

June 8, 2021

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

[dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov)  
[katie.zilgme@mass.gov](mailto:katie.zilgme@mass.gov)  
[peter.ray@mass.gov](mailto:peter.ray@mass.gov)

D.P.U. 20-75 Virtual Technical Conference, June 3, 2021

Dear Secretary Marini,

Nexamp, Inc. attended the Department of Public Utilities' (DPU) June 3, 2021 technical conference in docket 20-75. Nexamp has been an active and engaged participant throughout the process in this docket and appreciates the continued consideration given to this matter by the DPU. The June 3, 2021 technical conference afforded the EDCs, solar community, and other stakeholders the opportunity to clarify positions and statements made through proposals and comments concerning a possible provisional plan and cost allocation solution. As a reminder, docket 20-75 was established in response to concerns regarding the fairness of the cost causation principle historically utilized in the Commonwealth. Through the consideration of six initial proposals, and feedback via an initial technical session on April 30, 2020, the DPU ultimately determined in its October 22, 2020 Vote and Order Opening Investigation that, *in addition to near-term changes* [emphasis added], development of a long-term approach to cost allocation is warranted. The DPU also concluded that current strategies to alleviate the cost causer method of recovery may be insufficient in the long run in light of the Commonwealth's clean energy mandates. Nexamp agrees with these conclusions and stresses that the creation of the near-term solution is crucial to advancing the Commonwealth's clean energy goals.

The urgent need for a near-term cost allocation solution for projects currently in the queue cannot be overstated. A significant portion of Nexamp's Massachusetts solar and storage project pipeline is currently held up in National Grid and Eversource's group study processes. Significant investment has been made in all of these projects, some of which initially applied for interconnection more than four years ago. In the absence of near-term cost allocation reform that results in a fair and reasonable solution, none of those projects will be able to move forward to completion. Additionally, Nexamp will be forced to discontinue its investment in the development of future clean energy solutions in its home state of Massachusetts. Statewide, the consequence of failing to adopt a near-term solution will be significant delay, and possibly permanent hindrance, of clean energy adoption in Massachusetts.

As stated in Nexamp's May 21, 2021 Information Request responses in the docket, distributed generation plays a key role in the solutions outlined within the Commonwealth's 2050 decarbonization Roadmap. If the Commonwealth desires to move towards a resilient grid centered on deep decarbonization and variable renewable resources, correcting the outdated cost allocation method is critical to reaching that goal. The infrastructure upgrades currently being considered via the EDC group study processes provide significant



system and climate benefits to all customers and as such, the costs should be allocated accordingly. Nexamp urges the DPU to move forward with a provisional system plan process and corresponding cost allocation methodology that aligns with the proposal outlined in the NECEC/EDC/solar community joint letter submitted to the Hearing Officer on June 8, 2021.

Respectfully,

A handwritten signature in black ink that reads "Jenna Warmuth".

**Jenna Warmuth** / *she, her, hers*  
Interconnection Policy Advisor  
Phone: 218.969.5976  
Email: [jwarmuth@nexamp.com](mailto:jwarmuth@nexamp.com)