**NPA Working Group: NPA Framework Comment Submission Due January 29**

**On behalf of (company/organization name): Groundwork Data**

**Submitted by (name and email): Michael Walsh (mjw@groundworkdata.org)**

**Date: 1/29/25**

Reference ID (to be filled in by Apex):

## Transmittal Forward

Matt Nelson

Partner, Apex Analytics

Dear Mr. Nelson,

Groundwork Data is pleased to submit comments on the proposed Non-Pipeline Alternatives Framework. These comments reflect an immediate reaction to the NPA process and proposed framework on behalf of Groundwork Data. Groundwork Data anticipates revising these comments as part of the Department of Public Utilities' consideration of the proposed NPA Framework in the Climate Compliance Plans of the Local Distribution Companies.

The comments do not necessarily reflect the position of our sponsor, the Massachusetts Clean Energy Center, or the Commonwealth of Massachusetts.

Sincerely,

*Michael J. Walsh*

Partner, Groundwork Data

Jan 29, 2025

Enclosures: comments are provided below in this document

## High-Level Comments

#### Synthesis

*NOTE: Groundwork Data provides a high-level executive summary comment that integrates or assesses the proposal's strengths and challenges.*

The proposed NPA Framework is a template that can be applied to a diverse group of capital investment projects. Depending on the type of project (e.g., pipe replacement, LNG/LPGA, etc.), the template will be built to address specific project-type evaluation needs. Since different LDCs have different project investment needs, NPA processes will be customized to meet LDC and project needs.

The 8-step process flow structure from Project Identification to Project Execution provides a structure for assessing alternatives. Below is a high-level summary of our assessment.

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| --- | --- | --- |
| **Process Step** | **Evaluation Criteria** | **High-Level Feedback** |
| Project identification | Identification based on classification | Classification and screening seem reasonable, with minor adjustments |
| Viability | To-be-proposed LDC-specific viability test that implies that each LDC will develop a scoring system | This step and its articulated considerations are reasonable; however, its effectiveness will depend on LDC-defined criteria and application. Given some of the factors listed, the step could subjectively screen out viable and beneficial projects. |
| Feasibility | Can the gas system function without the project the NPA will displace? “System Zero” electric system review | The step is suitable, but complementary measures should be considered to make the NPA feasible. More details should be provided on the gas and electric feasibility approaches. |
| Electric system review | What are the impacts of the NPA on the electric system? | The step is suitable, but more details are needed. |
| Benefit-Cost Analysis | Per DPU, the project should not be “cost prohibitive.” | The step is suitable and required. This step can be used to inform NPA design. A formal BCA is challenging due to the cross-sector and evolving policy landscape. The cost-effectiveness methodology proposed by the LDCs is underdeveloped. A simpler approach for GSEP pipe may be merited. |
| Project Authorization | Synthesis of prior review steps leading to NPA go/no-go | The step is reasonable but could come after project prioritization. |
| Project prioritization | Proposes prioritizing projects based on criteria. | Prioritization may be necessary, but given the early stage of NPA efforts, prioritization should be considered based on qualitative factors. |
| Project Execution | Process for implementation | LDCs require more guidance on customer engagement, particularly for NPAs requiring the coordinated transition of specific customers from gas. |

While the above process template is reasonable, there is a lot of uncertainty around the details that will influence the successful application of the framework. One shortcoming of the NPA Working Group process so far is the lack of tangible examples that could be considered by the Working Group to better inform their feedback on the approach. Such examples are readily available. Several of the LDCs have demonstrated in various filings that they have begun to conduct integrated gas and electricity planning, assessment of alternatives to LNG projects, project screening (various 2024 GSEP filings), cost-benefit analysis of NPA projects (see National Grid’s GSEP filing: 24-GSEP-03 DPU1-9Attachment.pdf).

The framework may suit distinct projects such as reliability, regulator, and LNG investments. However, it is underdeveloped for targeted electrification to avoid pipeline replacement (GSEP) and similar projects. We provide additional details below, but note that GSEP’s large program size, generally smaller project size, complex cost factors, and customer needs require a more holistic approach than the framework presented here.

The Department’s directive did not preclude the development of an NPA framework for application to programs such as GSEP. Specifically, it encouraged stakeholder input on the level at which the framework should be developed. In its motion for clarification on the 20-80-B Order, the LDCs asked what “materiality level” to conduct the NPA analysis on: “individual project level, program level or segment level.”[[1]](#footnote-1) In its clarification in 20-80-C, the Department confirmed: “An NPA analysis should be applied to all investments in new natural gas infrastructure at a project level. The Department will, however, consider the reasonableness of a materiality screen as part of our consideration of the fuller NPA analysis framework to be developed by the LDCs in consultation with stakeholders”.[[2]](#footnote-2) Numerous stakeholders have been vocal about this point. Again, we express that a more holistic consideration of NPAs beyond capital plan projects, particularly regarding GSEP, is needed to lower the risk of imprudent investment and accelerate efforts to achieve climate targets in line with the “beyond gas” principles expressed in the 20-80-B Order. Further, the Department is explicitly interested in the application of NPAs to the GSEP program.[[3]](#footnote-3) At the same time, the legislature has expanded the scope of potential measures applicable to GSEP to include several NPAs.[[4]](#footnote-4)

Groundwork Data and other stakeholders have repeatedly raised this point at the start and throughout the process. Further, we and other stakeholders have emphasized the need to consider customer transition needs and costs. While these topics were touched upon, they were not given sufficient consideration to meaningfully inform a robust NPA approach.

Groundwork Data appreciates the efforts of the LDCs, their consultant team, and the stakeholder participants in the NPA process. We recognize that this is an incredibly complex and challenging task. However, while this process is coming to a close, all participants still have their work cut out to achieve the Commonwealth’s climate goals while preserving energy affordability.

We recognize that the NPA framework and broader inaugural Climate Compliance Plan elements are a step in achieving that necessary level of ambition. To head in that direction, as this process wraps up, we recommend that the LDCs and their consultants respond to this feedback by focusing efforts on the following two areas:

1. Use the February 5 meeting to discuss and develop recommendations for expanding the NPA principles to the GSEP program level. Such recommendations should focus on:
   1. Tasking the LDCs to develop a program-level inventory of GSEP segments and customers to be included in the next GSEP filing. The inventory should show the location of leak-prone pipes, risk ratings associated with leak-prone pipes, describe the customers (e.g., discount rate) and buildings (e.g., single vs multifamily) directly served by the pipe, and represent the level of hydraulic severability associated with each pipe (severable, severable with interventions or lower demand, unseverable / core).
   2. In this process’s final report and the CCPs, each LDC should acknowledge the need to develop a program-level NPA approach for GSEP and targeted electrification. A draft framework for this should be submitted in each LDC’s 2025-2026 GSEP filing.
   3. Discuss customer transition considerations concerning GSEP by focusing on messaging, costs and incentives, timing, flexibility, and commitment to inform that framework.
   4. Discuss the role of municipalities in supporting the coordination of NPAs associated with neighborhood electrification to inform that framework.
2. Use the March 5th, 2025 meeting to review tangible examples of applying the LDC’s draft NPA frameworks. This exercise should demonstrate at least one LDC-applied gas system feasibility analysis, electric system feasibility analysis, and cost-benefit assessment.[[5]](#footnote-5) The presentations should be used to obtain final stakeholder feedback on applying the NPA framework and to inform the GSEP NPA framework.

In Spring 2025, Groundwork Data will produce tangible examples of integrated planning for non-pipe alternatives, specifically managing leak-prone pipes. Our analysis will demonstrate cost-benefit assessment, the impact of project timing and staging, hydraulic feasibility, grid impacts, and the tradeoffs associated with various building intervention measures. The primary audience for these examples are state agencies, EDCs, and LDCs. The final output of this work is anticipated at the end of summer 2025.

## Project Identification

*Key Point #1: The uniqueness of GESP and leak-prone pipe necessitates a program-level NPA approach.*

Many of the programs listed in the framework (except GSEP) are distinctive in addressing specific locational operational needs. Although these projects may be fewer in number than GSEP, they tend to be more costly and serve more customers than individual GSEP projects. NPA analysis of these projects is likely more bespoke than that of GSEP-like pipe replacement projects.

GSEP focuses on many pipe replacements that, while collectively expensive, are likely less expensive individual projects of other types. If decommissioning was selected as the NPA for a GSEP segment, all customers would be impacted and transitioned off gas. In contrast, with other project types (e.g., LNG for peaking), only a subset of customers would have to migrate off the gas system or reduce their gas demand.

GSEP pipes should be addressed as an NPA at a holistic program level. Comprehensive, integrated gas energy planning is likely to be more effective than a segment-by-segment approach in identifying and phasing out segment decommissioning through the short-term capital planning processes.

Customer engagement on a project-by-project basis will be inefficient. Successful and cost-effective targeted NPAs will require a program-level customer engagement strategy. Such a strategy will need to engage with customers on more immediate NPAs and those where an NPA could be implemented over a longer time horizon.

Similarly, such efforts will require program-level efforts to engage with municipalities and the relevant electric distribution companies.

#### Key Point #2: Consider integrating meter replacements into adjacent NPA projects.

Regarding meter exchanges, if a targeted electrification project is being considered, the LDCs should consider strategies to align the timing of meter exchanges more optimally with the segment transition. For example, a small incentive could be provided to a customer who disconnects early to avoid meter exchange or improvements to complex meter exchanges on segments that may have a near-term opportunity to be decommissioned.

## Initial Viability Testing

#### Key Point #1: Efficacy of Viability Testing depends on the application by each LDCs

This step and its articulated considerations are reasonable; however, its effectiveness will depend on how the LDC conducts this step. Given the subjective nature of some factors listed, the step could screen out viable and beneficial projects. LDCs will need to be transparent about how this test is applied.

Slide 9 of the framework also identifies “total project cost relative to customers impacted” as a factor. Please clarify if this is the project cost the NPA seeks to avoid.

#### Key Point #2: Examples of LDC applications of this step would be helpful for more effective stakeholder feedback.

Please provide concrete examples in the final stakeholder meetings and NPA report.

## Gas System Feasibility Review and Electric System Feasibility Review

#### Key Point #1: Gas system feasibility review should be more comprehensive than what has been presented so far

Conducting hydraulic and other applicable feasibility analyses is appropriate. However, such an analysis should not solely rely on a “remove a pipe, check the impact” model assessment. Another measure—system looping, additional electrification, or some other strategy—could make an infeasible segment feasible for removal. For example, if a segment is deemed infeasible because of impacts on a downstream segment, the downstream segment could be brought forward into the NPA. Hydraulic feasibility analysis should also start incorporating changes in demand associated with long-term electrification.

#### Key Point #2: The electric system review should be more comprehensive than what has been presented so far

Conducting an electric system review is sound. However, the lack of electric capacity is not necessarily a barrier to an NPA. Alternative NPA implementations (backup fuels or GSHPs) can mitigate some impacts. In some cases, conducting electric upgrades on the same timeline as the NPA may be possible.

The attribution of electric system costs is complicated due to various possible counterfactuals (e.g., upgrades are triggered in 10 years under a home-by-home electrification scenario) and approaches for allocating costs. Ongoing NPA framework development should be consistent with evolving grid modernization and financing policy.

#### Key Point #3: Future stakeholder engagement should include more detailed examples of these analyses so stakeholders can better understand and provide feedback on potential challenges and opportunities.

In the final NPA report, please provide concrete examples of how LDCs have conducted gas and electric system reviews.

## Benefit Cost Analysis

#### Key Point #1: Observation: The DPU Directive on Cost-Benefit Analysis is open-ended in how the LDCs should consider cost and climate goals but emphasizes the importance of stakeholder input on underlying assumptions

In the order 20-80-B on page 98, the Department wrote: “The recoverability of additional investment in natural gas infrastructure will require an analysis of whether such investments are consistent with state emissions reduction targets and the thorough evaluation of NPAs. As part of any future cost recovery proposals, LDCs will bear the burden of demonstrating that NPAs were adequately considered and found to be non-viable or cost prohibitive in order to receive full cost recovery.”[[6]](#footnote-6)

A reasonable interpretation is that the standard for NPA implementation must be viable and non-cost-prohibitive. It does not necessarily mean that it is or is not cost-effective as understood by conventional tests.

In footnote 66, the Department recognized the importance of a broad and diverse understanding of “cost-effectiveness” or “cost prohibitive”: “that stakeholders should have the opportunity to review not only individual NPA analysis but the underlying assumptions and inputs. The Department therefore directs that in conducting the cost-benefit analysis underlying the consideration and evaluation of NPAs, the LDCs consult with stakeholders prior to submitting an NPA analysis for Department review and adjudication.”

Stakeholders have had very limited exposure to the details of the costs that would go into a BCA. For example, in National Grid’s GSEP filing, a response to a data request included a column called “NPA Cost Estimate,” in which the cost of NPAs in some examples can reach $100’s of thousands of dollars per building.*[[7]](#footnote-7)* It is not clear how such estimates are generated.

#### Key Point #2: The proposed BCA approach using a suite of tests suffers from functional limitations. A simpler interim approach may be suitable for targeted electrification of leak-prone pipe

“Cost-effectiveness” or “cost-prohibitive” is ultimately determined by several subjective factors. These factors include the choice of the discount rate, the future evolution of electricity and gas rates, what societal benefits to include, and counterfactual electrification timelines. There’s arguably a large degree of uncertainty and subjectivity around these parameters with respect to an NPA that has implications in the building and electric sector.

Groundwork Data echoes some concerns other stakeholders raise, particularly regarding applying the RIM test.

The point of the NPA is to avoid new gas infrastructure that will likely be underutilized. Many NPAs will require investment in building and electric grid assets that will be utilized beyond simply reducing gas demand: upgraded buildings provide more customer value, while updated electric systems can be used by highly flexible loads: EVs, DERs, and AI. In some instances, cost allocation of electric sector investment can reduce what could be attributed to the impact of the NPA. The calculus of the NPA cost becomes more complex depending on whether the investment would have been made anyway and is being brought forward. Alternatively, while buildings see beneficial investment for the occupant, an accelerated NPA may result in the early retirement of building gas assets. Optionality in NPA design can affect multiple aspects of this cost calculus: propane conversion of some equipment could use existing gas assets while delaying grid investment.

This is complex and beyond the analytical capabilities of this process at this moment. Groundwork Data hopes to shed some light on this in the coming year, but we anticipate fully developing a comprehensive BCA framework will take additional time.

Again, the primary goal of an NPA is to avoid reinvestment in the gas system. As discussed above, this can occur at the project and program levels. There will likely be suitable straightforward projects where standard BCA methodologies apply.

At the program level, avoided GSEP spending via targeted electrification NPAs delivers both program cost savings while advancing electrification. Constructing a simplified “cost prohibitive” test using the ratio of NPA costs to pipe replacement cost could provide a reasonable estimate of whether a project is “cost prohibitive.” The cost of an NPA could simply be the estimate of a standardized electrification project plus decommissioning and program costs.

By conducting this estimate on the GSEP project list, a cost-prohibitive threshold (e.g., 150% of the pipe replacement cost) could be developed based on goals associated with limiting GSEP spending. This threshold could be adjusted based on several factors relevant to the project:

* NPA timing, for example:
  + 150% threshold for pipes that need to be replaced in less than 5 years
  + 120% threshold for pipes that can wait longer than 5 years
* Grid capacity adjustments to the threshold:
  + +20% if the grid is constrained
* Adjustments to meet specific customer goals
  + -10% if the project meets specific customer benefits, e.g., additional energy efficiency to lower customer costs
  + -10% if projects involve efforts to improve the involvement of customers underserved by existing energy efficiency programs or meet certain EJ criteria

Groundwork Data acknowledges that this simplified structure is arbitrary and will require calibration and discussion about what should be included in the project cost. Our present thresholds are illustrative and should be calibrated based on a review of potential projects and costs. However, more detailed cost-benefit analyses can be both arbitrary, burdensome, and obfuscatory.

## Project Authorization and Prioritization

#### Key Point #1: Use a balanced approach to project prioritization.

The Department’s order in 20-80-B at 97 and 98 stated: “The Department agrees that consideration of NPAs will be an essential part of the regulatory landscape and companies should begin examining opportunities to minimize investments that may contribute to future stranded costs.”

If such barriers exist, Groundwork Data recommends that in early applications of the NPA framework, the LDCs avoid taking a structured approach to project prioritization and instead use situational judgment that incorporates EJ principles while maximizing emissions reductions and avoiding costs.

The above simplified NPA-project ratio could also be used for prioritization.

#### Key Point #2: The Framework’s Environmental Justice Considerations Need Development

The framework solely addresses environmental justice as an element of project prioritization, in which projects in EJ communities will be given the highest priority. While we commend the LDC’s efforts to prioritize EJ populations, locating a project in an EJC does not necessarily achieve environmental justice goals, and the LDCs should take a broader perspective.

Geographic considerations of EJ can become complicated quickly. First, many communities in the state with large EJ populations (Boston, Worcester, Fall River, Brockton) are served by separate LDC / EDC corporate entities.

The Department noted in the 20-80 order at 87 that projects “environmental justice populations that have borne the burden of hosting energy infrastructure” should be one of the factors used to determine the siting of a targeted electrification project. Notably, the department highlighted the “burden of hosting energy infrastructure.” This could refer to leak-prone pipes or LNG facilities.

Some strategies may involve tradeoffs with respect to EJ goals. An overly generous electrification incentive to a wealthy homeowner could enable the avoidance of LNG infrastructure in an EJC.

The LDCs should avoid efforts to micro-optimize for EJ at the project level. We make several observations emphasizing that NPAs are an opportunity to achieve broad and local EJ goals.

First, an NPA intends to limit capital spending that needs to be recovered by the ratepayer. This outcome reduces future energy burdens for gas ratepayers.

Second, NPAs should be viewed as an opportunity for market transformation. Coordinating multiple retrofits can improve contractors' retrofit practices, indirectly benefiting future LMI customers.

Third, electrification increases heating costs relative to gas today but protects customers from increasing gas costs in the future.

For LMI participants in early projects, it will be important to ensure that the outcomes of the project are clearly beneficial: high-quality retrofits and a reduction in operating expenses achieved through energy efficiency or a discounted rates.

Given the scale of the challenge, pilots and early projects should be conducted to maximize learning and market transformation to deliver broad benefits and lower project costs.

## Customer Education, Engagement and Commitment

#### Key Point #1: Education needs to include an explanation of the challenges facing the gas system, their options, and how electric rates are evolving.

Customer education should clearly explain that climate ***and*** cost concerns drive NPA efforts. This explanation should emphasize that historically, gas has been the cheapest fuel because economies of scale justify investments in the gas system. Now that customers depart from the gas system, there is a significant risk that customers who remain on the system will bear increasing costs. NPAs are opportunities to avoid costs and increase the orderly transition of customers to electric heat. Further, customers should understand that an NPA is also a prudent business move for the utility as the increasing risk of unrecoverable assets could increase borrowing costs, further increasing customer costs.

Customers should understand that in certain situations, they can still use combustible fuels and that some fuels may be compatible with existing equipment.

Customers should be educated on existing or forthcoming heat-pump-friendly and affordable rates.

#### Key Point #2: The framework should articulate the LDCs understanding of the obligation to Serve with Respect to NPAs

Throughout the process, stakeholders have heard from the LDCs that an NPA cannot proceed without sufficient customer participation. For example, in the case of a targeted electrification project to avoid pipeline replacement, the LDC position is that it would require 100% customer participation.

It is conceivable that projects exist that (1) are not in the public interest concerning the state’s climate law; (2) not in the public interest concerning the fact that it is an imprudent investment that will raise ratepayer costs; (3) be not be in the financial interest of the utility as investors grow weary of the growing risk of unrecoverable spending; but (A) be necessary for the safe and reliable provision of service; and, (B) would otherwise require the cessation of service to customers. From the LDC’s perspective, one customer could block this. However, if this scenario is taken to its extreme, it is unsustainable and would create long-term financial and safety risks.

Generally, one interpretation of the obligation to serve requires maintaining service to existing customers if they desire it. Alternatively, a more liberal interpretation of the obligation to serve would allow for flexibility in the public interest as long as impacted customers were given “due regard.”

The LDCs should articulate their perspective on the obligation to serve NPAs and discuss situations that challenge their current application of it.

## Impacts on Project Implementation

#### Key Point #1: Concerns about changes to customer commitment need to be more clearly described.

The framework slide 23 notes that if “changes in customer commitment” or “Customer terminates their participation,” the NPA scope cannot be completed.

The framework needs to provide clarity around this situation. Is there a point where customers are locked in, or is this slide implying that if the last customer to electrify on the street gets cold feet, they can still back out?

Please reframe this slide as a risk to be managed and something that may need department guidance, changes to state codes, or legislative action.

## Framework Updating

#### Key Point #1: The 5-Year CCP process is initially too slow for framework adjustments and updating.

The nascent nature of the NPA process will result in rapid learning through early projects. While the core NPA framework may be reviewed and revised every five years, there must be an effort to improve LDC practice during the first several years.

The LDCs should convene an inter-LDC and stakeholder technical session each year to review the application of NPAs and each LDC’s practice. Each LDC should track and report on projects successfully advanced as NPAs and summarize projects for which an NPA was not pursued and the rationale for not pursuing such a project.

## Other: Community Outreach

#### Key Point #1: The LDC’s Consultant Community Outreach Has Not Focused on Issues that are Specific to NPAs

The NPA Working Group Stakeholders have had limited opportunity to adequately comment on and inform the community outreach work being done by the LDC’s consultant.

The NPA Working Group was updated on the community engagement process on January 15, 2025. To our best recollection, this was the first time the NPA working group was presented with the Engagement Design (slide 5). It was also the first comprehensive report out to the Working Group. Notably, on 12/20/2024, the LDCs submitted a Quarterly Status update on the NPA Framework Development in the D.P.U. #20-80 Proceeding. This reported a comprehensive shift in approach that was not communicated to the NPA Working Group until the January 15 meeting.

The initial findings reported by the LDCs consultant at this meeting do not demonstrate any novel insight into this process. The interviews' findings reflected a typical understanding of the barriers to electrification, which Mass Save and similar research have well documented. Some of these barriers are being addressed through heat pump-friendly rate design mechanisms.

The research questions listed on slide 6[[8]](#footnote-8) solely focus on electrification, not issues related to gas system investment and the long-term issues associated with the gas system. Such issues could include long-term customer costs associated with continued reliance on gas, disruption caused by pipeline replacement, and issues created by other gas infrastructure. Additionally, residents and contractors have been impacted by relevant challenges to the gas system, such as the Merrimack Valley explosions or moratoria in the Pioneer Valley served by the Tennessee Lateral.

Residents and politicians on Aquidneck Island in RI (while out-of-state, this location exhibits similar gas system features to that in MA) organized to support a non-pipeline alternative approach to system reliability needs on that island, specifically raising concerns about the “neighborhood noise nightmare,” construction, and trucking that could be associated with the continued operation or upgrade to an LNG injection facility on the island.[[9]](#footnote-9)

The LDCs consultant's proposed parent intercept approach (Slide 22) at an elementary school in Westport, MA, has limitations. While Westport has a handful of potential candidate terminal gas segments that may be suitable for NPAs, its limited amount of leak-prone pipe does not place the community at the top of a list for NPA efforts.

It is also unclear whether outreach to Multifamily Property Owners or Restaurants specifically focuses on issues related to NPAs.

One approach to improving the remaining engagement would be to frame questions in the context of a hypothetical NPA outcome: *The cost of maintaining gas infrastructure has reached an unsustainable point for utilities and ratepayers. If 75-100% of the cost of electrifying your property was covered, a heat-pump-friendly rate kept the cost of electric heating only slightly more expensive than gas, and you were still allowed to cook with propane if your property situation allowed, would you be willing to electrify? Could you do it in 2 years, 5 years? What other barriers would stop you?*

This framing mirrors National Grid’s pilot proposal, which is an experiment that seeks to remove economic barriers while limiting customer effort. Such an experiment aims to identify the non-economic barriers to the coordinated deployment of a decommissioning NPA.

An earlier presentation of the outreach’s methodological approach to the NPA Working Group could have provided a more effective direction for community engagement. Separately, this workstream could have used more guidance from the LDCs to connect it with key NPA issues.

1. Local Distribution Company Motion for Clairficaiton on D.P.U. Order 20-80-B at page 9 [↑](#footnote-ref-1)
2. D.P.U. Order 20-80-C at page 23 [↑](#footnote-ref-2)
3. D.P.U. 24-GSEP-[01-06] Hearing Office Memorandm [↑](#footnote-ref-3)
4. Barrett MJ, Roy JN. An Act promoting a clean energy grid, advancing equity and protecting ratepayers . 2967 Oct 21, 2024. Available from: <https://malegislature.gov/Bills/193/S2967> (page 79) [↑](#footnote-ref-4)
5. See column “NPA Cost Estimate” in Attachment to the Response to DPU Data Request 1-9 in 24-GSEP-03, National Grid. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/19880578> [↑](#footnote-ref-5)
6. [↑](#footnote-ref-6)
7. See column “NPA Cost Estimate” in Attachment to the Response to DPU Data Request 1-9 in 24-GSEP-03, National Grid. <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/19880578> [↑](#footnote-ref-7)
8. January 15, NPA Working Group Meeting Materials Deck. [↑](#footnote-ref-8)
9. Wolfgang, Zane. P*ublic Weighs In on Old Mill Lane LNG Facility*, Newport This Week, 3/14/24 https://www.newportthisweek.com/articles/public-weighs-in-on-old-mill-lane-lng-facility/ [↑](#footnote-ref-9)