



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

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

Dear Secretary Marini,

We appreciate 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 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.

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?

Galehead controls or has an interest in three projects in active ASO Studies and an additional three projects that are awaiting decision around placement into new group studies.

Currently active ASO Study participation:

- Freetown - 1 Project
- Plymouth - 2 Projects

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 methodology is also flawed in that upgrades are identified prior to attrition in the queue (which may eliminate some of the identified upgrades) which may result from the upgrades themselves or projects that are not fundamentally viable which artificially inflate the upgrade requirements. Furthermore, because an Interconnection Service Agreement is a required of the SMART Statement of Qualification, the EDC's proposed upgrade and construction timelines are in direct conflict with the mechanics of SMART program design and



competitive tension of Declining Block schedule that the development community embraced in making these early-stage at-risk project investments.

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 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 make reliable contributions to the Commonwealth's energy and climate goals and equitable with DOER's SMART program design for the Declining Block mechanic.

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 and have been subject to repeated study delays inconsistent with applicable Tariffs and the Industry's expectations for the interconnection study process when funding interconnection applications and the EDC's engineering time for such studies, 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 2 years – such delays and conditional upgrades are in direct conflict with the Commonwealth's energy and climate goals and competitive mechanic of DOER's SMART program design for the Declining Block schedule.

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 EDCs 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,
Matt Marino

A handwritten signature in brown ink, appearing to read "Matt Marino", is written over a light blue horizontal line.

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