



April 13, 2021

Via email: dpu.efiling@mass.gov; katie.zilgme@mass.gov

Mark D. Marini
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: DPU 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 recently passed in Massachusetts increases the urgency of long-term capital investments in infrastructure to achieve net-zero emissions. We strongly 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 that these projects facilitate deployment of 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?

REDP is currently participating in the Eversource Group Study for the Plymouth Group (SEMA). REDP has 6 projects totaling 18.7 MWAC.

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?

Based on the data provided by the EDC's to date, it would not be economically viable for REDP to move forward with interconnection of any of our projects assuming the proposed cost allocation methodology of sharing the costs between projects in the Group. Indeed, given the

magnitude of the planning level costs, even when spread between current and future projects these costs are untenable.

In light of the magnitude of the planning level costs, REDP strongly supports a Technical Conference or stakeholder forum for each EDC to provide transparency into system planning assumptions, alternatives considered, current capacity available, and cost mitigation strategies. The solar stakeholder industry has expressed in prior filings with the Department that distributed solar projects > 500kW 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 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 to reduce the cost to interconnect AND develop a schedule for upgrade construction that is commercially reasonable. The comprehensive upgrades envisioned by Eversource span over the next five years. Our projects participating in the Group Study have been in the interconnection queue for a number of years already, and their economic viability has already been diminished by this delay. The focus of a provisional planning program with respect to the timeline for upgrade construction should be to identify opportunities for as many projects as possible to interconnect in advance of comprehensive upgrades, and to prioritize the completion of necessary upgrades based on the number of projects that will be able 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 45-60 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?

REDP does not have feedback on this question.

Thank you for your consideration of our input on this important matter.

Regards,



Hank Ouimet
Managing Partner