



June 8, 2021

Sent via email

Katie Zilgme, Hearing Officer  
Department of Public Utilities  
One South Station, 5th Floor  
Boston, MA 02110

**Re: Feedback to Technical Session June 3, 2021**

Dear Hearing Officer Zilgme,

Borrego appreciates the time and attention that the Department Staff and Commission have given to the investigation of a potential program. These comments intend to address the last agenda topic in the Technical Session on June 3, 2021. The Department requested that stakeholders provide written feedback on the question: **Are there other issues or information that the Department should consider in its investigation?**

System Planning assumptions:

While costs, timelines, and ratepayer risks were discussed in the technical session there are underlying system planning assumptions that are driving the need for additional infrastructure, such as additional transformers for Eversource to meet a new N-1 planning standard for Distributed Energy Resources<sup>1</sup> that should be considered. While the reliability offered by Eversource is admirable it is also unprecedented and a fundamental shift and ultimately the costs of enabling this approach and cost impacts for Group Study projects and Massachusetts ratepayers may not be palatable in the near-term. A scaled version of a provisional plan could alternatively be considered with the objectives maximizing existing available hosting capacity and identifying and implementing opportunities to enable some additional capacity by upsizing station and distribution equipment. Apportioned costs on any incremental investment would then be recovered in a Capital Improvement Project \$/kW fee. While this would result in a more conservative and near-term approach with reduced potential of enabling future Distributed Generation and electrification loads it would likely result in reduced ratepayer exposure and \$/kW fees.

Timing:

The Eversource Affected System Operator (ASO) study for Southeastern Massachusetts and the Cape is now expected to complete in August 2021. Based on the preliminary information

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<sup>1</sup> National Grid does not plan for Distributed Energy Resources to meet the same N-1 standard



contained in Eversource EDC 1-1 the forecasted upgrades amount to \$60 million.<sup>2</sup> Borrego urges swift decision making regarding the applicability and treatment of transmission upgrades in a provisional plan should one be recommended by the Department. Importantly, attrition that may occur in response to this magnitude of upgrade costs levied on individual projects would have a bearing on the make-up and completion timeframe Group Studies and therefore potentially the scope and scale of upgrades envisioned to interconnect those projects to the electric distribution system. Should the Department recommend transmission cost allocation treatment in the manner proposed by Eversource and National Grid and supported by many stakeholders there are immediate steps that Eversource can take to perform detailed engineering to support the procurement and permitting of these long-lead upgrades which would benefit from immediate action. Alternatively, should the Department not recommend the implementation of a provisional plan that includes transmission upgrades then there is little time to “course correct” before the utilities spend needless resources and time completing detailed engineering for plans that are not acceptable for the purposes of Group Study and are not warranted without Commission approval of a provisional plan.

Thank you for your consideration,

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<sup>2</sup> The upgrades identified in excel workbook Eversource-1(b) specifically identify 191 line reconductor costs of \$27 million and 140 MVAR Dynamic Reactive Device cost of \$33 million.