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June 8, 2021

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

Re: 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, D.P.U. 20-75.

Dear Secretary Marini:

At the conclusion of the Department of Public Utilities' (the "Department") June 3, 2021 Technical Conference, Hearing Officer Katie Zilgme invited participants to submit written reactions/comments to the final discussion topic of the day because time expired. The Massachusetts Office of the Attorney General ("AGO") submits the following comments in response to the Hearing Officer invitation.

Discussion Topic #5: What are we missing?

During the technical session, the Electric Distribution Companies (the "EDCs")¹ cited to the Commonwealth's climate goals recently enacted in An Act creating a next-generation roadmap for Massachusetts climate policy ("the Act"). St. 2021, c. 8. Yet, the EDCs have not addressed if or how the expanded authority for utility-owned solar and storage under section 77 of the Act intersects with the provisional plans. Is this type of utility development a driving factor in the proposed oversized buildout of certain substations or group study areas? To what extent will utility-owned solar limit access to the excess capacity, thereby throttling the ability of the private, competitive market from developing facilities in the very areas the EDCs deem buildable by the proposed excess capacity? The EDCs' repeated citation to the Act during the technical conference as justification for expanded ratepayer responsibility of interconnection costs is potentially muddled by their own interests. Estimates of a 40-60 percent ratepayer share

¹ The EDCs include three electric distribution companies in Massachusetts: NSTAR Electric Company d/b/a Eversource Energy ("Eversource"); Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid ("National Grid"); and Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil").

of responsibility for interconnection costs could be understated if more of the excess capacity is taken by EDC-sponsored projects rather than developer-driven projects which would otherwise contribute through a CIP. The Department should seek clarity from the EDCs on how the Act's allowance of hundreds of megawatts of new utility-owned solar intersects with the proposed provisional plans and impacts ratepayer expenses.

Thank you for the opportunity to address the final technical session agenda item. The AGO looks forward to reviewing information provided by the EDCs on these questions soon.

Sincerely,

/s/ Elizabeth Mahony

Elizabeth Mahony

Assistant Attorney General

Energy and Telecommunications Division

cc: Kate Zilgme, Hearing Officer