

Information Request EDC-4

Request:

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?

Response:

The Company could prepare and submit a provisional system planning program proposal to the Department based on the results of the distribution system and transmission system impact studies associated with the Group Studies referenced in the Company's response to Information Request EDC-1 approximately three to four months after completion of all of the Group Studies and the associated impact studies.<sup>1</sup>

The provisional system planning program proposal National Grid would develop during this three to four month period would be analogous to the last step in the long-term planning process National Grid described in its D.P.U. 20-75 Reply Comments at 8, i.e., the box labeled CIP-Pre-Approval Process. During this period National Grid would determine the criteria for proposing CIPs (Capital Investment Projects) and for proposing CIP Fees. Stakeholder engagement would occur as part of the Group Study process.

National Grid proposes that development of the provisional system planning process occur before Group Study participants are presented with Interconnection Service Agreements ("ISAs") so that any proposed CIP Fees the Department approves can be included in the applicable ISAs. To implement this, the Company may need to put the applicable projects on hold during the provisional planning process through Department approval (or disallowance) of the Company's proposed CIPs and CIP Fees before issuing ISAs. This approach would require Department approval as it would exceed current Group Study timeframes to issue an executable ISA.<sup>2</sup>

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<sup>1</sup> For the purposes of this response, "completion" would be after all of the participants in a Group Study have satisfied their post-study documentation requirements that the Company typically requires before issuing an executable ISA, including any required design documentation changes based on the protection requirements identified in the study results (and Company approval of all such changes).

<sup>2</sup> Section 3.4.1(i) of the Standards for Interconnection of Distributed Generation, D.P.U. 19-55 and D.P.U. 20-63 EDC Compliance Tariff (Revised 11.12.20).