



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Electronic Distribution List in D.P.U. 19-55

FROM: Kate Tohme, Hearing Officer

RE: DG Interconnection, D.P.U. 19-55
Interim Guidance - Affected System Operator Studies

DATE: September 25, 2019

CC: Mark Marini, Secretary

I. INTRODUCTION

On May 22, 2019, the Department of Public Utilities (“Department”) opened this inquiry to investigate the interconnection of distributed generation (“DG”) in Massachusetts, pursuant to the Standards for Interconnection of Distributed Generation tariff (“DG Interconnection Tariff”) and Distributed Generation Interconnection, D.P.U. 11-75-E (2013). In its Vote and Order, the Department provided notice of a technical conference on July 18, 2019. At the July 18, 2019 technical conference the Department facilitated a conversation to obtain stakeholder recommendations on what should be included in a Department interim guidance document designed to direct process related to affected system operator (“ASO”) studies. Stakeholders provided valuable recommendations both orally at the technical conference and memorialized with submission through July 23, 2019. The Department includes here its first interim guidance related to ASO studies that shall be in effect from today, September 25, 2019, until further resolution is found through this investigation, or otherwise directed by the Department. The Department may issue additional interim guidance in this docket in the future related to ASO studies or other topics.

A. INTERIM GUIDANCE - ASO STUDIES

1. If an electric distribution company (“EDC”) becomes aware that there is the potential need for an ASO study for any DG application for interconnection of a facility that is less than 5 megawatts (“MW”), the EDC must immediately notify the DG applicant in writing of the potential and include:
 - i. An explanation of why the EDC believes there is a potential need for an ASO study;
 - ii. Whether and what additional information is needed to determine if an ASO study is necessary;
 - iii. Expected date when the EDC will know whether an ASO study is necessary; and
 - iv. Potential impact on interconnection timeline and costs.
2. Following initial notification required by Paragraph 1, the EDC shall provide written biweekly updates to the DG applicant that include:
 - i. Whether and what additional information is needed to determine if an ASO study is necessary;
 - ii. Expected date when EDC will know whether an ASO study is necessary; and
 - iii. Potential impacts on interconnection timelines and costs.
3. Upon commencement of an ASO study for any DG application, the EDC shall provide monthly written updates to the DG applicant that include:
 - a. Scope and process of the ASO study;
 - b. Roles and responsibilities of all parties involved in executing the ASO study;
 - c. Standards and jurisdiction of the ASO study;
 - d. Estimated timeline for completion of the ASO study;
 - e. Estimated necessary system modifications and associated costs; and
 - f. Study results as they become available.

4. Each EDC must file a bimonthly report in D.P.U. 19-55 indicating whether it is experiencing DG saturation in any region or at any substation that indicates the potential need for an ASO study that would affect three or more DG applications or more than 15 MWs of DG capacity in the following 6 months, and what actions the EDC is taking to prevent, mitigate, and prepare for such an occurrence. The first of these reports must be filed by or before October 8, 2019, with each following report due by the first of the month.
5. If an EDC becomes aware that there is the potential need for an ASO study that will implicate three or more DG applications or more than 15 MWs of DG capacity, the EDC must immediately notify the Department in writing and include:
 - i. An explanation of why the EDC believes there is a potential need for an ASO study;
 - ii. Whether and what additional information is needed to determine if an ASO study is necessary;
 - iii. Expected date when the EDC will know whether an ASO study is necessary;
 - iv. Areas/substations potentially impacted;
 - v. Number of DG applications potentially affected and total associated MWs;
 - vi. A spreadsheet with details of each affected DG application, including but not limited to: application number, current application status, substation and town/city at which DG application is seeking to interconnect, alternating current nameplate capacity, and estimated date on which the project would be authorized to interconnect without the ASO study;
 - vii. Details of the EDC's communications with ISO New England Inc. and any other Affected System Operators;
 - viii. How the situation has impacted interconnection timelines to date;
 - ix. If found to be necessary, how the ASO study would impact interconnection timelines;

- x. Any proposed resolutions the EDC is exploring to enable some affected DG applications to proceed with the interconnection process prior to completion of the ASO study;
 - xi. The EDC's plan to address the situation and minimize delays to interconnection timelines of affected DG applications; and
 - xii. A draft written notification to potentially affected DG applicants for Department review. The written notification should include: items i-v above, and potential impacts on interconnection timelines and costs.
6. Once approved by the Department, the EDC shall immediately issue the notification required under Paragraph 5(xii) to all potentially affected DG applicants and post the notification on its website or a website dedicated to ASO studies in the EDC's service territory.
7. Following initial notification required by Paragraph 5 above, the EDC shall provide written biweekly updates to the Department and all potentially affected DG applicants (including posting on the EDC's website) that include:
 - i. Whether and what additional information is needed to determine if an ASO study is necessary;
 - ii. Expected date when EDC will know whether ASO study is required;
 - iii. Potential impacts on interconnection timelines and costs;
 - iv. Any proposed resolutions that the EDC is exploring to enable some affected DG applications to proceed with the interconnection process prior to completion of the ASO study; and
 - v. EDC's plan to address the situation and minimize delays to interconnection timelines of potentially affected DG applicants.
8. If the potentially affected DG applicant pool is modified at any point, the EDC shall provide the Department with an updated spreadsheet as detailed in Paragraph 5(vi) above, highlighting the modifications.

9. Upon commencement of an ASO study that implicates three or more DG applications or more than 15 MWs of DG capacity, the EDC shall coordinate biweekly conference calls with the Department and provide monthly written updates to the Department and all affected DG applicants (including posting on the EDC's website) that include:
 - a. Scope and process of the ASO study;
 - b. Roles and responsibilities of all parties involved in executing the ASO study;
 - c. Standards and jurisdiction of the ASO study;
 - d. Estimated timeline for completion of the ASO study;
 - e. Estimated necessary system modifications and associated costs;
 - f. A prioritization system to determine which of the affected DG applications would be eligible to interconnect first if capacity became available;
 - g. Any proposed resolutions the EDC is exploring to enable some affected DG applications to proceed with the interconnection process prior to completion of the ASO study; and
 - h. Study results as they become available.
10. Throughout the ASO study process, the EDC shall (a) provide affected DG applicants with the contact information of a knowledgeable EDC employee who can answer inquiries related to the ASO study in a timely manner and (b) hold stakeholder meetings to provide updates and a forum for Q&A as needed.

For purposes of this Interim Guidance, written communications may be via Email.

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Kate S. Tohme, Hearing Officer, at Kate.Tohme@mass.gov.