



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Electronic Distribution List in D.P.U. 20-75

FROM: Katie Zilgme, Hearing Officer

RE: Distributed Energy Resource Planning and Cost Assignment, D.P.U. 20-75
Procedural Notice, Request for Comments, and Information Requests

DATE: May 7, 2021

CC: Mark Marini, Secretary

I. INTRODUCTION

On October 22, 2020, the Department of Public Utilities (“Department”) opened this inquiry to investigate the electric distribution companies’ (“EDCs”) (1) distributed energy resource planning and (2) assignment and recovery of costs for the interconnection of distributed generation (“DG”), pursuant to its ratemaking authority under G.L. c. 164, § 94 and its superintendence authority under G.L. c. 164, § 76. Distributed Energy Resource Planning and Cost Assignment, D.P.U. 20-75 (2020). In opening the inquiry, the Department issued a straw proposal that outlines distributed energy resource (“DER”) planning requirements and a common system modification fee. D.P.U. 20-75, Att. A (“Straw Proposal”). The Department posed questions to the D.P.U. 20-75 Electronic

Distribution List pertaining to the structure and elements of its proposal and opened an initial and reply comment period. D.P.U. 20-75, Att. A at 12-16.

The Department has identified three discrete topics for its investigation:

- (1) Whether the Department should establish a long-term system planning program to include DER planning requirements and common system modification fees;
- (2) If the Department establishes a long-term system planning program, what the EDC's system planning analysis to develop capital investment project proposals would entail; and
- (3) Whether the Department should establish a provisional system planning program to address imminent DG interconnection concerns.

D.P.U. 20-75, Att. A at 12-16; Hearing Officer Memorandum at 2 (March 23, 2021).

On March 23, 2021, the Department issued a Hearing Officer Memorandum directing the EDCs to develop system planning analysis proposals to implement the distribution system assessment process and issued two set of information requests, one directed to the EDCs and one directed to the Stakeholders.¹ After review of the responses to the March 23rd information requests, the Department has determined that additional information is necessary to continue our investigation. This memorandum sets forth next procedural steps in D.P.U. 20-75.

¹ We refer to the Stakeholders as the non-EDC participants in this proceeding.

II. PROVISIONAL SYSTEM PLANNING PROGRAM: SECOND SET OF INFORMATION REQUESTS

Through responses to information requests, Stakeholders and the EDCs have represented that there is a significant amount of distributed generation (“DG”) seeking to interconnect to the EDCs’ electric power systems in the Commonwealth that will likely withdraw from the interconnection process due to anticipated high interconnection costs under the currently applied cost causation methodology. We understand that, within the next year, the EDCs will present a large portion of the DG currently in the queue with costs to interconnect and that those interconnecting customers will be asked to make a determination on whether to execute an interconnection service agreement based on a commitment to pay the associated costs. In this docket, the Department is investigating the establishment of a long-term system planning process. If established, the Department expects that it will take 1-3 years before the first system planning proposals are developed and submitted by the EDCs and are reviewed and approved by the Department.

On March 23, 2021, the Department sought additional information to determine whether it should consider a provisional system planning program to address imminent DG interconnection cost allocation concerns through information requests to the EDCs and Stakeholders. As stated above, the Department has determined that additional information is needed to continue our investigation. Enclosed are second sets of information requests to the EDCs, Attachment A, and Stakeholders, Attachment B. For efficiency and to expedite the

process, the EDCs and Stakeholders² are to provide only information in response to the Department's specific questions.

III. NOTICE OF TECHNICAL CONFERENCE

To provide further opportunity for comment and discussion, **the Department will hold a technical conference on June 3, 2021, at 10:00 a.m., via Zoom.** The Department will provide additional information, including a Zoom link and detailed agenda, in advance of June 3, 2021.

Reasonable accommodations for people with disabilities are available upon request. Include a description of the accommodation you will need, including as much detail as you can. Also include a way the Department can contact you if we need more information. Please provide as much advance notice as possible. Last minute requests will be accepted but may not be able to be accommodated. Contact the Department's ADA coordinator at DPUADACoordinator@mass.gov.

² Given that D.P.U. 20-75 is an inquiry rather than an adjudicatory proceeding and there are no official parties to the docket, responses by Stakeholders to information requests are voluntary. In other words, Stakeholders are not compelled to provide responses to Department information requests but may do so at their discretion.

IV. SUMMARY OF ANNOUNCED DATES

Topic	Date
Deadline for responses to May 7, 2021 Information Requests	No later than 5:00 p.m. May 21, 2021
Deadline for initial comments in response to April 23 rd EDC system planning analysis proposals	No later than 5:00 p.m. May 28, 2021 ³
Date of Technical Conference	June 3, 2021
Deadline for reply comments to April 23 rd EDC system planning analysis proposals	No later than 5:00 p.m. June 11, 2021

V. PROCEDURAL MATTERS

When submitting written comments, all documents must be submitted to the Department in **pdf format** by e-mail attachment to dpu.efiling@mass.gov, and katie.zilgme@mass.gov. The text of the e-mail must specify: (1) the docket number of the proceeding (D.P.U. 20-75); (2) the name of the person or company submitting the filing; and (3) a brief descriptive title of the document. All documents submitted in electronic format will be posted on the Department's website as soon as practicable at <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber> (insert 20-75). To the extent a person or entity wishes to submit comments in accordance with this memorandum,

³ On April 30, 2021, the Department granted the Interstate Renewable Energy Council's April 28, 2021 extension request, thus changing the initial comment deadline from May 7, 2021 to May 28, 2021 and the reply comment deadline from May 14, 2021 to June 11, 2021.

electronic submission, as detailed above, is sufficient. To request materials in accessible formats (Braille, large print, electronic files, audio format) for people with disabilities contact Department's ADA coordinator at DPUADACoordinator@state.ma.us.

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Katie Zilgme at katie.zilgme@mass.gov.