Cape Light Compact JPE
Executive Committee &
Governing Board Meeting

DATE:	**Wednesday, September 9, 2026**
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. 2025, c. 2, which extends the temporary provisions pertaining to remote meetings of public bodies under the Open Meeting Law to June 30, 2027. 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 Margaret Song, Compact Administrator, at msong@capelightcompact.org by 2:00 PM on Tuesday, September 8, 2026, and should follow the public comment protocol below. Written public comments received after the September 8th deadline will be distributed prior to the Compact's next Board meeting.

Telephone dial-in: +1 (646) 558-8656
Meeting ID: 751 421 7410
Passcode: 2026261

AGENDA

1. Public Comment

2. Approval of July 8, 2026, Open Session Minutes

3. Chairman's Report, David Anthony
   - Yarmouth Alternate Governing Board Appointment
   - 2027 Operating Budget Timeline and Expectations
   - 2027 Governing Board Elections Timeline and Expectations
   - November Board Meeting Date Conflict – Move to 11/18

4. Review of Energy Efficiency Residential Enhanced Offerings – Stephen McCloskey

5. Vote and approval of consumer advocacy shared costs worksheet for D.P.U. 26-20 (Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan) – Mariel Marchand

6. 2028-2030 Energy Efficiency Three-Year Plan Timeline – Margaret Song

7. Energy Efficiency Large Commercial and Industrial Offers – Dan Schell

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, Margaret Song, at msong@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 8, 2026

The Cape Light Compact JPE Board of Directors met on Wednesday, July 8, 2026, 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. 2025, c. 2, which, among other things, extends the temporary provisions pertaining to remote meetings of public bodies under the Open Meeting Law to June 30, 2027.

PARTICIPATING IN-PERSON WERE:

1. David Anthony, Chair, Executive Committee, Barnstable
2. Tom McNellis, Secretary, Executive Committee, Eastham
3. Robert Schofield, Executive Committee, Bourne
4. Nate Mayo, Provincetown
5. Joyce Flynn, Executive Committee, Yarmouth

PARTICIPATING REMOTELY WERE:

1. Alan Strahler, Edgartown
2. Colin Odell, Vice Chair, Executive Committee, Brewster
3. Nicola Blake, Executive Committee, West Tisbury
4. Valerie Bell, Executive Committee, Harwich
5. David Jacobson, Executive Committee, Orleans
6. Brad Crowell, Dennis
7. Chris Palmer, Truro
8. Scott Mueller, Falmouth
9. Wayne Taylor, Mashpee

ABSENT WERE:

1. Forrest Filler, Aquinnah
2. Brian Miner, Chatham
3. Timothy Carroll, Chilmark
4. Tristan Israel, Dukes County
5. Peter Meleney, Oak Bluffs
6. Leanne Drake, Sandwich
7. Russ Hartenstine, Tisbury
8. Susan Ryan-Ishkanian, Wellfleet

LEGAL COUNSEL PARTICIPATING REMOTELY:

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

STAFF PARTICIPATING IN-PERSON:

1. Margaret Song, Chief Administrative Officer
2. Briana Kane, Deputy Director
3. Emily Webb, Executive Assistant
4. Mariel Marchand, Power Supply Planner

STAFF PARTICIPATING REMOTELY:

1. Phil Moffitt, Chief Financial Officer
2. Rebecca Martin, Outreach Coordinator
3. Jason Bertrand, Marketing & Communications Coordinator
4. Kim Grant, Town Energy Manager & Outreach
5. Angela Hurwitz, Senior IT Services & Data Management Analyst
6. Miranda Skinner, Senior Regulatory Analyst
7. Anneliese Haskell, Data Services Coordinator
8. Tatsiana Nickinello, Senior Analyst
9. Steph Spadoni, Energy Efficiency Analyst
10. Dan Schell, Technical Services Manager
11. Stephen McCloskey, Residential Programs Manager

PUBLIC PARTICIPANTS:

1. Sakiko Isomichi (MVC)

David Anthony called the meeting to order 2:04PM.

PUBLIC COMMENT:

No written comments were received in advance of the meeting, and no public comments were made.

NEW STAFF MEMBER INTRODUCTION:

David Anthony introduced Emily Webb who recently joined Cape Light in the Executive Assistant position. Emily introduced herself and summarized her professional background. Emily expressed excitement at joining the Compact and thanked the Board for their warm welcome.

APPROVAL OF MINUTES:

The Board considered the June 10, 2026, Open Session Meeting Minutes.

No corrections or comments were noted.

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

David	Anthony	Barnstable	Yes
Robert	Scofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Brad	Crowell	Dennis	Abstain
Tom	McNellis	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Scott	Mueller	Falmouth	Yes
Valerie	Bell	Harwich	Yes
Wayne	Taylor	Mashpee	Yes
David	Jacobson	Orleans	Yes
Nate	Mayo	Provincetown	Yes

Chris	Palmer	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

Motion carried in the affirmative (13-0-1)

CHAIRMAN'S REPORT:

David Anthony proposed that the August Board meeting be cancelled unless anything unexpected arises. The Board and staff were in general agreement with the proposal. The next meeting of the Board will be in September.

David Anthony commended Cape Light Compact staff for their communication with the towns on Cape Cod and Martha's Vineyard. Specifically, he highlighted a recent communication on power supply from Mariel Marchand noting that it was clear, concise and informative. He recognized all the work that the staff does behind the scenes.

DPU PROCEEDINGS UPDATE – MARIEL MARCHAND:

Mariel Marchand presented an update on three DPU proceedings relevant to Cape Light Compact: DPU 26-20, DPU 26-44 and DPU 26-62. The three proceedings relate to Advanced Metering Infrastructure (AMI) which could allow Cape Light Compact to offer time-varying rates to customers. The Compact participated in a previous AMI stakeholder working group at the state level prior to these dockets.

Mariel first reviewed Advanced Metering Data Access Protocol Implementation Plan Investigation (DPU Docket 26-20.) The Compact's petition to intervene in the proceeding was approved by the DPU. The Compact will be submitting discovery. The key concern for the Compact in DPU 26-20 is ensuring municipal aggregators and their competitive suppliers can access data collected by AMI for their customers in near real time at reasonable cost and that the data can be used to offer time-varying rates (TVR) to customers. Tom McNellis asked if it is possible that the Electric Distribution Companies (EDCs) might not provide the data. Mariel indicated the anticipated agreement terms that would be required to access the data had caused concern for the Compact as a municipal entity.

Mariel next reviewed the Investigation of the Use of Interval Data Collected by AMI to settle Load with ISO New England (DPU Docket 26-44). The Compact provided initial comments and is waiting for next steps from the DPU. The key concerns for the Compact in DPU 26-44 are ensuring Eversource conducts load settlement with ISO-NE using individual customer usage data collected by AMI as opposed to load profiles. Load settlement based on actual usage would allow the Compact to offer time-varying rates. David Anthony and David Jacobson both noted that this would be a significant change in the amount and type of data collected and how it is used. David Jacobson asked if the DPU has been planning on implementing these changes since earlier dockets. Mariel noted that it became clear that this was going to be an issue following the AMI stakeholder working group, resulting in the DPU opening this docket. Tom McNellis asked if alternatives have been considered or proposed. Mariel responded that the EDCs had proposed alternatives but they are not workable.

Colin Odell noted that time-varying rates will impact energy efficiency programs. Mariel agreed.

Nate Mayo asked if the DPU could rely on how time-varying rates have been implemented in other countries and regions. Mariel indicated yes, time-varying rates have been implemented in other regions in the United

States. The group of competitive suppliers that the Compact collaborated with on comments has referenced this and has requested that EDCs reach out to their counterparts in other regions.

Lastly, Mariel summarized Time-Varying Rates Investigation (DPU Docket 26-62). Comments on the docket are due to the DPU at the end of July 2026. The key concern is ensuring that the Compact can offer customers time-varying rates once the issues of AMI data access and ISO-NE load settlement are resolved. The Compact seeks to ensure that basic service will not be able to offer time-varying rates before municipal aggregators. Nate Mayo asked if this is a major concern. Mariel noted DOER previously convened an interagency rates working group and an electric rates task force which had recommended to begin implementing time-varying rates for basic service first. The Compact does not support this and will be submitting comment in opposition.

Nicola Blake asked if an upgrade will be required to customer meters for time-varying rates to be implemented. Mariel said yes, smart meters are replacing current meters which is projected to be completed on the Cape and Vineyard in 2027.

David Anthony asked if homeowners will be able to see their own smart meter data. Mariel said yes, based on Eversource's plan, customers would be able to see their own data on the online platform.

Joyce Flynn asked if the usage data referenced in DPU 26-20 is individual customer usage data. Mariel noted that the EDC's proposal is that individual customer usage data would only be shared with their supplier in order to implement time-varying rates. Customers could opt out from sharing data but then they could not be on a time-varying rate.

Nate Mayo asked if customers can opt-out of smart meters. Mariel confirmed that customers will be able to opt out of receiving a new meter. Margaret added that opting out may require customers to pay a fee to stay on old non-smart meters.

ENERGY AFFORDABILITY LEGISLATION UPDATE – MARGARET SONG

Margaret Song provided an update on the current Massachusetts Energy Affordability Legislation process. Margaret walked through the legislative activity from May 2025 to present. Margaret noted that the House and Senate versions of the legislation remain very different. Margaret highlighted points of interest in the current version of the Senate legislation including: an updated date for the EEA Secretary GHG goal, establishment of an oversight committee to review energy efficiency program costs, and additional seats on the Energy Efficiency Advisory Council (EEAC). Margaret noted that there are likely more changes to come.

David Anthony asked if there is an understanding of why an oversight committee is being proposed in the legislation. Margaret noted that affordability is the impetus of the legislation so the oversight is expected to be focused on cost containment.

David Anthony asked how Mass Save fared in Senate bill. Margaret noted that House version included a $1 billion dollar reduction to the Mass Save Three-Year Plan budget. In Senate bill, a budget cut to Mass Save is not proposed.

David Anthony noted that the Compact has an important advocacy role on behalf of Cape Cod and Martha's Vineyard ratepayers at the state level.

CHIEF ADMINISTRATIVE OFFICER'S REPORT – MARGARET SONG

a. Executive Session Meeting Minutes Review Announcement

Margaret Song announced that she has reviewed all sets of unreleased or partially released executive session minutes along with the Compact's Secretary and Compact counsel and it has been determined that the August 14, 2013, January 9, 2019 and March 11, 2026 meeting minutes should be released in their entirety.

The following sets of executive session minutes will continue to be withheld with partial redactions as continued nondisclosure of the redacted material is warranted under the Open Meeting Law: March 10, 2021, October 8, 2014, September 29, 2021, November 6, 2025 and November 18, 2025.

The December 13, 2023 and July 10, 2024 executive session minutes will continue to be withheld in their entirety as continued nondisclosure is warranted under the Open Meeting Law.

b. Staff Achievements

Margaret highlighted recent trainings and certifications completed by Compact staff, including:

i. Briana Kane – Massachusetts Municipal Association Human Resources certificate completed
ii. Dan Schell and Tatsiana Nickinello – Building Operator Certification completed
iii. Managers – International City/Town Management Association (ICMA) supervisor training completed. Lindsay Henderson, Dan Schell and Stephen McCloskey participated in this training.

BOARD MEMBER UPDATE (RESERVED FOR UPDATES ON MEMBER ACTIVITIES THE CHAIR DID NOT REASONABLY ANTICIPATE WOULD BE DISCUSSED – NO VOTING)

Nate Mayo asked if the recent localized brownouts had any nexus with the Compact's work. David Anthony noted the recent outages were localized. Margaret noted that the Compact participates in regional groups such as attending Restructuring Roundtable to stay up to date on activities related to grid infrastructure upgrades etc.

Motion to adjourn was made at 2:52pm moved by Robert Schofield, seconded by Nate Mayo.

David	Anthony	Barnstable	Yes
Robert	Scofield	Bourne	Yes
Colin	Odell	Brewster	Yes
Brad	Crowell	Dennis	Yes
Tom	McNellis	Eastham	Yes
Alan	Strahler	Edgartown	Yes
Scott	Mueller	Falmouth	Yes
Valerie	Bell	Harwich	Yes
Wayne	Taylor	Mashpee	Yes
David	Jacobson	Orleans	Yes
Nate	Mayo	Provincetown	Yes
Chris	Palmer	Truro	Yes
Nicola	Blake	West Tisbury	Yes
Joyce	Flynn	Yarmouth	Yes

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

Respectfully submitted,

Emily P. Webb

LIST OF DOCUMENTS AND EXHIBITS:

- Meeting Notice/Agenda
- June 10, 2026, Draft Open Session Meeting Minutes
- DPU Proceedings Update
- Energy Affordability Legislation Update

Cape Light Compact

Your Trusted Local Energy Resource

Learn More About Our Enhanced Residential Turnkey Offering

What are Enhanced Turnkey Services?

The Compact's Turnkey Services simplifies the energy efficiency upgrade process and offers **enhanced incentives for qualified customers.** The Compact will handle contractor coordination and project management for you

What is Covered?

Customers who qualify for turnkey services may be eligible for up to **100% cost coverage** for:

- Weatherization recommendations (option to self-attest at HEA)
- Remediation of pre-weatherization barriers
- Remediation of electrification barriers
- Whole-home heat pump installation

Who Qualifies?

- Customers who heat with oil, propane, or electric resistance and
- Whose gross annual income is between **61-80% of the area median income**.

Household Size	Barnstable County	Dukes County
1	$51,778 - $79,100	$51,778 - $74,800
2	$61,710 - $90,400	$61,710 - $90,279
3	$83,642 - $115,522	$83,642 - $115,522
4	$99,754 - $132,764	$99,754 - $132,764

To verify your income, head to masssave-qualify.clearesult.com

To sign up for a Home Energy Assessment, scan he QR code

PROUD SPONSOR OF mass save

Cape Light Compact

Your Trusted Local Energy Resource

Single Family (1-4 Unit) Seasonal Offers

Cape Light Compact is currently offering the following seasonal offerings, regardless of household income, to help you save even more on energy efficiency upgrades:

- 100% off weatherization recommendations for **veterans and active military** through November 11, 2026
- 100% off weatherization recommendations for **current and retired teachers** through September 30, 2026
- **Bonus $200 e-gift card** for eligible Cape Light Compact customers who complete a Home Energy Assessment before September 30th, 2026 and proceed with weatherization recommendations

To verify your income, head to masssave-qualify.clearesult.com

To sign up for a Home Energy Assessment, scan he QR code

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Consumer Advocacy Update

Cape Light Compact Governing Board
September 9, 2026

Consumer Advocacy Worksheet Background

What?

- Describes a Department of Public Utilities (DPU) proceeding that the Compact is participating in that involves both power supply and energy efficiency issues
- Describes how the Compact intends to track and allocate costs between the two

Why?

- Required by the DPU when there is a proceeding that includes shared power supply and energy efficiency costs
- Requires a Board vote to approve the proposed allocation of shared costs

Advanced Metering Data Access Protocol Implementation Plan Investigation (DPU Docket 26-20)

Key Concerns – Power Supply

- Ensuring municipal aggregators and their suppliers can access data collected by Advanced Metering Infrastructure (AMI) for their customers in near real time, at reasonable costs
- AMI data is needed to offer time-varying rates

Key Concerns – Energy Efficiency

- Ensuring the Compact's energy efficiency vendors will be able to access AMI data
- AMI data will be required to implement and evaluate programs

Shared Costs

- Will be allocated based on the actual time spent on power supply and energy efficiency issues

Cape Light Compact

Discussion and Board Vote

- Consumer advocacy worksheet for AMI docket (26-20) is in Board packet
- Vote to approve

D.P.U. 26-20 Board Approved _____

Consumer Advocacy Allocation Worksheet

Parties involved:
On February 18, 2026, NSTAR Electric Company d/b/a Eversource Energy ("Eversource"), Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid ("National Grid"), and Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") (together, the "EDCs"), filed a joint AMI Central Data Repository Implementation Plan (the "Plan") for approval with the Department. The following are parties to the proceeding: the Attorney General's Office, Department of Energy Resources ("DOER"), the Compact, Colonial Power Group, and NRG Retail Companies. Mission:data's petition to intervene remains pending.

Description of the Matter or Proceeding:
The Plan was submitted pursuant to *Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers*, St. 2024, c. 239 ("2024 Climate Act" or "Act"), §§79, 127-128 and the Memorandum issued by the Department on September 8, 2025. The Plan is intended to comply with the Climate Act's requirements that the EDCs establish a statewide centralized AMI data repository to allow customers and third parties access to advanced metering infrastructure ("AMI") data in near-real time and to implement accelerated switching to permit residential and small commercial customers to change suppliers within three days once AMI is fully deployed. The Plan provides three phases for third-party data access: (i) data sharing by individual customers; (ii) an EDC-specific bulk data sharing platforms on top of their existing platforms to allow approved third parties to access bulk data; and (iii) deployment of the central data repository. Plan at 1.

Further, the Plan sets forth the EDCs' proposed data access protocol that includes an opt-out procedure for customers, cyber standards for data sharing, and proposed sample agreements that would be executed between the EDCs and competitive suppliers and/or municipal aggregators. Plan at 5, 15; Exh. EDC-2, App. A and B. The Plan would require third parties to: (1) register on an EDC's website; (2) certify agreement with the EDC's terms and conditions; and (3) execute the Third Party Data Security Agreement (Exh. EDC-2, App A). The EDCs also proposed customer outreach and education on data sharing permission management.

The EDCs estimate costs of around $23-30 million for the Plan, subject to competitive solicitations and Department modifications. Notice at 2. The EDCs recommended a fee structure for platform users that would be based on benchmarking the expected use rate of the platform to estimate the total number of annual transactions performed as well as the total costs of platform implementation and annual licensing and maintenance costs.

The Department has not yet issued a procedural schedule so the timeframe for adjudication of this proceeding is unknown. Discovery has commenced and is ongoing, with the Compact having issued one set of information requests.

Docket Number (if any):
D.P.U. 26-20 (Eversource Energy)

1. Does this proceeding raise issues that may impact the Compact's administration of its three-year energy efficiency plan? If yes, please explain.
   Yes, based on the proposed Plan, the Compact is uncertain whether or how the Plan may affect the Compact's energy efficiency vendors' (e.g., Connected Solutions vendors, evaluation vendors) access to data for energy efficiency purposes. Currently, the Compact has an operating agreement with Eversource for data sharing related to energy efficiency that accounts for customer privacy and data security. The Compact is unsure whether or how that agreement may be affected by this proceeding. The Compact has concerns related to the requirements and costs for its EE vendors to access AMI data, given that the Plan appears to require additional and more stringent data security protocols and cybersecurity requirements for those who access the data. The Compact needs to understand how the data security agreement and requirements may apply to the Compact's EE vendors.

2. Does this proceeding raise issues regarding the general administration of energy efficiency in Massachusetts? Are other Program Administrators parties or otherwise intervening? Other stakeholders? If yes, please explain.
   Yes. Eversource, National Grid and Unitil, who are utility PAs, are parties to the proceeding in their role as electric distribution companies and are the proponents of the Plan.

3. Does this proceeding raise issues regarding the Compact's administration of active demand response programs/initiatives/measures? If yes, please explain.
   Yes, the proceeding raises active demand response ("ADR") issues for the Compact. The Plan recognizes that, by 2028, all customers will have advanced metering with access to their usage information and more tools to engage in demand response and clean energy programs. The Compact, through its EE vendors, will need to be able to access AMI data for the Compact's customers on the proposed state-wide repository or bulk data sharing platform for energy efficiency purposes. The Compact may want to explore new energy efficiency programs based on the AMI data, as well as opportunities to increase the level of participation in the Compact's ADR programs.

4. Does this proceeding raise issues regarding the general administration of active demand response in Massachusetts? Are other program administrators parties or otherwise intervening? Other stakeholders? If yes, please explain.
   Yes, as noted above, Eversource, National Grid and Unitil are utility Program Administrators ("PAs") and have proposed the Plan in this proceeding.

5. Does this proceeding concern the efficient utilization of energy in Massachusetts? Are other Program Administrators parties or otherwise intervening? Other stakeholders? If yes, please explain.

   Yes, this proceeding concerns the efficient utilization of energy in Massachusetts because it requires the EDCs to establish a statewide centralized repository for AMI data. The repository will allow customers to access their own energy-use data and make more informed decisions about their electricity consumption. Such data access should enable third parties, including competitive suppliers and municipal aggregators, to develop and offer time-varying rates ("TVR") and other products and services that encourage customers to shift or reduce their electricity usage.

6. Describe the direct energy efficiency benefit resulting from the Compact's participation in this proceeding.
   The proposed Plan ultimately will determine whether and how the Compact through its EE vendors will have access to the Compact's customers' AMI data for energy efficiency and demand response purposes. That outcome will have a direct impact on the Compact's energy efficiency and demand response programs. AMI data should enable the Compact as a PA to better target, design, and evaluate energy-efficiency and demand-response programs by identifying customers' usage patterns and allowing programs to measure actual changes in consumption and peak demand. The Compact seeks to ensure that the Plan's requirements and costs will allow the Compact through its EE vendors to access its customers' AMI data for these purposes.

7. Is the described benefit quantifiable? If yes, please explain and provide any supporting documentation.
   Not at present, given that the Plan is subject to an adjudicatory proceeding and thus may not be approved or may be adjusted over the course of the proceeding.

8. Will the Compact's participation assist its planning for future energy efficiency plans and/or programs?
   Yes. AMI meters will be deployed in the Compact's service territory in late 2027 (as estimated by Eversource). Understanding how the Compact through its EE vendors may be able to access and use that data (and at what cost) for its programs will assist the Compact in its own future energy efficiency plans and programs.

9. Is the Compact's participation in this proceeding a reasonable use of energy efficiency ratepayer funds? Please explain.
   Yes, AMI data has the potential to provide the Compact with opportunities to enhance its energy efficiency offerings. The Compact needs to ensure that its EE vendors will have

access to its customers' AMI data and that it will be provided either free or at a reasonable cost.

10. Does this proceeding involve other non-energy efficiency issues? If yes, please explain.
    Yes, the proceeding also implicates how the Compact and its power supplier will have access to data (and at what costs) for power supply, including TVR. The Compact needs to participate here to better understand Eversource's proposals and what the impacts may be on the Compact's power supply, including its ability to offer TVR supply rates to its aggregation customers.

11. What is the initial estimate of the percentage allocation between energy efficiency and non-energy efficiency issues, as set forth in this worksheet?
    The costs for this proceeding will be allocated based on the actual subject matter, meaning that any work related to energy efficiency will be allocated as such and any work related to non-energy efficiency will be allocated as such.

12. Discuss any other factors as may be appropriate.
    It is important for the Compact to be involved in this proceeding as it will determine how the Compact and its supplier will have access to data and at what costs once AMI is deployed.

13. **To be completed at the conclusion of the proceeding/matter or every 12 months, whichever comes first,** a summary of the actual total costs associated with the Compact's participation and costs recovered through energy efficiency ratepayer funds and operating funds. A brief narrative should accompany any readjustment to the percentage allocation explaining the basis for the reallocation.

Please attach:

1. Initial Petition (attached)
2. Notice of Proceeding (attached)
3. Compact's Petition to Intervene (attached)
4. Agreements with Expert Consultants, if any (none)

Advanced Metering Infrastructure (AMI) Central Data Repository Implementation Plan

February 18, 2026

Table of Contents

1. Executive Summary

NSTAR Electric Company d/b/a Eversource Energy ("Eversource"), Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid ("National Grid"), and Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") (Eversource, National Grid, and Unitil may be referred to collectively as the "Companies" or "EDCs") have each launched a Grid Modernization Program with Advanced Metering Infrastructure ("AMI") at the center. Recognizing the value of AMI usage data for improving customer engagement, cost control, and accelerating electrification, the Massachusetts legislature, through An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers, St. 2024, c. 239 (the "2024 Climate Act" or the "Act") directed the EDCs to jointly develop a plan for a statewide repository to streamline customer data access and sharing. The EDCs jointly present this Central Data Repository Implementation Plan in response to the requirements of that Act and in response to the Department of Public Utilities' (the "Department") September 8, 2025, Memorandum issued in Dockets D.P.U. 26-20/26-21/26-22.

The Central Data Repository will provide a multi-utility, centralized energy data sharing repository using Green Button Connect ("GBC") standards for municipal aggregators, third-party energy suppliers, and other authorized third parties in one statewide platform. Customers will have complete control of their data and will be able to opt into or out of data sharing using a permission management center on their respective EDC websites, which will be accessible using their established EDC account credentials, providing a seamless experience.

Data sharing benefits customers and third parties alike. Data sharing will provide third parties with necessary access to data to support programs that could reduce consumer costs and assist the Commonwealth with meeting its climate goals.

The EDCs have structured this proposed implementation plan to provide benefits to customers as soon as practical while cost-effectively delivering the required functionality. Third party data sharing will be deployed in the following phases:

1. Data sharing by individual customer;
2. Bulk data sharing for municipal aggregators and third-party energy suppliers; and
3. Central data repository.

Individual customer data sharing and bulk data sharing are part of each EDC's in-flight AMI plan. The EDCs are proposing an Application Programming Interface ("API")-based design for the statewide data repository to cost-effectively leverage and integrate each utility's data sharing platform. API is a well-defined, secure, and reusable interface that allows different systems, partners, and applications to exchange data and services seamlessly. To an end user of an API-based repository, the repository will behave like a standalone database, with the data retrievable on-demand. However, the critical source data will remain in the respective EDCs' systems,

providing better security and a single source of information (i.e., better alignment with the data the EDCs are using within their respective customer systems).

This plan explains why the EDCs propose to use the GBC data standard and provides additional detail regarding each of the three phases of the data sharing implementation. Implementation of the central data repository will commence upon approval of this proposed plan.

2. Background on Green Button Connect My Data

The EDCs have selected the Green Button Connect My Data standard as the framework for all of their data sharing programs, including the individual customer portals implemented as part of each EDC's AMI plans, the bulk data sharing platforms, and the centralized data repository required by the 2024 Climate Act.

The Green Button initiative was created in response to the Obama Administration's September 2011 "A Policy Framework for the 21st Century Grid: Enabling Our Secure Energy Future." Green Button Connect My Data, also referred to as GBC, is the common name for the North American Energy Standards Board ("NAESB") REQ.21 – Energy Services Provider Interface Model Business Practices (https://www.greenbuttondata.org/cmd.html). Green Button Connect My Data is nationally governed by the Green Button Alliance Board.

Green Button Connect My Data is not a product or platform. It is an energy data sharing standard, and it is the only recognized standard among U.S. utilities and energy service providers. Some utilities have custom, homegrown solutions for third party data sharing, but those do not offer broad recognition and adherence.

The decision to adopt the Green Button Connect My Data standard was made following extensive stakeholder consultation, technical review, and regulatory guidance. The reasons that the EDCs selected GBC include:

- Customer-Centric and Privacy-Protective:
  - ◊ GBC ensures that only customer-authorized third parties receive customer data, and only for approved timeframes and scopes.

- Open and Widely Adopted Standard:
  - ◊ GBC is already deployed in other jurisdictions with mature AMI (e.g., CA, NY, IL), allowing for market-ready software and lower vendor integration costs.
  - ◊ Its use helps avoid proprietary solutions that could limit market access or increase platform costs.

- Future-Proof and Extensible:
  - ◊ GBC supports additional use cases including distributed energy resource ("DER") optimization, load forecasting, demand response, and energy benchmarking.

In summary, Green Button Connect My Data was selected because it provides a secure, standards-based framework that supports customer choice, privacy, and regulatory compliance. GBC enables near real-time, recurring, and authorized data sharing in a way that ensures interoperability and future scalability for the statewide platform.

If the Department were to pursue an alternative to GBC, the EDCs would have to re-set the timeline to build their own standards. These standards would not conform with any national standard and therefore a Commercial Off the Shelf ("COTS") solution would not be available. This would lead to an increase in time and cost required to implement the platform and would also likely serve to detract from or disincentivize the use of the platform by third parties who have already invested in GBC.

3. Data Sharing Foundation – Green Button Connect for Individual Customers

Prior to passage of the 2024 Climate Act, the EDCs were already making foundational data sharing investments under their approved AMI plans. Each EDC is implementing a plan to provide detailed usage data sharing to third parties, including Competitive Electric Power Suppliers with customer authorization through each EDC's respective website. Once a customer has granted a third-party permission to access his/her information, the third party would then be able to download the customer's historical usage information. The ability for third parties to access the customer's data is limited by the period of consent authorized by the customer.

Each EDC went through a competitive bidding process to select a data sharing platform that would allow customers to grant access to their electric utility data, including but not limited to, customer monthly usage, demand data, and interval data.

Eversource and National Grid selected UtilityAPI, a Green Button Connect certified vendor to host and maintain their usage sharing platforms and deployed their respective platforms in August 2025. Both EDCs have received Green Button Alliance certification, demonstrating that their platforms are in compliance with the Green Button Connect My Data standards.

Unitil is actively implementing its GBC compliant platform with a plan to go live in the first quarter of 2026. The platform will be hosted by its CIS vendor.

In all cases, the EDC GBC-compliant platforms provide customers with Single Sign On ("SSO"), which allow customers to use their existing utility username and password to sign on to the respective utility website and manage third party data sharing permissions. Customers are able to authorize approved third parties to receive their data, and the authorizations can be revoked at any time. This gives customers complete control and transparency over which entities have access to their data.

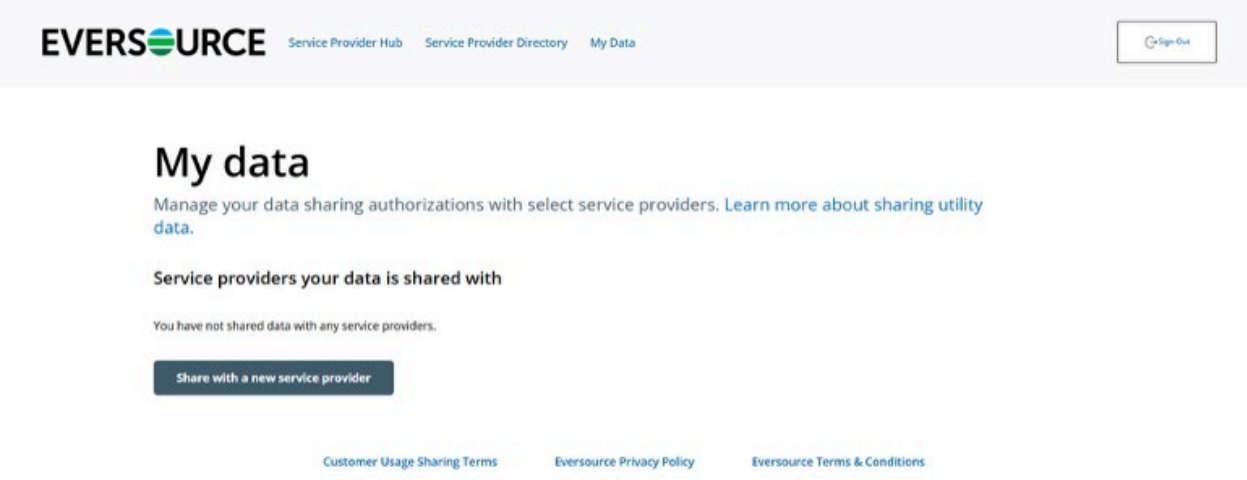
Third parties can become approved data recipients with each EDC by registering with the platforms and completing a self-attestation statement. Each application is reviewed by the respective EDC to ensure the third party meets the cyber security standards established for third-party data sharing. Once approved by the utility, third parties can submit direct requests to individual customers for authorization to access their data. Those requests may be sent through the platform or via an email invitation, which will contain a link taking customers directly to the GBC platform via SSO. After a customer authorizes a third party to receive data, the third-party can then access the customer's data either via CSV or XML download, or via an API connection.

These GBC-compliant platforms are already in production (or soon will be for Unitil), enabling near real time (within 24-48 hours) data access for both customers and third- parties. The EDCs will be building upon these existing platforms to provide bulk data sharing and a central data

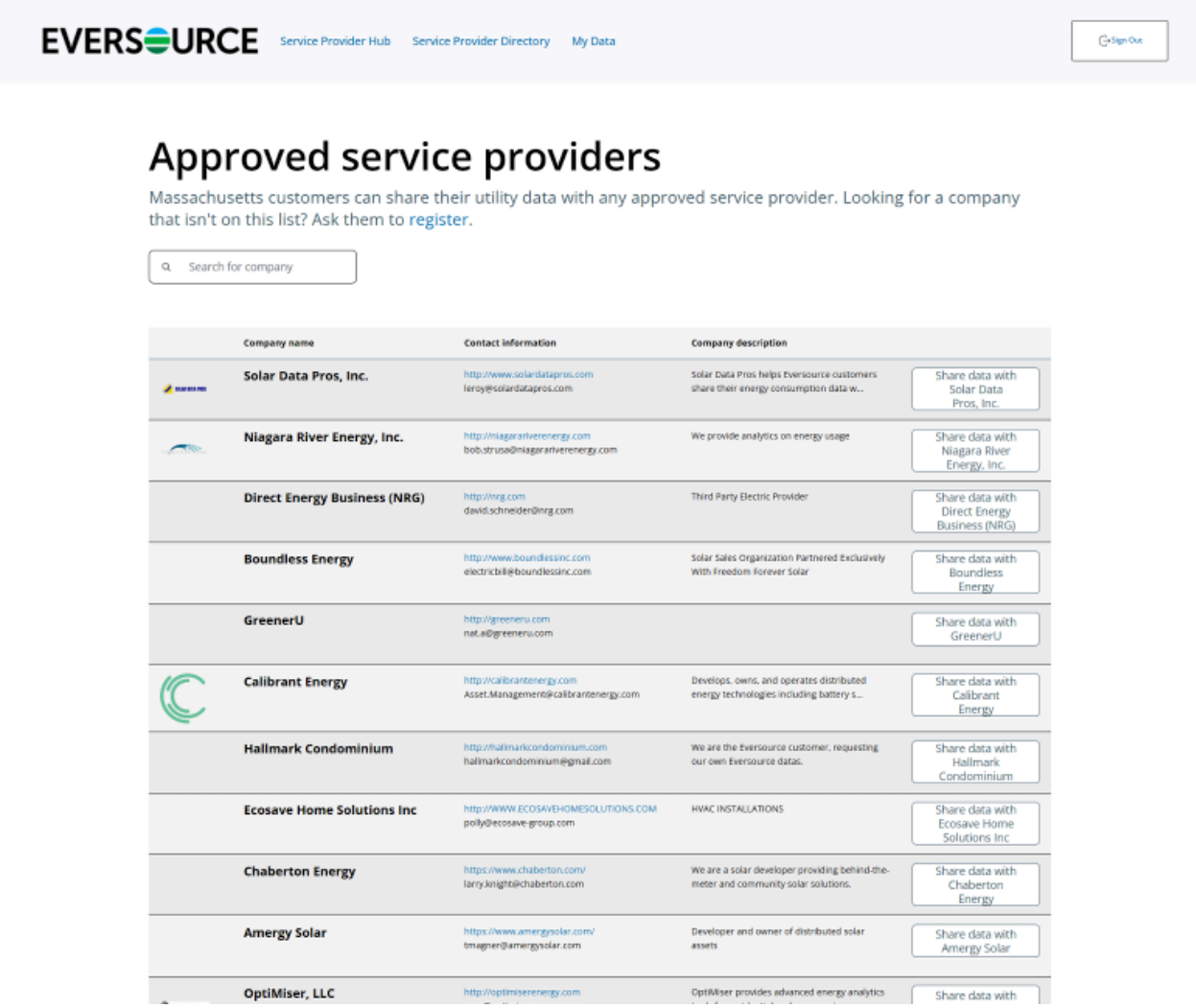
repository, while keeping the customer permissions in one place – within the GBC-compliant platform at the EDC's website, where the customer would expect to go to authorize and unauthorize data sharing, while also accessing other utility account features.

The following screenshots illustrate the experience for Eversource customers when authorizing their third-party data sharing permissions. National Grid's and Unitil's interfaces will be similar to Eversource's interfaces depicted below.

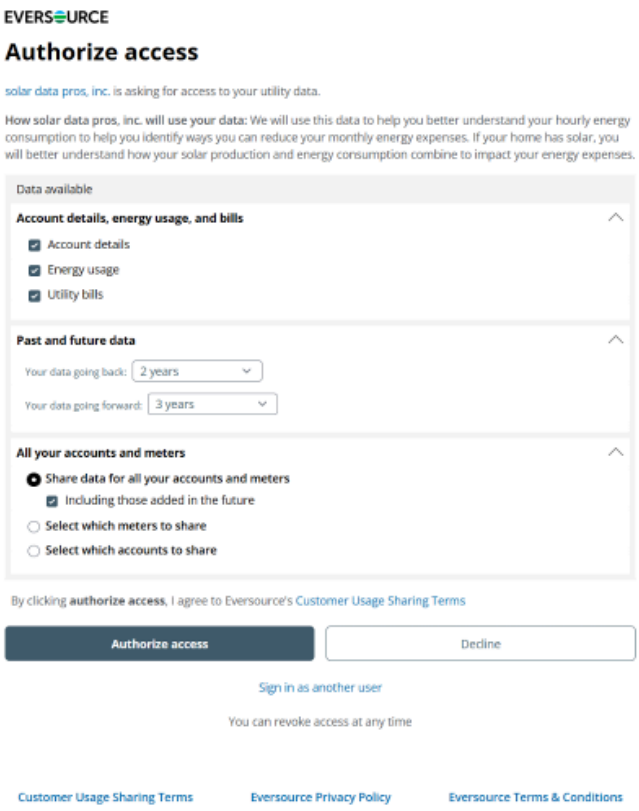
Landing page:



Directory:


EVERSOURCE
Service Provider Hub
Service Provider Directory
My Data
Sign Out
Approved service providers
Massachusetts customers can share their utility data with any approved service provider. Looking for a company that isn't on this list? Ask them to register.
Search for company
Company name
Contact information
Company description
Solar Data Pros, Inc.
http://www.solardatapros.com
leroy@solardatapros.com
Solar Data Pros helps Eversource customers share their energy consumption data w...
Share data with Solar Data Pros, Inc.
Niagara River Energy, Inc.
http://niagarariverenergy.com
bob.strusa@niagarariverenergy.com
We provide analytics on energy usage
Share data with Niagara River Energy, Inc.
Direct Energy Business (NRG)
http://nrg.com
david.schneider@nrg.com
Third Party Electric Provider
Share data with Direct Energy Business (NRG)
Boundless Energy
http://www.boundlessinc.com
electricbill@boundlessinc.com
Solar Sales Organization Partnered Exclusively With Freedom Forever Solar
Share data with Boundless Energy
Greeneru
http://greeneru.com
nat.a@greeneru.com
Share data with GreeneU
Calibrant Energy
http://calibrantenergy.com
Asset.Management@calibrantenergy.com
Develops, owns, and operates distributed energy technologies including battery s...
Share data with Calibrant Energy
Hallmark Condominium
http://hallmarkcondominium.com
hallmarkcondominium@gmail.com
We are the Eversource customer, requesting our own Eversource datas.
Share data with Hallmark Condominium
Ecosave Home Solutions Inc
http://WWW.ECOSAVEHOMESOLUTIONS.COM
polly@ecosave-group.com
HVAC INSTALLATIONS
Share data with Ecosave Home Solutions Inc
Chaberton Energy
https://www.chaberton.com/
larry.knight@chaberton.com
We are a solar developer providing behind-the-meter and community solar solutions.
Share data with Chaberton Energy
Amergy Solar
https://www.amergysolar.com/
tmagner@amergysolar.com
Developer and owner of distributed solar assets
Share data with Amergy Solar
OptiMiser, LLC
http://optimiserenergy.com
OptiMiser provides advanced energy analytics
Share data with

Authorization:



Email confirmation:

Authorization Receipt

This is your authorization receipt for sharing data from Eversource

Confirmation #: 2151134355
Date: 06/18/2025 03:50 p.m. EDT

Shared data with: UtilityAPI-UAT

What types of data:

- Service account details
- Utility bills
- Smart meter intervals

For these date ranges:

- Going back 1 year
- Ongoing for 3 years

For these meters:

- All of my meters (e.g. service accounts)

For this scope of use (written by UtilityAPI-UAT):

- *"UAT Testing"*

View your receipt online

View all of your authorizations: My Authorizations

If you have any questions, contact us through this form

Want to revoke access? Click here

4. Phase 2 – Bulk Data Sharing

Eversource and National Grid are in the process of developing their bulk data sharing platforms, which will be built on top of their existing individual GBC-compliant platforms. Eversource and National Grid expect to deploy their bulk data sharing platforms in mid-2026.

Unitil's overarching strategy for "Bulk Data sharing with Third-Parties" is consistent with Eversource and National Grid. Unitil's scoping sessions are ongoing and timing is to be determined.

Eversource's and National Grid's bulk data sharing platforms will consist of the following lifecycle:

4.1 Registration – one time within the Bulk Data Sharing Platform

- Competitive suppliers, and other parties determined by the Department to be eligible recipients of bulk customer data, will be prompted to register through each EDC's website, respectively, the first time that the utility data sharing platform is used. The third party will select the appropriate account type (e.g., supplier, aggregator, or other eligible parties per Department guidance) before continuing with a curated registration experience. Upon deployment in mid-2026, only competitive energy suppliers and municipal aggregators will have access to each EDC's bulk data platform; however, the platforms are capable of serving other entities approved by the Department.

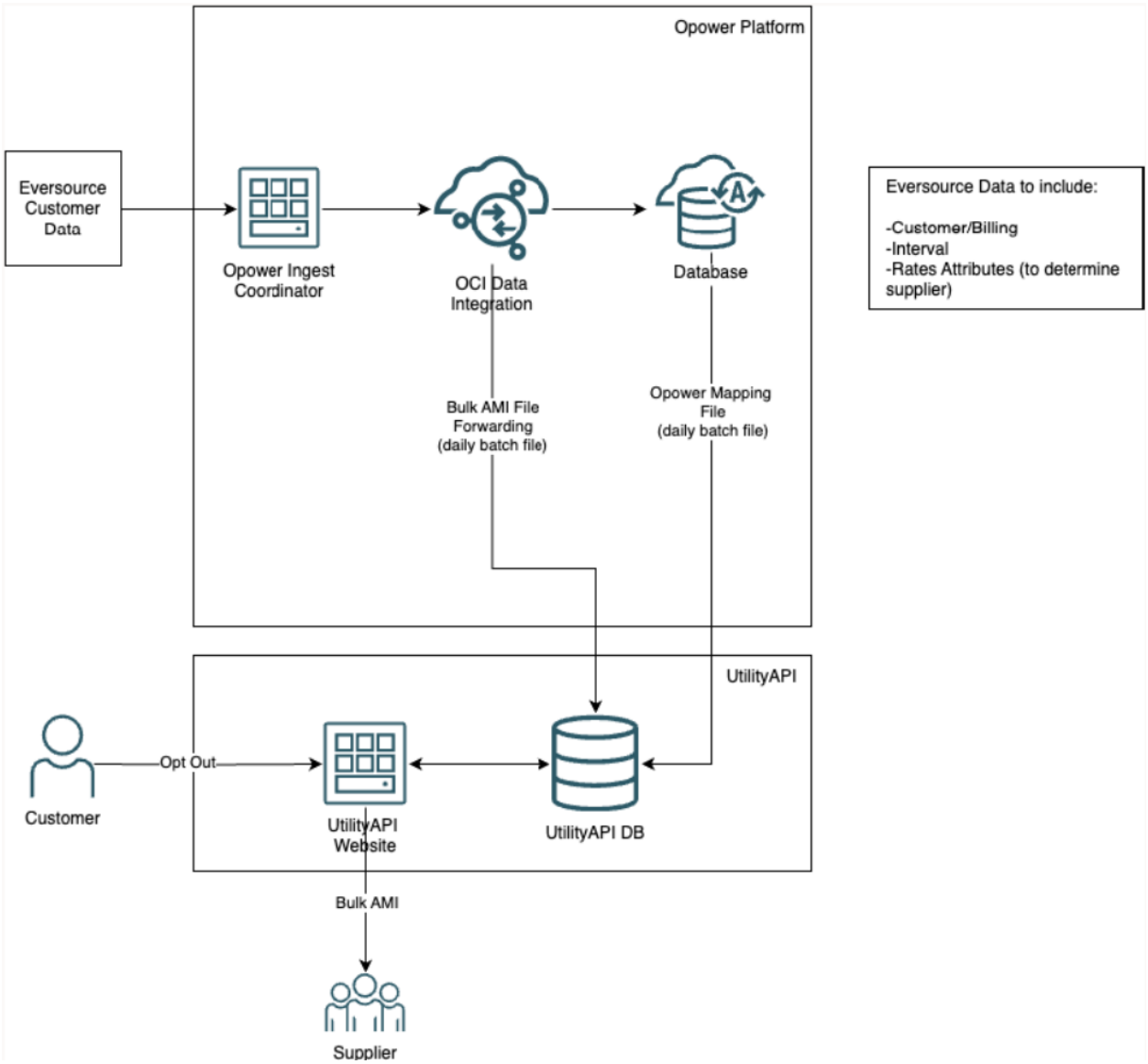
- Subject to confirmation of technical feasibility, the EDCs' intent is for EDC-specific registration to extend to the central repository (see Section 5), without the need for the third parties to register again.

- After successfully entering basic user and company information necessary to create an account, the eligible third party will be prompted to agree to specific terms and conditions, including the AMI usage data protection agreement and terms and conditions for their group. The EDCs' proposed sample agreement is included in Appendix A.

- The third party data recipient must accept these agreements in order to successfully create an account and receive customer data.

4.2 Data transfer configuration for newly registered bulk data recipient

- See the diagram below showing how data will be shared across responsible stakeholders to enable the outcome of giving eligible recipients timely access to their customers' data. This architecture is specific to Eversource; however, National Grid and Unitil are utilizing a similar process:



4.3 Eligible third-party access to bulk customer data from data sharing platform APIs

- Customer data transfer via Secure File Transfer Protocol ("SFTP"): The GBC-compliant platform host vendor will receive a supplier and aggregator customer list from Eversource and National Grid on a daily basis.
- The GBC-compliant platform host vendor will receive customer data files for the latest customers in the supplier or aggregator's customer list from the respective EDC on a daily basis.

- Eligible third party access to customer data will be managed through Green Button Connect My Data authorizations for each of the supplier's or aggregator's customers. Each authorization defines the scope of data shared between the customer and the supplier.

- Supplier and aggregator authorizations will be configured on an "Opt Out" basis consistent with the Department's procedural memo. A customer will be defaulted to sharing their data with the supplier and aggregator (when applicable) upon enrollment with the applicable supplier or aggregator; customers will not have to provide explicit consent. Each customer associated with a supplier that has "Opt Out" permissions will have a Green Button Connect My Data authorization automatically created for their account.

- Suppliers and aggregators will receive customer data on a daily basis via CSV files.

- The EDCs are seeking Department guidance on other third parties that will be eligible to receive bulk customer data, and the frequency of those data transmissions.

4.4 Customer permission management (opt out) of authorized Green Button Connect My Data connections

Customers will maintain control over sharing of their data.

- Customers may use their EDC's Data Sharing Platform to view and terminate their existing data sharing permissions with competitive suppliers, aggregators, and any other bulk-data-eligible third parties. This is consistent with how data sharing permissions are managed for the EDC's GBC-compliant platform (Section 3). The opt-out capability applies to both the third-party recipients that the customer specifically authorized, as well as those data sharing permissions in which the customer was included by default.

- When a customer chooses to terminate their data sharing permission, the existing data sharing permission will be cancelled and become inactive.

- A record of the transaction will be available on the EDC's Data Sharing Platform's administrator portal, and suppliers will no longer receive data for that customer.

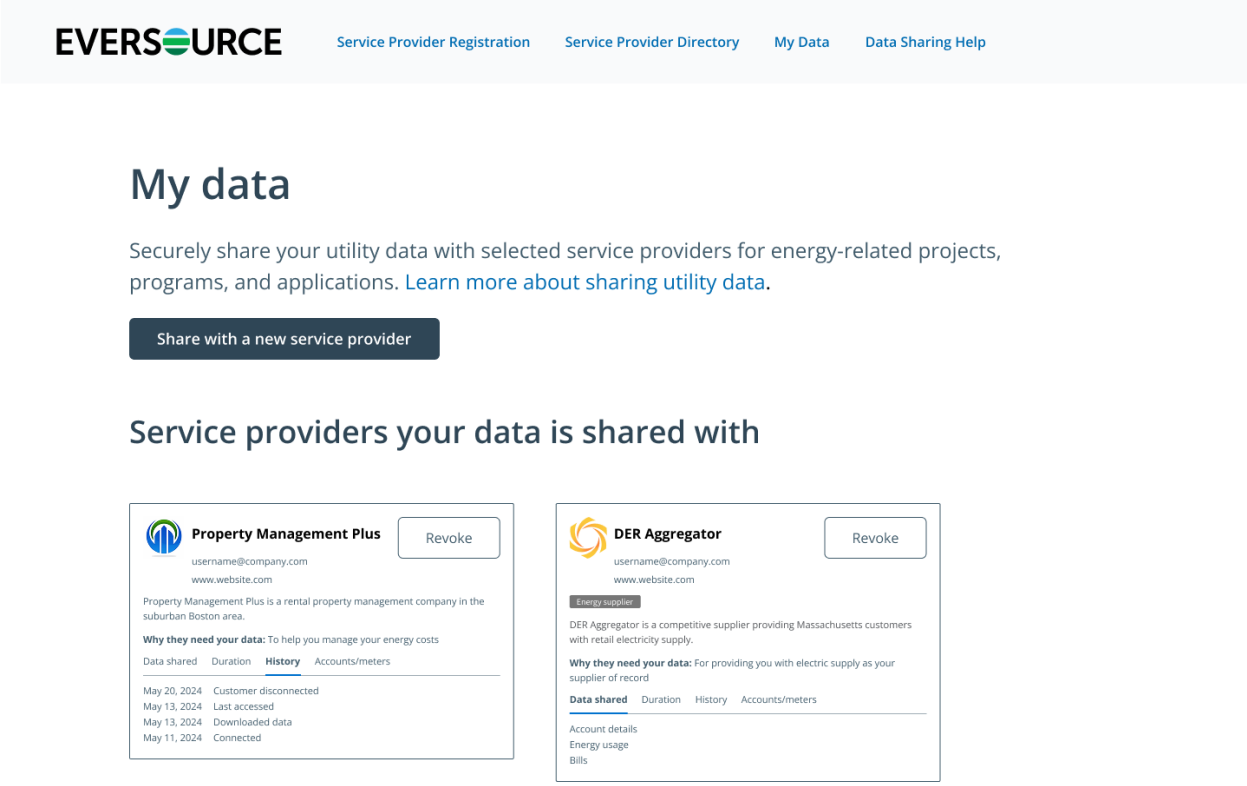
- Customers who unenroll with a given supplier will also have their data sharing permissions for that supplier cancelled and the permission will become inactive.

- If such permission is revoked, that customer will be excluded from subsequent bulk data sharing. Their data will not be deleted from data sets shared with third parties prior to the

revocation of consent, even if the customer was previously defaulted into the data sharing without explicit consent.[1]

- Once the statewide data sharing platform (see Section 5) is live, customers' EDC-specific sharing permissions will be applied consistently to the statewide platform, subject to technical feasibility.

The following image is an illustration of what the customer permissions management for data sharing at the EDC's website will look like when a customer is sharing with several third parties, including their competitive supplier or municipal aggregator:



4.5 Educating customers on data sharing permission management

Customer outreach and education on their rights with respect to data sharing and how to opt out will be accomplished through several channels:

- Customer disclosures will be sent to remind customers of their data sharing rights and that they have control over their data sharing permissions. These disclosures will remind customers that permissions can be managed through their EDC website account where

[1] The EDCs cannot enforce a data deletion requirement for previously shared data.

they can review and manage the entities that have access to their data, including opting out or restricting access at any time.

- Each EDC will update their Terms and Conditions and Privacy Policies, located on the EDC websites, to address data sharing and customer rights.

- Each EDC will create a content page to educate customers on data sharing and opt out rights.

Customer management of their data sharing permissions is best accomplished through the customer's online account on their respective EDC website, where customers can not only see their data sharing permissions, but are also able to revoke or edit those permissions, including data sharing elements and time periods. Therefore, communication will focus on directing customers to the EDC websites.

5. Phase 3 - Statewide data sharing platform

The EDCs are proposing a COTS solution with customizations for a state-wide, multi-EDC, centralized energy data sharing repository (referred to as the "Platform"), facilitating the authorization that will allow the EDCs, their customers, and third parties to access and share customer energy data.

The proposed Platform will provide access to utility customer usage data for customers and third parties. It will fully support the Green Button Connect My Data standard, and the EDCs may pursue certification by the Green Button Alliance if doing so will provide additional value to customers.[2]

The Platform will be an API-based online energy data platform designed to efficiently manage and integrate energy data from each of the EDCs. This Platform will harness a centralized web portal and a unified API architecture that adheres strictly to the Green Button Connect My Data standards to support secure and standardized data exchanges. This API-centric design, which integrates directly with EDC-provided backend APIs, avoids redundant data retention costs by storing data only temporarily for necessary aggregation, caching, and computational operations. The API-based approach provides significant benefits over a strictly centralized database in several areas. The first is that the API-based approach allows each EDC to maintain its cybersecurity controls, whereas with a strictly central database, new cybersecurity controls would need to be developed and maintained by a central administrator. The second is that, in order to maintain a strict central database, the data would be "at rest" and only updated at scheduled intervals. With an API-based approach, the data would be as current as each EDC is able to update the data within its own customer systems. For these reasons, the EDCs recommend moving forward with the API-based approach.

Each EDC's specific API will provide access to historical data for up to 24 months within the EDC's respective internal databases. This design is meant to strike an important balance between optimized performance, high-level data security, prudent cost management, and customer consent. The proposed Platform will be designed to cost-effectively tie together the EDCs' data sharing capabilities described in the preceding sections, which are already operable and well-performing or in advanced stages of development as of the date of this document.

Consistent with their focus on cost control and oversight, as well as affordability, the EDCs will issue a Request for Proposal ("RFP") once the approach to the Platform has been approved by the Department.

[2] The EDCs are still evaluating whether they will pursue formal certification of GBC compliance.

5.1 Overall Solution

The Platform solution will be designed to meet the following requirements:

1. The solution will provide a responsive design that includes a browser-based user interface allowing third parties to register, login, and access authorized customer usage data and perform approved activities. A separate mobile application will not be required.

2. The solution will conform to current Level AA Web Content Accessibility Guidelines (WCAG)[3].

3. The solution will perform data entry validations and present errors to third parties, as appropriate.

4. The solution will establish and maintain a repository of approved third-party Platform users. The solution will enable authorized administrators to manage (add and remove) third parties.

5. The Platform will support data requests from the end users described below:

    a. Municipal Aggregators with existing customers;
    b. Third-party suppliers with existing customers;
    c. Third parties seeking aggregated data only;
    d. Third parties seeking individual customer data; and
    e. Third parties deemed eligible by the Department to receive bulk data.

    Note that each entity requesting customer data must first obtain cybersecurity and data privacy certification and sign the appropriate agreements covering data access.

6. The solution will interface with the EDCs' systems through the designated EDC APIs to request and receive data to be provided to Platform end-users.

7. The solution will allow customers to opt in and opt out of data sharing through each EDC's individual GBC portal. The solution will capture these opt outs for the Platform through the designated EDC APIs. Customers will be automatically opted in to share data with their alternative energy supplier or municipal aggregator.

[3] These are part of a series of web accessibility guidelines published by the World Wide Web Consortium's Web Accessibility Initiative to help make website content accessible for disabled users, including those with low vision.

When the EDCs complete their systems enhancements to accommodate accelerated switching, the data within their respective customer information systems ("CIS") will reflect any accelerated switching requests received from customers or suppliers. Since the API-based solution for the central data repository will be fed data from the CIS, the usage data will align with the then-current status of the customer account, including whether they have recently availed themselves of accelerated switching.

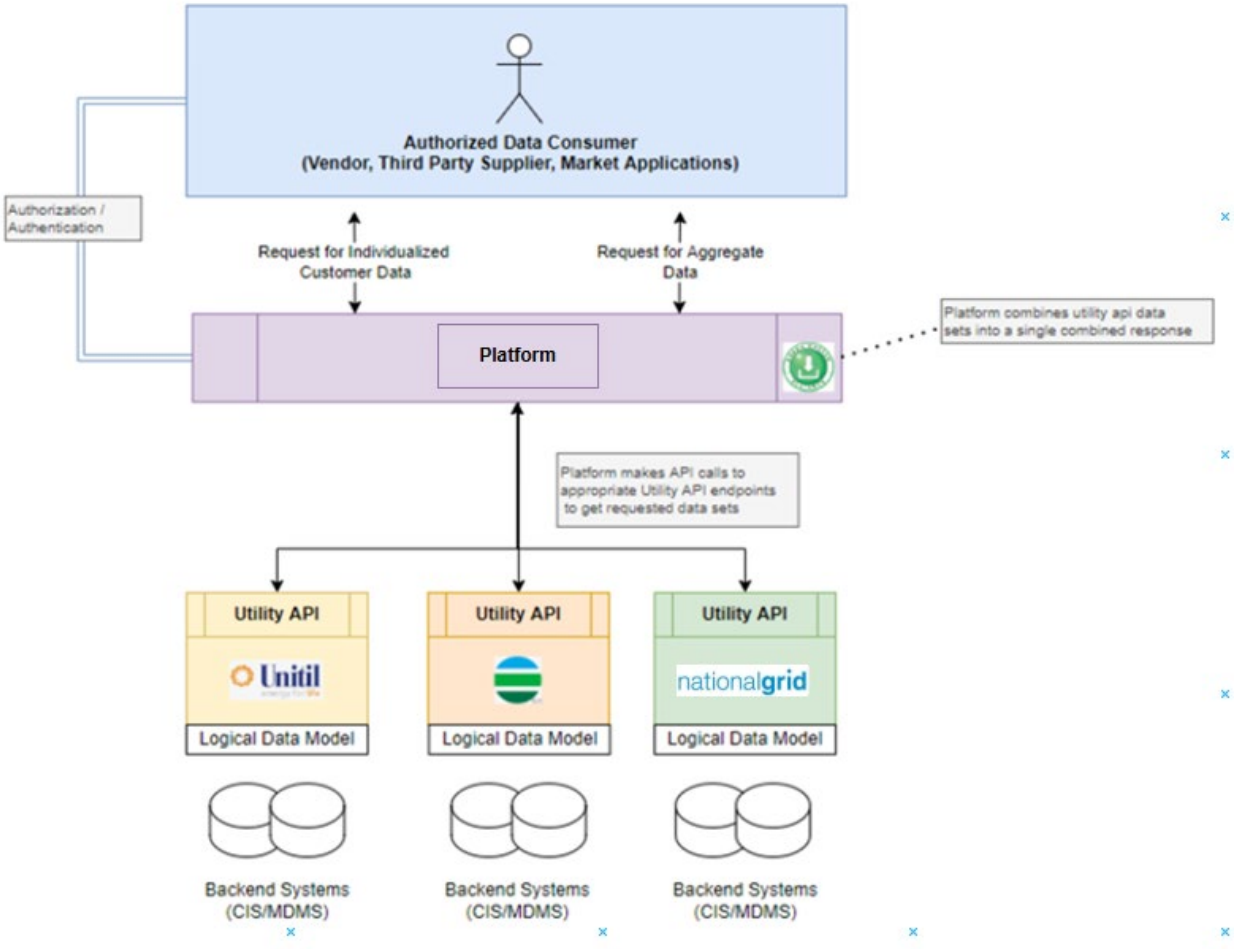
8. The solution will capture and log utility API interactions.

9. The solution will provide reporting capabilities to review third-party and EDC API requests including request outcomes (i.e., success, error, content).

10. The solution will meet the cybersecurity requirements outlined in the EDCs' proposed Cyber Requirements included in Appendix B.[4]

11. The following schematic illustrates the architecture and data flows:

[4] The EDCs previously included these Cyber Requirements as Appendix C to their comments filed on June 27, 2025 in D.P.U. 21-80/81/82.



5.2 Available Data Fields

Billing Data Fields			
Data Fields	**Green Button Location**	**Enumerated / Allowed Values**	**Example**
Account Number	Retail Customer Schema > CustomerAccount		1089999
Premise			
Customer Name			Bob Smith
Customer Email Address			smith@mail.com

Customer Phone		Home / Mobile / Business	
Account Address	Retail Customer Schema > ServiceLocation	This should be multiple addresses: Contact and Service	123 Main Street. Salem NH 03079
Customer Rate Code			D1 Res
Meter Number	Retail Customer Schema > ServiceLocation > Usage Point		234433
Meter Reading Previous		Register Read End KWH or KW at end of cycle "meter reading previous"	345678
Meter Reading Current		Register Read End KWH or KW at end of cycle "meter reading current"	345878
Overall Consumption Last Period	UsageSummary > OverallConsumptionLastPeriod		809
Overall Consumption This Period	UsageSummary > CurrentBillPeriodOverAllConsumption		784
Billing Period	UsageSummary > BillingPeriod > Duration and Start		
Commodity	UsageSummary > Commodity	Gas or Electric	"E"
Bill Amount	UsageSummary > Amount	Current bill total	106.5100
Balance Forward?			
Customer Charge	UsageSummary > CostAdditionalDetailLastPeriod (bill line item collection)		$17.00
Delivery Charge	UsageSummary >CostAdditionalDetailLastPeriod (bill line item collection)	ItemKind: 2 Energy Delivery Fee	0.0233
Stranded Cost Charge	UsageSummary > CostAdditionalDetailLastPeriod (bill line item collection)		0.0432
System Benefit Charge	UsageSummary >CostAdditionalDetailLastPeriod (bill line item collection)		0.00456

Consumption Tax	UsageSummary > CostAdditionalDetailLastPeriod (bill line item collection)	ItemKind 5: Tax	0.00005
Energy Service Charge Fixed	UsageSummary >CostAdditionalDetailLastPeriod (bill line item collection)		0.0823
Quality of Reading	UsageSummary > QualityofReading	0 - valid 7. - manually edited 8. - estimated using reference day 9. - estimated using linear interpolation 10. - questionable 11. - derived 12. - projected (forecast) 13 - mixed 13. - raw 14. - normalized for weather 15. 16. - other 17. - validated 18. - verified 19. - revenue-quality	valid
Service Supplier Kind	Retail Customer Schema > Service Supplier > Supplier Kind	Utility, Retailer, Other, LSE, MDMA, MSP	retailer
Service Supplier ID	Retail Customer Schema > Service Supplier > SupplierID		
Service Supplier Effective Date	Retail Customer Schema > Service Supplier > EffectiveDate		
Service Supplier Name	Retail Customer Schema > Service Supplier > Name		
Peak Demand (for current bill period)	UsageSummary > PeakDemand		
Interval Data Fields			
Interval Reading Start Date and Time	MeterReading > IntervalBlock > IntervalReading > TimePeriod		

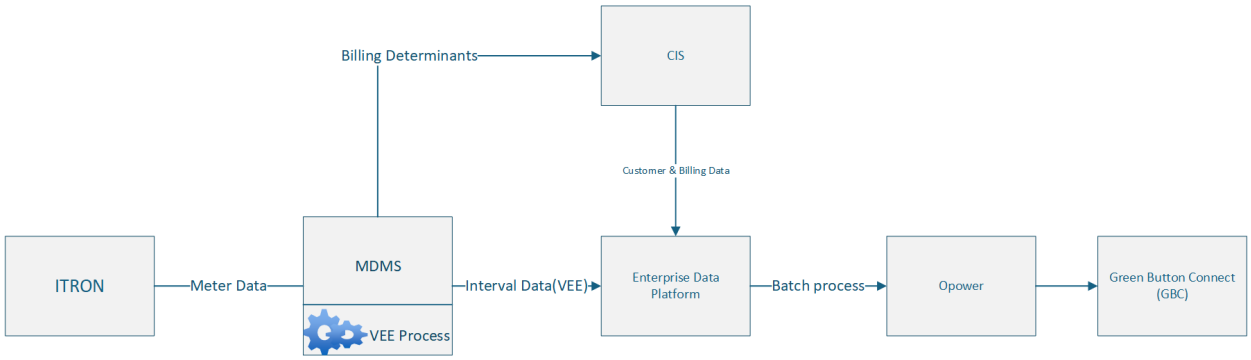
Interval Reading Value	MeterReading > IntervalBlock > IntervalReading > Value		
Interval Duration	MeterReading > IntervalBlock > IntervalReading > TimerPeriod > Duration		
Interval Reading Quality	MeterReading > IntervalBlock > IntervalReading >Reading Quality	Valid, Manually Edited, Estimated Using Reference Day, Estimated Using Linear Interpolation, Questionable, Derived, Projected, Mixed, Raw, Normalized For Weather, Other, Validated, Verified, Revenue-Quality	
TOU	MeterReading > IntervalBlock > IntervalReading>TOU	TOU bucket for interval period	

5.3 Data Standards

The Act requires that AMI infrastructure provide data to end-users and third parties in "near real-time." To meet this objective, the EDCs' proposal is to provide Validation, Estimation and Editing ("VEE") processed, billing-quality data within 24-48 hours consistent with industry practice.

The proposed timing is based on the necessary processes required to collect, validate, and integrate such data across multiple systems. Specifically, the process of collecting AMI interval meter data involves a series of steps, culminating in an overnight batch integration with other customer information in the EDCs' back-end systems that feeds into the Platform. As part of this process, the data is subjected to VEE to ensure accuracy. The validated data must then be integrated with customer data from additional systems (e.g., CIS) and integrated into the EDC's enterprise data platform. While bypassing the VEE process would expedite data delivery, it would also increase the risks of interval data gaps. Such inconsistencies between early data uploads, VEE processed data and customer monthly bills could lead to customer confusion. Following the VEE process, the risk of data inconsistencies is significantly reduced. Accordingly, the EDCs have proposed to provide only VEE processed interval data through GBC, which requires 24-48 hours.

Illustration of data flow:



Mitigating customer confusion will be particularly important during the early stages of AMI implementation.

Data will be available using flat file transfers via .CSV and .XML. Third parties using the Platform will be able to request file downloads on demand within the Platform, and will also be able to use an API to pull the data automatically on a set schedule.

Competitive energy suppliers and municipal aggregators will have access to up to two years of historical data once they onboard a customer, depending on when the customer received their AMI meter. The EDCs envision the Platform will offer a choice of how much data is provided (one day, one week, etc. up to two years) each time such a request has been made.

5.4 Aggregated Data

While the GBC data standard does not directly support aggregated data, aggregated data in defined geographic groupings such as municipality or ZIP code could be provided through an alternative delivery method including downloadable .CSV files via an API-based endpoint. These aggregated files would require programmatic changes to the EDCs' back-end systems based upon an approved methodology for ensuring anonymization of customer data.

The EDCs recommend applying an aggregation threshold of: At least 100 customers per data set without a contractual relationship with the third party.

When an aggregated data request is made, the EDCs' systems will need to aggregate the data according to the requested specifications. The Platform will be responsible for combining the multi-customer data sets provided by the EDC APIs into a single multi-utility output.

There will be pre-defined reports specified that can be used for requesting aggregated data. If data is being requested on an aggregated basis that is suppressed according to the thresholds described above, then users will still need to pass a high-level screen in order to gain access.

Aggregated data will only include fields (Interval Reading Value) already being shared through the Platform (shown in Section 5.2). The data can only be aggregated based on an existing datum that exists in both the EDCs' CISs and in the GBC data model, as defined by the data fields in Section 5.2. Data cannot be aggregated by a field that does not already exist within the EDCs' CISs, such as building identifiers or U.S. Census identifiers (e.g., census block group).

Data aggregation granularity will be at the following geographic levels: state, municipality, and zip code. Data can be shown by rate class within geographic areas. A significant value of AMI data is the availability of more frequent billing data than monthly. The EDCs are therefore proposing to provide aggregated 15-minute interval usage data.

5.5 Customer Data Sharing Permission Management

Customers will continue to be able to utilize their individual EDC's website to view and terminate their data sharing permissions with competitive energy suppliers, municipal aggregators, and any other third parties authorized by the Department. This is consistent with data sharing permission management for the individual customer data sharing platform (see Section 3) and the bulk data sharing platform (see Section 4).

Keeping the customer permission capabilities at the individual EDC websites offers several benefits. Customers will be able to use their existing EDC website usernames and passwords, see all of their data sharing permissions in one place, and in the place where they already conduct transactions related to their electric utility account.

If customer permissions for the Platform were to be managed through the Platform, customers would only see their platform data sharing permissions, and not the permissions granted through the individual EDC platforms. Adding customer permission functionality to the Platform would also require customers to create new usernames and passwords, and to connect their EDC accounts to the Platform. These additional steps create unnecessary friction for the customer. The EDCs would also have to build new APIs to allow customers to sync their accounts to the Platform, which would add additional complexity and cost to the implementation and management of the Platform.

The EDCs recognize that accommodating customer permission management in the EDC account environment rather than on the central data repository does create a modestly more cumbersome experience for owners of properties across multiple EDC territories. The EDCs view this as a beneficial tradeoff, particularly for multi-premise owners, because permission management, access to AMI data insights and account recommendations can all be provided in an integrated digital experience within the EDC account environment, whereas those value-added features would not be available in the central data repository. If the Department determines the EDCs should include customer permission management in the Platform, the EDCs can include this in the scope of the competitive solicitation, and determine how much additional cost would be required for this functionality.

5.6 Administration

Central Data Repository Administrator

In order to promote consistent experiences for customers and third-party data recipients, the EDCs support third-party administration of the central data repository. The EDCs recommend that the independent administrator be selected via a competitive solicitation. While the detailed business requirements will be determined once the Department issues its directives on the Platform, the EDCs recommend the following requirements for inclusion in evaluating candidates for the independent administrator:

- **User Management.** The central data repository administrator will need to register users and manage their access to the application.

- **Third Party Registration Request.** The central data repository administrator must enable third parties to register their intent to access data. The central data repository administrator will facilitate the onboarding and security review of the third party. The review process and authorization to access this data may be managed outside of a user-driven Green Button workflow. Once approved, the Platform must maintain a list of approved third parties and make it available to users.

- **Third Party Data Requests.** The central data repository administrator must allow a third party to make a request to retrieve data, which will call the appropriate utility APIs to gather and deliver the requested data. This encompasses a single customer, "bulk" data requests (for a group of customers), and "aggregated" (where only the group's total metrics are delivered).

- **Data Request Management.** The central data repository administrator will monitor and record requests enabling asynchronous responses to data requests from third parties. It will also provide query capability to enable third parties and the utilities to manage request activity.

- **Platform Management for EDCs.** The central data repository administrator will facilitate EDC staff viewing interaction and transaction history, user management, and managing third parties' registrations.

- **Customer functionality.** Customers are not required to establish an account for the Platform. A multi-premise owner across EDCs who would like to access data for all of their properties at once in the central data repository (instead of in each of their respective EDC's website) will be able to register as a third-party and select themself as an authorized third-party recipient of their data.

Third Party Authorization Administrator

The EDCs plan to issue an RFP to select a Third-Party Authorization Administrator who will be responsible for approving third parties who request access to the Platform.

The EDCs will jointly agree on the criteria the Third-Party Authorization Administrator will use to determine whether a requesting third party should be approved or denied. These criteria will include the requirements included in the attached Cyber Requirements included in Appendix B.

The Third-Party Authorization Administrator will be required to complete their review within 30 days and to notify requesting third parties of their approval or denial within 35 days.

Any requests that are initially denied by the Third-Party Authorization Administrator can be appealed. Appeals may be made in the following order 1) Third-Party Authorization Administrator, 2) the relevant EDC, and 3) the Department.

5.7 Service Level Agreements

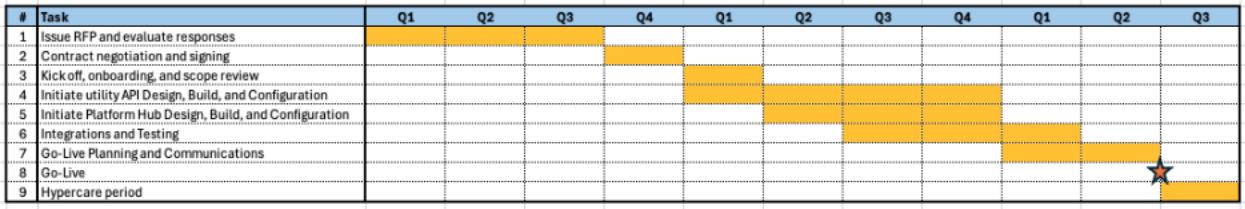
The Companies propose a 99 percent uptime rate as an aspirational service level agreement ("SLA") goal based on what the proposed system design could support. However, since the system is not yet in use, this goal is preliminary and will be revisited as the system begins to see productive usage. It must also be noted that an SLA is a matter of negotiation with potential vendors in a competitive solicitation, and there are likely to be tradeoffs between performance targets and costs. To date, potential third-party data recipients have not articulated the value to customers of maintaining a specific service level. Therefore, it would not be prudent to stipulate an SLA target prior to a competitive bid process and an assessment of the cost of achieving performance guarantees at various service levels. The EDCs remain committed to ensuring that their platform implementations, including the statewide Platform, meet the expectations of customers and other users, including competitive suppliers. Accordingly, the EDCs will include performance standards in the GBC partner agreements and will work to ensure the reliability of processes using the Platform, internal data systems, and digital channels. If GBC users experience sustained periods of performance below the established service levels, the EDCs will commit in good faith to discussions with stakeholders regarding solutions.

5.8 Timeline

Once the EDCs receive approval from the Department on their approach to the Platform, the EDCs estimate it will take approximately 2.5 years to fully implement the solution. The timeline estimate includes nine months for the RFPs, as outlined below. This timeline does not include significant contingency for unanticipated complexities that may emerge during the competitive solicitation, design and implementation.

There will be two RFPs issued to build the Platform. The first RFP will be for the COTS system itself, and the second RFP will be for a Project Management Consultant to oversee the project for the EDCs. Both RFPs will be jointly managed by the EDCs, and the EDCs will be the sole evaluators using all three EDCs' competitive solicitation protocols. The Statement of Work for the Program Management Consultant is included in Appendix C.

Implementation Timeline



5.9 Features Determined Out of Scope

The EDCs have carefully considered all aspects of the central data repository as required by the 2024 Climate Act, as well as feedback from various stakeholders. The solution put forward by the EDCs will provide meaningful benefit for customers and third parties who require access to advanced metering data. But in order to provide a cost-effective and timely solution, the EDCs consider the following items out of scope at this time:

- Bill Images
    - ◊ The EDCs are not currently able to provide bill images in the Platform. While the GBC data standard does support the inclusion of PDF bill images, the back-end technology currently used by the EDCs does not support this capability via GBC or any other means of bulk transfer. Bill images are created by the EDCs' billing vendor partners and are not stored as PDFs – they are instead rendered on demand. Providing bill images via GBC would require significant architecture changes, and would cause significant additional costs based on the existing commercial agreements with each EDC's bill production vendor. For example, Eversource's bill production vendor only receives payment for bill images rendered on demand. Currently, 24% of Eversource customers receive an electronic rendering of a bill image each month (the majority simply pay the balance shown in their bill notification without viewing their full bill image). If an electronic bill is required for each customer potentially included in bulk data sharing and/or GBC transactions, the annual volume would increase to roughly 1.5 million monthly electronic bill images for Eversource's Massachusetts customers, and there would be an additional charge to transfer the bill files to the Platform. This is an estimated increase in cost of around $2.3 million annually.

- ◊ National Grid bill print costs will have an estimated $150,000 in implementation costs with $250,000 in annual SaaS fees to include bill prints as part of the GBC transfer for its roughly 1.5 million electric bill images for Massachusetts customers.

- ◊ The inclusion of bill images is also currently out of scope for the EDCs' current GBC contracts. Incorporating the bill prints will have an increased cost in the established contracts and will complicate the process of data transfer.

- ◊ The bill image is an unnecessary additional layer of data redundancy, as all of the meaningful elements of the bill are included in the data that will be accessible via the Platform in CSV files.

- Building-Level Data

  - ◊ The EDCs are not currently able to provide building-level data systematically. The creation and provision of building-level data is a manual effort, as the EDCs do not currently store data at the building level, nor do they maintain standard indicators that allow customers to be grouped by their buildings. Because the building indicator does not exist, it cannot be included in the data model (Section 5.2), nor can it be used for aggregation (Section 5.4). Building owners are in the best position to identify which accounts and meters are associated with their building. In addition, anonymization standards would likely not be sufficient for building-level data due to the smaller number of customers; in other words, there would be a high number of building exclusions in order to protect customers from data mining that could compromise their privacy and/or commercially valuable information.

5.10 Data Repository Costs

Costs for the Platform will not fully be known until the RFPs are conducted. However, the EDCs have identified the following categories of costs: one-time cost to build and execute the Platform solution; third-party authorization administration of the Platform; and annual internal costs and fees for Platform operation and maintenance including licensing. As discussed above, if the EDCs are directed to make changes to their proposal (e.g., inclusion of PDF bill images) there will be additional costs that must be addressed.

The estimated costs outlined below are for order of magnitude purposes only. The estimates will ultimately be refined (and may change significantly) once the Department confirms which aspects of the EDCs' proposal are to be adopted, and a competitive solicitations are subsequently performed.

One-time cost to build and execute the Platform solution

The one-time cost to build the Platform includes the costs from the Platform Administrator to stand up the Platform; the cost for each EDC to build the back-end support to integrate with the Platform (i.e., APIs); and the Project Management cost to support the project.

Platform set up (dependent upon RFP)	$700,000 - $1,000,000
Eversource back-end integration	$400,000 - $500,000
National Grid back-end integration	$400,000 - $500,000
Unitil back-end integration	$400,000 - $500,000
Project Management (dependent upon RFP)	$1,000,000 - $1,800,000
Total	**$2,900,000 - $4,300,000**

Third-party authorization administration of the Platform

These costs are unknown at this time, and will be determined based on the outcome of the RFP to choose a third-party authorization administrator. The EDCs could not find a similar structure in other states or jurisdictions that could be used to create an estimate.

Annual fees and licensing

Each EDC will have ongoing operation and maintenance costs to ensure the EDCs' integration with the Platform continues to work seamlessly.

Eversource	$250,000 - $500,000
National Grid	$250,000 - $500,000
Unitil	$100,000 - $200,000
Total	**$600,000 – $1,200,000**

In addition, based on the EDCs' experience with GBC for individual customers (Section 3) and bulk data (Section 4), the annual licensing fee for the Platform will be based on the number of AMI meters served. The annual licensing fee includes the customer data layer, the aggregated data layer, and the overall shared platform operation. These costs are forecasted using each EDC's expected number of AMI meters as of December 31, 2025.

Eversource	$1,650,000 - $1,875,000
National Grid	$1,575,000 - $1,800,000
Unitil	$35,000 - $40,000
General Platform support	$200,000 - $250,000
Total	**$3,460,000 - $3,965,000**

Overall Platform Costs

Based on the estimates provided above, the EDCs have estimated the total implementation and annual costs of the platform below:

Implementation	Annual maintenance and licensing
$2,900,000 - $4,300,000	**$4,060,000 - $5,165,000**

These costs give an estimated 5-year total cost of the Platform to be $23,200,000 to $30,125,000.

Bill PDFs

While the EDCs consider bill PDFs to be out of scope for the Platform (Section 5.9), cost estimates are included below for reference.

As outlined in Section 5.9, the back-end technology currently being used by the EDCs does not support this capability via GBC or any other means of bulk transfer. The costs below outline the implementation costs to provide the technology, including costs from each EDCs' bill composition vendor as well as the costs to maintain and store bill PDFs within the GBC solutions.

EDC	Implementation	Annual Service & Support Fees
Eversource	$500,000	$2,340,000
National Grid	$150,000	$250,000
Unitil	$100,000	$20,000
Total	**$750,000**	**$2,610,000**

Potential Fee Structure

The EDCs recommend a fee structure for users of the Platform, not to exceed the overall total cost to implement and maintain the Platform. The EDCs recognize that affordability is top of mind for our customers and the Department. Customers are already receiving the benefits of third-party data sharing through the EDC GBC solutions outlined in Section 3. Most of the requirements of the Platform have been requested by the eventual end users of the Platform (i.e. third parties) and those users will be the primary beneficiaries of the Platform. Therefore, the EDCs would propose a fee for access to the Platform and this would be used to offset the customer costs for the Platform.

The EDCs recommend benchmarking the expected use rate of the Platform to estimate the expected total number of annual transactions performed, and use that information, the total cost of implementation of the Platform and the annual licensing and maintenance costs to arrive at an appropriate fee structure. For example, if there are 500 users of the Platform who perform transactions 200 times per year, the per transaction cost would be $46 - $60, or $9,280 - $12,050 annually, based on the 5 year total cost estimate provided above. This is an example calculation

and is subject to change based on the results of the RFPs. The calculation may also increase slightly to account for any required taxes.

Cost Allocation

The EDCs propose allocation of all joint costs, not recovered through the fee structure defined above, based on the number of AMI meters each EDC has in its service territory. The EDCs will submit individual cost recovery framework proposals to the Department for the costs associated with the Platform, including ongoing costs, until they can be captured in each EDC's next rate case.

The Platform will be jointly owned by the EDCs (Eversource, National Grid, and Unitil). Implementation and development costs incurred for the central data repository will be capitalized as a new intangible software asset and booked to plant in-service for each individual EDC share of the Platform. To the extent that the EDCs are unable to capitalize any of the predevelopment costs, each EDC will submit its cost recovery proposal to address those expenses. The SaaS fees incurred on an annual basis will be considered as O&M expenses. The EDC's are seeking revisions to their Advanced Metering Infrastructure Factor ("AMIF") or Grid Modernization Factor ("GMF") recovery mechanisms to capture costs incurred for implementation.

6. Conclusion

The EDCs are prepared to execute this plan to ensure the central data repository meets the needs of customers, third-parties, and the Commonwealth of Massachusetts consistent with the requirements of the 2024 Climate Act.

The implementations of individual customer third-party data sharing as well as bulk data sharing are already completed or in progress. Following Department review and approval of this plan, the EDCs are ready to begin the RFP process for the central data repository (the Platform). This plan demonstrates the EDCs' commitment to providing cost-effective access to AMI data for authorized parties in order to continue to advance the climate goals of the Commonwealth, while ensuring that customers maintain control over their individual data.

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

NOTICE OF FILINGS, PUBLIC HEARING, AND REQUEST FOR COMMENTS

D.P.U. 26-20/26-21/26-22 April 7, 2026

Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan and Related Proposals Submitted by NSTAR Electric Company d/b/a Eversource Energy, Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, and Fitchburg Gas and Electric Light Company d/b/a Unitil Pursuant to an Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239, §§ 79, 127, 128.

On February 18, 2026, NSTAR Electric Company d/b/a Eversource Energy ("NSTAR Electric"), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid ("National Grid"), and Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") (together, the electric distribution companies "EDCs") each submitted for approval with the Department of Public Utilities ("Department") an advanced metering infrastructure ("AMI") data access protocol implementation plan ("AMI data access plan"). These filings were submitted pursuant to Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239 ("2024 Climate Act" or "Act"), §§ 79, 127-128. The Department docketed these matters as D.P.U. 26-20 for NSTAR Electric, D.P.U. 26-21 for National Grid, and D.P.U. 26-22 for Unitil, which the Department consolidated for adjudication.

Sections 79 and 128 of the 2024 Climate Act requires the EDCs to establish a statewide centralized AMI data repository to allow customers and third parties, including competitive suppliers, access to AMI data in near-real time and to implement accelerated switching permitting residential and small commercial customers to change suppliers within three days once AMI is fully deployed. Section 79 of the Act also permits the EDCs to recover prudent and necessary expenses to implement the centralized data repository.

In this proceeding, the EDCs submitted a joint AMI data access plan with supporting documentation, including sample agreements between the EDCs and competitive suppliers and municipal aggregators. Each EDC also submitted separate cost recovery proposals for implementation of the centralized data repository and data sharing. Key provisions of the EDCs' proposals are described below. This is not intended as an exhaustive list. Additional information on the EDCs' proposals can be found in each company's filing, which is available through the Department's website as noted further below.

Three-Phase Implementation of AMI Customer Usage Data Access and Centralized, AMI Data Repository. In the first phase, the EDCs will permit customer and approved third parties to access a customer's historic AMI usage data via an EDC-specific online platform deployed as part of the EDC's AMI implementation plan approved by the Department in 2022. In the second phase, the EDCs will develop EDC-specific bulk data sharing platforms on top of their existing individual platforms to allow approved third parties to access a group of customers' AMI usage data. In the final phase, the EDCs propose to jointly deploy a statewide, centralized AMI energy data sharing repository that utilizes an application programming interface ("API") and the Green Button Connect ("Green Button") "My Data Standard." The EDCs anticipate deployment of the data repository two-and-a-half years following Department approval.

Data Sharing Timing and Formats. The EDC-specific platforms and centralized data repository will provide customers and eligible third-parties relevant AMI usage data in near-real time (within 24 to 48 hours of use). Third party access to a customer's data would be provided through flat file transfers via a .CSV (referring to Comma Separated Values) or Green Button-compliant .XML format, or through an API-based connection. Third parties would be able to request file downloads within the repository and to schedule delivery of the data through an API. Aggregated customer data in defined geographic groupings (i.e., by municipality or ZIP code) could be provided to third-parties through a .CSV file via an API-based endpoint.

Third-Party Eligibility Requirements to Access Customer-Specific and Bulk AMI Data. To be eligible to receive EDC-specific customer data through the bulk data sharing platform and centralized data sharing platform, each third-party would be required to: (1) register on the relevant EDC's website; (2) certify agreement to the EDC's terms and conditions; and (3) execute a data privacy protection and cybersecurity agreement. The EDCs request Department guidance regarding which third-parties other than competitive suppliers and municipal aggregators should be considered eligible to receive bulk AMI data.

Customer Opt-Outs, Outreach, and Education. Under the EDCs' proposals, customers with an AMI meter and who have selected a competitive supplier or are participating in municipal aggregation will be opted into AMI data sharing with the competitive supplier or municipal aggregator by default and may opt out of providing data to third-party recipients and data sharing permissions through their EDC's website. When a customer opts out of data sharing, any existing data sharing authorization for their competitive supplier or municipal aggregator will be cancelled. The EDCs each propose revisions to their existing Terms and Conditions for Distribution Service tariff to address customer opting out. The EDCs propose to conduct customer outreach and education regarding data sharing permission management.

Estimated Costs. The EDCs estimate a minimum five-year total cost for the centralized data repository to be $23.20 million to $30.13 million but explain that the actual costs of the platform will not be fully known until after competitive solicitations are conducted and depending on any Department-directed modifications.

Proposed Cost Recovery from Third-Parties and Customers. The EDCs propose an annual fee structure for non-customer, third-party users of the centralized data repository, not to exceed the overall total cost to implement and maintain the platform. For costs not recovered through the fee structure, the EDCs propose to allocate joint costs based on the number of AMI meters in each EDC's service territory to be recovered along with EDC-specific costs through existing reconciling mechanisms. NSTAR Electric and National Grid propose to recover these remaining costs through their AMI factor ("AMIF") cost recovery mechanisms and propose illustrative revisions to their AMIF tariffs. Unitil proposes to recover the remaining joint and company-specific costs through its grid modernization factor ("GMF") cost recovery mechanism and proposes illustrative revisions to its GMF tariff. The EDCs do not propose changes to customer rates at this time; rather, if their current proposals are approved, the EDCs would submit costs for recovery in future proceedings.

Accelerated Switching. The EDCs include an initial proposal to address accelerated switching to be addressed in any separate proceeding. In particular, the EDCs propose to facilitate customer requests involving the enrollment, termination, or change in a supplier within three business days of the request and propose a framework to address, among other things, multiple switching requests within the same billing period and multiple suppliers seeking to enroll the same customer.

The Attorney General of the Commonwealth of Massachusetts ("Attorney General") filed a notice of intervention in this matter pursuant to G.L. c. 12, § 11E(a). Further, pursuant to G.L. c. 12, § 11E(b), the Attorney General has filed a notice of retention of experts and consultants to assist in her investigation of the Company's filing and has requested Department approval to spend up to $150,000 per docket in this regard. Pursuant to G.L. c. 12, § 11E(b), the costs incurred by the Attorney General relative to her retention of experts and consultants may be recovered in each EDC's rates.

The Department will conduct a virtual public hearing to receive comments on the EDCs' filings. The Department will conduct the hearing using Zoom videoconferencing on **Thursday, May 14, 2026,** beginning at 2:00 p.m. Attendees can join by entering the link, **https://us06web.zoom.us/j/83412529912**, from a computer, smartphone, or tablet. No prior software download is required. For audio-only access to the hearings, attendees can dial in at **(309) 205-3325 (not toll free)** and then enter the **Meeting ID # 834 1252 9912**. If you anticipate providing comments via Zoom during the public hearing, please send an e-mail by **Wednesday, May 6, 2026,** to kerri.phillips@mass.gov with your name, e-mail address, and mailing address. If you anticipate commenting by telephone, please leave a voicemail message by **Wednesday, May 6, 2026,** at (617) 305-3611 with your name, telephone number, and mailing address.

The Department will also accept written comments on the EDCs' filings and the Attorney General's notice of retention of experts and consultants until close of business (5:00 p.m.) on **Thursday, May 28, 2026**. Any person who otherwise desires to participate in the evidentiary phase of this proceeding shall file a petition for leave to intervene no later than the close of business (5:00 p.m.) on **Wednesday, May 6, 2026**. A petition for leave to intervene must satisfy the timing and substantive requirements of 220 CMR 1.03. Receipt by the Department, not

mailing, constitutes filing and determines whether a petition has been timely filed. A petition filed late may be disallowed as untimely, unless good cause is shown for waiver under 220 CMR 1.01(4). To be allowed, a petition under 220 CMR 1.03(1) must satisfy the standing requirements of G.L. c. 30A, § 10.

All documents must be submitted to the Department in **.pdf format** by e-mail attachment to dpu.efiling@mass.gov and kerri.phillips@mass.gov. In addition, one copy of all written comments and petitions to intervene should be emailed to: (1) NSTAR Electric's attorneys, Danielle C. Winter, Esq., Jessica Buno Ralston, Esq., and Michael B. Hershberg, Esq., at dwinter@keeganwerlin.com, jralston@keeganwerlin.com, and mhershberg@keeganwerlin.com; (2) National Grid's attorney, Melissa G. Liazos, Esq., at melissa.liazos@nationalgrid.com; (3) Unitil's attorney, Patrick H. Taylor, taylorp@unitil.com; and (4) Assistant Attorneys General Christopher Modlish and Kayla M. Burns at chris.modlish@mass.gov and kayla.m.burns@mass.gov. The text of the e-mail must specify: (1) the docket number of the proceeding (D.P.U. 26-20/26-21/26-22); (2) the name of the person or company submitting the filing; (3) a brief descriptive title of the document; and (4) for EDC customers only, the name of the EDC that provides electric service to their home. The electronic file name should identify the document but should not exceed 50 characters in length. Importantly, all large files submitted must be broken down into electronic files that do not exceed 20 MB. All documents submitted in electronic format will be posted on the Department's website through our online File Room as soon as practicable (enter either "26-20" for NSTAR Electric, "26-21" for National Grid, or "26-22" for Unitil) at https://eeaonline.eea.state.ma.us/dpu/fileroom/#/dockets.

To the extent a person or entity wishes to submit comments or intervene in accordance with this Notice, electronic submission, as detailed above, is sufficient. If a member of the public is unable to send written comments by e-mail, a paper copy may be sent to Peter Ray, Secretary, Department of Public Utilities, One South Station, 3rd Floor, Boston, Massachusetts 02110. Please note that in the interest of transparency any comments will be posted to our website noted above as received and without redacting personal information, such as addresses, telephone numbers, or e-mail addresses. As such, consider the extent of information you wish to share when submitting comments.

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), contact the Department's ADA coordinator at eeadiversity@mass.gov or (617) 626-1282.

For further information regarding the EDCs' filings, please contact the applicable EDC's attorney(s) through e-mail, as identified above. For further information regarding this Notice, please contact Kerri DeYoung Phillips, Department Hearing Officer, at kerri.phillips@mass.gov.

Translation and Interpretation Services

English
ATTENTION: Translation and/or interpretation services are available upon request. Please email Kaylee Burgess at dpu.ej@mass.gov to request language services, specifying your preferred language and contact information.

Español (Spanish)
ATENCIÓN: Los servicios de traducción y/o interpretación están disponibles bajo solicitud. Por favor envíe un correo electrónico a Kaylee Burgess en dpu.ej@mass.gov para solicitar los servicios de idiomas, especificando su idioma preferido e información de contacto.

Português (Portuguese)
ATENÇÃO: Disponibilizamos nossos serviços de tradução e/ou interpretação de acordo com a sua demanda. Para solicitar um serviço linguístico, envie um e-mail para Kaylee Burgess através do endereço dpu.ej@mass.gov, informando o idioma desejado e seus dados para contato.

中文 (Simplified Chinese)
提醒您：您可依需要申请提供笔译和/或口译服务。 请发送电子邮件给 Kaylee Burgess（dpu.ej@mass.gov）来申请语言服务要求，并注明您的首选语言和联系信息。

(Traditional Chinese)
提醒您： 您可依照需求申請筆譯和/或口譯服務。請以電郵聯絡Kaylee Burgess（dpu.ej@mass.gov）來申請语言服务请求，請在電郵內註明需要的語言和聯絡資訊。

Kreyòl Ayisyen (Haitian Creole)
ATANSYON: Gen sèvis tradiksyon ak/oswa entèpretasyon ki disponib sou demann. Tanpri voye imèl bay Kaylee Burgess nan dpu.ej@mass.gov pou mande sèvis lang, ki enfòme lang ou pi pito a ak enfòmasyon kontak ou.

Tiếng Việt (Vietnamese)
LƯU Ý: Các dịch vụ biên dịch và/hoặc phiên dịch có sẵn theo yêu cầu. Vui lòng gửi email đến Kaylee Burgess theo địa chỉ dpu.ej@mass.gov để yêu cầu dịch vụ ngôn ngữ, nêu rõ ngôn ngữ ưa thích của quý vị và thông tin liên lạc

Français (French)
ATTENTION : Des services de traduction et/ou d'interprétation sont disponibles sur demande. Veuillez envoyer un e-mail à Kaylee Burgess à l'adresse dpu.ej@mass.gov pour demander des services linguistiques, en précisant votre langue préférée et vos coordonnées.

(Arabic) العربية

يُرجى الانتباه: تتوفر خدمات الترجمة و/أو الترجمة الفورية عند الطلب. لطلب خدمات لغوية يُرجى التواصل مع Kaylee Burgess **بإرسال رسالة إلكترونية إلى العنوان** dpu.ej@mass.gov**، تحدّد فيها اللغة المفضّلة لديك وتذكر معلومات الاتصال.**

Русский (Russian)
ВНИМАНИЕ!
Услуги письменного и/или устного перевода предоставляются по запросу. Для запроса услуг перевода обращайтесь к Kaylee Burgess по адресу dpu.ej@mass.gov. В запросе укажите язык перевода и контактную информацию.

ខ្មែរ (Khmer)
ជូនចំពោះ៖ សេវាបកប្រែឯកសារ និង/ឬអ្នកបកប្រែផ្ទាល់ មានតាមការស្នើសុំ។ សូមផ្ញើអ៊ីមែលទៅ Kaylee Burgess តាម dpu.ej@mass.gov ដើម្បីស្នើសុំសេវាកម្មផ្នែកភាសា ដោយបញ្ជាក់ភាសាដែលអ្នកចង់បាន និងព័ត៌មានទំនាក់ទំនង។

한국 (Korean)
주의: 요청 시 번역 및/또는 통역 서비스가 제공됩니다. Kaylee Burgess에게 dpu.ej@mass.gov로 이메일을 보내 선호하는 언어와 연락처 정보를 명시하여 언어 서비스를 요청하십시오.

KO LAW, P.C.

ATTORNEYS AT LAW

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

1337 Massachusetts Ave
Box 301
Arlington, MA 02476

617-644-7681

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May 6, 2026

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

Secretary Peter A. Ray
Department of Public Utilities
One South Station, 3rd Floor
Boston, MA 02110

Re: D.P.U. 26-20
Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan and Related Proposals Submitted by NSTAR Electric Company d/b/a Eversource Energy Pursuant to an Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239, §§ 79, 127, 128.

Dear Secretary Ray:

Pursuant to the Notice of Filings, Public Hearing and Request for Comments dated April 7, 2026, attached for filing please find the Petition for Leave to Intervene of the Cape Light Compact JPE in the above-referenced proceeding, along with a Notice of Appearance and Certificate of Service.

Thank you for your attention to this matter. If you require further information or have any questions, please do not hesitate to contact me.

Sincerely,

Rebecca F. Zachas

Rebecca F. Zachas

RFZ/drb
Enclosures

cc: Kerri Phillips, Esq., DPU Hearing Officer (w/enc.) (via email only)
Danielle C. Winter, Esq., NSTAR Electric (w/enc.) (via email only)
Jessica Buno Ralston, Esq., NSTAR Electric (w/enc.) (via email only)
Michael B. Hershberg, Esq., NSTAR Electric (w/enc.) (via email only)
Melissa G. Liazos, Esq., National Grid (w/enc.) (via email only)
Patrick H. Taylor, Esq., Unitil (w/enc.) (via email only)
Christopher Modlish, Esq., Assistant Attorney General (w/enc.) (via email only)
Kayla M. Burns, Esq., Assistant Attorney General (w/enc.) (via email only)
Margaret Song, Compact Administrator (w/enc.) (via email only)

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan and Related Proposals Submitted by NSTAR Electric Company d/b/a Eversource Energy Pursuant to an Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239, §§ 79, 127, 128.	)))))))	D.P.U. 26-20

PETITION FOR LEAVE TO INTERVENE OF THE CAPE LIGHT COMPACT JPE

Pursuant to the Notice of Filings, Public Hearing, and Request for Comments by the Department of Public Utilities (the "Department" or "DPU") dated April 7, 2026 ("Notice"), and 220 C.M.R. §1.03, the towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County, organized and operating collectively as the Cape Light Compact JPE, a joint powers entity organized pursuant to G.L. c. 40, §4A ½ and G.L. c. 164, §134 (the "Compact"), hereby respectfully petition the Department for leave to participate as a full party in the above-referenced proceeding.

As grounds for its petition of intervention, the Compact states the following:

I. INTRODUCTION

1. On February 18, 2026, NSTAR Electric Company d/b/a Eversource Energy ("Eversource" or the "Company"), jointly with Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid ("National Grid"), and Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") (together, the "EDCs"), filed a joint AMI Central Data

Repository Implementation Plan (the "Plan") for approval with the Department.[1] The Plan was submitted pursuant to *Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers*, St. 2024, c. 239 ("2024 Climate Act" or "Act"), §§79, 127-128 and the Memorandum issued by the Department on September 8, 2025. The Plan is intended to comply with the Climate Act's requirements that the EDCs establish a statewide centralized AMI data repository to allow customers and third parties access to AMI data in near-real time and to implement accelerated switching to permit residential and small commercial customers to change suppliers within three days once AMI is fully deployed.

2. The Plan provides three phases for third-party data access: (i) data sharing by individual customers; (ii) bulk data sharing for municipal aggregators and third-party energy suppliers; and (iii) deployment of the central data repository. Plan at 1. Initially, data would be available on an EDC-specific online platform with customers' historic AMI usage data. *Id.* at 5, 15. The EDCs propose to complete the deployment of the state-wide central data repository approximately 2.5 years after the Department's Order in this proceeding. *Id.* at 25. That repository would use API and GBC "My Data Standard". *Id.* at 1. The EDCs would provide AMI usage data that would be provided in near-real time within 24 to 48 hours of use. *Id.* at 5-6. In addition, the EDCs would develop EDC-specific bulk data sharing platforms on top of their existing platforms to allow approved third parties to access bulk data by mid-2026. *Id.* at 9.

[1] Advanced metering infrastructure ("AMI") was approved for deployment by the Department in D.P.U. 21-80-B. In doing so, the Department found that third-party TVR and data access were key customer benefits in the approval of AMI costs. See *Petition of NSTAR Electric Company d/b/a Eversource Energy for approval of its Grid Modernization Plan for 2022 to 2025*, D.P.U. 21-80, Order at 327-29 (November 22, 2022). That Order also directed the commencement of the AMI Stakeholder Working Group, which was charged with focusing on, among other things, "customer and third-party access to customer usage data." D.P.U. 21-80-B Order at 327.

Aggregated customer data would be provided to third parties through a .CSV file via an API-based endpoint in defined geographic groupings (e.g., by municipality or zip code). *Id.* at 22.

3. Further, the Plan sets forth the EDCs' proposed data access protocol that includes an opt-out procedure for customers, cyber standards for data sharing, and proposed sample agreements that would be executed between the EDCs and competitive suppliers and/or municipal aggregators. Plan at 5, 15; Exh. EDC-2, App. A and B. The Plan would require third parties, including municipal aggregators, to: (1) register on an EDC's website; (2) certify agreement with the EDC's terms and conditions; and (3) execute the Third Party Data Security Agreement (Exh. EDC-2, App A). The EDCs also proposed customer outreach and education on data sharing permission management.

4. The EDCs estimate costs of around $23-30 million for the Plan, subject to competitive solicitations and Department modifications. Notice at 2. The EDCs recommended a fee structure for platform users that would not exceed the total cost to implement and maintain the platform. Plan at 29-30. The fee structure would be based on benchmarking the expected use rate of the platform to estimate the total number of annual transactions performed as well as the total costs of platform implementation and annual licensing and maintenance costs. *Id.* Third parties would pay fees for their data access based on that fee structure.

5. On April 3, 2026, the Department issued a Memorandum consolidating D.P.U. 26-20, D.P.U. 26-21, and D.P.U. 26-22.

II. BACKGROUND OF THE COMPACT

6. The Compact is a governmental aggregator under G.L. c. 164, §134 that provides energy services to consumers on Cape Cod and Martha's Vineyard. The Compact operates a municipal aggregation competitive supply program pursuant to a municipal aggregation plan,

most recently approved in D.P.U. 14-69-B on February 2, 2023, which provides electric power supply on an opt-out basis to customers across all customer classes located on Cape Cod and Martha's Vineyard. The Compact maintains a business office at 261 Whites Path, Unit 4, South Yarmouth, Massachusetts 02664.

7. The purposes of the Compact include, among other things, to negotiate the best terms and conditions for electricity supply and transparent pricing for consumers, to utilize and encourage renewable energy development to the extent practicable though contract provisions and demonstration projects, and to advance consumer protection and interests for the residents of Cape Cod and Martha's Vineyard. Third Amended and Restated Joint Powers Agreement of the Cape Light Compact JPE at Article II.[2]

8. The Compact also provides comprehensive energy efficiency services to Cape Cod and Martha's Vineyard as a Program Administrator of the Massachusetts Joint Statewide Three-Year Electric and Gas Energy Efficiency and Decarbonization Plans, most recently approved on February 28, 2025, in D.P.U. 24-140 through D.P.U. 24-149. The Compact's energy efficiency programs target the residential, income eligible, and commercial and industrial customer sectors. Eversource is the distribution company providing service in the Compact's service territory.

9. The Compact routinely participates in various Department proceedings as an advocate for all ratepayers on Cape Cod and Martha's Vineyard. The Compact actively participated in grid modernization and time-varying rate proceedings in D.P.U. 12-76, D.P.U. 14-04, D.P.U. 15-122, D.P.U. 21-80, D.P.U. 24-10, and was a member of the AMI Stakeholder Working Group in D.P.U. 21-80. The Compact also recently filed comments in D.P.U. 26-44

[2] The Compact's Joint Powers Agreement is available online at https://www.capelightcompact.org/wp-content/uploads/2025/01/Third-Amended-and-Restated-JPA-Final-4-10-24.pdf.

regarding ISO-New England load settlement and intends to participate in D.P.U. 26-62 regarding the Department of Energy Resource's Petition on TVR.

III. PARTICIPATION BY THE COMPACT IN THE PROCEEDING

10. The Compact seeks to participate in this proceeding as a full party with rights to receive copies of all pleadings, discovery requests, and responses and to file brief(s) in accordance with the procedural schedule to be established by the Department. In conducting adjudicatory hearings, the Department "may allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose." G.L. c. 30A, §10(4); 220 C.M.R. §1.03(1)(b).

11. The Compact is substantially and specifically affected by this proceeding as a municipal aggregator operating a competitive power supply program in Eversource's local distribution service territory, as a consumer advocate for its municipal aggregation consumers on Cape Cod and Martha's Vineyard, and as a sponsor of Mass Save® providing energy efficiency and demand response services (G.L. c. 25, §21). The Compact may require access to the AMI data at issue in this proceeding for its power supply and energy efficiency programs, and thus this proceeding may result in impacts and precedents that would affect its provision of those programs.

12. The Compact generally supports the concept of the proposed standardized, state-wide data repository with opt out, near real-time data access for customers and third parties, including municipal aggregators. The Compact has concerns and questions about the Plan's requirements and costs for municipal aggregators to access the data on the platform. Those

requirements and costs should be reasonable for municipal aggregators and need to recognize their role as public entities. Otherwise, they will act as barriers to accessing the data required for municipal aggregators to offer TVR.

13. Data access is critical for TVR, which in turn is expected to be an important piece of supporting the Commonwealth's decarbonization goals and customers managing their energy burdens. See D.P.U. 26-62, DOER's Petition, Exhibit G (April 8, 2026). The Department's Order in D.P.U. 21-80-B envisioned third-party TVR as a key benefit of its approval of AMI. D.P.U. 21-80-B Track II Order at 327-29 (finding third-party TVR as a key benefit justifying approval of AMI deployment). Given the increasing number of customers on municipal aggregations (i.e., over 50 percent of Massachusetts' cities and towns have an approved municipal aggregation plan), municipal aggregations will play a significant role in offering third-party TVR and helping to meet the Commonwealth's decarbonization goals and energy burden concerns. The Compact has repeatedly noted that it is eager to bring the benefits of TVR to its customers. See, e.g., D.P.U. 14-04, Compact Comments at 5-7 (March 10, 2014); D.P.U. 15-122, Compact Initial Brief at 2 (July 12, 2017); D.P.U. 21-80, Compact Reply Brief at 4-5 (June 13, 2022). To offer TVR, the Compact requires opt-out data access from Eversource that includes interval level energy usage data at reasonable costs. See D.P.U. 21-80, Compact Initial Brief at 2, 7, 20 (May 16, 2022). The value of AMI to customers will ultimately depend in part on whether third parties are able to access data by reasonable means.

14. Through its participation in this proceeding, the Compact seeks to clarify aspects of the Plan, in particular in regard to the terms and conditions of the Third Party Data Security Agreement and cybersecurity requirements to which municipal aggregators would be subject, as well as the costs for municipal aggregators to access the data and the customer opt out process.

In particular, throughout the AMI Stakeholder Working Group, the EDCs clearly differentiated the agreements necessary for data access for municipal aggregators and competitive suppliers. D.P.U. 21-80, Final Report at 18-19 (August 1, 2024). Related to municipal aggregators, the EDCs noted that they are "Department regulated entities with bilateral agreements with the EDCs." Final Report at 18. Despite that, in the Plan, the EDCs proposed the Third Party Data Security Agreement (Exh. EDC-2, App. A), which would apply to all third parties alike, including municipal aggregators, with no differentiation between public and private entities.

15. In addition, the EDCs note that the estimated costs of the Plan are not final, and third parties do not appear able to determine any estimate of their data access costs as a result of the Plan. Plan at 27-30. The EDCs proposed that third parties pay an annual fee to access the platform, but do not seem to provide any support for their conclusion that the fees are reasonable, especially for municipal aggregations. Exh. ES-BJO at 7-8. Further, the EDCs appear to base a third party's costs on how many other parties access the platform (and how many times per party), which would seem to indicate the fees could fluctuate based on platform use by other parties, leading to uncertainty in costs. Plan at 29-30. The Compact seeks to better understand the EDCs' recommendation. Municipal aggregations require predictable, certain costs for data access coming out of this proceeding.

16. The Compact is also uncertain whether or how the Plan may affect the Compact's access to data for energy efficiency purposes. Currently, the Compact has an operating agreement with Eversource for data sharing related to energy efficiency that accounts for customer privacy and data security.

17. Further, the Compact has raised significant concerns in the past related to ensuring full inclusion of municipal aggregators in any roll out of TVR programs. See, e.g.,

D.P.U. 20-69, Compact Comments at 4-5 (August 13, 2020); D.P.U. 21-80, Compact Initial Brief at 9-14 (May 16, 2022). As the Department concluded in D.P.U. 15-122, "[t]o maximize benefits from dynamic pricing, we need an *inclusive deployment strategy* for competitive supply, municipal aggregation, and basic service customers." D.P.U. 15-122 at 5 (emphasis added). Under no circumstance should Eversource be able to offer supply TVR to its basic service customers prior to municipal aggregators being enabled to offer TVR to their customers. Unreasonable conditions in the Plan could raise barriers to TVR for municipal aggregations.

18. Moreover, the Department's approval of a data access plan should include meaningful metrics. The Plan proposes a 99 percent uptime rate as an aspirational service level agreement goal. Plan at 25. The Plan does not specifically suggest any further metrics, but notes that the EDCs "remain committed to ensuring that their platform implementations, including the statewide Platform, meet the expectations of customers and other users, including competitive suppliers." Plan at 25. The Compact believes that additional metrics should be required to weigh the implementation and use of the data access and repository.

19. The Compact would bring to this proceeding its unique perspective as a municipal aggregator who has participated extensively in the Department's grid modernization and TVR proceedings and as the only non-utility energy efficiency program administrator.

20. Accordingly, the Compact believes that, in its role as an advocate for its municipal aggregation consumers and as an energy efficiency program administrator for customers in the Compact's service territory, it can best serve its members and customers through its participation in this proceeding. No other party can adequately represent the Compact and its members and customers in this proceeding. The Compact's participation will contribute to a full and fair hearing in this proceeding in that the Compact will represent unique

interests from its perspective as a municipal aggregator and as the only non-utility program administrator in Eversource's distribution service territory. The Compact's participation is in the public interest and will not unduly burden the Department, Eversource or any of the other parties that may intervene in this proceeding in that the Compact will refrain from introducing duplicative or repetitive material and will cooperate in ensuring a speedy and efficient proceeding.

IV. CONCLUSION

WHEREFORE, for the above reasons, the Compact respectfully moves that the Department allow this petition to intervene and participate fully in this proceeding in order that its interests as stated above may be fully protected.

Respectfully submitted,

CAPE LIGHT COMPACT JPE

By its attorney,

Rebecca F. Zachas

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Arlington, MA 02476
617-644-7681 (voice)

Dated: May 6, 2026

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan and Related Proposals Submitted by NSTAR Electric Company d/b/a Eversource Energy Pursuant to an Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239, §§ 79, 127, 128.	)	D.P.U. 26-20

NOTICE OF APPEARANCE OF COUNSEL

The undersigned attorney hereby gives notice of appearance as counsel on behalf of the Cape Light Compact JPE in the above-captioned proceeding.

Respectfully submitted,

CAPE LIGHT COMPACT JPE

By its attorney,

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Dated: May 6, 2026

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities on the Advanced Metering Data Access Protocol Implementation Plan and Related Proposals Submitted by NSTAR Electric Company d/b/a Eversource Energy Pursuant to an Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239, §§ 79, 127, 128.	)	D.P.U. 26-20

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 May 2026.

Rebecca F. Zachas

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Agenda Action Request
Cape Light Compact
Meeting Date: 9/9/26

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

Advanced Metering Data Access Plan (DPU 26-20)

REQUESTED BY: *Margaret Song*

Proposed Motion(s)

I move the Board vote to adopt the Consumer Advocacy Worksheet for D.P.U. 26-20 and allocate costs between the Compact's energy efficiency and operating budgets as set forth in the Consumer Advocacy Worksheet.

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

Additional Information

On February 18, 2026, the electric distribution companies (the "EDCs") filed a joint AMI Central Data Repository Implementation Plan (the "Plan") for approval with the Department in D.P.U. 26-20. The Plan was submitted pursuant to Act Promoting a Clean Energy Grid, Advanced Equity, and Protecting Ratepayers, St. 2024, c. 239 ("2024 Climate Act" or "Act"), §§79, 127-128 and the Memorandum issued by the Department on September 8, 2025. The Plan is intended to comply with the Climate Act's requirements that the EDCs establish a statewide centralized AMI data repository to allow customers and third parties access to advanced metering infrastructure ("AMI") data in near-real time and to implement accelerated switching to permit residential and small commercial customers to change suppliers within three days once AMI is fully deployed.

The Plan sets forth the EDCs' proposed data access protocol that includes an opt-out procedure for customers and a proposed data security agreement with cybersecurity and other requirements for data sharing. The EDCs also proposed customer outreach and education on data sharing permission management, as well as a fee structure for platform users.

The Department approved the Cape Light Compact's petition to intervene but has not yet issued a procedural schedule for the adjudicatory proceeding. Discovery has commenced. See attached Consumer Advocacy worksheet for additional information.

Record of Board Action

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

Cape Light Compact

Your Trusted, Local Energy Resource

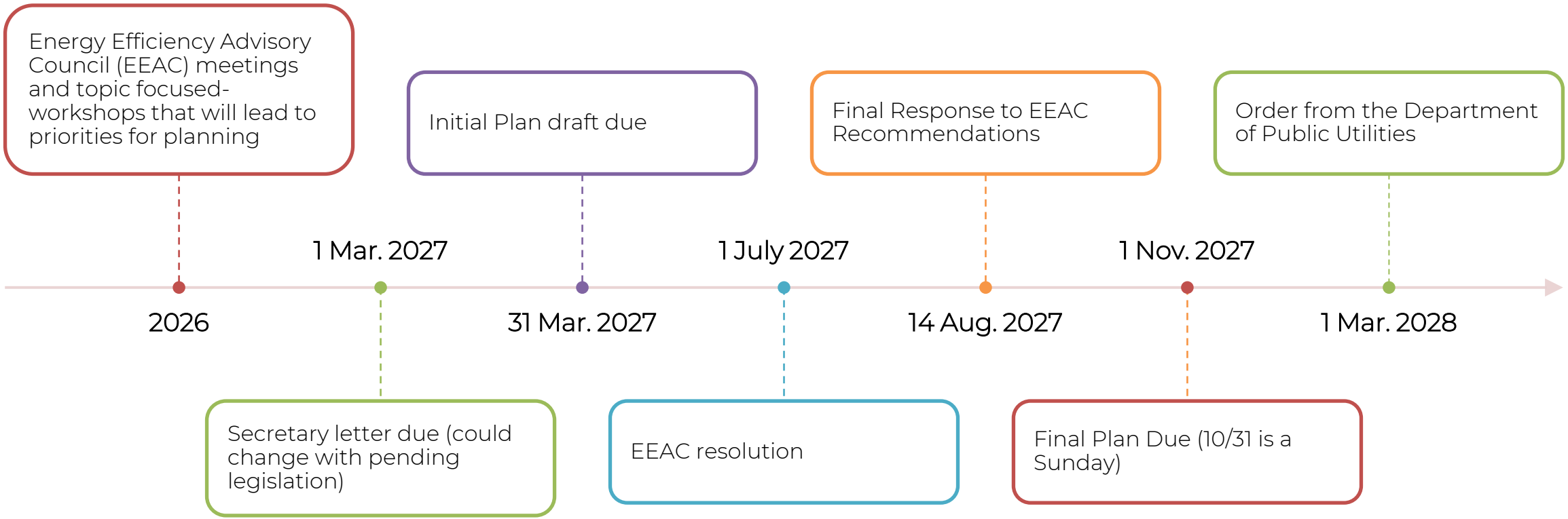
2028-2030 Energy Efficiency Plan timeline

Cape Light Compact Governing Board
September 9, 2026

Margaret Song

mass save®

Key Dates: 2028-2030 Plan Development



Cape Light Compact

Your Trusted, Local Energy Resource

Large Commercial & Municipal Offers

Cape Light Compact Governing Board
September 9, 2026

Overview of offers through '27

Engineering Studies and Services

- Engineering Bench
- Comprehensive Building Assessments
- Portfolio Prioritization Plans
- Scoping Studies
- Focused Studies

Building Controls and Optimization

- Building Management System
- Existing Building Commissioning

Equipment rebates and applications

- Custom application process
- Municipal lighting reminder

Cape Light Compact

Engineering Bench

- Mass Save Sponsors issued an RFP in 2024 for engineering services covering multiple scopes (list below).
- The Compact proceeded with awarding 34 engineering firms
  - Firms may be eligible for a single scope or multiple scopes depending on what they bid on and what was awarded.
  - Goal was to provide consistency in expectations and work product statewide.
  - Compact firms align with National Grid to allow for more seamless implementation across projects where there is gas.
  - Full list can be found here: https://www.capelightcompact.org/engineeringservicesvendors

Customer Engagement, Project Development, & Scoping Studies
Engineering Services, Site Inspections, and Measurement and Verification (M&V)
Program Support & Tool Development
Electrical Engineering & Building Capacity Reviews
Lighting & Controls
New Construction
Decarbonization Master Planning Studies

Engineering Studies

Study Type	Purpose	Deliverables	Timeline
Portfolio Prioritization Plan (PPP)	A PPP is a high-level energy use analysis of all buildings within a portfolio (municipalities, campuses, etc.) with the intent to prioritize which buildings should be studied via CBAs or begin implementation of energy efficiency measures.	Report	6 months
Comprehensive Building Assessment (CBA)	A CBA provides a detailed evaluation of an individual building's energy performance and systems to identify both electrification and energy efficiency opportunities. Offers Standardized process, requirements, and data form to support mid-size/moderately complex buildings	Report with recommended Energy Conservation Measures (ECMs)	4-6 Months
Scoping Study	Conduct quick assessment to identify actionable energy efficiency measures for C&I customers. Not as exhaustive and potentially more focused than a CBA	Report with recommended ECMs	3-6 weeks
Focused/Technical Assistance(TA) Study	Focused Studies provide precise cost, savings and emissions impact estimates for selected energy efficiency or decarbonization measures, along with documentation required to complete a Mass Save custom incentive application.	Energy savings calculations, benefit/cost screening, minimum requirements document, custom application	Varies by project

- Costs are covered up to 100%. Scope and pricing must be approved by the Compact and National Grid, as applicable.
- Please note: these studies are standardized statewide. Report templates are available on the Mass Save website at www.masssave.com/ciquicktools

Sunsetting Municipal Non-Controllable Lighting

- **On 11/1/2026** Fixture incentives will be removed from the Mass Save Municipal lighting Program. All Municipal Lighting projects must be completed by **10/31/2026** in order to receive fixtures incentives.
- Projects not completed by **10/31/2026** may receive a lowered incentive amount.
- Any lighting projects completed after **11/1/2026** will be incentivized based on controls strategies only.
- New controllable lighting projects will continue to be supported
- As we continue to shift away from lighting, we are focusing more on broader facility controls and operations.

Existing Building Commissioning (EBCx)

Incentives:

Offer **up to 100% of the cost** of qualification and investigation studies depending on the building size and complexity.

Pay incentives for implemented and verified measures of **$0.17/kWh and $1.20/therm** on top of study payments.

For customers under 2.5 million kWh or less and 150,000 therms annual usage, use a prescriptive **6% energy reduction**.

Who is involved:

Program is implemented by Resource Innovations.

Customers select a preapproved Qualified Service Provider (QSP)

Contact Dan for a list of QSPs

Examples of savings opportunities:

Replacing or calibrating building control system sensors

Repairing/replacing broken controls/mechanical components e.g. dampers, leaky valves, and sensors

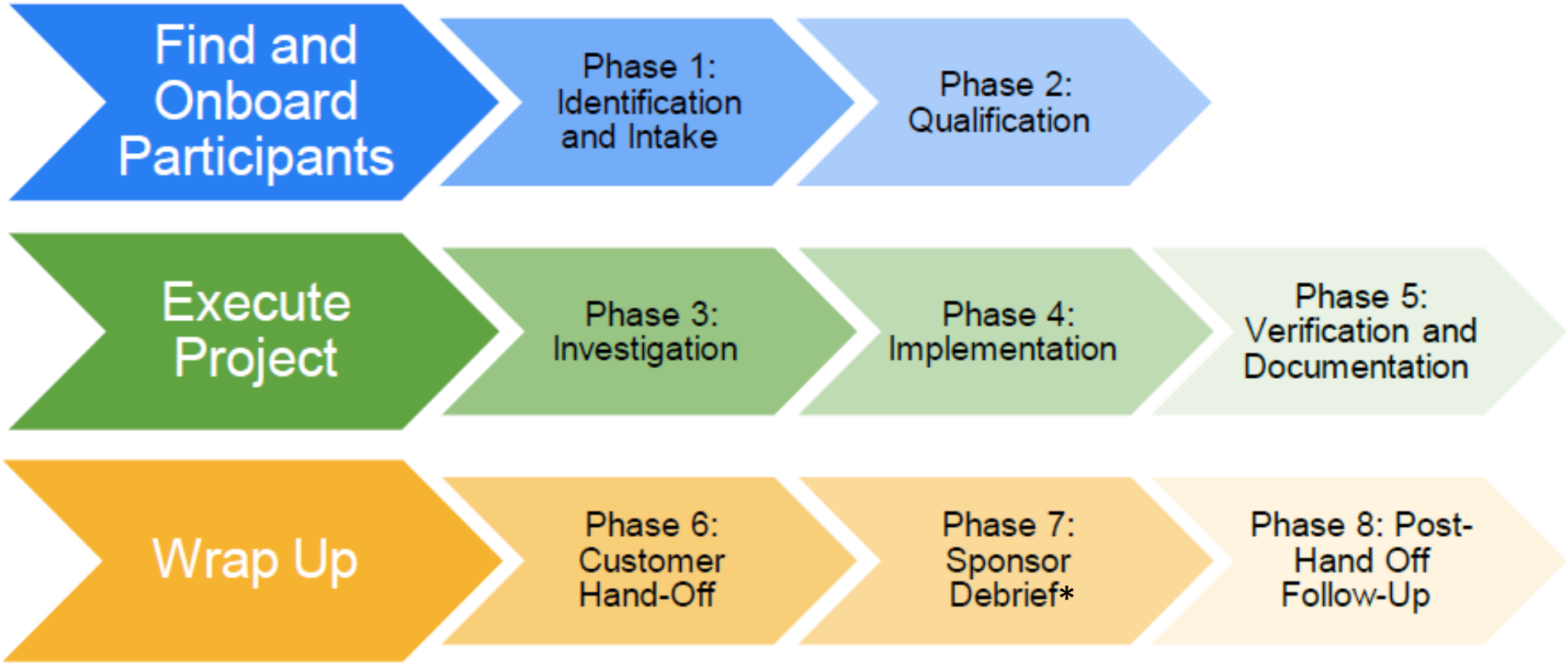
Moving sensors to more appropriate location for accurate air stream, flow or space sensing

Eliminating simultaneous heating and cooling

Tuning existing lighting controls

Operations and Maintenance (O&M) measures such as steam trap repairs, compressed air leaks, and coil cleaning

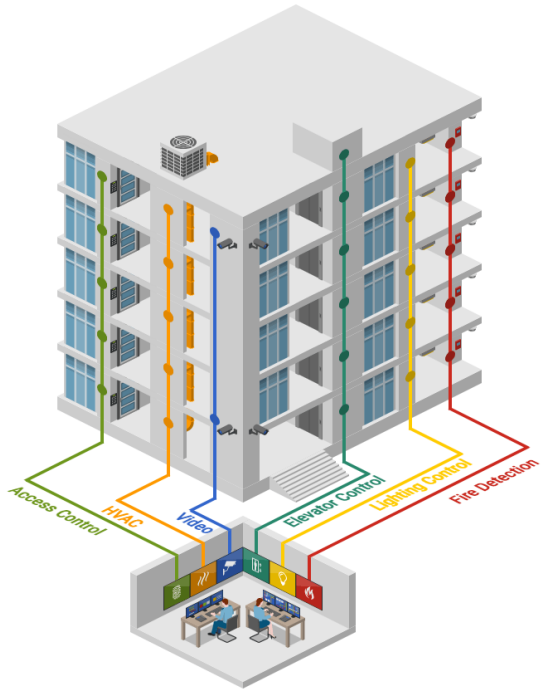
EBCx Process



*Sponsor would be the Compact. National Grid would also be the Sponsor if there are gas systems commissioned/savings.

Building Management Systems (BMS)

- **Prescriptive offer**:
  - Available for implementation of a new BMS system, replacement of a system 15 years or older, or optimization or implementation of new sequences
  - Rebate scales with the number of sequences implemented
  - Calculator tool is publicly available so vendors can screen prospective projects
  - Examples of sequences include:
    - Resets on boiler water temp, chilled water temp, and/or static pressure
    - Demand control ventilation
    - Optimal start/stop
    - Schedules and unoccupied setbacks
    - A few others
  - Adders available for demand response sequences and enrollment in ConnectedSolutions



Custom Applications

- **Examples of Projects:**
  - Heating electrification (Air Source Heat Pumps, Variable Refrigerant Flow, Ground Source Heat Pump>35 tons)
  - This is a recent change. Previous cap was 150 tons
  - All Air to Water Heat Pumps
  - Process/manufacturing equipment upgrades or optimization
  - Heat recovery
  - Projects that do not fit within prescriptive program parameters
  - Comprehensive projects with multiple ECMs, often the result of an engineering study

Custom Application Process Pre-install

Customer expresses interest in a custom application

Customer provides project documentation including application form, project specifications, and savings calculations (if already complete).

Engineering bench develops and/or reviews savings calculations including benefit/cost ratio. Staff determines level of incentive support available based on the savings.

Incentive offer is created based on savings (kWh or lifetime MMBtu), customer receives offer letter and Minimum Requirements Document (MRD)

Custom Application Process Post-install

Customer implements the project

Once installed and operable, the customer or vendor contacts CLC to complete the post install inspection. The Compact may engage an engineering firm to complete the post inspection and verify the requirements in the MRD are satisfied.

Based on post installation verification, savings and incentive values may be adjusted to reflect the reality of the install

Incentive payment is issued

Site may be flagged for evaluation

How to get started?

For municipal projects:

Tatsiana Nickinello
Senior Energy Efficiency Analyst
tatsiana.nickinello@capelightcompact.org
Office (508)-375-6948

For all other large commercial projects:

Dan Schell
Technical Services Manager
Dan.schell@capelightcompact.org
Cape Light Compact
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