



ATTORNEYS AT LAW

The firm has attorneys also admitted to practice in District of Columbia, Idaho, New Hampshire (Inactive) and Vermont

1337 MASSACHUSETTS AVENUE, BOX 314
ARLINGTON, MASSACHUSETTS 02476

TELEPHONE: 617.244.9500
FACSIMILE: 802.419.8283
E-MAIL: bckboston@bck.com
WEBSITE: www.bck.com

November 3, 2021

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

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: *D.P.U. 21-80*
NSTAR Electric Company d/b/a Eversource Energy 2022-2025 Grid
Modernization Plan

Dear Secretary Marini:

On behalf of the Cape Light Compact JPE (the "Compact"), enclosed for filing please find the Compact's First Set of Document and Information Requests in the above-referenced proceeding. We have also included a Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Rebecca F. Zachas". The signature is written in a cursive style.

Rebecca F. Zachas

RFZ/drb
Enclosures

cc: Sarah Spruce, Esq., Hearing Officer (via email only)
D.P.U. 21-80 Service List (via email only)
Margaret T. Downey, Compact Administrator (via email only)

or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

8. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, emails, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

9. If the Company finds that any of these Requests is ambiguous, please notify the Compact's attorney, Rebecca F. Zachas, so that the Requests can be clarified prior to the preparation of a written response.

10. Provide electronic copies of all requested documents. A response which does not provide the Compact with the responsive documents and requests the Compact to inspect documents at any location is not responsive.

11. Please serve by email a copy of the responses to the service list, including the Compact's attorney, Rebecca F. Zachas.

12. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.

13. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.

14. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

15. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company

cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.

16. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.

17. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.

18. If the response contains attachments with confidential materials and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.

19. Please submit responses within ten (10) business days of receiving the Request.

INFORMATION REQUESTS

- CLC-ES-1-1 Refer to ES-AMI-2, Appendix C at 12-13 and ES-AMI-4 at 24. To offer time-varying rates ("TVR"), the Compact's power supplier would require access to interval level energy usage data to develop competitively priced offers and communicate savings opportunities to the customers who participate in their programs. Please explain in detail and provide complete and detailed documentation on:
- (a) Whether the Company's Grid Modernization Plan ("GMP") would allow such data access, as described above. Please include in your response the reasoning behind whether or not the Company would provide such data access.
 - (b) If the response to (a) is yes, what procedures would a power supplier use to arrange for that access with the Company.
 - (c) If the response to (a) is yes, whether interval level data would be accessible at the customer level (e.g., by customer account number) or would such interval level data be aggregated.
 - (d) If the response to (a) is yes, what would the applicable costs be for such access. Please specify whether: (i) the cost would be on a per customer basis; and (ii) the cost would be tied to each data access request or administered based on a timeframe (e.g., as a per month cost).
 - (e) If the response to (a) is yes, whether a power supplier would be able to access historical interval meter data for:
 - (i) customers that have an established account with usage history before enrolling in a municipal aggregator's supply offering, for a time period prior to those customers enrolling with the aggregator, and
 - (ii) all other current aggregation customers.
 - (f) If the response to (e) is yes, how far back will interval meter data be available (e.g., number of months, years) and at what interval for both (i) and (ii).
 - (g) Whether the Company would share interval data in a manner that it will show PM versus AM and at what interval level would the interval data be available (e.g., 15 minute, 30 minute, etc.).

- (h) Whether there would be any difference in ability to obtain such data access in responses (a) and (e) as between a supplier working with a municipal aggregator and a competitive electric supplier serving individual customers.

CLC-ES-1-2 Please explain in detail and provide complete and detailed documentation on whether it is the Company's intention that municipal aggregators would be able to access the same information for its power supply customers as the Company does for its basic service customers. If the Company does not intend to afford municipal aggregators access to the same information it affords to its basic service customers, please explain the reasoning behind the Company's decision.

CLC-ES-1-3 Please refer to Exhibit ES-AMI-4 at 15. Please explain in detail and provide complete and detailed documentation on:

- (a) Whether the new billing system would allow the Company to differentiate between Eversource basic service customers and Compact customers for targeted marketing purposes.
- (b) Whether a municipal aggregation could clarify on its bills why the bill identifies the supplier as a company other than the municipal aggregator.
- (c) Whether a municipal aggregator could add a short message on its bills to its customers.

CLC-ES-1-4 Refer to the DPU's Order in D.P.U. 12-76-B dated June 12, 2014 ("D.P.U. 12-76-B Order") at 3, n.1. In the D.P.U. 12-76-B Order, the Department defined advanced metering functionality ("AMF") as including four main functions: (1) the collection of customers' interval usage data, in near-real-time, usable for settlement in the ISO New England energy and ancillary services markets; (2) automated outage and restoration notification; (3) two-way communication between customers and the electric distribution company; and (4) with a customer's permission, communication with and control of household appliances. Please explain in detail and provide complete and detailed documentation on how the Company's GMP proposed in this docket complies with that definition.

CLC-ES-1-5 Refer to D.P.U. 12-76-B Order at 36 where it states that:

Access to data will allow third parties, whether competitive electricity suppliers, demand response aggregators, or other service providers, to develop and market innovative products to offer to consumers and allow ISO-NE to evaluate and manage the regional electric system more effectively. Accordingly, in their GMPs, electric distribution companies should address: (1) how customers will be provided access to consumption data that can be easily understood; (2) the

procedures for allowing an authorized third party to access customer usage data with the customer's permission; and (3) procedures for making aggregate usage data available to third parties and ensuring that it cannot be linked to any individual customer.

Please explain in detail and provide complete and detailed documentation on how the Company's GMP complies with (1), (2), and (3).

- CLC-ES-1-6 Please explain in detail and provide complete and detailed documentation on whether all customers not on the Company's basic service would receive advanced meters under the GMP.
- CLC-ES-1-7 Refer to ES-AMI-2, Appendix C at 12-13 and ES-AMI-4 at 24. Please explain in detail and provide complete and detailed documentation on, if the Company structures its TVR as a distribution rate, how would the Company work with municipal aggregators and/or competitive electric power suppliers to structure its TVR so that it is compatible with a supply TVR (e.g., alignment of peak hours).
- CLC-ES-1-8 Refer to ES-AMI-2, Appendix C at 12-13 and ES-AMI-4 at 24. Please explain in detail and provide complete and detailed documentation on:
- (a) The structure of the Company's TVR. More specifically:
 - (i) Whether the TVR would be a supply or a distribution rate or both.
 - (ii) How would the rate(s) be structured (e.g., on peak/off peak, critical peak pricing, etc.).
 - (iii) Whether there are any structural differences proposed for supply and distribution TVR offerings.
 - (iv) To which rate classes would the TVR apply and would the TVR be structured in the same way across rate classes.
 - (b) Whether the Company would offer TVR for low income customers.
 - (c) If the response to (b) is yes, whether the Company will offer customer education directed at those customers specifically.
- CLC-ES-1-9 For energy efficiency and demand response program administration purposes, please explain in detail and provide complete and detailed documentation on what procedures this GMP would establish for the Compact to obtain access to data for customers not on its power supply but residing within its energy efficiency service territory. Please include in your response the following:

- (a) Would the Compact have access to data including account number, customer name, customer address, and customer email address.
- (b) Would interval level data be available by customer account number. If so, at what interval level will data by customer account number be available (e.g., 15 minute, 30 minute).
- (c) How would the Compact access this data (e.g., through an Eversource administered platform, file transfer from Eversource).
- (d) Would this data be available for download and in what form.
- (e) How far back would interval meter data be available (e.g., number of months, years) and at what interval.
- (f) How frequently would the Compact be able to access or be provided with this data.

CLC-ES-1-10 Refer to ES-AMI-1 at 28. Please explain in detail and provide complete and detailed documentation on what form municipal aggregators and/or competitive electric power suppliers would be able to access interval meter data. More specifically, will suppliers have access to data in any of the following forms:

- (a) Data that is available through an Eversource administered platform.
- (b) Analyzed data that is available through an Eversource administered platform. If so, what type of analysis does Eversource plan on performing and providing.
- (c) Raw data files provided in spreadsheet form.
- (d) Any other form. Please explain.
- (e) If the answer to (a) and/or (b) is yes, would this data be available for download. If so, in which format(s).

CLC-ES-1-11 Refer to ES-AMI-1 at 28. Please explain in detail and provide complete and detailed documentation on how often the Company would provide data to municipal aggregators and/or competitive electric power suppliers if municipal aggregators and/or competitive electric power suppliers would not be able to access data through an Eversource administered platform.

CLC-ES-1-12 Refer to ES-AMI-1 at 29. Please explain in detail and provide complete and detailed documentation on:

- (a) Whether all customers (including those not on basic service) would have access to the Company's customer portal to review their usage data.
- (b) If the response to (a) is yes, whether customers not on basic service would receive the same level of data and analysis as Eversource basic service customers.
- (c) Whether all customers would be able to receive Critical Peak Pricing, demand response, or any other applicable alerts provided as part of the GMP.

CLC-ES-1-13 Refer to ES-AMI-2 at 5. Please explain in detail and provide complete and detailed documentation on whether customers of municipal aggregators and/or competitive electric power suppliers would receive mid-cycle high bill alerts and customer-directed bill alerts from the Company.

CLC-ES-1-14 Refer to ES-AMI-1 at 30. Please explain in detail and provide complete and detailed documentation on whether the customers residing in the Compact's territory would be targeted as part of the Company's Customer Engagement Plan.

CLC-ES-1-15 Please explain in detail and provide complete and detailed documentation on whether the Company plans to establish new account numbers for customers when the Company replaces customers' meters with interval meters.

CLC-ES-1-16 Please explain in detail and provide complete and detailed documentation on whether the Company is planning to fund any portion of its Customer Engagement Plan through its energy efficiency funds.

CLC-ES-1-17 Please explain in detail and provide complete and detailed documentation on:

- (a) Whether the Company is planning to market energy efficiency and/or demand response services as part of its Customer Engagement Plan.
- (b) If the response to (a) is yes, how will the Company coordinate with the Compact to direct customers within the Compact's energy efficiency service territory to the Compact's energy efficiency and demand response programs.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

NSTAR Electric Company d/b/a Eversource Energy 2022-2025 Grid Modernization Plan)))))	D.P.U. 21-80
--	-----------------------	--------------

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon Secretary Mark D. Marini and Hearing Officer Sarah Spruce via electronic mail only and 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 3rd day of November, 2021.



Rebecca F. Zachas, Esq. (rzachas@bck.com)
BCK LAW, P.C.
1337 Massachusetts Avenue, Box 314
Arlington, MA 02476
617-244-9500 (voice)
802-419-8283 (fax)