

Massachusetts Electric Company  
Nantucket Electric Company  
Each d/b/a National Grid  
D.P.U. 23-150  
Exhibit EDF-CLF-MW-1  
March 29, 2024  
H. O. Tassone

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

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Petition of Massachusetts Electric Company and	)	
Nantucket Electric Company each d/b/a National Grid	)	
Pursuant to G.L. c. 164, § 94 and 220 C.M.R. § 5.00 for	)	D.P.U. 23-150
Approval of an Increase in Base Distribution Rates and	)	
Approval of a Performance-Based Ratemaking Plan	)	

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PRE-FILED DIRECT TESTIMONY OF

MARY WAMBUI

ON BEHALF OF

ENVIRONMENTAL DEFENSE FUND  
AND  
CONSERVATION LAW FOUNDATION

March 29, 2024

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**TABLE OF CONTENTS**

<b>I.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>II.</b>	<b>PURPOSE OF TESTIMONY .....</b>	<b>3</b>
<b>III.</b>	<b>CONCERNS WITH NATIONAL GRID’S RATE CASE PROPOSALS .....</b>	<b>5</b>

1   **I.    INTRODUCTION**

2   **Q.    Please state your name.**

3   A.    My name is Mary Wambui.

4   **Q.    On whose behalf are you submitting testimony?**

5   A.    I am submitting testimony on behalf of the Environmental Defense Fund (EDF) and  
6       Conservation Law Foundation (CLF).

7   **Q.    Please summarize your personal, educational, and professional background.**

8       I spent the first 13 years of my life in one of Nairobi's shanties, Kangemi. These shanties  
9       were overcrowded, and I had limited access to basic amenities such as water, energy, and  
10      housing. As a young girl, I would shower in a bathroom full of holes and without a roof.  
11      These experiences during my childhood have influenced my commitment to addressing  
12      poverty and inequality in my adult life. I moved to the United States of America in 2002  
13      after working in women's microenterprise development in some of the poorest towns and  
14      communities in Kenya. I moved to this country because I received a scholarship from  
15      Brandeis University for a Master of Arts in the Sustainable International Development  
16      Program at the Heller School. I did not study at Brandeis once I arrived; instead, I attended  
17      Southern New Hampshire University, where I received a master's in Community  
18      Economic Development. I later attended Tufts University, receiving a Master of Public  
19      Policy degree from the Urban and Environmental Policy Department. I am very grateful

1 for the scholarships I received from these three institutions because I wouldn't have had the  
2 chance to pursue a career dedicated to combating poverty and inequality without them.

3 I have worked as an affordable housing asset manager in Massachusetts for at least  
4 16 years. My work is directly related to preserving affordable housing and promoting  
5 housing stability. I started my career in Roxbury, Massachusetts, working for a community  
6 development corporation called Nuestra Comunidad Development Corporation (Nuestra).  
7 Roxbury, where Nuestra is situated, has the highest proportion of families making under  
8 \$15,000 a year and the highest number of black residents in the City of Boston. From  
9 Nuestra, I moved to Dorchester Bay Economic Development Corporation and  
10 Opportunities Communities, preserving affordable housing in Chelsea, Dorchester,  
11 Roxbury, and Mattapan. In early 2020, I moved to the Planning Office for Urban Affairs  
12 (POUA), where I am currently employed. The POUA is a non-profit social justice ministry  
13 that strives to create vibrant communities by developing high-quality, affordable, and  
14 mixed-income housing where people of modest means can live with dignity and respect in  
15 homes they can afford. I am also a member of the Massachusetts Energy Efficiency  
16 Advisory Council (EEAC)—a body that oversees the development, implementation, and  
17 evaluation of investor-owned utilities' energy efficiency plans—where I represent  
18 residential consumers.

19 I have lived in Lowell, Massachusetts, for 21 years. Historically, Lowell is known  
20 as the cradle of the American Industrial Revolution because of its textile mills. Lowell is a

1 Gateway City with a population of at least 115,000 people. Like me, most Lowell residents  
2 are renters. The percentage of those who rent in Lowell is 50% higher than those who rent  
3 in Massachusetts; 28% are foreign-born, and almost 40% speak another language other  
4 than English. The percentage of non-white residents in Lowell is almost twice that of  
5 Massachusetts; the median household income in Lowell is 26% lower than in  
6 Massachusetts, and the poverty rate in Lowell is nearly twice the rate of Massachusetts  
7 statewide.<sup>1</sup> Like me, most Lowell residents receive electric service from National Grid.  
8 And while I receive gas service from National Grid, many Lowell residents use delivered  
9 fuels, such as propane and heating oil, to heat their homes.

10 **II. PURPOSE OF TESTIMONY**

11 **Q. Are you familiar with National Grid's proposals in this rate case?**

12 A. Yes, at a high level. However, even though I am an energy advocate, I found it difficult to  
13 understand every detail of National Grid's proposals. That is partly because National Grid's  
14 testimony and exhibits are not written in a way that is accessible. It is also partly because—  
15 as I will discuss in more detail in my testimony—the Company's communications with  
16 customers like myself ahead of its rate case filing were not helpful.

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<sup>1</sup> See City of Lowell Proposal to Serve as a Program Administrator for Mass Save, 2019-2021 (Apr. 30, 2018), available at: <https://ma-ceac.org/wp-content/uploads/City-of-Lowell-Proposal-to-Serve-as-Mass-Save-Program-Administrator-4-30....pdf>; United States Census Bureau, Lowell city, Massachusetts, available at: <https://www.census.gov/quickfacts/fact/map/lowellcitymassachusetts/RHI825216>.

1           That said, I understand the Company is proposing to increase its rates. I also  
2 understand it is proposing to spend a lot of customer dollars on its system in the coming  
3 years. Finally, I understand the Company is proposing new “performance incentive  
4 mechanisms” in this rate case.

5   **Q.   What is the purpose of your testimony?**

6   A.   First and foremost, the purpose of my testimony is to make sure the Department hears the  
7 voices of customers like myself in this rate case. The last time National Grid filed a rate  
8 case, I did not know what the Company was proposing and did not feel included in the  
9 process, even though the case directly impacted my life. I want things to be different this  
10 time around.

11           Second, I want to ensure the Department is aware of the realities that National Grid  
12 customers like me face. The energy bills of National Grid’s customers—including  
13 customers like myself living in small apartments—are already very high. I hear from my  
14 neighbors in Lowell that they, like myself, are already having a hard time affording their  
15 energy bills while also paying for rent, food and other daily necessities.

16           Third, I want to ensure that customers like myself and other residents of Lowell,  
17 who have paid our energy bills for years and contributed to National Grid’s infrastructure  
18 and programs, get our share of the benefits from National Grid’s spending. I do not believe  
19 the benefits of National Grid’s infrastructure and programs are currently fairly or equitably

1 distributed, and I would like to make sure National Grid is held accountable for its service  
2 to income-eligible and moderate-income households.

3 Finally, I would like to encourage National Grid to do more to help low- and  
4 moderate-income residential customers currently using delivered fuels for heating move  
5 towards electrified heating. To date, only a small fraction of the heat pumps installed in  
6 Massachusetts have been installed in income-eligible and moderate-income households  
7 using delivered fuels. Installing heat pumps in those households would not only save those  
8 households money, but would also help the Commonwealth achieve its greenhouse gas  
9 reduction targets.

10 **III. CONCERNS WITH NATIONAL GRID'S RATE CASE PROPOSALS**

11 **Q. Please summarize your experiences as a National Grid electric customer.**

12 A. As mentioned above, I am a National Grid electric and gas customer. Even though I rent a  
13 small apartment in a naturally occurring affordable housing property, my monthly bill  
14 average for the past 12 months is about \$144, which has steadily increased. While I am  
15 currently not income-eligible, I can quickly identify with the struggles of low- and  
16 moderate-income households since I worked for years as a direct care staff member,  
17 earning 10-14 dollars an hour. A monthly bill of 144 dollars is an entire day of work for a  
18 home health aide. There are other significant financial and social obstacles for an  
19 immigrant household like mine, especially for those living in cities like Lowell. Another

1 increase in utility bills will make life more challenging. I also believe my home is not  
2 energy efficient, so I am spending more on electricity than I should be.

3 **Q. Do you believe other Lowell residents share your experiences?**

4 A. Yes, I do, based on my conversations with several Lowell residents. I know many others  
5 in Lowell struggle to afford their energy bills. I understand National Grid has shut off the  
6 electric service of other Lowell residents who failed to pay their electric bills. Even those  
7 who have not experienced shut offs owe too much on their bills, and that is a very stressful  
8 situation to be in. Some who may benefit from National Grid's discount rate or other  
9 assistance programs do not know about the programs, or may be immigrants who lack  
10 access due to the program's design.

11 Beyond those affordability concerns, I believe other Lowell residents have also  
12 found it difficult to access or benefit from National Grid's energy efficiency programs and,  
13 therefore, continue to live in energy-inefficient homes, a fact presented to the EEAC in the  
14 development of the 2019-2021 energy efficiency plan where the City of Lowell presented  
15 a proposal to serve as program administrator for the Mass Save program. While there have  
16 been new programs that aim to increase participation by low- and moderate-income  
17 communities; these communities have been left behind for so long that there is now a need  
18 for aggressive accelerated action so that they can benefit equitably.



1    **Q.     What concerns you about National Grid’s proposals in this rate case?**

2    A.     I have several concerns. I am concerned that National Grid is proposing to make major  
3           investments in its system but that people like me will not receive the benefits of that  
4           spending and will only see our bills increase. I am concerned that National Grid’s proposed  
5           “performance incentive mechanisms” will not benefit customers like me and my  
6           community, and will instead benefit the Company’s shareholders, a point that was recently  
7           delivered very well in a Lawrence hearing by a National Grid customer who is also a  
8           shareholder. I am also concerned about the lack of transparency from National Grid. The  
9           Company has not provided information about its proposals in a manner that is easy to  
10          understand, nor has it incorporated customer feedback into its proposals meaningfully. In  
11          short, I do not think the Company’s rate case proposals promote equity.

12   **Q.     What do you mean by “equity”?**

13   A.     I agree with the definition of “equity” adopted by the Global Warming Solutions Act  
14          Implementation Advisory Committee Climate Justice Working Group. That working group  
15          defined equity as “treating an individual or community according to their needs, thereby  
16          ensuring that historically marginalized people and historically disinvested people and  
17          historically disinvested communities, especially people of color, low-income residents, and  
18          Language-isolated residents gain access to opportunities and resources and discharge the  
19          negative consequences of unsustainability. Unless justice, equity, and worker rights are

1 central components of our equitable climate agenda, the inequality of the carbon-based  
2 economy will be replicated in the new pollution-free economy.”

3 In the context of National Grid, I believe equity is a measure of how fairly the  
4 benefits of National Grid’s investments and programs are distributed. Those benefits  
5 include jobs, safety, reliability, resilience, access to clean energy technologies, and bill  
6 savings, among other things. Customers in Lowell, including me, want to know: will  
7 Lowell benefit from the clean energy transition? When can we anticipate seeing these  
8 changes take place, and how will National Grid help us get there?

9 Equity is about more than the distribution of benefits, however. Equity is not  
10 possible without accountability, transparency, and a balance of power. Unless National  
11 Grid brings the voices of community members to the table, includes those voices in its  
12 decision-making process, and reduces the information asymmetry that currently exists  
13 between the Company and its customers, I do not believe it can truly achieve equity.

14 **Q. Does the Company’s proposed low-income discount rate address your concerns?**

15 A. I am glad the company has proposed changes to its low-income discount rate. A discount  
16 rate helps moderate-income households. However, I think the discount rate must be deeper  
17 to help the lowest-income households. More broadly, while a discount rate helps, I think it  
18 is insufficient to address the equity concerns I mentioned earlier.

1   **Q.   What are some examples of concrete actions the Department can take to address your**  
2       **concerns?**

3   A.   First and foremost, the Department should encourage National Grid to provide more heat  
4       pumps to low- and moderate-income households currently using delivered fuels to heat  
5       their homes. The Department can do so by adopting the performance incentive mechanism  
6       that EDF-CLF expert witness Castigliego describes in his testimony.

7   **Q.   Why should the Department encourage National Grid to provide heat pumps to low-**  
8       **and moderate-income households currently using delivered fuels to heat their homes?**

9   A.   Delivered fuels are expensive and extremely polluting. Households using delivered fuels  
10      could save money by switching to electric heat pumps. Those savings can be very  
11      meaningful for low-and moderate-income households, and can help free up money to spend  
12      on food, medicine, and other daily needs. However, National Grid must empower those  
13      customers to switch from delivered fuels to electricity by offering heat pumps at no cost  
14      and making electric rates affordable.

15           Unfortunately, to date, I believe National Grid has not done a good job of installing  
16      heat pumps in low- and moderate-income households—instead, the vast majority of heat  
17      pumps through National Grid’s electrification program have gone to market-rate  
18      customers. While National Grid may want to achieve the lowest-cost greenhouse gas  
19      emissions reductions by providing heat pumps to market-rate customers, that approach  
20      risks leaving low- and moderate-income customers—like many who live in Lowell—

1 behind. That is why, in my opinion, the Department must step in and push National Grid  
2 to perform better, and specifically to improve its performance in terms of providing heat  
3 pumps to low- and moderate-income customers currently using propane and heating oil for  
4 home heating.

5 **Q. Are there other actions the Department can take to address your concerns?**

6 A. Yes. The Department should encourage National Grid to prioritize and advance equity  
7 across its operations. To that end, the Department should consider adopting an additional  
8 performance incentive mechanism targeted at improving workforce diversity. EDF-CLF  
9 expert witness Castigliero describes that mechanism in his testimony. Finally, the  
10 Department should encourage National Grid to be more inclusive before filing its next rate  
11 case or other tariff proposal. The Company should give its customers more notice of its  
12 filing and give them more opportunities to provide input that shapes that filing.

13 **Q. Didn't the Company host public workshops to present its performance incentive**  
14 **mechanisms prior to filing its rate case?**

15 A. Yes. I attended those workshops in October of 2023. I found the workshops to be rushed  
16 and poorly facilitated. National Grid presented a number of performance incentive  
17 mechanisms at those workshops, but it seemed like those proposals had been finalized and  
18 the Company was not genuinely interested in stakeholder input to shape those proposals. I  
19 also found the language used during the workshops highly technical and far too complex  
20 for non-expert customers to understand.

1   **Q.   What are some concrete ways in which National Grid might improve its**  
2       **communications with you and other customers?**

3   A.   First, National Grid should start its community engagement process far earlier than it did  
4       before filing this rate case, both in terms of time and in terms of procedural steps. Second,  
5       National Grid should try to genuinely incorporate stakeholder feedback into its proposals  
6       rather than present stakeholders with finalized proposals.

7   **Q.   Is there anything else you want the Department to know?**

8   A.   I want the Department to know that equity is a process, an outcome, and a goal. I hope the  
9       balance of power will be restored between ratepayers like me and National Grid by  
10      prioritizing, including, and reflecting community voices in this rate case.

11   **Q.   Does this conclude your direct testimony?**

12   A.   Yes, it does.