mod-income, non-income qualified/market-rate).
C&I Metrics (including equity)	
Quarterly	Number of EBCx study enrollments, number of studies completed, and number of studies with completed projects in C&I grouped by size using studied square footage
Quarterly	Number of custom C&I electrification and traditional energy efficiency (including lighting and non-lighting) projects, savings by fuel and combined, and 2030-GHG reductions.
Quarterly	Number of small business weatherization projects, total savings (net Lifetime MMBtu), and incentives broken out by Turnkey and non-Turnkey. Number of small business energy assessments
All Other Equity Metrics	
Quarterly	Total equity investment, including low- and moderate-income incentives, renter incentives, small business turnkey incentives, community engagement, language access, workforce development, and program support to these customers.
Annual	Total of CFP awards for all CFP communities and awards by partner
Annual	Supplier Diversity: # of direct contracts with diverse suppliers and spend for contracts with diverse supplier that are directly between PAs and vendors (with breakouts for MBEs, WBEs, and other diverse supplier types); total number and spend of all direct contracts.
Annual	Supplier Diversity: # and % of diverse suppliers directly informed on the availability of RFPs (with breakouts for MBEs, WBEs, and other diverse supplier types)
Annual	Supplier Diversity: # and % of diverse suppliers responding to RFPs (with breakouts for MBEs, WBEs, and other diverse supplier types)
Annual	Language Access: Total number of customers indicating preference for a language other than English at intake, by their language of preference Language Access: Total number of customers indicating preference for a language other than English at intake who ultimately receive HEAs and weatherization by their language of preference. Note: The combination of these metrics will enable the assessment of rolling conversion rates from intake to assessment to weatherization for customers expressing LOTE preference.
Active Demand Reductions / ConnectedSolutions Metrics	

Bi-annual	Active demand participation and savings by PA, by technology and dispatch type (Res: batteries and direct load control thermostats and water heaters; C&I: Targeted/Daily Dispatches for batteries and technology-agnostic) Number of participating thermostats by customers on an electric rate discount vs market rate, compared with the number of connected thermostats incentivized by low-income vs market-rate programs.
-----------	--

Appendix D
EM&V Studies Completed Since April Draft Plan

Commercial and Industrial

1. C&I Existing Building Baseline Study (MA22C05-B-BSLN)*
 - Characterized the type, quantity, and efficiency of energy-using equipment for existing buildings to support program planning and future market and evaluation research. The results of the general population survey showed that heat pumps account for primary heating in about 12% of C&I tax parcels, and over half of the state’s C&I facilities rely on manual or handheld manual thermostats, while only 7% of facilities (17% of square footage) rely on a BMS. The survey results also demonstrated that the lighting controls market has not changed substantively since the last time the baseline study was conducted (2020), as dimmer switches and occupancy sensors are the dominant technology in 20%-30% of C&I tax parcels, while advanced lighting controls are only present in about 3% of parcels.
2. Custom Program Process Study (MA23C04-B-CUSTPRPR)*
 - Identified opportunities to increase the efficiency and productivity of custom offerings. This study found that custom project processes worked well overall for most recent participants, but the least satisfactory aspects of the process reported by participants include project timelines, incentives, and documentation requirements. In response to the DOER EM&V Policy directives, the EMC will be revisiting documentation requirements for custom project baseline determination, as well as developing new protocols for determining impacts from existing building projects, which may result in expedited engineering review, streamlined documentation requirements, and faster project timelines in the 2025-2027 term plan. This study recommended the creation of a database of evaluated custom projects, which is underway, and the continued evaluation of custom express calculation tools, which is included in the SEP for the 2025-2027 term.
3. MA CI 2022 Custom Electric Rolling Evaluation (MA23C06-E-CUSTELEC)^
 - Provided verification and re-estimation of energy and demand savings for a sample of statistically selected non-lighting custom electric projects through site specific verification, monitoring, and analysis. The results of this study were used to determine the gross realization rates and lifetime savings adjustment factors for custom electric energy efficiency projects implemented in 2021, 2022, and 2023, and were combined with the previous two studies to provide rolling results based on the most recent three years of study. On the whole, the results of this study were higher than the previous study.
4. MA CI Energy Optimization Model Version 2.1 Update (MA24CXX-B-EOUPDATE)^
 - Updated the C&I Energy Optimization Model to estimate impacts for prescriptive heat pump measures in commercial buildings using the most up-to-date program data. This study resulted in increased C&I midstream VRF measure impacts, decreased midstream ASHP measure impacts, increased fuel savings and almost doubled electric penalties for VRFs displacing gas and ASHPs displacing all fuels

from the April plan. These updates are largely due to changes in the modeling approach for VRFs (now utilizing updated performance curves from NREL) and in the modeling of ventilation air provisions.

5. Prospective Realization Rates for PY2025 Custom Gas (MA24-C03-G-RECUSTGAS)^
 - Will update gross realization rates and lifetime savings adjustment factors to be applied to custom gas projects in the 2025-2027 term.

Residential & Income Eligible

6. Heat Pump Metering Study (MA22R51-B-HPMS)^
 - Performed field monitoring to assess actual heating and cooling performance and usage of the latest generation of residential heat pumps being supported by the programs. Fielded participant surveys to understand customer experience and usage of heat pumps and backup/auxiliary heating systems. The study quantified gross measure impacts for heat pump installations and informed savings parameter estimates for the Massachusetts Technical Reference Manual. The measure impacts for residential heat pumps were similar to the previous measure impacts with varying directional changes across the multiple heat pump types and fuel baselines.
7. MA Income Eligible Process Evaluation (MA23R55)^
 - Process evaluation to look at program ecosystem, customer experience, program processes, and program opportunities.
8. MA Income Eligible Single Family Impact Evaluation (MA23R56)^
 - Update gross savings impacts. For most measures this resulted in lower savings.
9. Renovations and Additions Process & Program Theory Logic Model Update (23R54-B-RAPROCESSPTLM)^
 - Through an online survey with homeowners who participated in the R&A program between 2021 and 2023, interviews with 17 builders and 5 HERS raters active in the program during that same timeframe. Mixed levels of program satisfaction from customers and builders suggest room for improvement in the program. HERS raters drive program awareness and participation. The PAs should increase awareness about the program, provide additional support on how to participate, and provide educational materials on energy efficiency. Market actor opinions were mixed about how the market would respond to the R&A program switching to an all-electric model.
 - The team held 4 meetings with the PAs' program and implementation team to update the existing R&A program theory and logic model (PTLM). Home and building owners learn about the program primarily through HERS raters, and the R&A pages of the Mass Save website. HERS raters are provided program materials for use with clients, via Northeast HERS board quarterly meetings and newsletter. Builders are engaged via outreach with home builder and remodeler association and on-line training.
10. Residential New Construction Baseline Study (MA23R60)^

- Used RESNET data to develop updated UDRH specifications for single-family and multifamily homes, compared program and non-program homes against each other, against previous baselines, against different code versions. Market actor interviews provided qualitative feedback about the RNC market to inform program design and future evaluations. Both Single-family and Multi-Family HERS scores have improved since the previous studies. Homes with electric heat have HERS scores better than those with fossil-fuel systems, and all-electric homes have better scores than all other homes on average.

11. RCD Single Family Impact Study (MA23R58)^

- Update realization rates for weatherization and deemed gross savings impacts for other measures. Overall resulted in lower savings.

12. Income Eligible & Market Rate Multifamily Impact Evaluation (MA23R59)^

- Update of deemed gross savings impacts.

Special & Cross Cutting

13. Heat Pump Market Effects Indicators Baseline & Interim Studies (MA22X06-B-HPMEIB, MA23X18-B-INTERIMHP)*

- Developed an approach to quantifying any market effects, measured market progress made in 2022; and assessed traditional NTG to establish a floor for market effects from 2022.
- Research found that PAs were a key driver in the increase of heat pump sales from 2021 and 2022 and provided insights that could be used to update the program theory for market transformation (e.g., customer awareness and understanding of heat pumps, contractor trainings, changes in inventory and stocking practices).

14. Non-residential New Construction & Fuel Switching NTG (MA22X02-B-NRNCHPNTG)^

- Produced updated NTG values for Paths 1 and 2 of the Commercial New Construction and Major Renovations program as well as measure NTG for C&I fuel switching. These NTG values would only be applied if these program components were to be treated as resource acquisition.
- However, the NTG values should not be applied for impact accounting purposes if program components are treated as market transformation initiatives.

15. Minority & Women-Owned Business Enterprise Contractor Study (MA23X16-B-MWBE)^

- This study reviewed non-incentive spending for contracted vendors from 2016-2018 and then 2019-2021, which was then analyzed for MWBE certification and other lists. Surveys, a focus group, review of best practices, and a pipeline analysis were also conducted.

16. NEIs Associated with Resilience of Battery Storage for IE Customers (MA23X11-E-BATTNEI)^

- Developed participant resilience NEIs associated with battery storage for income-eligible and moderate-income customers participating in the Cape and Vineyard Electrification Offering. The results of the study showed that one battery is sufficient to provide the critical load for a home during outages in summer, fall, and spring; however, a second battery greatly improved the system's ability to meet critical demand during winter outages. Once there is more CVEO participant data available, the NEI values will be updated for homes that have one and two batteries.
17. Supplement & Analyze Residential Heat Pump Invoice Cost Data (MA23X14-B-RHPINV)^
- Provided basis for long-term heat pump cost-tracking process and normalized metrics that can be compared over time
18. C&I Omnibus Electric NTG Study (MA23X15-E-CIONTG)
- Updated NTG for selected custom and prescriptive measures for downstream electric C&I programs. Updated NTGRs were comparable to those derived from the previous study, completed in 2021.
19. C&I Omnibus Gas NTG Study (MA24X28-G-CIONTG)^
- Updated NTG for selected custom and prescriptive projects for downstream gas C&I programs. Updated NTGRs were comparable to those derived from the previous study, completed in 2021.
20. Non-Residential New Construction & Multifamily Market Actor Population Sizing Study (MA23X17-B-NRNCMS)^
- Estimations of the number of architects, MEP engineers, design/build contractors, and sustainability consultants active in the MA NRNC and the Passive House NC markets and the proportion that have participated or are currently participating in Mass Save new construction programs.

Demand Response

21. MA C&I Targeted and Daily Dispatch Summer 2023 Study (MADR2301-E-CITDD)^
- Updated RR values for each type of C&I DR offering.
 - Provided results of process evaluation based on conversations with respondents regarding program satisfaction, participant motivations, participation barriers, and incentives.

*Filed with the 2023 Plan Year Report

^Report is or will be final for 2025-2027 plan.

Appendix E

Attachment: EEAC EM&V Policy Memo

Appendix F

Attachment: Strategic Evaluation Plan