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December 22, 2021

**VIA ELECTRONIC MAIL ONLY ([dpu.efiling@mass.gov](mailto: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 Second Set of Document and Information Requests in the above-referenced proceeding. Also enclosed is a Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

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

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)

**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
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**CAPE LIGHT COMPACT JPE’S SECOND SET OF DOCUMENT AND  
INFORMATION REQUESTS TO EVERSOURCE ENERGY**

Date Issued: December 22, 2021

**INSTRUCTIONS**

The following instructions apply to this set of document and information requests (“Requests”) and all subsequent document and information requests issued by the Cape Light Compact JPE (the “Compact”) to NSTAR Electric Company d/b/a Eversource Energy (“Eversource” or the “Company”) in this proceeding:

1. These Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the Company and its affiliates or to any individual or entity sponsoring testimony or retained by them to provide information, advice, testimony or other services in connection with this proceeding.
2. The term “Company” refers to NSTAR Electric Company d/b/a Eversource Energy. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
3. Each Request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These Requests shall be deemed continuing so as to require supplemental responses from the Company when further or different information with respect to the same is obtained.
6. The phrase “provide complete and detailed documentation” means to provide all data, documents, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data

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-2-1 Refer to Eversource's response in CLC-ES-1-1. Please explain in detail and provide complete and detailed documentation on:
- (a) Whether the Company prepared a plan for time-varying rates ("TVR") prior to filing its Petition on July 2, 2021 in this docket. In this context, "plan" could include an internal outline for what the Company anticipates proposing for TVR in the future.
  - (b) If the response to (a) is yes, whether that plan included both the Company offering TVR as well as data access for competitive suppliers and municipal aggregators to have data access that would allow them to offer TVR.
- CLC-ES-2-2 Refer to Eversource's response in CLC-ES-1-1 where the Company states that it is required to file a TVR proposal in a full adjudicatory proceeding pursuant to D.P.U. 14-04-D Order at 7-8. Please explain in detail and provide complete and detailed documentation on:
- (a) Whether the Company is committed to filing a future TVR proposal in an adjudicatory procedure (or, in the alternative, whether the Company may in its own discretion ultimately choose not to offer TVR to its customers).
  - (b) Whether the Company intends to include a data access plan in any Company TVR proposal for competitive suppliers and municipal aggregators to be able to offer TVR.
  - (c) Regardless of whether the Company chooses in the future to offer its own TVR proposal for its customers, will the Company commit in this proceeding to take the steps necessary, including to the extent necessary filing with the Department for any required approval(s) (e.g., tariff revisions), to allow competitive suppliers and municipal aggregators to implement TVR.
  - (d) If the response to (c) is yes, would the Company be required to file for any Department approvals (other than tariff revisions related to data access).
  - (e) If the response to (c) is yes, whether the Company will commit to take the steps necessary to allow competitive suppliers and municipal aggregators to implement TVR, by the end of 2027 or, in the alternative at that time, file an explanation for why it has not done so and provide an update. To the extent that timeframe would not be acceptable for the Company, please explain why and whether a different timeframe would be acceptable.

(f) If the response to (c) is no, please explain why not.

CLC-ES-2-3 Refer to Eversource's response in CLC-ES-1-1. Please explain in detail and provide complete and detailed documentation on whether the Company has an estimated timeline for when the Company plans to file its TVR proposal, including an estimate of how long after the Department's order in this proceeding the Company intends to file its TVR proposal.

CLC-ES-2-4 Refer to Eversource's response in CLC-ES-1-1. Please explain in detail and provide complete and detailed documentation on whether Eversource has a timeline for when it will begin to engage with competitive suppliers and municipal aggregators regarding its TVR proposal.

CLC-ES-2-5 Refer to Eversource's response in CLC-ES-1-1. Please explain in detail and provide complete and detailed documentation on whether the Company acknowledges that competitive suppliers and municipal aggregators would require additional data access from the Company (beyond what they currently may receive) to offer TVR.

CLC-ES-2-6 Refer to Eversource's response in CLC-ES-1-1. Please explain in detail and provide complete and detailed documentation on:

(a) Whether Eversource will commit to engage with competitive suppliers and municipal aggregators before any Company TVR proposal is filed in a full, adjudicatory proceeding.

(b) Whether Eversource will commit to include a data access plan for competitive suppliers and municipal aggregators in any Company TVR proposal.

CLC-ES-2-7 Refer to Eversource's response in CLC-ES-1-4. Please explain in detail and provide complete and detailed documentation on:

(a) Whether the Compact would be able to leverage the Home Area Network ("HAN") functionality to directly communicate with and control customer's household appliances or to provide customers with real-time access to their usage data.

(b) Why the Company has decided not to leverage the HAN functionality to directly communicate with and control customer's household appliances.

CLC-ES-2-8 Refer to Eversource's response in CLC-ES-1-15. Please explain in detail and provide complete and detailed documentation on:

- (a) What procedures and safety protocols will be in place to ensure continuity of data access for a customer's supplier when the customer is issued a new account number.
- (b) How Eversource will ensure that issuing new account numbers will not cause any disruption to competitive suppliers and municipal aggregators power supply services.

CLC-ES-2-9 Refer to Eversource's response in CLC-ES-1-8. Please explain in detail and provide complete and detailed documentation on:

- (a) How the Company's proposed foundational investments plan in advance for what will be needed for the Company, competitive suppliers and municipal aggregators to offer TVR in the near future.
- (b) What specific foundational investments take TVR, including the data access needs for competitive suppliers and municipal aggregators to offer TVR, into account.
- (c) What assumptions about TVR, including the data access necessary for competitive suppliers and municipal aggregators to offer TVR, were made by the Company in proposing its foundational investments.
- (d) Was any input from competitive suppliers and/or municipal aggregators used to propose the foundational investments as they relate to TVR, including data access.

CLC-ES-2-10 Refer to Eversource's response in CLC-ES-1-10. Please explain in detail and provide complete and detailed documentation on:

- (a) What the Company's expectations are in terms of what the foundational investments would allow the Company to offer for TVR.
- (b) Whether, in proposing its foundational investments, the Company made any assumptions or tentative determinations on how competitive suppliers and municipal aggregators would access interval meter data. Please include any discussions the Company may have had on what options its foundational investments would offer for such interval meter data access.

CLC-ES-2-11 Refer to Eversource's response in CLC-ES-1-10. Please explain in detail and provide complete and detailed documentation on whether the Company has a timeline for when it will begin engaging with competitive suppliers and municipal

aggregators on the design of the foundational systems, such as the CIS and MDMS, as those systems relate to data access for TVR.

CLC-ES-2-12 Refer to Eversource's response in CLC-ES-1-10. Please explain in detail and provide complete and detailed documentation on whether the Company will commit to engage with competitive suppliers and municipal aggregators throughout the process of designing the foundational systems, such as the CIS and MDMS, to address any data access issues.



**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 22<sup>nd</sup> day of December, 2021.



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