



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; peter.ray@mass.gov; katie.zilgme@mass.gov

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

Dear Secretary Marini,

We appreciate the collaborative process that the Massachusetts Department of Public Utilities (the “Department”) 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 stalled in the interconnection queue 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.

SunRaise and ReWild recommend that the Department initiate a Technical Conference for each EDC to present system planning assumptions, alternatives considered, current capacity available, and cost saving mitigations. We recommend this occur in parallel with the ongoing Group Studies as there is no need to pause the studies. This forum would support a transparent dialogue and collaboration between EDCs and stakeholders that would enable a pathway to optimize system plans within group study areas such that interconnection and upgrade costs are ultimately optimized and do not exceed a \$/kW threshold. As has been expressed by the distributed generation (“DG”) industry, distributed solar projects are unable to bear interconnection costs that are above \$300/kW. We appreciate that the EDCs have proposed a cost allocation framework that would share infrastructure costs among current and future DG projects as well as ratepayers, but the costs proposed to be borne by DG solar projects under this framework are untenable.

We are members of the Northeast Clean Energy Council (“NECEC”) and the Coalition for Community Solar Access (“CCSA”) and we support those comments.

SunRaise and ReWild submit the following individual 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?



SunRaise and ReWild are involved in the following Eversource Group Studies:

- Marion-Fairhaven - 6 Projects totaling 19.997 MW AC
- Plymouth - 4 Projects totaling 11.499 MW AC

We previously participated in the National Grid 2019-2020 western/central Massachusetts area studies. We have withdrawn all our projects involved in these area studies from the interconnection queue due entirely to the high distribution upgrade costs of \$681/kW to \$852/kW. These projects had already received local and state permits but the interconnection costs forced us to terminate the projects. To avoid a similar outcome to these current Group Studies, we strongly recommend that interconnection costs assigned to DG projects be capped at a fee of \$300/kW for the projects to be financed and contribute to the Commonwealth's renewable energy and climate goals.

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?

No, we would not move forward with interconnection under the currently applied cost causation methodology. We would also not move forward with interconnection based on the costs allocated according to Eversource's cost allocation proposal. The data provided by the EDCs clearly demonstrates 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.

Under the current cost causation methodology the system upgrades for the Groups that we are participating in are \$1,977 /kW for the Plymouth Group Study (enabling 126 MW in Group Study) and \$3,270/kW for the Marion- Fairhaven Group Study (enabling 49 MW in Group Study). In Table 5 of Eversource's Information Request Eversource has indicated forecasted fees in accordance with their cost allocation proposal for these same Groups are \$340/kW and \$554/kW respectively. Under either cost allocation methodology, these costs exceed the level of affordability for distributed solar. NECEC and the DG industry have 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. Eversource's response to Information Request EDC-3 supports this. Their response states, "facilities receiving only base compensation under the Massachusetts SMART Program could fail to achieve target rates of return of 10% at interconnection costs above \$100-\$300/kW."

This gap in what projects can bear in interconnection upgrade costs and what has been proposed for cost allocation by the EDCs needs to be openly reviewed and discussed so it can be closed. It is one of the reasons we believe a Technical Conference is critical for stakeholder discussion and feedback in order for these projects to remain viable.



As stated by Borrego Solar Systems, Inc., these filings demonstrate that 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 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.

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?

SunRaise and ReWild would *most likely* move forward with interconnection if the provisional system planning program decreased the cost but did not alter the timeline. However, the result of such a program should be a clear \$/kW fee structure *and schedule* that will enable these projects to execute Interconnection Service Agreements. Many of our projects in Group Study have been in the interconnection queue for over three years. Both ourselves and the landowners that we have partnered with have been incredibly frustrated by the long interconnection process and many delays. If the outcome of the provisional system planning program were to be a design and construction duration of longer than three years then we, and our landowners, may not be able to move forward with interconnection. We do believe our projects can tolerate a construction duration of three years and we understand many other developers and owners to be in a similar position. Therefore, *we strongly recommend this three year construction duration* be built into the provisional system planning program.

As stated by Borrego Solar Systems, Inc., **it is also critical for EDCs to work with developers to identify opportunities to interconnect projects in advance of comprehensive area upgrades when possible.** These opportunities could be identified collaboratively through a Technical Conference and before a provisional system program is filed by the EDC.

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?

The provisional system planning program should be submitted to the Department simultaneously with the release of Group Study results for the affected Group Studies. To answer the question, we recommend a 45 Business Day period for the issuance of an order, inclusive of Department review and stakeholder comment. We recommend that the preparation of the provisional system plan proceed in parallel with the Group Study, and that the Group Study Notice Period then be paused until the Department issues an order for the provisional system plan. Upon plan approval, group study members will provide notice and the EDC can proceed with the issuance of



Interconnection Service Agreements. Below is an example of this sequence based on the Eversource Group Studies:

Step	Duration
Stakeholder Conference/ Stakeholder Process	May – June 2021
Group Studies Complete	August – October 2021
EDC Filing of Provisional System Plan (per Group)	August – October 2021
Department review and approval of provisional system plan	45 Business Days from EDC Filing
EDC to amend Group Study results and fees (as applicable)	10 Business Days from approval
Group Members to review results and notify EDC of whether they wish to proceed / withdraw (“Notice Period”)*	15 Business Days
Interconnection Service Agreement issuance (if Affected System Operator study is complete) *	35 Business day

**Denotes existing Group Study Process Tariff timelines*

It is worth noting, that this schedule would bring the issuance of ISAs to approximately May of 2022, over 12 months from the submission of these IR responses and would result in another full year of being in the interconnection process for the Group Study projects. If ISAs are issued in May of 2022, many projects have will already suffered 4+ years of delays and study in the interconnection queue. An expedient construction process is both reasonable and necessary in order for these projects to become a reality. Once again, we recommend a maximum 3 year construction duration for Group Study projects.

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 support the comments submitted by NECEC and CCSA on Stakeholder-5.



Sincerely,

A handwritten signature in black ink that reads "Matt" followed by a stylized "D" and a long horizontal flourish.

Matt Doubleday
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