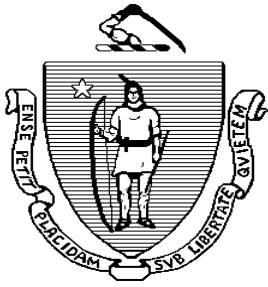


Attachment A



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF PUBLIC UTILITIES
TO FITCHBURG GAS AND ELECTRIC LIGHT COMPANY D/B/A UNITIL,
MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC COMPANY
D/B/A NATIONAL GRID, AND NSTAR ELECTRIC COMPANY AND WESTERN
MASSACHUSETTS ELECTRIC COMPANY D/B/A EVERSOURCE ENERGY
D.P.U. 20-75

Pursuant to 220 CMR 1.06(5)(c), the Department of Public Utilities (“Department”) submits to Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, and NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource Energy (collectively “Distribution Companies”) its First Set of Information Requests.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to the Company in this proceeding.

1. Responses should be **submitted before 5:00 p.m. on Tuesday, April 6, 2021.**
2. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Consistent with the Department’s March 12, 2020 directive regarding paper filings (see Instruction 9 below), please do not send the paper copy of the response.
3. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The term “provide complete and detailed documentation” means:

6. Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of working Microsoft Excel spreadsheets with all cell references and formulae intact.
7. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
9. If a question refers to an information request of another party, please provide that response and answer with information that supplements the previous response.
10. All responses must contain an internally consistent and usable form of referencing. Documents of three pages or more without a preexisting referencing system must be marked with consecutive page numbers. Where it is necessary to supply page numbers for a document, the numbers should be added in some way that differentiates the additions from the preexisting text. The Department will not accept documents without an acceptable referencing system.
11. At this time, all filings will be submitted only in electronic format in recognition of the difficulty that parties and the Department may have filing and receiving original copies. On March 10, 2020, Governor Baker issued a state of emergency related to COVID-19 for the entire Commonwealth. Until further notice, parties must retain the original paper version and the Department will later determine when the paper version must be filed with the Department Secretary. Importantly, all large files submitted must be broken down into electronic files that do not exceed 20 MB.
12. All documents should be submitted to the Department in electronic format by e-mail attachment to peter.ray@mass.gov and the Hearing Officer, katie.zilgme@mass.gov. The text of the e-mail must specify: (1) the docket number of the proceeding (D.P.U. 20-75); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. The electronic filing should also include the

name, title, and telephone number of a person to contact in the event of questions about the filing. The electronic file name should identify the document, but should not exceed 50 characters in length. All documents submitted in electronic format will be posted on the Department's website:

<https://eeaonline.eea.state.ma.us/DPU/Fileroom> (enter "20-75").

13. Each individual information request response should be submitted in a separate PDF file. In addition, the entire set of information request responses should be submitted as a single PDF file (or, in the case of large sets, as few separate PDF files as possible). In each instance, the electronic file name should identify the document, but should not exceed 50 characters in length.
14. At this time, the Department will not consider information beyond the scope of what is requested below.
15. In referring to a "provisional system planning program," the Department intends that such a program would not decrease the amount of time for an Electric Distribution Company ("EDC") to construct the necessary Electric Power System ("EPS") upgrades.

Requests

EDC-1 Identify whether a group or groups of interconnecting customers in the Company's service territory are likely to be presented with interconnection costs in the next 1-1.5 years that are significantly higher than have been historically presented. Include in the Company's response:

- a. Detailed information on the group(s), including: geographical region, number of distributed generation ("DG") facilities, capacity in megawatt ("MW"), and estimated timing for conclusion of associated distribution and transmission impact studies;
- b. High-level planning estimates of expected interconnection costs for the group(s). Provide data in dollar-amount-per-kilowatt ("\$/kW") and by group, where possible;
- c. High-level planning estimates of timeline for construction of anticipated EPS upgrades that will be required due to interconnection impacts of the group(s). Provide data by group, where possible;
- d. High-level estimates of how much DG capacity will be enabled by the anticipated EPS upgrades for the group(s); and

- e. Whether additional DG capacity could be enabled in coordination with anticipated EPS upgrades for the group(s), and if so, high-level estimates of costs and timelines for any additional EPS upgrades required to enable additional DG capacity.
- f. Will the anticipated EPS upgrades for the group(s) provide benefits to ratepayers and the Commonwealth beyond enabling renewable energy to interconnect to the EPS?

EDC-2 If the estimates of expected interconnection costs identified in response to EDC-1 were allocated pursuant to the cost assignment and recovery provisions of the Department's straw proposal, provide high-level estimates of bill impacts for ratepayers if the costs were amortized for recovery over 10, 20, and 30 years.

EDC-3 Based on historical data, estimate the threshold \$/kW at or below which interconnecting customers have agreed to pay to interconnect. Provide data by group, where possible.

EDC-4 If the Department seeks to implement a provisional system planning program based on the study results of the above referenced group(s), how quickly following the completion of associated impact studies could the company prepare and submit a proposal to the Department?

EDC-5 Are there any federal law implications that should be considered concerning sharing costs of EPS upgrades with interconnecting customers over an extended period of time and in particular after the EPS upgrade has been constructed?

Dated: March 23, 2021