



Massachusetts Electric Company
Nantucket Electric Company
each d/b/a National Grid
D.P.U. 20-75
5/21/2021
H.O. Katie Zilgme

Responses to the Department's Second Set of Information Requests to Non-EDC Participants in this Proceeding

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.

- Syncarpha appreciates National Grid's proposal to allocate 40% of the costs to its customers. In proposing the allocation, National Grid addresses many foreseeable upgrade needs based on policy goals and grid benefits.
With that said, a new allocation structure should take into account feasibility and ease of implementation while also considering the end beneficiaries. We believe 100% of transmission and substation-related upgrades should be allocated to customers, as they are upgrades that benefit all customers and have been traditionally socialized entirely to customers. Cutting down future upgrades to 40% would imply that they are only reaping 40% of the benefits, which is not the case. Furthermore, Syncarpha asks that this allocation breakdown be adopted by all EDCs in scope by Docket 20-75, including Eversource. Finally, there should be transparency in the upgrades by each level of facility, so costs can be properly attributed to each substation/transmission/distribution system.

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.

- Syncarpha appreciates that the Commission is considering an adjudicatory proceeding to review comments from all stakeholders involved.
Syncarpha again recommends that the provisional proposal be published at the same time the group study is completed. This will shorten the timeline of the ISA issuance since an adjudicatory proceeding may be required.



Syncarpha also recommends that the Commission create a list of specific data sets and information for inclusion in the provisional plan. This will allow the EDCs to have ample time to prepare the information needed by the stakeholders in deciding the future of the projects; thus, avoiding any delays in the review process. The data submitted should include the following, but not limited to:

- Required upgrades and their costs specific to DGs and rationale, as well as their benefits attributable to DG, customers, or both.
- Breakdown of each upgrade-required facility’s current capacity, currently remaining capacity, and projected future capacity. It should also show how much of the newly installed capacity is for future DG projects. The information should also indicate whether the proposed costs assume allocation to future and current projects or only to current projects.
- Detailed schedule for each station/transformer/distribution line upgrade
- Alternatives considered to the proposed upgrades, and rationale for why they were rejected if they were more cost-effective.

As for the timeline, we propose the below timeline; however, we believe the duration for Department Order should be expedited as much as possible, and the proposed 6-week timeline should only be the standard for larger groups. While we acknowledge that certain steps may require more time as the adjudicatory process plays out, shortening the ISA issuance timeline would be very much appreciated by the industry.

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
Initial Briefs	10 Business Days
Reply briefs	20 Business Days
Department Order	6 weeks
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

Additionally, in case an adjudicatory proceeding is required for all groups, we recommend the proceedings happen in parallel to avoid further delays in the ISA issuance. If they happen in sequence and a group has to wait until the proceedings of other groups are finished, it will further delay the ISA issuance, which will lower the chances of moving forward with the project.

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. Adjudicatory process of 3, 6, and 9 months?

- The shorter the process, the more likely that we will move forward with the project. However, the more significant deciding factor will be the cost and timeline associated with the upgrades. As indicated in a previous filing, if the cost is over \$300/kW the project will be unviable no matter the timeline. We believe this process can be achieved in less than 9 months, especially for smaller/simpler groups.

Thank you for your consideration,

Annie Jung
 Project Developer
 Syncarpha Capital LLC
 Annie.jung@syncarpha.com