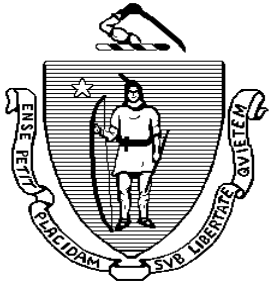


## Attachment B



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF PUBLIC UTILITIES TO THE D.P.U. 20-75 ELECTRONIC DISTRIBUTION LIST

Pursuant to 220 CMR 1.06(5)(c), the Department of Public Utilities (“Department”) submits to the D.P.U. 20-75 Electronic Distribution List (“Stakeholders”) 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 13, 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 a Stakeholder 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](mailto:peter.ray@mass.gov) and the Hearing Officer, [katie.zilgme@mass.gov](mailto: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

Stakeholder-1 Refer to the response to EDC-1. Do you currently have a distributed generation facility in the interconnection queue within one of the groups identified by the EDCs?

Stakeholder-2 Refer to the response to EDC-1. Based on the high-level planning estimates for costs and timelines provided by the EDCs, would you move forward with interconnection under the currently applied cost causation methodology?

Stakeholder-3 Refer to the response to EDC-1. If a provisional system planning program were implemented that decreased the cost to interconnect but did not alter the timeline for EPS upgrade construction, would you move forward with interconnection?

Stakeholder-4 Refer to the response to EDC-4, how long following submittal of a provisional system planning program proposal by the EDCs would the Department need to make a determination on the proposal for you to move forward with interconnection?

Stakeholder-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