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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**
www.plan-ne.org

January 20, 2023

VIA ELECTRONIC MAIL ONLY

Laurie Ellen Weisman, Senior Counsel, Department
Scott Seigal, Hearing Officer, Department
Department of Public Utilities
One South Station
Boston, MA 02110

RE: D.P.U. Docket No. 21-50 - Procedures for Enhancing Public Awareness of and Participation in its Proceedings, Draft Policy

Dear Ms. Weisman and Mr. Seigal:

Introduction

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) is an organization incorporated in 2015 with a mission statement that includes: “We envision a public that understands where its energy comes from and that is actively engaged in energy decisions that affect our communities and our region.” PLAN has assisted many organizations and individuals in their attempts to navigate, understand and participate in Department of Public Utilities (“Department”) proceedings.

We stand by our previously submitted comments at the June 2021¹ and September 2022² opportunities along with their message that the public's input must not only be listened to but also matter to the Department.

On December 28, 2022 the Department issued an Interlocutory Order and Draft Policy on Enhancing Public Awareness and Participation in D.P.U. Docket 21-50. Please accept our brief comments below on the published Draft Policy.

Types of Proceedings

In addition to the different levels of publication and outreach described in the Draft Policy, Tier 1 “major, significant proceedings” and Tier 2 “proceedings requiring public hearings” must be recorded and posted online to a location such as a YouTube channel like the Energy Facilities Siting Board, and all hearing transcripts posted for public access at the DPU File Room. It is unreasonable to expect interested citizens to purchase the transcript, if they are even aware of that unpublicized opportunity.

The docket subscription policy described to be put in place for Tier 1 should be extended to Tier 2 proceedings as well. It would seem to present no, or very minimal, extra work for staff.

Petitioner Outreach Plan

Regarding the requirement of distribution companies to include information as a billing insert, this should extend to an electronic requirement for those ratepayers who have chosen electronic-only communications and auto-payment.

¹ Available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13643142>

² Available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/15503834>

Conclusion

In addition to suggestions made above, we note that while the Draft Policy seems to enhance public awareness of Department proceedings in some respect, we don't see as much policy or action on the public participation side. Hearings are still held during the work day without recordings or access to transcripts. For working people unable to attend online, or in-person should they return, public hearings there is no remedy. Without hearing recordings and transcripts, there is no way to at least become informed about what was presented by the petitioner and the comments made by those who were able to attend. The Energy Facilities Siting Board has begun to make both public hearing recordings and transcripts available to the public, the Department must do the same.

In general, efforts to enhance awareness are a move in a positive direction but we need equal efforts to enhance participation.

PLAN appreciates the opportunity to participate in this proceeding.

Respectfully submitted,



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