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,

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?

Plymouth Group Study - 4 Projects Totaling 14.97 megawatts 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 most likely 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 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. The Industry has expressed in prior filings with the Department that distributed solar projects > 500kW are unable to bear 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 and National Grid span over the next five years. Many Group Study projects have been in the queue since 2018 and the EDCs should identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades. Our project simply cannot tolerate the timeline of 3 years for an interconnection study and then a subsequent 4 years to interconnect.

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. 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,

Eric Crisler

Director of Development, Entero Energy