

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities)	
On Its Own Motion Into Electric Distribution Companies')	
(1) Distributed Energy Resource Planning and)	D.P.U. 20-75
(2) Assignment and Recovery of Costs for the)	
Interconnection of Distributed Generation)	

FITCHBURG GAS AND ELECTRIC LIGHT COMPANY d/b/a UNITIL
COMMENTS ON STRAW PROPOSAL

I. INTRODUCTION AND GENERAL COMMENTS ON STRAW PROPOSAL

Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil” or the “Company”) appreciates the opportunity to provide comments in the Department’s Distributed Energy Resource Planning Proposal. The Company is generally supportive of the straw proposal, subject to the comments offered below as well as those offered by other Electric Distribution Companies (“EDCs”). As explained in the Company’s comments, many aspects of the Department’s straw proposal are consistent with Unitil’s current planning processes and ongoing or future initiatives.

The comments set forth in Section II respond to specific questions appended to the Department’s Straw Proposal. Unitil offers, in addition to these responsive comments, the following observations regarding the proposed Reconciling Charge (Attachment A Section II.C). As an initial matter, Unitil supports a Reconciling Charge and cost recovery mechanism that allows for concurrent recovery of pre-approved Capital Investment Projects that are placed into service. While the Straw Proposal outlines the structure of the proposed Reconciling Charge, it does not detail a proposed process for implementing the charge. The Company believes that a

relatively simple and straightforward process that implements the policy goals of the straw proposal while adhering to principles of administrative efficiency is appropriate. Such a process would have a clear and defined timeline for making a filing with the Department, adjudicating the filing, and implementing the rate. This would best be accomplished through an annual filing that provides the first year and current revenue requirements for any pre-approved Capital Investment Projects that have been placed into service, offset by Capital Investment Project Fees received by the Company during the same period of time. With respect to the charge itself, Unutil is concerned that making it non-bypassable and a part of the distribution charge would be awkward as a matter of bill presentation and potentially confusing to customers. Unutil recommends that the Reconciling Charge be presented as a separate factor, which would be more transparent and easier to understand.

II. RESPONSES TO STRAW PROPOSAL QUESTIONS

(1) Refer to Section II, Distributed Energy Resource Planning Requirements. Please discuss the effectiveness of this proposal, specifically:

- a. The Department has identified the following list as solutions that address potential system needs. If you disagree with any solution included on this list, please explain why. Please identify and explain any additional solutions.**
 - i. Technologies for Voltage Control on the Distribution System**
 - ii. Distribution Bulk Transformer Addition or Replacement**
 - iii. New Bulk Station**

Response: Section II, Distributed Energy Resource Planning Requirements states:

“Distribution Companies must guarantee the resilience and sustainability of their electric power systems to ensure their operation of safe and reliable facilities in the delivery of electric service to customers.” Attachment A at 4. Distribution system planning studies are

conducted to identify system improvements required to accommodate forecasted load and Distributed Energy Resource (“DER”) interconnections in a safe and reliable manner. These studies will identify cost effective improvements (the “Capital Improvement Projects”) to address capacity, voltage regulation, reliability, and system protection constraints which may otherwise limit the amount of DERs that can be connected to the distribution system. The Department attempts to clarify the types of Capital Improvement Projects that might be considered for special ratemaking treatment with cost recovery through a Reconciling Charge, including: (1) substation transformer replacements; (2) reconductoring of distribution feeders; (3) distribution protection measures; and (4) transmission-related upgrades triggered by resources interconnecting to the distribution system. Attachment p. 5 n. 2.

Unitil agrees that the three solutions listed in the question above are potential projects to address system needs.¹ However, the Company notes that these solutions, as well as the list provided on page 5 of 16 of the Straw Proposal, do not include all types of projects the Distribution Companies may implement to support the integration of DERs. Distribution systems are changing rapidly. The Distribution Companies will require the flexibility to be creative in implementing cost effective solutions that may also provide other benefits. Attempting to detail all types of potential projects now may lead to the unintended consequence of eliminating projects from consideration in the future.

¹ The Company notes that the term “Bulk” transformer or “Bulk” substation has a specific meaning and loosely correlates to transformers connected to transmission level voltages. For the purpose of Docket 20-75, Unitil assumes the use of Bulk Transformer is meant for all substation power transformers.

The Company provides the following representative list as types of projects that should be considered Capital Improvement Projects. Each project is designed to address capacity, voltage control, reliability, and system protection constraints that may otherwise limit the amount of DER that can be connected to the distribution system. Please note, this is not an exhaustive list; it is representative of the types of projects Electric Distribution Companies may implement to interconnect more DERs than otherwise would be connected.

Constraint	Typical Projects to Address Constraint	Justification
Capacity	<ol style="list-style-type: none"> 1) Transmission substation addition or upgrade 2) Transmission Line addition or reconductoring 3) Substation transformer addition or upgrade 4) Substation circuit position upgrade 5) New circuit position 6) Reconductoring or cable replacement 7) Voltage Conversion 8) Energy Storage 9) Circuit Reconfiguration 10) Switchgear addition or replacement 11) Managed EV charge/discharge 	<p>Projects are designed to increase the capacity to accommodate DERs during light loading conditions where existing equipment does not have the capacity to serve the DER.</p>
Voltage Control	<ol style="list-style-type: none"> 1) Addition or relocation of line regulators 2) Addition or relocation of capacitors 3) Distribution Energy Resource Management System (DERMS) 4) Volt/Var Optimization 5) Voltage conversion 6) Managed EV charge/discharge 	<p>Projects are designed to provide the necessary voltage control and support to ensure the system continues to operate within the required voltage bandwidth regardless of the operating condition.</p>
Reliability	<ol style="list-style-type: none"> 1) Energy Storage to account for intermittent nature of the DER 	<p>Projects are designed to ensure the necessary reliability of the DER, especially if the DER is</p>

	<ul style="list-style-type: none"> 2) Reconductoring with tree wire to improve reliability (in addition to providing more capacity) 3) Advanced Distribution Management System (ADMS) to improve monitoring and control of the DER and the impact to the system. 4) Circuit reconfiguration 	integral to distribution planning.
System Protection	<ul style="list-style-type: none"> 1) Modification or addition of system protection devices and schemes. 2) Ground Overvoltage Protection for reverse power flows 3) Direct Transfer Trip 4) Switchgear addition or replacement 5) Field communications 6) SCADA addition 	Projects are designed to ensure the safety of the electric system for customers as well as the public.

b. Should transmission studies and costs be included in proactive system planning as it relates to interconnection? Explain your reasoning.

Response: Future DER interconnection will affect and require upgrades to the transmission system as well as the distribution system. The integrated nature of the transmission system and distribution systems requires studies to identify constraints on both. In certain cases, a transmission investment might be less costly and provide more capacity for distributed generation. In addition, a transmission solution may be implemented to benefit the interconnection of multiple DERs.

Transmission system performance assessments are a required component of the DER interconnection process. Any cost for transmission work that is not recovered through the transmission power pool should be included in the Capital Investment Project Fee.

c. Should the distribution system assessment identify projects that provide broader benefits beyond enabling incremental DG capacity? If so, explain:

i. what benefits should be considered,

Response: Until believes that any identification of projects that provide broader benefits beyond enabling incremental DG capacity should be consistent with current system planning principles and processes. The Company also believes system forecasting and planning process should incorporate the additional inputs such as electric vehicle and heat electrification, asset condition information, and reliability performance information. This will ensure that traditional system safety and reliability benefits are identified, as are modernization benefits such as enablement of distributed generation, electric vehicles, and heat electrification.

ii. How these benefits should be quantified, and

Response: The Company recommends the EDCs work collaboratively with the Department to develop a means to identify benefits that can be quantified (e.g., hosting capacity, EV enablement, reliability improvement, etc.), and benefits are more qualitative in nature (e.g., operational flexibility, safety, etc.). A consistent approach in valuing the benefits will assist the EDC's, and the Department's, review of projects.

iii. The appropriate method for cost assignment and recovery.

Response: Until believes that the costs should be allocated and recovered in a manner consistent with traditional principles of causation, allocation, and recovery. Transparent and economically efficient pricing structures will ensure a viable and sustainable long term model that provides sufficient revenue to support the investments. Until does not propose a specific

method of cost allocation at this time but believes that the allocation and recovery of costs should be straightforward and uncomplicated while generally aligning with principles of cost causation.

- d. Should there be a cap on the dollar-per-kW billed to each Facility that benefits from the Capital Investment Project? If so, please explain how the cap should be determined.**

Response: Unitil opposes a cap on the dollar-per-kW billed to each facility benefitting from a CIP. Imposing such a cap could either have the effect of placing an artificial ceiling on DER integration onto the system or, to the extent that costs exceed the cap on allowed cap, shift costs from DER customers to non-DER customers.

- e. Requests to the Distribution Companies**

- i. Please propose an optimal format for the 10-year distribution assessment, including all substantive information points that should be contained in the assessment. Please include a proposal on the frequency with which such assessments should be conducted.**

Response: Currently, Unitil performs planning of its electric system using two processes. The Electric System Planning process analyzes the electric system from the transmission system to the substation power transformers. Distribution Planning analyzes the electric distribution system from the substation power transformer to the distribution secondary services. Under the Electric System Planning process, system loads are forecasted ten years into the future to generate a Design Peak load forecast as well as an Extreme Peak load forecast. N-1 contingency analysis is performed on the system using the Design Peak load forecast and the Extreme Peak load forecast is assumed as a contingency for analysis purposes. Using these load forecasts, analysis is performed to ensure the system thermal

capacity, voltages, and power factor adhere to the planning criteria. Unitil intends to include 10-year forecasting of DER and perform system planning analysis using the DER forecasts in addition to the present load forecasts.

The Distribution Planning process forecasts customer load five years into the future and performs unbalanced load flow analysis and short circuit analysis to ensure thermal capacity, voltages, power factor, and distribution protection meet the required criteria.

Unitil intends to add DER forecasts to the Distribution Planning process. The DER forecasts will be used to identify where upgrades are required on the distribution circuit main line, substation circuit positions, and power transformation.

Unitil intends to utilize its existing System and Distribution planning processes for the purposes of conducting the 10-year distribution assessment. DERs will be forecasted annually and incorporated into system and distribution planning processes. The Company will conduct the assessment on an annual basis and will analyze the thermal capacity, voltages, and power factor of the transmission system, distribution substation equipment, and distribution mainline circuits. Unitil will analyze the system constraints netting the forecasted minimum daytime load with the forecasted DER. This analysis will be done in addition to the system and distribution planning processes that are currently performed, using the same planning criteria.

- ii. Please indicate the length of time required to update hosting capacity maps to reflect additional capacity built into the system after planned projects have been approved by the Department.**

Response: It is unclear if the Department is proposing that hosting capacity maps be updated after additional capacity has been physically “built into the system,” or if it is

proposing that the maps be updated after *planned* projects receive Department approval. Unitil believes that Hosting Capacity Maps should only depict the *present available capacity*, not planned capacity, and therefore should be updated after any additional system capacity is completed. Although some aspects of the Hosting Capacity Maps are updated monthly (such as the amount of DER interconnected to a circuit), the circuit load forecast used in the Hosting Capacity Maps is updated annually. The circuit loads and thermal capacity supporting the hosting capacity map should be updated during the load forecasting process immediately following the building of the additional capacity.

- iii. For illustrative purposes, please provide an estimated annual cap on the Reconciling Fee for the last five calendar years based on the description above.**

Response: Unitil provided a response to this request on December 4, 2020. A copy of the Company's response is attached hereto as Attachment A.

(2) Refer to Section III, Common System Modification Fees. Please discuss the effectiveness of this proposal, specifically:

a. Simplified Facilities

- i. Is a Common System Modification Fee appropriate for Facilities using the simplified interconnection process? If so, provide a proposed method for establishing such a fee.**

Response: Unitil believes that a Common System Modification Fee is appropriate for Facilities utilizing the simplified interconnection process. Common System Modifications that are required for Simplified projects typically include the upgrade to a service transformer and/or the secondary conductors (i.e., "Secondary Crib") serving multiple

customers. Currently, when the aggregate DER capacity connected to a service transformer reaches the transformer capacity, the cost to replace the transformer is borne solely by the DER customer who triggers the upgrade. This cost can be burdensome on a small residential project, and in some cases can create an insurmountable barrier to such a project, while prior projects in close proximity were allowed to interconnect at no cost. In order to reduce such a burden on a small project a Common System Modification Fee should be assessed on Simplified projects. Unitil proposes that the forecasted DER and historical system modifications (up to the service transformer), and average existing transformer size be used to estimate the number of Simplified Interconnecting Customers that would require system modifications. A fee based on \$/kW (Nameplate) would be assessed to all Simplified Interconnecting Customers at the time of approval to interconnect. Additional costs (not covered by the Simplified Common System Modification Fee) would also be assessed to individual Interconnecting Customer as required for their application.

ii. What types of upgrades should be funded by a Common System Modification fee for Facilities using the simplified interconnection process?

Response: Unitil believes that the Common System Modification fee should fund distribution transformer upgrades and the reconfiguration and upgrades of secondary conductors (Secondary Cribs) and services.

iii. How would such a fee interact with the system planning process described in Section II? Should fees collected from Facilities using the simplified interconnection process be used to offset the costs of

**Capital Investment Projects approved through the proposed
distribution system planning process?**

Response: A Common System Modification Fee for the simplified interconnection process should not be an offset to CIP costs. The Common System Modification Fee and the CIP Fee are two different fees covering different system costs. For example, the planning process which initiates the Capital Investment Project would only include transmission systems, substations, and circuit mainline assets. It would not include analysis from the service transformer to the customer, which would be the limit of the equipment covered by the Common System Modification Fee.

b. Expedited and Standard Facilities

- i. Is a minimum Common System Modification Fee appropriate? If so,
1. Provide a proposed method for determining such a fee.**

Response: A minimum Common System Modifications Fee should not be assessed to Expedited and Standard applications. System modifications required for these projects will be covered by the Capital Investment Project Fee (“CIP Fee”), and a Commons System Modification Fee would undermine the price signal of a CIP Fee and inappropriately socialize costs. Unutil believes that there should only be one method for cost allocation for system modifications that benefit expedited or standard DG applicants, and is in agreement that the Department’s proposed CIP Fee is the appropriate method.

- 2. Explain why the proposed fee levels are appropriate considering the level of investment required to support the types of investments the fee is intended to cover.**

Response: See above.

3. Explain how proposed fee establishes clear price signals, provides cost certainty, and limits ratepayer costs.

Response: See above.

4. Explain how such a fee would interact with the distribution system planning process described in Section II.

Response: See above.

- ii. Is a fixed Common System Modification Fee appropriate? If so,
 1. Provide a proposed method for establishing such a fee.

Response: See above.

2. Explain how the proposed fee levels are appropriate considering the level of investment required to support the types of investments the fee is intended to cover.

Response: See above.

3. Explain how the proposed fee establishes clear price signals, provides cost certainty, and limits ratepayer costs.

Response: See above.

- iii. Explain how such a fee would interact with the distribution system planning process described in Section II.

Response: See above.

1. As part of your explanation indicate whether a maximum price for Common System Modification Fees is appropriate.

Response: See above.

2. If a maximum price is appropriate, explain how such a cap would be determined.

Response: See above.

- iv. **Should Common System Modification Fees be based on nameplate capacity and/or export capacity?**

Response: See above.

- 1. **If you propose that the fees be based on a combination of the two, please clarify how they should be weighted.**

Response: See above.

- v. **Since it is unlikely a Common System Modification Fee would cover all necessary upgrades:**
 - 1. **Provide a proposed method for how to determine which upgrades would be covered by the funds collected.**

Response: See above.

- 2. **Explain if such upgrades covered by the Common System Modification Fees would be subject to Department approval.**

Response: See above.

a. Requests to Distribution Companies

- i. **For each of the last ten years, provide estimates of the following:**
 - 1. **The minimum, maximum, median, and average system modification cost for Facilities using the simplified interconnection process. Please also provide the total number and capacity of Facilities using the simplified interconnection process that have applied by year and the cumulative total system modification costs charged to Facilities in each year.**
 - 2. **The minimum, maximum, median, and average system modification cost for Facilities using the expedited and standard interconnection processes. Please also provide the total number and capacity of Facilities using the expedited and standard interconnection process that have applied by year**

and the cumulative total system modification costs charged to Facilities in each year.

Response: Unitil provided a response to these requests on December 4, 2020. A copy of the Company's response is attached hereto as Attachment B.

- ii. To date, how much money have the Distribution Companies collected through the imposition of interconnection application fees, study costs, and interconnection related construction costs? Please organize this information by year going back to 2011 as well as by Facility type (i.e., Simplified, Expedited, Standard).**

Response: A copy of the Company's response is attached hereto as Attachment C. Please note, the Company did not separately track application fees prior to 2015.

3) Refer to Vote and Order, Section III, Proposals For Implementation in the Short Term. Please discuss the effectiveness of these proposals, specifically:

- a. Attorney General's Power Control Limiting Program (Att. B-1, Att.)**
 - i. Would eligibility for the Program be for (a) new Interconnecting Customers or (b) new and existing Interconnecting Customers?**

Response: The Attorney General proposes that the Department adopt a "power control limiting approach" to "control and manage power export, allowing medium and large DER projects to interconnect without causing costly and time-consuming upgrades." Att. B-1, Attorney General Cover Letter at 3; Attorney General Proposal at 16-17. Under the Attorney General's proposal, a DER applicant would propose a power control limitation as part of the interconnection application process to limit its capacity or its imports and

exports in order to avoid triggering system upgrades. Att. B-1, Attorney General Proposal at 16.

Unitil agrees that limiting the output of a Facility may reduce the amount of system modifications required to serve the individual Interconnecting Customer. Presently the Company works with the Interconnecting Customer through the Impact Study Process to determine the output level at which system modifications are required. However, limiting the output of an individual Facility does not increase the Hosting Capacity of the circuit. In addition, by designing the output of a Facility to use the capacity of a circuit, but limit the output to a point to avoid system modifications, the Hosting Capacity of the circuit is not increased, but the burden of costs of system modifications that would increase the Hosting Capacity is shifted to future customers. Unitil does not agree with the Attorney General's suggestion that power control limiting is a manner of cost allocation that appropriately assigns costs to direct beneficiaries and avoids assigning costs to non-beneficiaries. The Company also does not agree that a Power Control Limiting Program would allow an Interconnecting Customer to avoid all system modifications.

Although limiting the output of a Facility may reduce some system modifications, it is unlikely that all such costs can be avoided. The system modifications that would most likely be avoided are those specific to thermal capacity of the electric system. However, it is likely that there would be system modifications associated with system voltage control and system protection as well as those specific to the Facility, such as remote monitoring and control.

To the extent the purpose of the proposed Power Control Limiting Program is to limit system modifications required to interconnect a Facility, eligibility for this program should

only apply to new Interconnecting Customers that have not yet completed their project design. Existing Interconnecting Customers would have already paid for any required system modifications. If an Interconnecting Customer who has already received an Interconnection Service Agreement (“ISA”), proposed to change the design, such as addition of an Energy Storage System (“ESS”), to limit the Facility Output, this change of design would require a new application to be analyzed.

ii. Identify equipment and software necessary for implementation of the Program and which equipment and software would be installed (a) at the Interconnecting Customer and (b) at the Distribution Company.

Response: There are multiple ways in which an Interconnecting Customer can limit the output for the Control Limiting Program. For example, an Interconnection Customer could reduce the aggregate nameplate rating of their DG equipment and/or use one of the export control methods identified in the Department’s proposed new Section 4.3 of the DG Interconnection Tariff. The Company would need to review the Interconnecting Customer’s power control limiting proposal as part of the Impact Study to determine its effectiveness. At this time there is no standard software or control scheme that would be specified. However, the Company would need to install remote monitoring of the Interconnection Customer’s Facility in order to verify the Facility’s limited output.

iii. Identify any amendments or attachments to the ISA that would be necessary to implement the Program.

Response: Unitil does not believe that any new amendments or attachments would be necessary to implement a Power Control Limiting Program. As stated above, the Company presently allows the Interconnecting Customer to limit the Facility output. The current ISA has an attachment (Attachment 1) to describe the Interconnecting Customer’s

Facility, as well as an attachment (Attachment 4) to describe special Operating Procedures. These two attachments are currently used and can be used in the future to describe the proposed operation of the Facility to limit the output.

iv. Request to the Distribution Companies

b. Does the Company currently have the ability to implement the Program? If no, please explain what would be required to successfully implement this Program.

Response: The Company has the ability to implement the program. Please refer to the response above. It should be noted that additional effort is required to analyze and specify the levels at which the Facility could operate to avoid system modifications, then analyze the revised proposal in addition to the control system proposed by the Interconnecting Customer.

c. Attorney General's Dynamic Curtailment Program (Att. B-1, Att.)

i. Based on your understanding of the Program, identify equipment and software necessary for implementation of the Program and which equipment and software would be installed (a) at the Interconnecting Customer and (b) at the Distribution Company.

Response: Under the Attorney General's proposed pilot program, "a developer interconnecting to a congested circuit [would agree] to an estimated amount of DER export curtailment as an economic alternative to otherwise necessary system modification costs." Att. B-1, Attorney General's Proposal at 17. The developer would agree to allow the system operator (i.e., the EDC) to curtail the Facility's output during times of high system penetration and low absorption. Id.

For the Attorney General's proposed approach to be viable, an EDC would need to have real-time monitoring of the Facility and many points of the electric power system, and

control of the Facility. The monitoring, analysis of the electric power system, and control of the Facility would be need to be implemented through a Distributed Energy Resource Management System (DERMS), which would be integrated into the Company's Advanced Distribution Management System (ADMS). Unitil is in the process of implementing its ADMS but has yet to implement DERMS functionality.

In order to implement this solution, the Facility must utilize an inverter compliant to IEEE 1547-2018 and measurement equipment which would communicate with a Company-Owned Real-time monitoring and control (SCADA) system using Company-specified communication protocol. Unitil does not anticipate that specific software would be required for the Interconnecting Customer.

Unitil's vision is to utilize DERMS, which is an integral module of the ADMS, to manage and control DER facilities and other infrastructure including both Company-Owned and Customer-Owned facilities. Following deployment of Unitil's ADMS, it is the Company's intention to implement the DERMS module and develop the necessary integrations needed for utilization.

Unitil will require significantly more visibility and control of DER facilities that will participate in the Dynamic Curtailment program including real-time status of inverters, measurement and control of real power output, reactive power output, and voltage management. In the cases of energy storage Unitil will also need real-time information on the available storage and dispatch control over the energy storage facility including charging and discharging control. It is Unitil's vision that these will be integrated with Unitil's SCADA/ADMS.

Additionally, Unitil anticipates the need for real-time monitoring at specified congested locations on the distribution system to provide the necessary data to make informed operational decisions. Depending on the desired functionality, this could require the development of automated customer communication algorithms and messaging to inform facilities when curtailment is occurring or will occur.

In the event there is a need to forecast curtailment, Unitil's ADMS/DERMS will have a distribution state estimator that can forecast DER and load utilizing historical and forecasted weather information. In order to perform this type of forecasting the system will require information that is not currently readily available, including solar panel size, direction of solar panel installation, historical hourly weather data, hourly historical data for all load and generation on the system.

ii. Identify any amendments or attachments to the ISA that would be necessary to implement this Program.

Response: The Company would need additional information that is not currently provided by interconnecting customers to implement the proposed Dynamic Curtailment program. Such information includes, but is not limited to: technical and operational requirements; annual curtailment limits; hardware requirements; cyber security requirements; a communication protocol; penalties for failure to comply; and provisions specific to certain types of DER. This is offered as an illustrative, not an exhaustive, list. Any such additional information will need to be included in the ISA process and an amendment or attachment may be an appropriate means of doing so.

iii. Requests to the Distribution Companies

- a. Does the Company currently have the ability to implement the Program? If no, please explain what would be required to successfully implement this Program.**

Response: As noted above, Unitil currently does not have DERMS functionality and as such is not able to implement the proposed Dynamic Curtailment pilot program at this time. The Company is currently in the process of implementing ADMS on some of the distribution circuits, and plans to integrate DERMS functionality in the future.

c. Provide details on the flexible capacity pilot in NY (applicable to National Grid only).

Response: N/A

d. Request to the Distribution Companies

i. Based on the current DG interconnection queue, identify any potential Capital Investment Projects that could be constructed/installed in the near-term.

Response: Installation of Ground Overvoltage protection (3V0) on all substation power transformers. Ground Over Voltage (3V0) protection is required to protect substation equipment from damaging over voltage from DER back-energizing the secondary substation bus during a Phase-to-Ground fault on the primary supply line of the substation. When a fault occurs on the substation supply line, the line breaker trips to isolate the fault. In that instant, while the substation secondary bus is still energized from DER, and voltage is developed that is greater than the withstand voltage of the substation equipment. The Ground Overvoltage protection scheme will isolate the distribution circuits when the primary source is tripped off, thereby de-energizing the secondary bus.

III. CONCLUSION

Unitil appreciates the opportunity to provide comments in response to the Department's Straw Proposal, and looks forward to working collaboratively with the Department and other stakeholders in this Docket.

Respectfully submitted,

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