

April 12, 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,

Thank you for the opportunity to comment and outlining a collaborative process for DPU 19-55, 20-75 and related dockets and Hearing Officer Memorandum issued on March 23, 2021. CVE supports 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.

Distributed solar projects are not able to bear interconnection costs of \$200/kw or more. If costs cannot be reduced many projects in the group studies will be forced to withdraw and not be built. This will also have additional implications for the remaining projects. We expect the EDCs will require projects that remain after this group to go through a restudy because of the high rate of withdrawal due to interconnection costs. This is not a sustainable system.

We recommend that the Department initiate a Technical Conference to host a transparent dialogue and EDC and stakeholder collaboration to enable a pathway to optimize system plans within group study areas and ultimately cap interconnection costs at a \$/kW threshold.

CVE submits the following responses 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?

CVE is involved in the following Eversource Group Studies

- Dartmouth-Westport – 2 projects totaling 6 MW AC
- Freetown – 1 project totaling 3 MW AC
- Marion-Fairhaven– 1 project totaling 2 MW AC
- New Bedford– 1 project totaling 2 MW AC
- Plymouth– 1 project totaling 2 MW AC
- Plainfield-Blandford– 1 project totaling 5 MW 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 EDCs 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.

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 support 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 with a clear interconnection timeline. 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 several years already and the EDCs should identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades.

CVE has a project in the Dartmouth-Westport group study that Eversource deemed we had a complete application on June 20th, 2018. We have already been in the process for 3 years-- 3.5 years before we have an ISA. This project, and in fact none of our projects, can bear a construction timeline that takes an additional 3 years.

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?

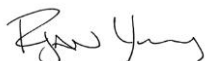
We encourage the Department and EDCs to accelerate the submittal and review period of provisional system plans. The provisional system plans should be prepared in parallel with the group study and finalized simultaneously with the completion of the Group Study itself. We suggest that 45 days is an acceptable amount of time between the final provisional system plan submittal and the review and approval period for the Department.

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 any feedback on this question.

Yours sincerely,



Ryan Young,
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