

Via Hand Delivery and E-Mail

September 27, 2019

Mark D. Marini, Executive Secretary
Department of Public Utilities
One South Station
Boston, MA 02110

RE: D.P.U. 19-55; Inquiry by the Department of Public Utilities on its own Motion into Distributed Generation Interconnection.

Dear Secretary Marini:

The Northeast Clean Energy Council (“NECEC”), on behalf of its membership, the Electric Distribution Companies¹ (“EDCs”), the Department of Energy Resources (“DOER”) and the Office of the Attorney General (“AGO”) (together, the “Joint Stakeholders”) appreciate the opportunity to submit this joint filing in the above-referenced docket in response to the Department’s directive to (See the Department’s Procedural Notice and Request for Public Comments, August 19, 2019).²

I. Background

Based on the Department’s revised comment schedule, the Joint Stakeholders convened a series of meetings and calls to work through the various implications. Specifically, the Joint Stakeholders held Meetings/Calls on, August 22nd, September 6th, Sept 10th, September 16th, September 20th, September 24th, and September 26th. These calls were constructive in understanding the current ASO Study process and areas where consensus was possible.

II. Consensus Areas

Based on these discussions, the Joint Stakeholders have identified the following areas where we believe consensus is possible at this time:

1. Definitions. Providing additional definitions concerning Affected Systems.
2. Pre-application Content. Adding information to Pre-Application Reports that includes known ASO Studies in the location of the proposed project and other information that may inform whether an ASO Study may be likely.

¹ Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid, NSTAR Electric Company d/b/a Eversource Energy, and Fitchburg Gas and Electric Light Company d/b/a Unutil.

² We thank the Department for granting an extension for this process and for allowing parties to submit additional comments by October 10th. (See H.O. Email Memorandum, August 30, 2019).

3. Communications. With the EDCs playing a critical communication role between the Interconnecting Customer and the other parties involved in an ASO Study, establishing clear parameters for communication is essential. The parties have agreed to some additional provisions regarding such communication. The release of the Department's September 25th *Interim Guidance – Affected System Operator Studies* provides a new set of parameters to consider and incorporate into compromise tariff language. Given the short time between the Interim Guidance issuance and this filing, the Joint Stakeholders withheld offering additional consensus language as to specific communication requirements but intend to use this guidance in ongoing discussions prior to the upcoming comments deadline and technical session.
4. Parallel Studies. All parties agree conceptually that there may be instances in which a distribution Impact Study for a particular customer could occur concurrently with an ASO Study.

Below are several tariff sections in which the Joint Stakeholders have achieved consensus on language. Each of the Joint Stakeholders reserves their right to offer additional comments and proposed tariff revisions to build upon these consensus revisions throughout the remainder of this process.

1.2 Definitions

“Affected System” shall mean any ~~neighboring EPS distribution or transmission electric power system, other than not under the control of~~ the Company EPS, for which the stability, reliability or operating characteristics may be significantly affected by the proposed -Facility (i.e., a municipal electric light company or other regulated utility).

“Affected System Operator” or “ASO” shall mean the person or entity operating an Affected System.

“Affected System Owner” shall mean the person or entity owning an Affected System.

“Affected System Operator Study” or “ASO Study” shall mean an engineering study conducted by or with the oversight of an Affected System Operator and/or Affected System Owner for the purpose of determining whether a Facility may have a significant effect on the stability, reliability or operating characteristics of the Affected System and, if necessary, to determine the scope of the required modifications to the Affected System and/or the Facility to provide the requested interconnection service.

“Company EPS” shall mean the distribution electric power system owned, controlled or operated by the Company used to provide distribution service to its Customers.

2.0 Basic Understandings

Paragraph two of the Basic Understandings section shall be amended as follows:

The interconnection of the Facility with the Company EPS must be reviewed for potential impact on the Company EPS and Affected Systems under the process described in Section 3.0 and meet the technical requirements in Section 4.0, and must be operated as described under Section 6.0. In order to meet these requirements, an upgrade or other modifications to the Company EPS or

Affected Systems may be necessary. Subject to the requirements contained in this Interconnection Tariff, the Company or its Affiliate shall modify the Company EPS accordingly. Paragraph 5 of the Basic Understanding section shall be amended as follows:

The Facility should operate in such a manner that does not compromise, or conflict with, the safety or reliability of the Company EPS or any Affected System. The Interconnecting Customer should design its equipment in such a manner that faults or other disturbances on the Company EPS do not cause damage to the Interconnecting Customer's equipment.

3.0 Process Overview

Paragraph two of Section 3.0 shall be amended as follows:

Prior to submitting an Application through either the Expedited or Standard Process, all Interconnecting Customers with Facilities that are 500kW or greater must request and receive a Pre-Application Report from the Company. Facilities smaller than 500 kW may request and receive a Pre-Application from the Report. If the Pre-Application is not received within the applicable Time Frame, the Interconnecting Customer can file its Application. The Pre-Application Form is located in Exhibit B and the Pre-Application Report process is described in more detail in Section 3.2.

3.2 Pre-Application Reports

Paragraph three of Section 3.2 shall be amended as follows:

The Company shall provide the following information for the proposed Facility interconnection location in the Pre-Application Report:

- 1) Circuit voltage at the substation;
- 2) Circuit name;
- ~~3)~~ Circuit voltage at proposed Facility;
- ~~4)~~ Substation name;
- ~~3)5)~~ Substation transformer rating;
- ~~4)6)~~ Whether Single or three phase is available near site;
- ~~5)7)~~ If single phase – distance from three phase service;
- 8) Aggregate connected Facilities (kW) on circuit;
- 9) Aggregate connected Facilities (kW) on the substation transformer and submitted complete applications of Facilities (kW) that have not yet been interconnected;
- ~~6)10)~~ Whether 3V0 is deployed or scheduled for deployment on the circuit or substation;
- ~~7)11)~~ Submitted complete applications of Facilities (kW) on circuit that have not yet been interconnected;
- ~~8)12)~~ Whether the Interconnecting Customer is served by an area network, a spot network, or radial system;
- 13) Identification of feeders within ¼ mile of the proposed interconnection site through a snap- shot of GIS map or other means; and
- 14) For the nearest available feeder, the circuit rating and approximate circuit length from the proposed Facility to the substation;
- 15) Whether the proposed Facility is likely to be on the Standard track;
- ~~9)16)~~ Whether an Affected System operator has informed the Distribution Company that an ASO Study is required, or the Distribution Company is

aware of an on-going ASO Study for the proposed Facility interconnection location:

~~10)17)~~ Other potential system constraints or critical items that may impact the proposed Facility.

3.4 Standard Process

The Standard Process description shall be amended as follows:

- a) The Company will conduct an initial review, which may include if requested, a scoping meeting/discussion with the Interconnecting Customer to review the application. From the initial review, the Company will provide pertinent information such as:
 - The available fault current at the proposed location;
 - The existing peak loading on the lines in the general vicinity of the Facility;
 - The configuration of the distribution lines;
 - Whether the Facility may require an ASO Study;
 - If the application is subject to the Pre-Application Report requirement in Section 3.2, the Pre-Application Report may, as necessary, be discussed at the initial review.

- b) Company provides an Impact Study Agreement, including a cost estimate for the study. Where there are other potentially Affected Systems, and no single Party is in a position to prepare an Impact Study covering all potentially Affected Systems, the Company will coordinate with the Interconnecting Customer, the Affected System Operator and/or the Affected System Owner; but not be responsible for the timing of any studies required to determine the impact of the interconnection request on other potentially Affected Systems. The Company will, when such information becomes available, communicate to the Interconnecting Customer the plan for conducting the ASO Study, the responsibilities of each party, the scope of the ASO Study, the expected timeframe for completion, and the estimated cost of the ASO Study. The Interconnecting Customer will be directly responsible to the potentially Affected System operators for all costs of any additional studies required to evaluate the impact of the interconnection on the potentially Affected Systems. To the extent any studies or System Modifications are required, all associated agreements will be between the Affected System operator and the Interconnecting Customer. The Time Frames in Tables 1 through 5 will be affected if ISO-NE determines that ~~a system Impact Study is required. This will occur if the Interconnecting Customer's Facility is, or group of facilities are, equal to or greater than 5 megawatts ("MW") and may occur if the Interconnecting Customer's Facility is greater than 1 MW.~~ Affected System Operator and/or Affected System Owner review is required. Where an ASO Study may be required, the Interconnecting Customer, after consultation with the Company, may elect to proceed with the Impact Study and the ASO Study concurrently. In the event the ASO Study determines that a concurrently completed Impact Study requires re-study due to the assumptions originally

assumed in the initial Impact Study are now invalid, the Company will provide an amended Impact Study Agreement with a cost estimate and expected timeframe for the needed re-study. The timeframe will not exceed the timeline in Table 3 for completion of an Impact Study.

- c) Once the Interconnecting Customer executes the Impact Study Agreement and pays pursuant to the terms thereof, the Company will conduct the Impact Study.
- d) If the Interconnecting Customer has not yet selected the generation equipment, the Interconnecting Customer has the right to ask the Company to perform an Impact Study for up to three options of the same generation type and location. However, the cost of the Impact Study will increase in accordance with the complexity of the requested options. Also, the Time Frame for the Impact Study will revert to a mutually agreed upon duration but not to exceed an additional one-third of the allowable Time Frame for each additional option.
- e) If the Company determines, in accordance with Good Utility Practice, that the System Modifications to the Company EPS are not substantial, the Impact Study will determine the scope and cost of the modifications as defined in Section 5.0. If the Company determines, in accordance with Good Utility Practice, that the System Modifications to the Company EPS are substantial, the Impact Study will produce an estimate for the modification costs (within $\pm 25\%$) and a Detailed Study Agreement and cost for Interconnecting Customer's approval. For Facilities requiring completion of an ASO Study, such estimate shall not include any Affected System Owner and/or Affected System Operator costs for studies or necessary system modifications to the Affected System. The Company shall coordinate with the Affected System Operator and/or Affected System Owner and communicate to the Interconnecting Customer the ASO's estimated study and system modification costs.

Within the Standard Process are extended Time Frames applicable to Complex Facility Interconnection Applications that will require extensive System Modifications. The Company will inform the Interconnecting Customer within 20 days following the commencement of the Impact study whether the Interconnection Application shall be treated as a Complex Project under the Standard Process.

III. Conclusion

There remain areas in which the stakeholders exchanged draft tariff language and engaged in good faith discussions but were, nevertheless, unable to reach consensus. Instead of detailing these areas in this letter, the Joint Stakeholders will address these areas individually in the upcoming October 10th comment opportunity and Technical Conference(s).

Again, the Joint Stakeholders greatly appreciate the opportunity to present this filing to the Department and we look forward to further engagement with the Department in this proceeding. Should you have any questions please contact any of the below representatives.

Sincerely,

Ben Dobbs
Department of Energy Resources

Elizabeth Mahony
Office of the Attorney General

John K. Habib
On behalf of Eversource

Nancy D. Israel
On behalf of National Grid

Gary Epler
On behalf of Unitil

Jeremy McDiarmid
Northeast Clean Energy Council

cc: Kate Tohme, Department of Public Utilities
D.P.U. 19-55 Service List