



May 21, 2021

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

Re: Response to the Second Set of Information Requests of the Department of Public Utilities to Stakeholders to the D.P.U. 20-75 Electronic Distribution List

Dear Secretary Marini,

We appreciate the Department's consideration of a provisional system planning program and coordination of a technical conference on June 3, 2021. Borrego is a member of the Northeast Clean Energy Council ("NECEC") and the Coalition for Community Solar Access ("CCSA") and we support those comments. Borrego submits the following individual feedback to the Department's Second Set of Information Requests issued by Hearing Officer Memorandum on May 7, 2021.

Thank you for your consideration,

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Enclosures

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Stakeholder 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.

In EDC-1 National Grid identifies substantial upgrades that provide multiple system benefits associated with voltage control, protective devices, substation redundancy, increasing ability to host un-forecasted load growth based on economic development and electrification, and other ancillary benefits associated with advancing work to occur earlier than would otherwise be performed in the asset maintenance planning cycle. National Grid has acknowledged that those system benefits warrant a broad socialization of 40% of system modification costs. We commend National Grid's consideration of the full suite of benefits and network "readiness" created by the implementation of a provisional and long-term program whereby a fundamental shift needs to occur in the planning and the design of the electric system to provide accessibility for all customers.

In identifying a new cost allocation paradigm that distributes costs amongst Distributed Energy Resources and Massachusetts Customers it is critical that such a cost allocation method be equitable and implementable. While an allocation percentage could offer ease of implementation by the EDCs it should also be equitable considering the broad set of beneficiaries associated with the infrastructure. Specifically, while it may be appropriate for a percentage of **40% or higher** be allocated to Massachusetts Customers for shared distribution infrastructure, the percentage for transmission and substation investments should be 100%.

Transmission and substation infrastructure (both "high-side" transmission assets and "low-side" distribution improvements necessitated to serve DER and load) serves the backbone of electric service to all Massachusetts customers and should be socialized in the same manner that reliability upgrades are allocated. This includes the \$380 million of transmission investment identified by National Grid in EDC-1 (e) related to 69kv, 115kv and 345kv system upgrades needed to support the system and associated substation improvements (i.e. both "high side" and "low side") to enable DER and grid access for Massachusetts customers. The modernization of this infrastructure stands to provide an even greater level of benefit to the customers and goals of the Commonwealth and not less.

An allocation percentage could be an appropriate methodology for remaining distribution infrastructure needs as an outcome of the provisional plans in the absence of a more detailed methodology based on long-term distribution plans established in MA DPU 20-75. As referenced in Eversource's response to EDC-1 (f) *"...new distribution lines and line upgrades are likely to create opportunities to rebalance feeders, reduce exposure and transfer load, which would lead to improved reliability and voltage quality for ratepayers. On completion of detailed distribution analyses, the distribution line costs can then be further delineated between reconciling charges and capital investment fees."* Borrego believes that an allocation percentage of 40% is too low for distribution



infrastructure that is not solely dedicated to the interconnection of solar but rather shared benefits amongst Distributed Energy Resources and load.

Stakeholder 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.

Borrego acknowledges that stakeholder feedback and regulatory process is required to implement even a provisional program to adequately represent the interests of all stakeholders. If stakeholder collaboration and visibility into system plans and needs cannot be enabled before the provisional planning filings are made, then the adjudicatory process becomes an essential vehicle to ensure that costs to DER customers and ratepayers are appropriate, alternatives have been properly considered, and certainty regarding both interconnection costs and timelines can be established.

Borrego offers the following recommendations:

First, we urge that the Department **require the provisional plans to be filed upon Group Study completion**. The Group Study sub-areas are currently proceeding on individual tracks, and the ability for stakeholders to review and weigh in on each provisional plan individually will result in focused and targeted feedback and create opportunities for improvements to provisional plans not yet filed.

Second, we ask the Department to consider whether specific cost allocation guidance should be given to Eversource in light of the Affected System Operator ("ASO") Study in progress that is expected to be completed in August 2021. In EDC-1(e) Eversource has forecasted \$60 million of transmission upgrades for this currently pending ASO study. We ask the Department to consider this component of the provisional plan process for two reasons. First, these upgrades constitute infrastructure that has long-lead engineering, procurement, or permitting implications that drive timelines for DG projects in the region. Second, there are projects included in the ASO study not implicated by Group Study that will otherwise face uncertainty unless an equitable approach is identified for those transmission costs. In the absence of action by the Department it is unlikely



that those projects will receive an Interconnection Service Agreement. Alternatively, the Department could direct Eversource to release early Interconnection Service Agreements to allow those projects to proceed with waiver of the 25% payment associated with the transmission cost component should it be subject to additional regulatory process.

Third, we urge the Department to **establish requirements for what information must be included in provisional plans before the first of those plans is filed**, subject to refinement as the provisional program filings are made and the process evolves. While the EDCs indicate that a period of several months may be required to prepare plans and verify Interconnection Customer information we do not see how that is necessary as the group study results should provide the level of detail necessary for Department review. In order for such an adjudicatory proceeding to be successful, we believe the filings made should be inclusive of the information that stakeholders will likely seek to understand the implications of the plan.

- Clear identification of current hosting capacity and equipment limits
- Electrical contribution of each facility to the identified upgrade by substation
- Analysis supporting the infrastructure required including the identification of current or future benefits attributable to Distributed Energy Resources, Load Customers, or both.
- A comparison of the scope, cost, schedule of each provisional plan for both the interconnection of the present Group Study Projects and the Comprehensive Solution that includes additional system needs and future projects.
- For infrastructure upgrades, the age and remaining useful life of existing infrastructure and whether this infrastructure would be subject to eventual modification within the upcoming 10-20 year period.
- Estimated schedules for each element of infrastructure upgrade including the identification of long-lead procurement and state/local permitting required to meet the timeline
- Alternatives considered (including scope, schedule, and costs) and narrative regarding why those alternatives were not selected.

Fourth, we acknowledge that Group Study areas and provisional plans vary in quantity of substations, participants, and costs and therefore the adjudicatory process and timeline may vary. For example, in cases where the infrastructure costs can be reasonably supported by the Group Study participants such that the \$/kW fee is less than \$300/kW (see Stakeholder 1-1) the process may be abbreviated. However, in the event that the scope of infrastructure and projected fees are much higher (as indicated in National Grid and Eversources responses to EDC 1-1) the proceeding must allow for adequate visibility and justification of the provisional plans; and allow for recommendations to optimize the proposed solution. Borrego offers the following timelines for each adjudicatory step in such a proceeding, recognizing that additional discovery and process may be warranted for some provisional plans:



Step	Duration
Technical Conference / Stakeholder Process	June 3, 2021
Order establishing Provisional Plan contents	August 2021
Group Study Complete	August - October 2021
EDC Filing of Provisional System Plan (per Group)	August - October 2021
Notice	Within 5 Business Days of Filing
Intervention	10 Business Days
Discovery	10 Business Days
Intervenor Filings	10 Business Days
Rebuttal testimony	10 Business Days
Evidentiary Hearings	2 Business Days
Parties to submit simultaneous Initial Briefs	10 Business Days
Parties to submit simultaneous Reply briefs	20 Business Days
Department Order	30 Business Days
EDC to amend Group Study results and fees (as applicable)	10 Business Days from approval
Group Members to review results and notify EDC of whether they wish to proceed / withdraw ("Notice Period")*	15 Business Days
Interconnection Service Agreement issuance (if Affected System Operator study is complete)*	35 Business days

**Denotes existing Group Study Process Tariff timelines*

For example, if a Group Study was filed on August 31, 2021 this proposed timeline assumes the regulatory process would be completed in February 2022, with an issuance of an Interconnection Service Agreement in May 2022. To the extent the current tariff timelines associated with issuance of Interconnection Service Agreements can be reduced from 35 Business Days to 15 Business Days this would be a meaningful improvement to the overall timeline for Interconnection Customers that have been awaiting the completion of the study process for a number of years.



Stakeholder 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.*

The implications for each DG project will be driven by the \$/kW fees identified by the EDC, the projected timelines for upgrades, and the time value of money of development expenditures and legal and technical expenses driven by the adjudicatory proceeding process will increase costs on a per project basis and thus may result in different project owner decisions. Borrego has invested considerable time and investment into our portfolio of projects in southeastern Massachusetts and is willing to be an engaged participant in additional adjudicatory process should it not exceed 9 months. Borrego believes that 6-9 months is a difficult but appropriate balance for additional project timelines, and as indicated in our response to Stakeholder 2-2 we believe this process can be completed in less than 9 months.