

***By Electronic Filing***

May 26, 2023

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, Massachusetts 02110

**Re: D.P.U. 23-XX: Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for Approval of Mid-Term Modification**

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid” or the “Company”), enclosed for filing is the Company’s Petition for Approval of Mid-Term Modification (“MTM”) to the Company’s 2022-2024 three-year energy efficiency plan, as previously approved in Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, D.P.U. 22-118 (2022). This filing is being made in accordance with the Energy Efficiency Guidelines promulgated by the Department of Public Utilities (the “Department”) in Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines, D.P.U. 20-150-A (2021) (“Guidelines”).

In support of this petition, please find the following: (1) the Pre-Filed Testimony of Steven Menges, Ezra McCarthy, and Whitney Brougner (Exhibit NG-1); (2) the benefit-cost model used to calculate savings (Exhibit NG-2); (3) the evaluation plan (Exhibit NG-3); and (4) a narrative description (Exhibit NG-4). This filing also includes the following: affidavits of Steven Menges, Ezra McCarthy, and Whitney Brougner; my appearance of counsel; and a certificate of service.

The Company respectfully requests expeditious review and approval of this MTM from the Department by June 30, 2023, to ensure that the demonstration is able to meet its timeline and provide Phase 1 results for consideration in the 2025-2027 Plan. A decision by June 30 should provide sufficient time to deploy metering equipment at participating facilities, and collect information on system performance during the summer months. Collecting summer performance data is important to reliably model how the system performs throughout the expected range of typical outdoor weather conditions, which is vital for a robust energy analysis.

National Grid understands and acknowledges the fact that the requested expedited review period is demanding. The Company, furthermore, recognizes the significant undertaking it will require from the Department. National Grid, however, contends that it is imperative for this demonstration and research begins in a timely manner to help inform 2025-2027 planning efforts. The Company sincerely appreciates the Departments consideration for expedited approval. If there is any way the Company can be of assistance to the Department in this matter, please do not hesitate to contact me.

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Lastly, in an effort to maximize administrative efficiency, given the truncated timeline, the Company intends, after submission of the instant filing, to begin the preliminary stages of customer outreach in attempts to garner interest in the demonstration. This preparation will optimize time and Company resources, and will allow National Grid to implement the demonstration expeditiously in the event the Department approves this request. The Company, however, will not implement the MTM pending review and approval by the Department, pursuant to §3.8.2 of the Guidelines.

A check in the amount of \$100 for the filing fee will be sent under separate cover. Please contact me at (351) 666-7799 if you have any questions with respect to today's filing. Thank you for your attention to this matter.<sup>1</sup>

Very truly yours,



Christopher R. Tuomala

Enclosures

cc: Krista Halwey, Hearing Officer, Department of Public Utilities  
Stephanie Mealey, Hearing Officer, Department of Public Utilities  
Jeff Leupold, Hearing Officer, Department of Public Utilities  
JoAnn Bodemer, Esq., Office of the Attorney General  
Elizabeth Anderson, Esq., Office of the Attorney General  
Rachel Graham Evans, Esq., Department of Energy Resources  
Jerrold Oppenheim, Esq., Low-Income Energy Affordability Network

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<sup>1</sup> In accordance with the June 15, 2021 Letter on Continuation of Modified Filing Requirements issued by the Department of Public Utilities ("Department"), this filing is being submitted in electronic form only and National Grid will file a paper version when directed by the Department.