

# NextGrid

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](mailto:dpu.efiling@mass.gov); [katie.zilgme@mass.gov](mailto:katie.zilgme@mass.gov)

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

Dear Secretary Marini,

NextGrid 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?**

NextGrid is participating in the following Eversource Group studies:

<u>Group</u>	<u># of Projects</u>	<u>Aggregate Size Included</u>
Cape	8	24 MW
Marion-Fairhaven	1	1 MW
Plymouth	1	1 MW

*Most of these projects had been in the queue for 1-2 years prior to the kickoff of the group studies.*

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## **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?**

After review of the cost data provided by Eversource and National Grid, the current cost causation methodology would cause solar development to almost cease in Massachusetts. If a solution for the cost causation methodology is not attained, then it is guaranteed that all NextGrid's projects will be forced to withdraw along with the rest of the group study participants who will share the same sentiment (making this assumption based on experience from 2019-2020 National Grid western/central area studies). If the approach to cost allocation is not changed, developers and utilities are going remain in a constant cycle, wasting significant amounts of resources, from submitting applications, completing studies, receiving high costs for new infrastructure that forces attrition, and then starting the cycle again, while in turn, not completing what we all want to accomplish: to reach our renewable energy goals.

NextGrid does take notice and appreciates that the Department and Eversource are making strides to better the cost scenario (e.g., Department's straw proposal and Eversource amenability to a \$/kW fee). However, even if a \$/kW fee were established in a provisional system planning program to be applicable to projects in the current Eversource group studies, the system upgrade costs that have been communicated are far too high for any developer to take on, ranging from \$340/kW to \$1,031/kW. 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, and NextGrid supports this.

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 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. 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?**

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If a provisional system planning program were implemented to decrease costs, NextGrid would move forward with interconnection on our projects currently in group studies. There 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, including our own, have been in queue for multiple years and it would be our hope that in parallel with holding a technical conference to potentially identify any mitigations, there would be a chance to trim down the preliminary five-year timelines that were published. NextGrid develops projects from 249 kW up to 4,999 kW and we understand that most of the projects participating in the group studies are 500 kW and above. With that said, we believe that for those larger projects, a maximum of two years for a construction duration will keep 500 kW and above projects viable. However, for projects that are under 500 kW, a two-year construction timeframe could certainly be detrimental to the project. Therefore, we propose that projects under 500 kW have a maximum construction timeframe of a year, and we are hopeful that solutions to achieve this can be discussed during the proposed technical conference with utilities.

## **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.

## **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?**

NextGrid does not have feedback on this question.

Sincerely,



Tiffany Robicheau  
Sr. Manager, Interconnection  
NextGrid Inc  
[trobicheau@nextgrid.com](mailto:trobicheau@nextgrid.com)  
978-609-6862

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