

**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 INITIAL COMMENTS ON THE**

**EDCS' SYSTEM PLANNING ANALYSIS PROPOSALS**

**HO MEMORANDUM 03/07/2021 AND EXTENSION NOTICE OF 04/30/2021**

**Stakeholder Engagement:**

Stakeholder engagement, and the review of the Planning Analysis Proposals in the stakeholder process, are referred to throughout the EDCs’ proposals. In general, we support and appreciate the fact that in each proposal stakeholder input has been designed into the process. There are however some clarifications that need to be made regarding the need for stakeholder engagement at all levels. Eversource states that “it is important to clarify that the Company does not support extending the system assessment and the stakeholder process to the development or review of system planning criteria.”<sup>1</sup> We certainly agree and understand the EDCs’ public service obligation to provide safe and reliable electric service in a timely fashion such that adding extensive process is undesirable. We also must understand that “traditional” processes will not result in an optimum solution. We can no longer continue to plan separately. It is not possible to guess how the system planning process and developer choices will impact each other in the rapidly changing environment we are in now. Not only will the understanding of how system planning is evolving, enable developers to make better choices. Direct feedback from developers during in the traditional system planning process will enable the EDCs’ to tailor their solutions so that we all achieve a true synergy in planning together, avoiding upgrades that do not achieve the Commonwealths goals. We would ask the department to facilitate a collaborative process to achieve this type of synergy. National Grid states that they will reach out to external stakeholders during the planning process<sup>2</sup> and engage with municipalities to determine the general willingness of specific

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<sup>1</sup> Eversource System Planning Proposal (4-23-21), at 1

<sup>2</sup> NG\_System\_Planning\_Proposal\_4-23-21, at 3

municipalities to allow or discourage DER development<sup>3</sup>. We are excited to see the inclusion of as many sources of information as possible and strongly agree with many aspects of this approach. The concern here again is the compartmentalization of data sources. Developers often discuss the planning of development efforts with municipalities before proceeding with applications to interconnect. These include a discussion of mutual benefits and concerns over development plans that result in the creation of overlay zones and other criteria that ensure a mutually respectful and beneficial relationship. A siloed discussion between EDCs' and municipalities risks not only misinforming the EDCs' planning process but may inadvertently create an impediment to DER deployment if municipalities make decisions based on misconceptions about Developers' desire to create a mutually beneficial relationship prior to having that input. We would suggest a cooperative effort to engage municipalities involving EDCs' and Developers to forecast DER development more accurately.

**Proposed Plan Costs:**

All components of the electrical grid have a defined useful life. (FERC) Account 356 (Overhead Conductors and Devices) – 55-year service life Account 362 (Station Equipment) – 45-year service life, Account 364 (Poles, Towers, and Fixtures) – 45-year service life, Account 366 (Underground Conduit) service life of 50 years<sup>4</sup>. Further, safety and reliability standards have changed over the years leaving our grid in a condition where portions longer meet current reliability standards, thus whenever a component is involved in any work other than just normal repairs the practice is to bring those component's (poles, wiring type, etc.) up to current standards. This has resulted in

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<sup>3</sup> *Id.*, at 10-11

<sup>4</sup> D.P.U. 18-150, at 295-302

interconnecting customers absorbing the cost of replacing an aged infrastructure with no separation between the cost of normal replacement and the costs attributed solely for the interconnecting customers DER (“Marginal Increase”). The department should ensure that any asset data such as Asset Health Index<sup>5</sup>, asset condition<sup>6</sup>, are used to determine the true Marginal Increase attributed to DER prior to applying cost caps or cost ratios.

Second, to provide coordination between Distribution and Transmission analysis. The EDCs’ should immediately engage with their transmission partners in the ISO Stakeholder process to ensure that use cases are developed to correctly analyze DER operating characteristics at the Transmission level.

**General Requests for Clarification:**

1). Energy Storage interconnection costs are listed in Eversource Attachment 2 at 28 as \$100/kW. Does this include all expected interconnection costs?

2). National Grid at 11. “Company will primarily solicit feedback regarding the forecasting review process from technical subject matter experts and key stakeholders” Please define “Key Stakeholders” and how they will be selected.

3). Eversource Attachment 2 at 17. “only battery resources that are under direct control of the utility are considered as NWA options”.

Please define “Direct Control” and clarify whether the battery resources must be owned by the utility.

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<sup>5</sup> Eversource System Planning Proposal (4-23-21) Attachment 2, at 3

<sup>6</sup> *Supra* note 2, at 3



Zero-Point Development thanks the EDCs' for their efforts in developing detailed planning analysis proposals and the opportunity to provide feedback, as well as the Departments lead role in this important topic.

Respectfully submitted,



Zero-Point Development