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PARALLEL PRODUCTS
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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,

As a stakeholder in the Massachusetts solar market for the past 15 years we welcome the opportunity to comment on the DPU Docket 20-75. The state of MA has been a nationwide leader in renewable energy starting with the Patrick Administration back in 2006 with Commonwealth Solar and Wind. Today it is clear that the state mandates of 3.2GW of solar will not meet the current goals of net zero emissions. The state must develop overarching programs dovetailed with the Biden Administration's Infrastructure plan- 'The American Jobs Plan' which it also proposes spending $100 billion to "reenergize America's power infrastructure."

As part of the goals of fighting climate change, we need to encourage renewable energy expansion and not delay and defer decisions to another economic window in time. Our opinion is for the DPU to think big and to get outside of the box of normal everyday regulatory incremental rulings on grid operators. With the current approach we are subject to the continuous rinse and spin cycle of grid studies with defections and restudy. Not that it is their fault, but the utilities are driven by a ROE model for their shareholders, their job is to spend as little as possible to keep the grid running and maintain profitability for the shareholders. The DPU needs to step in and make significant changes in the paradigm or we slowly go nowhere to meet climate change and the existential threat to society.

We have an aging electrical infrastructure in the state, there are system upgrades that should have taken place over the past decades but have not due to IOU concerns for their shareholders. We only need to look at PG&E and the phase slapping fires that caused devastation and bankruptcy due to poor grid maintenance and lack of investment. Let's be better than that in the Commonwealth of MA.

We support a 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.

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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?

Parallel Products Solar Energy, LLC (Beaumont Solar) is involved the following NSTAR/Eversource Group Studies.

Cape:

- Bourne (1) project 499kW AC
- Post Group Study Projects for Cape:
  - 2MW Bourne
  - 1MW Bourne
  - 1MW Bourne
  - 3MW Sandwich
  - .5MW Sandwich
  - 4MW Falmouth

New Bedford:

- New Bedford (1) project 999kW AC

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.

The New Bedford project for example has been in the queue since 2018 and would have an interconnect cost of $1M before any site specific equipment is added to the costs for reclosers, meters, poles etc. This is for one 1MW project which in the past would have cost $150K-$175K including equipment. Not only is this a non starter for investors, this is and has been misleading to the stakeholders that the state of MA is interested in building out its RPS and expanding RE growth to meet climate change targets. This is not 'our' goal, it is the goal of the people of the Commonwealth of MA.

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. The Industry has expressed in prior filings with the Department that distributed solar projects > 500kW are unable to bear interconnection costs above

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$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?

No. 1 year should be the maximum timeline for EPS upgrade construction for all projects and 6 months maximum for smaller projects under 500kW. Please keep in mind that the Hoover Dam and the Empire State Building were built in 5 years and 2 years respectively- with considerably less technology than today. 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. This needs to be a priority and not business as usual at the IOU. Many Group Study projects have been in the queue for a number of years already and the EDCs should identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades. Should the EPS timeline allow for smaller projects to interconnect within 6 months of ISA we would be in support of this notion. Anything outside of one year is not tenable.

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 30 calendar 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?

The federal government is in the process of rolling out an infrastructure bill aimed at electrification of the grid for renewable energy, transportation, climate change. Where possible the state of MA should participate in the EPS upgrade costs and rollout with the help of the Federal funds that will be made available for this purpose. We currently have a declining ITC which needs to be extended, there is also discussion of cash in lieu of ITC that was implemented in 2009 under the ARRA act. Battery technology should be included in the ITC as well.

Sincerely,

Phillip Cavallo

Business Development Executive

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