

**KEEGAN WERLIN LLP**

ATTORNEYS AT LAW  
99 HIGH STREET  
BOSTON, MASSACHUSETTS 02110-3113  
\_\_\_\_\_  
(617) 951-1400

TELECOPIERS:  
(617) 951-1354  
(617) 951-0586

August 25, 2023

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

Re: Inquiry by the Department of Public Utilities on its Own Motion into Procedures for Enhancing Public Awareness of and Participation in its Proceedings – D.P.U. 21-50

Dear Secretary Marini:

Enclosed on behalf of Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company, Nantucket Electric Company, and Boston Gas Company each d/b/a National Grid, NSTAR Electric Company, NSTAR Gas Company, and Eversource Gas Company of Massachusetts each d/b/a Eversource Energy, The Berkshire Gas Company, and Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (together the “Distribution Companies”) are the Distribution Companies’ joint comments provided in response to the Department of Public Utilities’ July 25, 2023 Hearing Officer Memorandum in the above-captioned matter.

Thank you for your attention to this matter.

Sincerely,



Ashley S. Marton

Enclosures

cc: Scott Seigal, Esq – Hearing Officer  
Kevin Penders, Esq. – Keegan Werlin LLP  
Brendan Vaughan, Esq. – Keegan Werlin LLP  
Andrea Keeffe, Esq. – National Grid  
Matthew Campbell, Esq. – Unitil  
R.J. Ritchie, Esq. - Liberty

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

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Inquiry by the Department of Public Utilities	)	
on its own Motion into procedures for	)	
enhancing public awareness of and participation	)	D.P.U. 21-50
in its proceedings.	)	

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**JOINT COMMENTS OF THE MASSACHUSETTS DISTRIBUTION COMPANIES ON  
THE DEPARTMENT OF PUBLIC UTILITIES’ REQUEST FOR COMMENTS**

**I.     INTRODUCTION**

On April 16, 2021, the Department of Public Utilities (the “Department”) issued a Vote and Order Opening Inquiry in the above-captioned docket (the “NOI”). The NOI sought input from interested persons on methods to procedurally enhance public notice requirements to increase public awareness of and participation in Department proceedings (NOI at 3). Many public comments were filed in response to the NOI. After reviewing the comments, the Department held a joint roundtable session with the Energy Facilities Siting Board (“EFSB”) on August 25, 2022. Following the roundtable, the Department solicited and received additional public comments. On December 28, 2022, the Department issued an Interlocutory Order and Draft Policy on Enhancing Public Awareness and Participation (“Draft Policy”) outlining tiers of proceedings and corresponding required public awareness actions. The Department solicited and received public comments on the Draft Policy.<sup>1</sup> On July 24, 2023, the Department held a technical conference to discuss the Draft Policy. Following the technical conference, the Department solicited additional comments on seven questions and other topics raised during the conference.

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<sup>1</sup> On July 11, 2023, the Department issued a memorandum entitled “Technical Conference Agenda and Guidelines” (“Memorandum”), which included a chart with the proposed types of cases which would fall into each tier for discussion. Memorandum at 2.

The Distribution Companies offer the following joint comments in response to the Department's seven questions and the conference topics.<sup>2</sup> In addition to the comments below, the Distribution Companies are also including a redlined Draft Policy as Appendix 1 and an updated chart of each Distribution Company's communication channels as Appendix 2.

## **II. DISCUSSION**

### **A. Responses to Department Questions**

1. Discuss anticipated challenges with collaboration between the distribution companies, municipal leaders, and local advocacy groups associated with the community outreach plans. As part of this response, discuss whether a stakeholder working group or an alternative process could be leveraged to address these challenges (e.g., to develop a distribution list for outreach).

Given the unique service territories each Distribution Company serves, each Distribution Company should be allowed to create a tailored outreach plan by tier designed to meet the needs of its communities, customers, and stakeholders. Further, some of the Distribution Companies serve many communities and will need to be conscious about overcommunicating with its municipal officials.<sup>3</sup>

The Distribution Companies recommend the Department collaborate with the Executive Office of Energy and Environmental Affairs ("EEA") Environmental Justice ("EJ") Director to develop a targeted list of local advocacy groups to be included on a communications and outreach plan subscriber list and provide an opportunity for the Distribution Companies to comment on the proposed list. Collaborating with the EEA to develop the subscriber list will solve the difficulties

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<sup>2</sup> The Distribution Companies are comprised of The Berkshire Gas Company ("Berkshire Gas"), NSTAR Electric Company, NSTAR Gas Company, and Eversource Gas Company of Massachusetts each d/b/a Eversource Energy (collectively, "Eversource"), Liberty Utilities (New England Gas Company) Corp. d/b/a Liberty ("Liberty"), Boston Gas Company, 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 Unital ("Unital") (collectively, "Distribution Companies").

<sup>3</sup> For example, National Grid serves 172 electric communities and 144 gas communities, with some overlap. That is a significant group to survey for each filing.

in identifying which local advocacy groups to include. Moreover, alignment between the EEA and Department will ensure consistency for stakeholders.

In addition to coordinating with the EEA, to ensure those who wish to receive an initial notification of a filing do, the Distribution Companies recommend that the Department request interested stakeholders subscribe to the list of those wishing to be initially notified of a regulatory filing. Further, by allowing individuals or organizations to add themselves to the subscriber list for their operating company or companies, the list will remain up to date. The Distribution Companies recommend the Department be the repository for the subscriber list which would allow the Distribution Company with an upcoming filing to contact the Department for the most up to date subscriber list for their service territory. By creating a subscriber list by service territory, it allows customers and stakeholders to receive notifications for only those filings relevant to them.

The Distribution Companies are concerned that over inclusion of “local advocacy group” on the subscriber list may pose challenges for future communication and outreach and delay proceedings. Therefore, the Distribution Companies recommend that “local advocacy groups” be comprised of organizations with the broadest possible reach and redundancy be minimized whenever possible. Additionally, for some service territories, there may not be as broad a community of advocacy groups, but in all instances there will be a community action partner (“CAP”) agency, and so at a minimum, the Distribution Companies would expect to partner and coordinate with CAP agencies as part of any subscriber list.

Given the expected extent of the subscriber lists for certain regulatory filings, the Distribution Companies stress the importance of requiring that public comments be filed within the designated public comment window in order to ensure the proceedings progress in a timely manner.

2. Describe the process by which petitioners should notify local governments and elected officials of Tier 1 proceedings. If the process should vary by municipality, discuss what level of outreach to local governments and elected officials is sufficient.

The Distribution Companies propose each Distribution Company develop a standard format for communication to its respective municipalities by applicable tier. Given that each Distribution Company varies in size and capabilities, the Distribution Companies should be permitted to employ a Distribution Company-specific format.<sup>4</sup> Each Distribution Company utilizing a standard format will result in lower administrative costs, and decreased possibility for confusion or unclear messaging.

3. For Tier 1 proceedings, discuss the communication channels (e.g., email, text, social media, bill inserts) that are the most likely to reach the greatest number of customers. For each communication channel, discuss the feasibility of an “opt in” and/or an “opt out” approach and the costs associated with each. Additionally, discuss at a high level a customer education approach for each type of communication channel. If the response varies by distribution company, please discuss the reasons for these differences (e.g., no texting capabilities) and the different communication options available to each company.

As discussed in the Distribution Companies’ May 25, 2022 comments, the Distribution Companies have different capabilities for communicating with customers and certain methods are more successful than others for some companies. Eversource and National Grid believe email correspondence to be the most successful means of reaching customers. However, Unitil and Liberty note bill inserts (and, in the case of Liberty, onserts)<sup>5</sup> are the most effective communication

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<sup>4</sup> For example, Unitil has an existing notification and communications process for rate cases that could be expanded for other Tier 1 proceedings. Unitil has a dedicated liaison team that reaches out directly to elected and municipal officials. The team communicates through direct phone calls and emails, in which the teams provide a high level overview of the rate case and the customer impacts. Unitil conducts the same outreach when it comes time for public hearings. As another example, Eversource would be able to use its existing notification and communications pathways to develop a plain language and translation version of filings to allow municipal officials to more easily forward information out to community partners.

<sup>5</sup> Unitil includes both inserts (with the bill) and onserts (on the bill).

channel to reach their customers. See Distribution Companies' Comments, Appendix A, Tables 2, 3 (May 25, 2022).<sup>6</sup> While each Distribution Company may have differing levels of customer reach for each communications channel, the Distribution Companies are generally supportive of communication outreach efforts across multiple channels such as website, email, and social media posts. Communicating across multiple channels, where feasible, increases the likelihood of reaching the greatest number of customers. Each Distribution Company should have the flexibility to determine the appropriate communication channel, or suite of channels, to distribute notices to customers, municipalities, and stakeholders.

With that general support being stated, however, the Distribution Companies do not believe social media posts are the most effective means of communicating these messages with customers. Further, some of the Distribution Companies have one social media account for multiple operating companies (sometimes in other jurisdictions as well), and have concerns that some posts may result in added confusion for customers.

Additionally, the Distribution Companies strongly oppose the use of text notification for regulatory proceedings. Unitil and Berkshire do not have text notification capabilities. For the Distribution Companies with texting capabilities, text messaging customers is a critical channel of communication used, where available, to inform customers of: (1) safety or outage information; and (2) bill payment information. Inundating customers with text messages for Department regulatory proceedings, where these customers have not self-selected to receive such updates, will inevitably lead to customers unsubscribing from general text message updates, and the Company losing out on its ability to provide necessary outage and safety updates. Accordingly, the

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<sup>6</sup> The Distribution Companies reiterate their concern for email fatigue and recommend, if there were multiple at the same time, grouping Tier 1 email notifications to customers with existing email communications. See Distribution Companies' Comments at 8 (September 16, 2022).

Distribution Companies strongly oppose text messaging for regulatory notices. Such a process risks increased opt-outs from these messaging channels, thereby hampering the Distribution Companies' ability to communicate with customers.

Each of the Distribution Companies has provided a breakdown of Tier 1 channels, the likely reach for their customers, whether that channel can be opted into or out of, and any other additional clarifying notes in Appendix 2.

4. Discuss the benefits, if any, associated with an annual communication (e.g., letter and/or email) to customers with the following: (a) contact information for the company; (b) a link to the company's website with all pending cases before the Department; and (c) the availability of any "opt in" options (e.g., text or email) to receive information on Tier 1 proceedings. For new customers, discuss whether this information could be provided as part of a "welcome packet." As part of this response, provide the anticipated costs associated with such a communication.

The Distribution Companies support annual communications to customers, which should provide customers with awareness of how to access regulatory materials and how to elect to participate.<sup>7</sup> Further, leveraging existing communications channels minimizes the cost impact and potential communication fatigue. To minimize cost impacts, the Distribution Companies recommend utilizing email for this annual communication with links to the relevant regulatory websites.

If the Department required an annual letter to be mailed to all customers, the Distribution Companies would incur additional costs.<sup>8</sup> Further, Unitil already has a method for their customers to opt in or out of communications through a preference portal.<sup>9</sup> Therefore, the Distribution

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<sup>7</sup> The Distribution Companies note again their recommendation to not include text messaging of customers for regulatory filings.

<sup>8</sup> Eversource estimates a single panel bill insert would cost approximately \$18,000 to mail to all customers receiving paper bills. Berkshire Gas estimates approximately \$12,000 per notification.

<sup>9</sup> Liberty customers can opt-in or out of the e-newsletter.

Companies do not recommend adding an opt-in/out functionality to an annual email or mailed letter.

Some of the Distribution Companies also use welcome packs for new customers. Specifically, the Distribution Companies note the ability to include information in the type discussed above in a welcome pack,<sup>10,11</sup> and/or in a quarterly newsletter.<sup>12</sup> The Distribution Companies note adding this information would incur incremental costs.<sup>13</sup>

5. Discuss any concerns related to providing accurate translation and/or interpretation services for Tier 1 proceedings. As part of this response, discuss: (a) lessons learned from previous interactions with language access service providers; and (b) the resources needed to provide accurate translation and/or interpretation services and the anticipated timeline for obtaining each resource.

The Distribution Companies remain concerned with ensuring quality of translation services due to the technical nature of the subject matters routinely at issue before the Department and the nature of that highly technical testimony needing translation. In the Distribution Companies' experience, a simple word-for-word translation of these materials is not accurate. As such, securing the services of third-party translators who are able to work on these types of proceedings consistently will be key to ensuring high quality services, but the translations will need to be reviewed and the translators will likely need time to learn utility terminology.

Eversource has experience using interpreter services and has learned several key takeaways from its experiences. First, Eversource has discovered that two interpreters per language is

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<sup>10</sup> Eversource emails a "Welcome Series" to its electric customers and anticipates being able to send the Welcome Series email to gas customers in 2024.

<sup>11</sup> If the Department needed National Grid to include this information in the welcome pack in the next three months, there would be associated costs with implementation.

<sup>12</sup> National Grid would also soon be able to include it in a "welcome email."

<sup>13</sup> To include a reference and URL in the welcome pack, Eversource estimates a one-time cost of approximately \$3,000-\$4,000.



important to ensure interpretation is fluid and to allow for interpreters to take breaks. Second, Eversource notes that Zoom does not allow for multiple screen sharing options in different language rooms. Therefore, participants using interpreter services must revert to listen only or use a separately translated presentation (as applicable). Third, many times interpreter services are acquired but no participants attend to avail themselves of these interpretive services. As such, this may indicate that there may be more effective ways of reaching non-English speaking populations than simply interpreting regulatory proceedings and filings, and the Department, through this proceeding and in partnership with the Distribution Companies and other interested stakeholders, should consider allocating human and financial resources differently to do so.

Importantly, the Distribution Companies are concerned with the cost of translation and interpreter services. In fact, during the post-pandemic era of translation services, the Distribution Companies have seen costs for such services increase significantly.<sup>14</sup> To contain these costs, the Distribution Companies request the scope of materials to be translated be considered and narrowly defined. Also, for this reason, the Distribution Companies recommend requiring translation and interpreter services be limited to Tier 1 proceedings. Should the Distribution Companies be responsible for the cost of these services, the Distribution Companies request a means to recover those costs. Additionally, the Distribution Companies recommend a phased approach of 180 days from the Order directing translation and/or interpreter services so that these services can be researched, retained, and onboarded.

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<sup>14</sup> The general price per interpreter per hour can begin at about \$175 per hour and go up from there, depending on the scarcity or difficulty of the language. Additionally, there is often a minimum hourly commitment (whether or not it is used), mileage for travel for in-person events, and the necessity to have two interpreters for each language. As an example, a one-hour virtual meeting using Spanish and Portuguese interpreters cost one of the Distribution Companies \$1,500.

In addition to the cost considerations outlined above, the Distribution Companies note, depending on the complexity of the translation (e.g., length, technical nature, number of languages required), they have experienced a wide variety of turnaround times for document translations from one to six weeks. Therefore, the Distribution Companies reiterate the recommendation to clearly define the scope of required translations and interpreter services.

6. For Tier 1 proceedings with a “significant geographic specific impact on an environmental justice population,” how should the term “significant” be defined (e.g., “a unique, material long-term environmental or economic effect on an environmental justice population,” as proposed by the companies)?

The Distribution Companies recommend defining the term “significant geographic impact” to mean “material, long-term, environmental or economic effect on an EJ population.” Additionally, the Distribution Companies discourage the inclusion of EFSB cases, filings made pursuant to G.L. c. 164 § 72, or zoning exemptions in Tier 1. Those projects are geographically limited and broad notice would create unnecessary anxiety, contribute to notice fatigue, and potentially encourage unhelpful intervention that will serve only to delay project review. In the alternative, the Draft Policy should be clarified to state that these filings require additional geographic-specific notice, and not broad notice across a Distribution Company’s service area.

7. Discuss the pros and cons of a phased approach to the initial implementation of the community outreach plans. As part of this response, discuss the actions the companies should take to coordinate with municipal and community leaders on the communication preferences of each community as part of the first phase. Additionally, discuss the anticipated timeline for such coordination between the distribution companies, municipal leaders, and local advocacy groups.

As discussed above, the Distribution Companies are in favor of a phased approach and recommend a 180-day window from the Order to allow the Distribution Companies sufficient time to implement the Tier 1 community outreach plan and adapt to any potential lessons learned. As outlined above and in the Distribution Companies prior written comments, the Distribution Companies have varying functionalities available to communicate with customers, advocacy groups and municipalities, varying levels of experience with translation services and varying technical capabilities. Allowing 180-days from the Order will allow the Distribution Companies with sufficient time to, as noted above, procure translation vendors, develop and vet materials and outreach plans to ensure that once implemented, the Distribution Companies are complying with the order's directives. Further, if adopted, the phased in approach will allow the Department to coordinate with EEA, outreach to stakeholders, and develop an initial subscriber list. The Distribution Companies note that depending on the scale and scope of the order, they may need to engage in procurement activities such as issuing Requests for Proposals ("RFP"), reviewing RFP responses, and developing or expanding on IT resources, all of which take time to conduct. Additionally, the Distribution Companies anticipate needing a significant amount of time to gather the municipal officials' preferences for each of the communities in their service territories, evaluate the feedback, and develop a uniform outreach plan by tier. The Distribution Companies requested implementation deadline allows for the different companies to acquire and expand on needed resources, engage in requisite meetings, and will ultimately result in a more efficient and effective process than an implementation deadline that does not allow for sufficient time.

## **B. General Comments**

In the Hearing Officer's July 25, 2023 email to participants at the technical session, the Department provided direction that stakeholders should address any topics of interest raised during the technical session. While the Distribution Companies are cognizant of the Department's time, and do not seek to reiterate past filings, in addition to the responses offered to the seven questions outlined above, the Distribution Companies note that during the course of this proceeding they have provided extensive comments on the following areas: (1) data to consider for use in adopting a particular outreach platform (June 14, 2021 Written Comments at 4-5); (2) input on how the Department can effectively provide notice to persons with limited English proficiency (*id.* at 7-8); (3) interpretation services (*id.* at 8-9); (4) creation of additional roles and offices within the Department to drive the Department's policy of increased engagement (*id.* at 12-13); (5) data on the available communication channels, including email, text messaging, social media and more (Distribution Companies response to April 27, 2022 Memorandum); (6) potential best practices for using such channels and their respective pros and cons (*id.*); (7) information and feedback on the Draft Policy; and (8) the use of an open dialogue for stakeholders and subject matter experts to provide feedback and insight into specific Department oriented goals and outcomes of this proceeding (January 20, 2023 Written Comments).

These prior filings, and the Distribution Companies' substantive feedback, are important and should be fully considered by the Department in rendering its final directives in this proceeding. As outlined throughout these filings, the Distribution Companies each have a varying level of experience and varying current capabilities for engaging in the sort of enhanced outreach discussed throughout this proceeding. While this is true, the Distribution Companies are confident that with the Department's clear direction, each can develop an appropriate company-specific

approach that will work for each companies' respective service area, customer base, capabilities, and technological abilities.

Over the past two years, the Distribution Companies have endeavored to be responsive and provide substantive technical feedback to the Department in this proceeding. The Distribution Companies are confident that with the clarity provided to the Straw Proposal and with regulatory support for incremental costs incurred to achieve the desired outcome, each can utilize the Department's clear feedback to develop company-specific plans that meet the Department's requirements.

Finally, the Draft Policy and methods above are aimed at enhancing the public's awareness of the Department's proceedings; however, none of it will guarantee a greater level of public participation. Any evaluation of the Distribution Companies' communication plans should be focused on the communications means within the Distribution Companies' control (e.g., extent of the outreach), rather than the hoped-for results (e.g., greater participation in a Department proceeding).

### **III. CONCLUSION**

The Distribution Companies appreciate the opportunity to participate in this important proceeding and submit these comments. The Distribution Companies look forward to reviewing the comments of other interested stakeholders and continued participation in the remaining phases of this proceeding to better determine the specifics of any proposals.

Respectfully submitted by,

**EVERSOURCE**

By its attorneys,



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Kevin F. Penders, Esq.  
Keegan Werlin LLP  
99 High Street, Suite 2900  
Boston, Massachusetts 02110  
(617) 951-1400

**NATIONAL GRID**



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Andrea G. Keeffe, Esq.  
National Grid USA Service Company, Inc.  
170 Data Drive  
Waltham, MA 02451

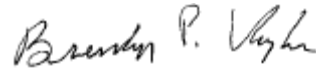
**LIBERTY**



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Ronald J. Ritchie, Esq.  
Liberty Utilities  
465 Sykes Road  
Fall River, MA 02721

**THE BERKSHIRE GAS COMPANY**



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Brendan P. Vaughan, Esq.  
Keegan Werlin LLP  
99 High Street, Suite 2900  
Boston, Massachusetts 02110  
(617) 951-1400

**UNITIL**



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Matthew Campbell, Esq.  
Unitil Service Corp.  
6 Liberty Lane West  
Hampton, NH 03842

Dated: August 25, 2023

## *Draft Policy*

### 1. Types of Proceedings

Different types of proceedings should merit different levels of publication and outreach, with certain proceedings receiving the greatest level of publication and outreach, and less significant and routine cases requiring less publication and outreach. Below, the Department sets forth criteria for different tiers of proceedings. These criteria are designed to serve as guidance, but the Department will determine under which tier each proceeding falls on a case-by-case basis. Prior to a filing submittal, a petitioner may confirm which tier applies with the Department.

- Tier 1 proceedings are major, significant proceedings (which may include gas or electric base distribution rate cases or significant policy change initiatives) or proceedings with significant geographic-specific impact on environmental justice communities (as identified by the Massachusetts Environmental Justice information and maps, <https://www.mass.gov/environmental-justice>) and shall receive the following publication and outreach efforts: prominent publication on the petitioner’s website; newspaper postings; outreach to interested persons and service lists; email notification to customers; outreach to municipal and community leaders; and social media posts. In addition, customers will also receive bill insert messaging for base distribution rate cases and significant policy change initiatives. These cases shall also have translated notices and interpretation services at the public hearing consistent with the Department’s Language Access Plan.<sup>7</sup>
  - “Significant geographic impact” shall mean material, long term, environmental, or economic effect on an environmental justice community.
  - Email notifications to customers will be only those customers with email addresses on file with the company and have not opted out.
  - Email and social media notices may be combined with other emails and postings to customers to streamline and reduce the number of communications.
- Tier 2 proceedings will encompass the majority of proceedings, include ratemakings, rulemakings, and proceedings requiring public hearings (which may include Department policy change initiatives, rulemaking proceedings, and forecast and supply plans), and shall receive the following publication and outreach efforts: prominent publication on the petitioner’s website; newspaper postings; and outreach to interested persons and service lists.
- Tier 3 proceedings will encompass routine proceedings that do not include a public hearing (which may include annual rate-setting filings (e.g., gas adjustment factor filings, basic service filings, true-up filings), service quality filings, and

## Appendix 1: Redline of Draft Policy

D.P.U. 21-50

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- <sup>7</sup> For any proceeding involving an environmental justice population designated as such on the basis of English isolation (i.e., limited English proficiency), the Department may require the translation of notices and interpretation services at the public hearing into relevant languages. For any proceeding requiring translation and interpretation services, interested parties may request that additional languages be accommodated.



informational filings) and shall receive the following publication and outreach efforts: prominent publication on the petitioner's website; and outreach to service lists. Customers will continue to receive 30-day notice of changes in basic service rates. Default Service Pricing and Procurement, D.T.E. 99-60-C at 7 (2000).

For Tier 1 proceedings, the Department will provide information on its website on how community-based organizations and other interested parties may subscribe to particular dockets and to receive notices of the proceeding. The Department will also provide regular updates of such proceedings on its website. The Department will also seek to establish links for interested parties to receive notices of all Department filings or particular types of filings or issues.

## 2. Petitioner Outreach Plan

When making a filing seeking Department review and approval, a petitioner must include with the filing a community outreach plan relevant to the subject matter and geographic scope of the filing and consistent with the level of scrutiny required by the tier into which it falls. The petitioner may customize the community outreach plan as appropriate for its service territory, customers, and stakeholders.

The outreach plan must include a list of the municipal and community organizations to whom the notice will be issued, provide plans for translation and interpretation services (including which languages and the justification for those languages), and indicate which steps of the outreach plan have already been accomplished.

The petitioner may request the most recent list of community-based organizations subscribed to the Department's website and notice of proceedings; this list may be customized further as appropriate for the filing and tier.

The petitioner must work with stakeholders in affected communities to develop outreach plans and determine which platforms or locations to use to publicize notices, as applicable by tier. The petitioner must also coordinate with the affected municipalities, including municipal energy managers, chambers of commerce, and community action programs, to develop outreach plans and disseminate the notice. For the avoidance of doubt, the petitioner may create a standard outreach plan and notice distribution list for each tier, and update this plan with the affected municipalities periodically as needed, to reduce the number of communications.

For Tier 1 proceedings, distribution companies, when required, must include as a billing insert a succinct, easy-to-understand summary of the petition in a larger font size. This summary will be for general informational purposes only and distinct from the Notice of Filing developed by the Department.

No later than [TBD], distribution companies must establish email and text distribution lists for all notices, with opt-out provisions, specific options for issues and locations, and plans for social media usage, aligned with the Tier requirements indicated above, and customized for the petitioner's service territory, customers, and stakeholders.

**Appendix 2**  
**Tier 1 Channels by Distribution Company**

**Berkshire Gas**

<b>Tier 1 Channel</b>	<b>Reach</b>	<b>Opt In/Opt Out</b>	<b>Notes</b>
Website	11,800	N/A	Unique users sessions per month
Newspaper postings	16,009 7,228 10,111	N/A	The Berkshire Eagle The Recorder (Greenfield) The Daily Hampshire Gazette (Northampton) Circulation as of 7/31/23
Email	TBD ~240	Opt-in Opt-out	Service lists Municipal and community leaders
Social media posts <sup>1</sup>	109	Opt-in	Twitter only # of followers as of 7/31/23
Bill insert (paper)	36,000	N/A	
Bill insert (email)	26,338	Opt-out	The paper insert sent electronically # of email addresses as of 7/18/23

**Unitil**

<b>Tier 1 Channel</b>	<b>Reach</b>	<b>Opt In/Opt Out</b>	<b>Notes</b>
Website		N/A	
Newspaper postings			Sentinel and Enterprise Worcester Telegram & Gazette Boston Globe or Boston Herald <sup>2</sup>
Email	~70% of customers with a valid email		Unitil notes the Company has a 45% open rate
Social media posts <sup>3</sup>		Opt in	
Facebook	6,894		
Twitter (X)	8,063		
Instagram	609		
Bill insert (paper)	19,783 customers		57.6% of total

<sup>1</sup> The Distribution Companies note social media is not a reliable communication channel for the dissemination of information regulatory filings. Some of the Distribution Companies have one social media account for multiple operating companies which could lead to customer confusion. Further, some social media platforms highlight certain account posts while burying other posts the user interacts with less. As a result, there is no guarantee a follower of a social media account will in fact see the Distribution Company's post.

<sup>2</sup> The newspapers listed here are those the Department directed Unitil to publish the Notice in for its 2019 base distribution rate cases (D.P.U. 19-130 and D.P.U. 19-131).

<sup>3</sup> See note 1.

### Liberty

Tier 1 Channel	Reach	Opt In/Opt Out	Notes
Website	~ 12,000 users/month	N/A	
Newspaper postings			
Email	~31% of customers with a valid email	Opt in / Opt Out	
Social media posts <sup>4</sup> Facebook Twitter (X)	253 followers 89 followers 100,000+Total Monthly Impressions	Opt in	Our messages extend beyond just the follower base
Bill insert (paper)	~61,000	N/A	Sent to all as part of the bill (onsert)
Bill insert (email)	N/A	N/A	

### Eversource

Tier 1 Channel	Reach	Opt In/Opt Out	Notes
Website	1,181,894	N/A	Unique visitors per month as of July 2023
Newspaper postings	Eversource does not have the actual reach available for each	N/A	<b>Eastern Mass</b>  <b>PRINT – Dailies, weeklies – and DIGITAL</b> <b>Regional/Local</b> <b>Boston Globe</b> Business desk: <a href="mailto:business@globe.com">business@globe.com</a> City desk: <a href="mailto:localnews@globe.com">localnews@globe.com</a> <b>Boston Herald</b> Business desk: <a href="mailto:business@bostonherald.com">business@bostonherald.com</a> City desk: <a href="mailto:citydesk@bostonherald.com">citydesk@bostonherald.com</a> <b>Brockton Enterprise</b> <a href="mailto:newsroom@enterprisene.com">newsroom@enterprisene.com</a> <b>Cambridge Chronicle</b>

<sup>4</sup> See note 1.

			<p><a href="mailto:cambridge@wickedlocal.com">cambridge@wickedlocal.com</a></p> <p><b>Cape Cod Chronicle</b> info@capecodchronicle.com</p> <p><b>Cape Cod Enterprise</b> – Falmouth, Mashpee, Bourne, Sandwich newsroom@capenews.net</p> <p><b>Cape Cod Times</b> news@capecodonline.com</p> <p><b>Fall River Herald News</b> – Southcoast news@heraldnews.com</p> <p><b>Framingham Source</b> <a href="mailto:editor@framinghamsource.com">editor@framinghamsource.com</a></p> <p><b>Martha’s Vineyard Gazette</b> <a href="mailto:news@mvgazette.com">news@mvgazette.com</a></p> <p><b>Martha’s Vineyard Times</b> <a href="mailto:news@mvtimes.com">news@mvtimes.com</a></p> <p><b>MetroWest Daily News</b> metrowest@wickedlocal.com</p> <p><b>Milford Daily News</b> – Hopkinton, Holliston, Medway, Bellingham milforddailynews@wickedlocal.com</p> <p><b>New Bedford Standard Times</b> – Southcoast newsroom@s-t.com</p> <p><b>Patriot Ledger</b> – Milton, Canton, South Shore newsroom@ledger.com</p> <p><b>Provincetown Banner</b> <a href="mailto:editor@provincetownbanner.com">editor@provincetownbanner.com</a></p> <p><b>State House News Service</b> <a href="mailto:news@statehousenews.com">news@statehousenews.com</a></p> <p><b>Woburn Daily Times Chronicle</b> – Woburn, Burlington, Winchester news@woburnonline.com</p> <p><b>Worcester Telegram and Gazette</b> <a href="mailto:news@telegram.com">news@telegram.com</a></p> <p><b>Western Mass</b></p> <p><b>PRINT – Dailies – and DIGITAL</b></p> <p><b>Berkshire Eagle</b> – Berkshire County news@berkshireeagle.com</p> <p><b>Daily Hampshire Gazette</b> – Hampshire County news@gazettenet.com</p> <p><b>MassLive</b></p> <p><b>The Recorder</b> – Franklin County</p>
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			<p>news@recorder.com  <b>The Reminder</b> – Longmeadow  news@thereminder.com  <b>The Republican</b> – Springfield and surrounding communities  news@repub.com</p> <p><b>Spanish</b>  <b>El Mundo Newspaper</b>  <a href="mailto:info@elmundoboston.com">info@elmundoboston.com</a>  <b>Vocero Hispano Newspaper</b>  <a href="mailto:news@vocerohispano.com">news@vocerohispano.com</a>  <b>El Planeta Newspaper</b>  <a href="mailto:editor@elplaneta.com">editor@elplaneta.com</a></p>
Email (% with valid email)	1,038,221 (50%)	Opt Out	Massachusetts total across operating companies. Typically achieve a ~50% open rate and ~18% read rate.
Social media posts <sup>5</sup> Facebook Twitter (X)	Eversource MA FB: 36.0K Eversource MA X (Twitter): 23.3K	Opt In	Massachusetts total - Cannot breakdown by operating company or between electric and gas. There is only one FB and X account for MA. Additionally, the totals do represent a guaranteed reach.
Bill insert (paper)	1,253,291 (58%)	N/A	Massachusetts total across operating companies.
Bill insert (email)	890,101 (42%)	Opt In	Massachusetts total across operating companies.

### National Grid

Tier 1 Channel	Reach	Opt In/Opt Out	Notes
Website	~385K – MECO Residential ~15K – MECO Business ~145K – MAG Residential ~6K – MAG Business	N/A	Avg. monthly visits to gas and electric residential and business homepages
Newspaper postings	-	-	As directed by the Department, for example <sup>6</sup> :

<sup>5</sup> See note 1.

<sup>6</sup> The newspapers listed here are those the Department directed National Grid to publish the Notice in for its 2018 and 2020 base distribution rate cases (D.P.U. 18-150 and D.P.U. 20-120).

			<p>The Enterprise, The Inquirer and Mirror, the Worcester Telegram &amp; Gazette, The Berkshire Eagle, the Eagle-Tribune, and either The Boston Globe or the Boston Herald</p> <p>English version: Worcester Telegram, Sentinel &amp; Enterprise, The Daily Item, The Patriot Ledger, The Lowell Sun, The Salem News, The Cape Cod Times, the Eagle-Tribune, and either The Boston Globe or the Boston Herald</p> <p>Spanish version: El Mundo and in El Planeta</p>
Email (% with valid email for National Grid Electric and Gas)	~72% 1.7M	Opt-out	Customers with email addresses on file. Potential to create new IP address for all regulatory themed messages; would remain an opt-out only channel, but would mitigate risk of losing ability to contact customer emails for billing, storms, etc.
Social media posts <sup>7</sup> Facebook Twitter (X)  Instagram	181K (US) 410 (MA) 43.3K (US)  12.3K (US)	Opt in	<p>Facebook and Instagram represent US footprint. Ability to regionally target with paid social media posts.</p> <p>Twitter (X) has a new MA-specific handle which just launched this summer.</p>
Bill insert	All	N/A	Ability to reach all customers with paper or e-bills, with long lead time for placements. Targeting varies by operating company, with ability to target by zip code for Mass. Electric and rate class for MA Gas.

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<sup>7</sup> See note 1.