

Summary of Non-Pipeline Alternatives Technical Subcommittee Meeting #4

Feb 11, 2025

Agenda: Framework Follow-up

Time	Topic
11:00-11:05	Welcome
11:05-12:05	Continue discussion of LDC framework
12:05-12:10	Wrap up and next steps

Acronyms:

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NPA	Non-Pipeline Alternative
TSC	Technical Subcommittee
LDC	Local Distribution Company
EJC	Environmental Justice Community
CCP	Climate Compliance Plan

TSC Feedback on draft LDC NPA Framework

E3 presented a summary of feedback on the draft LDC NPA framework provided by TSC members, following which the LDCs presented the last three steps of the draft LDC framework (project authorization, prioritization, and execution) and shed light on how stakeholder comments and engagement would be incorporated into an updated LDC framework.

Project Prioritization

- TSC members flagged the importance of including both avoided gas and electric capital expenditure in NPA cost-effectiveness screening and project prioritization.
- When reviewing the project prioritization stage of the draft LDC framework, TSC members identified the risks of otherwise cost-effective and feasible NPA projects becoming unviable if they receive lower prioritization scores compared to other screened NPA projects and thus remain in the project queue until they are no longer viable due to implementation timeline constraints. LDCs stated that traditional projects would need to proceed if the considered NPA no longer fulfilled the safety and reliability criteria needs of the project.
- TSC members suggested that the NPA project prioritization process should balance multiple factors to ensure a representative mix of projects and ensure that projects likely to succeed in implementation due to reasons (such as lower affected customer count) be considered in the early stages of scaling up NPAs.

Project Implementation

- TSC members sought additional detail from LDCs on when they would stop accepting new gas connection requests for projects considering NPAs. Discussions also included consideration of disallowing future gas connections from locations with approved NPAs and shifting the risk of proceeding with gas equipment installation in locations considering NPAs to customers.
 - LDCs flagged ongoing stakeholder discussions on line extension policies at the Department of Public Utilities (“Department”).
- TSC members suggested including opportunities for intervenor and Department staff review of LDC customer engagement strategies, separate to review of NPA analysis frameworks.
- For NPA projects in EJs, TSC members called for additional detail in the framework to ensure that renters in EJs benefit directly from NPAs, including understanding the impacts on energy burden and housing costs of building retrofits for these customers.
- LDCs stated that, at minimum, the frequency of NPA analysis framework updates would be tied to the filing of CCPs every five years, while the cost-effectiveness and technical feasibility screening results of considered NPAs would be included in all LDC cost recovery filings to the Department.