



May 21, 2021

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

Via Email: [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov); [peter.ray@mass.gov](mailto:peter.ray@mass.gov); [katie.zilgme@mass.gov](mailto:katie.zilgme@mass.gov)

## **D.P.U. 20-75 Attachment B-IRs to Stakeholders**

Dear Secretary Marini,

SunRaise and ReWild submit the following individual feedback to the Department's Information Requests:

### **Stakeholders-2-1**

**Refer to National Grid's response to EDC-1, at 8-9. Please provide your perspective on National Grid's proposal to allocate up to 40 percent of the DG interconnection costs as system benefits to all customers.**

We appreciate the proposals of National Grid and other EDCs that recognize the system wide benefits that system modifications can bring to the distribution system. To that end, we would like to make clear our support for allocating all transmission modification costs to all customers to reflect the broad benefits that transmission upgrades will deliver. Regarding the National Grid proposal, we agree with the principles that underly the proposal itself. However, we are unsure that the allocation amount is appropriate and we encourage the Department to revisit cost allocation proposal submitted by NECEC, which assigns no more than 30%, or \$300 per kilowatt, of shared distribution upgrade costs to DER. We do not expect to move forward with a DG project where interconnection costs exceed \$300 per kilowatt to the DER.

SunRaise and ReWild additionally support the response submitted by NECEC, CCSA, and SEIA on Stakeholder-2-1.

### **Stakeholders-2-2**

**Refer to Stakeholder responses to Stakeholder-4, which include recommendations for a 30-to-45-day Department review of an EDC's provisional system planning program proposal. Refer to (a) G.L. c. 30A, §§ 1(1), 10, 11, 12; and (b) 220 CMR 1.00. Considering the interests and issues involved in the review of an EDC's provisional system planning program proposal, the Department may be required to conduct the reviews of these proposals through an adjudicatory proceeding, which includes notice, intervention, discovery on petitioner's filing, opportunity for intervenors to file direct cases, discovery on intervenors' cases, opportunity to present rebuttal testimony, evidentiary hearings, briefs (initial and reply). Assume you are a party to an adjudicatory proceeding to review an**

**EDC's provisional system planning program proposal, identify the time period you would request for each of these procedural steps.**

SunRaise and ReWild support the response submitted by NECEC, CCSA, and SEIA on Stakeholder-2-2.

**Stakeholders-2-3**

**Refer to your response to Stakeholders-2-2. Explain how such a process would affect your decision to move forward with your DG project.**

- a) Provide a response based on an adjudicatory proceeding timeline of 3 months;**
- b) Provide a response based on an adjudicatory proceeding timeline of 6 months; and**
- c) Provide a response based on an adjudicatory proceeding timeline of 9 months.**

As stated in our earlier data responses from 4/13/21, many of our projects in the Group Study have been in the interconnection queue for more than 3 years. While we understand an adjudicatory proceeding is necessary given the magnitude of the issue, we would urge the Department to move as expeditiously as possible to conclude any proceeding with consideration for those projects that have been stalled in the interconnection queue for several years. Furthermore, there is likely to be a multi-year construction period resulting from the distribution upgrades and so we would hope and expect the adjudicatory proceeding to conclude as quickly as reasonably possible so as not to cause further delay for these DG projects and the landowners and off-takers associated with them.

Again, we understand the necessity for an adjudicatory process and believe this process can be completed in less than 9 months. We would likely move forward with our DG projects if the adjudicatory proceeding timeline were 9 months or less.

Sincerely,

A handwritten signature in black ink that reads "Matt" followed by a stylized surname.

Matt Doubleday  
VP of Project Management  
SunRaise Investments and ReWild Renewables  
603-852-2318  
[Matt@rewildrenewables.com](mailto:Matt@rewildrenewables.com)