



June 8, 2021

Sent via email

Katie Zilgme, Hearing Officer
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 Hearing Officer Zilgme,

Longroad Energy appreciates the opportunity to provide comments in follow up to the June 3, 2021, Technical Conference in the above captioned proceeding. Due to time limitations, the Department of Public Utilities (Department) invited participants to submit written comments on the final discussion topic of the day, namely this question: ***Are there other issues or information that the Department should consider in its investigation?***

Longroad is a Boston-based developer and operator of renewable energy facilities in Massachusetts and across the United States.

We recommend the Department explore the underlying system planning assumptions that were presented at the Technical Conference. In addition to a long-term Distributed Generation (DG) forecast, Eversource discussed a new N-1 distribution planning standard for distributed energy resources – one which has not been adopted by National Grid. This new practice will significantly increase the cost and timeline impacts for DG developers and ratepayers and create barriers for projects to interconnect in the near-term which would be inconsistent with the Commonwealth's decarbonization goals.¹

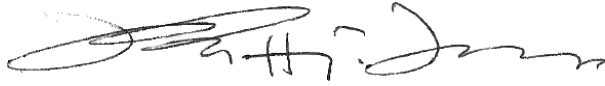
More generally, the Electric Distribution Companies' long-term planning includes load and DG forecast, which is based on historical trends, and therefore an amount of uncertainty is built into the process. The assumptions considered in the group studies include a DG forecast, which is beyond the interconnecting DG projects timeline and will likely increase cost impacts and therefore not suitable for a provisional plan. Finally, while looking to historical trends might be a reliable means of projecting future load growth, a similar reliance on historical trends of DG development to guide future DG forecasts should be further evaluated. Recent DG solar growth has slowed dramatically compared to historic trends, due to siting, program, and interconnection challenges.

¹ <https://www.mass.gov/doc/interim-clean-energy-and-climate-plan-for-2030-december-30-2020/download> (page 41)

Longroad strongly urges the Department to consider these planning standards in its investigation.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew T. Kearns". The signature is fluid and cursive, with a large initial "M" and "T".

Matthew T. Kearns
Chief Development Officer

Cc: dpu.efiling@mass.gov