

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES**

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Investigation by the Department of Public )  
Utilities On its Own Motion into Electric )  
Distribution Companies' (1) Distributed Energy )  
Resource Planning and (2) Assignment and )  
Recovery of Costs for the Interconnection of )  
Distributed Generation )

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D.P.U. 20-75

**ZERO-POINT DEVELOPMENTS RESPONSES TO THE**

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

**HO MEMORANDUM 05/07/2021**

**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.

**Response:**

National Grid's response marks a significant step forward in recognizing the system wide benefits that result from the process of enabling DER and planning for the electrification of commercial and transportation sectors in the Commonwealth. It is also important to recognize that the Commonwealth currently does not have an electrical infrastructure suited to the goals as laid out in the 2050 climate plan. The costs of replacing poles, wiring, and substation transformers that are either near or beyond their design life must be removed from the equation before any percentage of costs are allocated to DER. These replacements or upgrades would still be necessary to support the climate plan without DER.

Second, although the EDC's are working to resolve the issue, the lack of true coordination of Distribution and Transmission studies concerning solar production hours leads to the overbuilding of transmission systems and associated costs that further create a barrier to DER, and Clean Peak resources. The EDC's projection of viable interconnection cost<sup>1</sup> which we are in agreement with, would still be exceeded in existing group studies and ASO studies at the 40 percent suggested. Zero-Point Development considers the implementation of a sliding scale to limit interconnection costs based on NECEC's initial proposal<sup>2</sup> to be the best near-term solution to enabling the DER currently in que to move forward.

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<sup>1</sup> EDC-3\_ National\_Grid 4/6/2021

<sup>2</sup> NECEC 2020 Cost Allocation Proposal, at 20

**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.

**Response:**

Zero-Point intends to support the timeline proposal offered by NECEC in its response.

**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.

**Response:**

Projects already in que are required to maintain site control and permits which become more costly as time progresses. A 3-to-6-month proceeding would result in most projects moving forward. A 9-month proceeding would be project specific based on the current status of site control and permitting, assuming that the Department continues to take action regarding the extension of the “Notice Period” to respond to study results<sup>3</sup> for all projects in a Group or ASO study.

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<sup>3</sup> D.P.U. 20-75 ISA Timeline Order\_5.21.2021, at 5

Zero-Point Development thanks the Department for the opportunity to provide responses, and the care and attention the Department has shown in these important issues.

Respectfully submitted,



Zero-Point Development