



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,

Ironwood Renewables, LLC (“Ironwood”) 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. Ironwood supports a provisional system planning program to ensure that the hundreds of megawatts of clean renewable energy are 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.

Ironwood submits 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?

Ironwood Renewables is involved in the following Eversource Group Studies:

- Plymouth – 1 Project – 2.5 MW AC – entered queue in December 2019.
- New Bedford – 1 Project – 5 MW AC – entered queue in October, 2019.
- Dartmouth-Westport – 1 Project – 4 MW AC – entered queue in December 2019.

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 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.

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 beneficiaries of these system upgrades. The level of infrastructure proposed by Eversource 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.

Ironwood supports 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 support interconnection costs above \$300/kW. 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 span over the next five years. Many Group Study projects have been in the queue for several years already and the EDCs should identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades. Our projects cannot tolerate a construction timeline over 3 years.

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?

Ironwood encourages 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. Ironwood suggests 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.

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?

Ironwood does not have feedback on this question.

Thank you for your consideration.

Sincerely,

Adrian Ortlieb

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