



April 13, 2021

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Via Email: dpu.efiling@mass.gov; katie.zilgme@mass.gov

D.P.U. 20-75 Attachment B-IRs to Stakeholders

Dear Secretary Marini,

Syncarpha Capital, LLC ("Syncarpha") appreciates the collaborative process that the DPU has developed in the DPU 19-55, 20-75 and related dockets and Hearing Officer Memorandum issued on March 23, 2021. The Climate law passed in Massachusetts increases the urgency of long-term capital investments to achieve net-zero emissions. We support a provisional system planning program to ensure that the hundreds of megawatts of clean renewable energy is not stalled from contributing to the commonwealth's clean energy goals and provide a near-term opportunity to deploy the needed infrastructure to decarbonize and modernize the electric system.

We submit the following feedback to the Department's Information 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?

Syncarpha has one project in the Eversource Marion-Fairhaven group study at 4999 kW AC. We have also had several projects totaling over 10 MW in the National Grid's Western MA cluster study that we had to withdraw due to interconnection costs and timeline we could not afford.

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?

The data provided by the EDC's clearly demonstrate that the current cost causation methodology will not allow these projects to interconnect and even when infrastructure costs are spread between current and future projects these costs are untenable.

Furthermore, in the event that the study group experience attrition of projects, remaining project companies will bear the burden of sharing even larger upgrade costs which they will not be able to afford. In addition to the cost impact, there may be a possibility that the attrition will trigger a re-study, which will delay the process even further.

As demonstrated by these filings, financing the level of infrastructure required to enable current and future projects and allow for comprehensive system planning depends on a new approach to cost allocation that recognizes the many benefi-



ciaries of these system upgrades. The level of infrastructure proposed by Eversource and National Grid will have a significant impact on the Commonwealth's ability to electrify the grid, support increased loads and meet climate goals and these costs cannot be attributed to distributed-connected solar projects alone.

We support a Technical Conference or stakeholder forum for each EDC to provide transparency into system planning assumptions, alternatives considered, current capacity available, and cost saving mitigations. The Industry has expressed in prior filings with the Department that distributed solar projects > 500kW are unable to bear interconnection costs above \$300/kW or \$0.20/watt. It is therefore critical that a forum for stakeholder discussion and feedback be performed in parallel to the Group Studies for these projects to remain viable.

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?

The result of a provisional system planning program should be a clear \$/kW fee structure and schedule that will enable these projects to execute an Interconnection Service Agreement. The comprehensive upgrades envisioned by Eversource and National Grid span over the next five years. Many Group Study projects have been in the queue for a number of years already (Syncarpha's has been in the queue since 2018) and the EDCs should identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades. Even if the costs were to decline, our project cannot survive a construction timeline over 3 years. Another factor to consider is the patience of the landowners of the project sites. They have been waiting for a lease agreement to execute for many years, and many have expressed frustration at the prolonged timeline and some have even expressed interest in abandoning the solar opportunity for others. If the interconnection timeline is over 3 years, it may become impossible for us to keep extending land lease options, at which point we will have to execute the lease pre-emptively or abandon it altogether.

For Syncarpha's project in the Mario-Fairhaven group study, we have been waiting since March 2018 for the group study to start, which started in October 2020. This was due to Eversource's policy of studying projects one after another instead of in parallel; meaning, our project's study could not commence until projects ahead of us in queue had finished their studies. In this case, our project has already waited for 3 years. Waiting another 3 years will be a stretch, but any more than that would be unacceptable.

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?

We encourage the Department and EDC's to accelerate the submittal and review period of provisional system plans. The provisional system plans should be prepared in parallel with the group study and finalized simultaneously with the completion of the Group Study itself. We suggest that 45 days is an acceptable amount of time between the final provisional system plan submittal and the review and approval period for the Department. After the Department's approval.

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?

We do not have feedback on this question.

Sincerely,

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