



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

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

FROM: Katie Zilgme, Hearing Officer

RE: DG Interconnection, D.P.U. 19-55
Procedural Notice and Requests to EDCs

DATE: March 10, 2021

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 opening the inquiry, the Department announced five initial-phase topics: (1) methods to manage high volume queues for DG interconnection; (2) process related to affected system operator (“ASO”) studies conducted during DG interconnection; (3) interconnection of energy storage systems (“ESS”); (4) Timeline Enforcement Mechanism (“TEM”); and (5) interconnection process for DG facilities interconnecting to the transmission system.

D.P.U. 19-55, Vote and Order, at 4. Since that time, the Department has investigated additional topics, including: (6) metering; (7) implementation of IEEE 1547-2018;¹ (8) state vs. federal jurisdiction; (9) qualifying facilities; and (10) cost allocation. During the past year and a half, the Department has held five technical conferences, multiple technical meetings, and completed numerous rounds of public comments and stakeholder collaboration on the aforementioned topics. In addition, the Department has issued several interim guidance documents, established DG Guidelines for Interconnection,² and issued Orders on expansion of the Ombudsperson role, qualifying facilities, the process related to ASO studies, and methods to manage high volume queues.³ Looking ahead, the Department expects issuance of additional Orders in the near term related to interconnection of ESS and state vs. federal jurisdiction. Stakeholder comments and participation in this docket have been productive and informative. This memorandum sets forth next procedural steps in D.P.U. 19-55.

¹ The Institute of Electrical and Electronics Engineers, Inc, which publishes standards that establish specifications and procedures designed to maximize the reliability of materials products, methods, and/or services. IEE 1547-2018 sets forth technical specifications for, and testing of, the interconnection and interoperability between utility electric power systems and DG.

² The currently effective DG Guidelines are available at:
<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/12668672>

³ D.P.U. 19-55-A (April 22, 2020); D.P.U. 19-55-B (June 23, 2020); D.P.U. 19-55-C (August 6, 2020); D.P.U. 19-55-D (September 16, 2020).

II. NEXT STEPS

A. IMPLEMENTATION OF IEEE 1547-2018

The Massachusetts Technical Standards Review Group (“TSRG”) continues to discuss discrete topics related to IEEE 1547-2018 identified by the Department (March 4, 2020 Hearing Officer Memorandum). On January 28, 2021, the TSRG submitted a document to the Department summarizing the meetings held in 2020 by the TSRG IEEE 1547-2018 Subcommittee. This document has been posted to the Department’s online file room. To the extent the meetings convened by the TSRG identify interconnection implementation issues more suited for Department facilitation, we will announce additional Department facilitated process. TSRG meetings are open to the public and logistics of these meetings will be posted online.⁴ The Department seeks to keep meetings related to IEEE 1547-2018 at a reasonable size to allow for productive conversation and, as such, encourages only those stakeholders with specialized knowledge of this discrete issue to participate. At this time, the Department does not intend to take further action on this topic in D.P.U. 19-55.

B. COST ALLOCATION

The Department has opened a new docket to investigate this and other issues. Distributed Energy Resource Planning and Assignment and Recovery of Costs for the Interconnection of Distributed Generation, D.P.U. 20-75, Vote and Order Opening

⁴ <https://sites.google.com/site/massdgc/home/interconnection/technical-standards-review-group>

Investigation (October 22, 2020). You may follow this docket on the Department's online file room or email me at Katie.Zilgme@mass.gov to be added to the electronic distribution list for D.P.U. 20-75. The Department recognizes the hard work and resources expended by stakeholders in the development of their proposals on this topic. The proposals materially informed the Department's straw proposal in D.P.U. 20-75 and have been incorporated into D.P.U. 20-75 for background and reference. D.P.U. 20-75, at 4 n.7.

C. ASO STUDIES

As noted in footnote 3, on August 6, 2020, the Department issued Order on Affected System Operator Studies, D.P.U. 19-55-C. While investigation of this topic in D.P.U. 19-55 is complete, the Department recognizes this process is novel and evolving. Thus, the Department continues to follow this topic closely and we are monitoring the possibility for further investigation. Pursuant to the Department's DG Guidelines for Interconnection, the electric distribution companies ("EDCs") are required to file bimonthly ASO reports that will be available on the Department's website.⁵ In addition, the EDCs continue to provide biweekly and monthly updates for certain potential and ongoing ASO studies, which can be found on each EDC's website.⁶ Furthermore, in accordance with the Department's directive

⁵ <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber> (insert 20-DG)

⁶ NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource: <https://www.eversource.com/content/nh/about/about-us/doing-business-with-us/builders-contractors/interconnections/massachusetts-application-to-connect/affected-system-operator-studies>

in D.P.U. 19-55-C at 31, the EDCs filed an ASO Impact Screen on February 8, 2021 in docket D.P.U. 19-55. The Screen was developed by the EDCs with input from interested stakeholders and ISO New England Inc. and is available in the Department's online file room.⁷

Inquiries for the Department related to ASO studies should be submitted to the Department via our online DG inquiry form.⁸

D. TIME FRAMES FOR INTERCONNECTION AND TEM

On May 14, 2020, the Department's Ombudsperson issued a Memorandum seeking comments on discreet questions on the time frames for interconnection included in the DG Interconnection Tariff and the TEM (initial comments due July 17, 2020; reply written comments due August 14, 2020). The Department received valuable and informative comments. Upon review, the Department has determined that additional information is

Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid: <https://ngus.force.com/s/article/DG-Stakeholder-Updates>

Since Fitchburg Gas and Electric Light Company d/b/a Unitil does not currently have any Affected System Operator Studies underway, the requirement to publish bimonthly ASO reports on its website does not apply.

⁷ <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/13135729>

⁸ All inquiries and complaints related to DG and clean energy that are not topics currently under investigation in an open docket should be submitted to the Department's DG Group at <https://www.mass.gov/forms/submit-a-renewable-energy-complaint-or-question-to-the-dpus-distributed-generation-group>

necessary to complete the investigation of these topics. Below we seek additional information from the EDCs.

Some information has already been directed through Department Order to be submitted with each EDC's 2021 TEM filing:

1. In Revisions to Section 3.4.1 of the Standards for Interconnection of Distributed Generation Tariff, D.P.U. 17-164 at 13-14 (April 8, 2020), the Department directed the EDCs to submit an informational filing that includes: (1) an explanatory filing letter; (2) the number of group studies conducted; (3) the total capacity (MW AC) for each of the group studies; (4) the total time to complete each group study; (5) the number of project applicants in each group; (6) the number of projects per group; and (7) information for each group on any and all EDC directed holds, including, but not limited to, (a) if and when the EDCs put the group on hold, (b) the length of each hold, and (c) the reason the hold was instituted.
2. In D.P.U. 19-55-D at 17-18, the Department directed the EDCs to report the number of Pre-Application Reports issued and the length of time to issue each report from the date the interconnecting customer requests the Pre-Application Report to the date it is issued.

In addition to the above referenced directives, the Department requests the following information to be submitted in an informational filing included with each EDC's 2021 TEM filing:

1. Information on all holds instituted for expedited and standard process non-complex projects proceeding outside of a group study for calendar years 2015 to 2020, including, but not limited to: (a) if and when the EDC put the

group on hold, (b) the length of each hold, and (c) the reason the hold was instituted.

2. For standard process complex and non-complex projects provide the
 - a) construction timeframe reported in the executed interconnection service agreement (“ISA”) and (b) the actual construction completion date.
3. For standard process complex projects, provide the number of calendar days from the date of interconnection application receipt through executed ISA.

The Department does not expect further stakeholder process until the Department reviews this additional information.

E. DG INTERCONNECTING DIRECTLY TO THE TRANSMISSION SYSTEM

As part of the Ombudsperson’s May 14, 2020 Memorandum, the Department sought written comments by September 11, 2020, on two discrete questions concerning DG facilities interconnecting to the transmission system. The Department has reviewed and considered all comments received, and at this time, we do not intend to take further action on this topic.

F. TECHNICAL CONFERENCES

At this time, no additional technical conferences are contemplated in D.P.U. 19-55. Should the Department determine through the course of our investigation that additional technical conferences are warranted, dates will be announced as soon as possible. The Department will provide an agenda and logistics and seek online registration in advance of each technical conference.

G. CONTINUED STAKEHOLDER COLLABORATION

During the past year, the Department has directed and facilitated several EDC and stakeholder collaborative processes to address specific topics for investigation in D.P.U. 19-55. Through these processes and stakeholder comments in this docket, we have heard requests for continued collaborative processes and consideration of a more expansive process or working group. As such, the Department is considering what, if any, further investigation is appropriate on this topic and will announce next steps if applicable.

H. SUMMARY OF ANNOUNCED DATES

Topic	Date
Deadline for EDCs to file supplemental information on Time Frames for Interconnection and the TEM	April 1, 2021
Technical Conferences	Expected Spring/Summer 2021 (if necessary)
Deadline for the EDCs to file a progress report with the Department per D.P.U. 19-55-D at 8 ⁹	May 17, 2021

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Katie Zilgme at katie.zilgme@mass.gov.

⁹ “The [EDCs] shall make a progress report by May 17, 2021 including (1) the feasibility of publishing hosting capacity with this desired information; (2) the feasibility of publishing the maps with this desired information by the November 16, 2021 target date; and (3) the estimated cost of this project.”