



April 13, 2021

Mark D. Marini, Secretary
Department of Public Utilities
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D.P.U. 20-75 Attachment B-IRs to Stakeholders

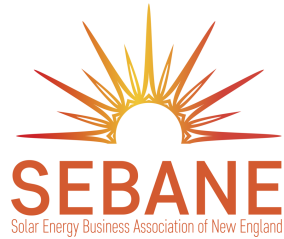
Dear Secretary Marini,

Solar Energy Business Association of New England (“SEBANE”), MassSolar, and our 100+ member companies appreciate the collaborative process that the DPU has developed for this, and related, dockets. We also wish to acknowledge the EDCs willingness to think more broadly about these concepts, particularly in the responses filed by Eversource.

SEBANE issued a member survey on April 7, 2021 to gather feedback to inform the attached responses to the developer information requests. In addition to joint responses submitted by SEBANE and MassSolar, several member companies have filed individual responses as well.

SEBANE and MassSolar members report struggling with untenable risk, skyrocketing interconnection costs, and recirculation through a seemingly endless Group Study process. At the beginning of a Group Study process, initial rough estimates of per MW shared interconnection costs are anticipated to make projects appear feasible. As the study progresses, projects drop out for a variety of reasons which increases the per MW cost for the remaining projects. At each step of the Group Study process, as costs and timetables for interconnection become unbearable, more projects drop out. That, in turn, raises the costs for the remaining projects, triggering even more projects to drop out.

For example, BlueHub’s 2 MW project is faced with at least \$9.2 million per MW in distribution and transmission upgrades and transmission upgrade carrying costs over twenty years. That cost is not financially feasible for developers. Given the high level of both risk and uncertainty,



many developers cannot continue lease payments etc at a particular site indefinitely in hope of some eventual relief via this DPU process.

In addition, our organizations are hearing feedback from our Developer members that they are no longer seeking prospective project opportunities in Massachusetts given the potential for extraordinary interconnection costs and delays extending five years before a project can be interconnected. The current interconnection landscape has become so bad that it puts at risk the Commonwealth's ability to achieve its 2030 clean energy goals. EDCs must be subject to the same rules as private developers in order to create a level playing field for the industry once utility owned projects begin to move forward. The Department must act quickly and decisively to signal to the market that it intends to create a less risky and more affordable approach to the interconnection of distributed energy resources (DER).

As it considers an appropriate framework for the interconnection of distributed energy resources, we encourage the Department to keep in mind that solar is funding capacity improvements that will benefit all ratepayers. The recently passed climate bill, "An Act Creating a Next-generation Roadmap for Massachusetts Climate Policy," the 2030 Massachusetts Clean Energy and Climate Plan, and the 2050 Massachusetts Decarbonization Roadmap all recognize that we cannot delay action to achieve Massachusetts' decarbonization goals. They also note the importance of the electrification of fossil fuel energy loads and the transition to clean electricity generation in the achievement of those goals. The development of solar contributes to multiple public policy goals, benefiting all ratepayers and citizens of Massachusetts:

- Building capacity to serve the doubling of kilowatt hours required to achieve the state's electrification goals, as outlined in the Decarbonization Roadmap;
- Reducing the emissions pollution of the average kWh supplied to ratepayers;
- Creating and sustaining clean energy employment, including jobs and training for workers from disadvantaged communities, with good, above average wages.

As each Massachusetts household transitions to electric vehicles, it will result in an estimated doubling of the average annual kWh consumption of the average household, not including the additional heat pump loads. In addition to being additional grid loads, those bi-directional EV batteries will also be interactive grid assets, able to discharge to the grid in the evenings, suppressing peak demand. If solar projects are interconnected to that same circuit before the adoption of EVs, why must DG projects carry the entire burden of the delivery system upgrades required? Let us not discourage solar developers for being first-movers. The Commonwealth will benefit if those electric vehicles are able to charge with clean energy when they eventually connect to the grid.



Thank you for the opportunity for SEBANE and MassSolar to participate in this process.

Mark Sylvia, President
Solar Energy Business Association of New England

Mark Sandeen, President
MassSolar