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# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### **NOTICE OF FILING, PUBLIC HEARINGS, AND REQUEST FOR COMMENTS**

D.P.U. 25-41

May 7, 2025

2025 Climate Compliance Plan of The Boston Gas Company d/b/a National Grid.

On April 1, 2025, The Boston Gas Company d/b/a National Grid (“Company”) filed with the Department of Public Utilities (“Department”) its 2025 Climate Compliance Plan (“CCP”). Boston Gas states that it submitted its CCP pursuant to Role of Gas Local Distribution Companies as the Commonwealth Achieves its Target 2050 Climate Goals, D.P.U. 20-80-B (2023). The Department docketed this matter as D.P.U. 25-41.

Pursuant to D.P.U. 20-80-B, each Massachusetts gas local distribution company (“LDC”) is required to file a CCP with the Department every five years, beginning no later than April 1, 2025. D.P.U. 20-80-B at 134-136. For the inaugural CCPs, the Department required that each LDC expand on previous net zero enablement plans by demonstrating how each LDC proposes to: (1) contribute to the prescribed greenhouse gas emissions reduction sublimits set by the Executive Office of Energy and Environmental Affairs for both Scope 1 and Scope 3 emissions; (2) satisfy customer demand safely, reliably, affordably, and equitably using market ready technology available at the time of the filing; (3) use pilot or demonstration projects to assist in identifying investment alternatives; and (4) implement recommendations for future plans. D.P.U. 20-80-B at 134-135.

The Department also directed the Company to: (1) detail the total investment required and include a description of at least one alternative method to meet the required emissions reductions, providing the estimated costs for the considered alternative and a demonstration that the proposed plan is superior to the alternative; (2) include information related to certain LDCs’ efforts to eliminate their reliance on the Everett Marine Terminal; (3) include customer, stakeholder, and community input where practicable; and (4) report on hybrid heating switchover practices, including technical resources provided to Mass Save contractors and service area specific guidance that differs from cold-climate sizing and design trainings offered by common manufacturers. D.P.U. 20-80-B at 135 & n.85; Constellation Energy LNG Supply Agreements, D.P.U. 24-25-B/D.P.U. 24-26-B/D.P.U. 24-27-B/D.P.U. 24-28-B at 18-19 (2024).

As part of the CCP proceedings, the Department will investigate several issues addressed in the recent 2025 gas system enhancement plan (“GSEP”) Orders issued on April 30, 2025 in D.P.U. 24-GSEP-01 through 24-GSEP-06. Specifically, the Department will investigate the following: (1) requirements related to the timeline for analysis of non-pipeline alternatives (“NPAs”) in advance of the date a pipeline project is planned to commence, including a potential

requirement to perform a cost-benefit analysis comparing non-NPA projects and NPA projects, as part of the NPA framework; (2) the Company's decommissioning practices and related depreciation charges; (3) the issue of stranded costs associated with GSEP investments in light of the consultant's report on potential stranded GSEP investments filed with the Company's CCP; and (4) the appropriateness of requiring the Company to integrate its GSEP into its CCP.

Further, on June 14, 2024, the Department directed the Company to submit information on the Company's line extension allowance policies in D.P.U. 20-80. The Company provided testimony on its line extension allowance policies in August 2024, and the Department solicited written comments from stakeholders. In February 2025, the Department solicited comments from stakeholders on a draft line extension allowance policy. The Department will continue its inquiry into the Company's line extension allowance policies and the Department draft line extension policy in the CCP proceedings.

Boston Gas states that its proposed CCP is a strategic plan to advance decarbonization goals over the next five and ten years in its service area. The Company states that its CCP complements existing long-term planning efforts related to utility-run energy efficiency and electrification programs, leak-prone pipeline elimination programs, and long-term gas forecasts and supply plans. Boston Gas states that its CCP focuses on five priority areas essential to achieving Massachusetts' decarbonization goals, including: (1) implementation of an NPA framework to avoid investments in gas infrastructure; (2) building capability for longer-term integrated energy planning; (3) developing new approaches to customer connections; (4) scaling up networked geothermal programs; and (5) offering low-carbon fuels for customers who face challenges to electrify.

In addition to these focus areas, Boston Gas' CCP includes a summary of its ongoing networked geothermal and targeted electrification demonstration projects. Further, the Company includes information on the workforce transition, including information on strategic initiatives aimed at enhancing workforce capabilities, fostering diversity, and providing training opportunities that empower individuals from historically underrepresented communities. Lastly, the Company's CCP includes five proposed performance metrics.

Boston Gas' filing includes: (1) a proposed NPA framework and its stakeholder process; (2) an assessment of potential gas transition costs, analysis of depreciation, and alternative regulatory approaches relating to Massachusetts' decarbonization goals; (3) a report on efforts to reduce or eliminate reliance on liquefied natural gas resources at the Everett Marine Terminal; and (4) a model tariff for the Company to recover certain incremental costs that are not recovered through existing rates.

In its filing, Boston Gas states that it seeks Department approval of the Company's proposed CCP, NPA framework, and CCP factor model tariff. Specifically, Boston Gas requests that the Department find that: (1) the Company's CCP includes the right priorities and action items for the next five and ten years; and (2) by following the CCP, Boston Gas is doing its part to contribute to Massachusetts' GHG emissions reduction goals. Boston Gas also requests that the Department confirm that (1) the proposed NPA Framework meets the Department's requirements; and (2) using this framework to evaluate gas asset investments against NPAs meets the Department's standards for prudent investments. Lastly, Boston Gas requests the

Department's approval of its proposed cost recovery tariff to recover incremental costs needed for NPA evaluations, customer outreach, implementation, gas asset decommissioning, and other CCP action items not covered by current rates.

The Department will conduct two virtual public hearings, using Zoom videoconferencing, to receive comments on the Company's filing:

- one on **June 4, 2025, beginning at 2:00 p.m.** Attendees can join by entering the link, <https://us06web.zoom.us/j/87197815903>, from a computer, smartphone, or tablet. No prior software download is required. For audio only access to the hearings, attendees can dial in at **1-646-931-3860** (not toll free) and then enter the **Meeting ID# 87197815903**;
- and the second on **June 5, 2025, beginning at 7:00 p.m.** Attendees can join by entering the link, <https://us06web.zoom.us/j/83417649618>, from a computer, smartphone, or tablet. No prior software download is required. For audio only access to the hearings, attendees can dial in at **1-301-715-8592** (not toll free) and then enter the **Meeting ID# 83417649618**.

If you anticipate providing comments via Zoom during the public hearing, please send an email by **June 2, 2025**, to [jennifer.cargill@mass.gov](mailto:jennifer.cargill@mass.gov), [elizabeth.c.mcnamara@mass.gov](mailto:elizabeth.c.mcnamara@mass.gov), and [stephanie.mealey@mass.gov](mailto:stephanie.mealey@mass.gov) with your name, email address, and mailing address. If you anticipate commenting by telephone, please leave a voicemail message by **June 2, 2025**, at 1-617-305-3729 with your name, telephone number, and mailing address. Interpretation services will be available over the Zoom platform upon request. To request interpretation services for the public hearings, please email Kaylee Burgess at [dpu.ej@mass.gov](mailto:dpu.ej@mass.gov), specifying your preferred language and contact information by **May 21, 2025**.

Any person interested in commenting on this matter may submit written comments no later than the close of business (5:00 p.m.) on **June 6, 2025**. Written comments from the public may be sent by email to [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov), [jennifer.cargill@mass.gov](mailto:jennifer.cargill@mass.gov), [elizabeth.c.mcnamara@mass.gov](mailto:elizabeth.c.mcnamara@mass.gov), and [stephanie.mealey@mass.gov](mailto:stephanie.mealey@mass.gov), and the Company's attorneys, Bess B. Gorman, Esq., John Habib, Esq., Andrea G. Keeffe, Esq., and Ashley S. Marton, Esq., at [bess.gorman@nationalgrid.com](mailto:bess.gorman@nationalgrid.com), [jhabib@keeganwerlin.com](mailto:jhabib@keeganwerlin.com), [andrea.keeffe@nationalgrid.com](mailto:andrea.keeffe@nationalgrid.com), and [amarton@keeganwerlin.com](mailto:amarton@keeganwerlin.com), respectively. Please note that in the interest of transparency any comments will be posted to our website as received and without redacting personal information, such as addresses, telephone numbers, or email addresses. As such, consider the extent of information you wish to share when submitting comments. The Department strongly encourages public comments to be submitted by email. If, however, a member of the public is unable to send written comments by email, a paper copy may be sent to Mark D. Marini, Secretary, Department of Public Utilities, One South Station, Boston, Massachusetts, 02110.

Any person who desires to participate otherwise in the evidentiary phase of this proceeding shall file a petition for leave to intervene no later than 5:00 p.m. on **May 28, 2025**. A petition for leave to intervene must satisfy the timing and substantive requirements of

220 CMR 1.03. Receipt by the Department constitutes filing and determines whether a petition has been timely filed. A petition filed late may be disallowed as untimely, unless good cause is shown for waiver under 220 CMR 1.01(4). To be allowed, a petition under 220 CMR 1.03(1) must satisfy the standing requirements of G.L. c. 30A, § 10. All responses to petitions to intervene must be filed by the close of business (5:00 p.m.) on the second business day after the petition to intervene was filed.

The Attorney General of the Commonwealth of Massachusetts (“Attorney General”) filed a notice to intervene in this matter pursuant to G.L. c. 12, § 11E. Further, pursuant to G.L. c. 12, § 11E(b), the Attorney General filed a notice of intent to retain experts and consultants to assist her investigation of the Company’s filing and has requested Department approval to spend up to \$150,000 in this regard. Pursuant to G.L. c. 12, § 11E(b), the costs incurred by the Attorney General relative to her retention of experts and consultants may be recovered in the Company’s rates. Any person who desires to comment on the Attorney General’s notice of intent to retain experts and consultants may submit written comments to the Department not later than the close of business (5:00 p.m.) on **May 28, 2025**.

All documents should be submitted to the Department in .pdf format by email attachment to [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov) and [jennifer.cargill@mass.gov](mailto:jennifer.cargill@mass.gov), [elizabeth.c.mcnamara@mass.gov](mailto:elizabeth.c.mcnamara@mass.gov), and [stephanie.mealey@mass.gov](mailto:stephanie.mealey@mass.gov). The text of the email must specify: (1) the docket number of the proceeding (D.P.U. 25-41); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. All documents submitted in electronic format will be posted on the Department’s website through our online [File Room](#) as soon as practicable (enter “25-41” on the line for “Docket No.”). In addition, one copy of all written comments and petitions to intervene should be emailed to the Company’s attorneys, Bess B. Gorman, Esq., John Habib, Esq., Andrea G. Keeffe, Esq., and Ashley S. Marton, Esq., at [bess.gorman@nationalgrid.com](mailto:bess.gorman@nationalgrid.com), [jhabib@keeganwerlin.com](mailto:jhabib@keeganwerlin.com), [andrea.keeffe@nationalgrid.com](mailto:andrea.keeffe@nationalgrid.com), and [amarton@keeganwerlin.com](mailto:amarton@keeganwerlin.com), respectively.

The filing and all subsequent related documents submitted to the Department or issued by the Department will be available on the Department’s website as referenced above as soon as is practicable. To the extent a person or entity wishes to submit comments or intervene in accordance with this Notice, electronic submission, as detailed above, is sufficient. To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), contact the Department’s ADA coordinator at [eadiversity@mass.gov](mailto:eadiversity@mass.gov) or (617) 626-1282.

For further information regarding the Company’s filing, please contact the Company’s attorneys, identified above. For further information regarding this Notice, please contact Jennifer Cargill, Elizabeth McNamara, and Stephanie Mealey, Hearing Officers, Department of Public Utilities, at [jennifer.cargill@mass.gov](mailto:jennifer.cargill@mass.gov), [elizabeth.c.mcnamara@mass.gov](mailto:elizabeth.c.mcnamara@mass.gov), and [stephanie.mealey@mass.gov](mailto:stephanie.mealey@mass.gov).

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### 繁體中文 (Traditional Chinese)

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### Tiếng Việt (Vietnamese)

LƯU Ý: Các dịch vụ biên dịch và/hoặc phiên dịch có sẵn theo yêu cầu. Vui lòng gửi email đến Kaylee Burgess theo địa chỉ [dpu.ej@mass.gov](mailto:dpu.ej@mass.gov) để yêu cầu dịch vụ ngôn ngữ, nêu rõ ngôn ngữ ưa thích của quý vị và thông tin liên lạc

### (Arabic) العربية

يرجى الانتباه: تتوفر خدمات الترجمة و/أو الترجمة الفورية عند الطلب. لطلب خدمات لغوية يرجى التواصل مع Kaylee Burgess بإرسال رسالة إلكترونية إلى العنوان [dpu.ej@mass.gov](mailto:dpu.ej@mass.gov)، تحدد فيها اللغة المفضلة لديك وتذكر معلومات الاتصال.

### ខ្មែរ (Khmer)

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### 简体中文 (Simplified Chinese)

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### Kreyòl Ayisyen (Haitian Creole)

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### Русский (Russian)

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