



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; katie.zilgme@mass.gov

Dear Secretary Marini,

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

Request: 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.

NextGrid greatly appreciates all of the EDCs proposals, and their efforts to recognize the system wide benefits of the proposed system modifications, specifically National Grid's proposal to allocate 40% of its costs to its customers, which is a step in the right direction. 40% is a fair start, but considering the broad group of beneficiaries of these upgrades, we are still concerned with getting costs down to the \$300/kW proposed by many developers in the last responses and ask the department to revisit NECEC's cost allocation proposal. Again, if we cannot get costs down to \$300/kW, our projects will not be able to move forward in the interconnection process.

Request: 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.

NextGrid

NextGrid recognizes that the Department must conduct review of the provisional system planning proposal. **The essential part to this process that NextGrid would like to highlight is that the EDCs need to submit their provisional plan filings simultaneously with the completion of the group studies.** For the proposed overall schedule, NextGrid agrees with the detailed schedule that NECEC has provided in their filing.

Request: 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.*

NextGrid has had projects in the queue with Eversource for 1-2 years and many factors, including development expenses, landowner agreements and interconnection timelines have already greatly impacted our projects cost wise. However, we understand that there should be a comprehensive process to review the provisional plans for the future of the Massachusetts grid. The effect on our projects with these different proposed timelines would be project specific. We can accommodate some time to review these the planning proposals, but we ask the department to consider the current timelines these projects have already undergone and to not exceed 9 months.

Sincerely,



Tiffany Robicheau
Sr. Manager, Interconnection
NextGrid Inc