

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities)
On its Own Motion into Electric Distribution)
Companies' (1) Distributed Energy Resource) D.P.U. 20-75
Planning and (2) Assignment and Recovery of)
Costs for the Interconnection of Distributed)
Generation)

**WRITTEN RESPONSE TO DISCUSSION TOPIC #5 PRESENTED IN THE
D.P.U. TECHNICAL CONFERENCE OF JUNE 3RD, 2021.**

The Department of Public Utilities (“Department”) hosted a technical conference on June 3rd, 2021 to discuss the potential implementation of a provisional planning system procedure order. Due to time limitations Discussion Topic #5 was not discussed and the Department determined that written comments would be accepted by all conference participants within 3 business days.

Discussion Topic #5: What are we missing? (3:15-3:45 pm)

o The Department's straw proposal, Hearing Officer memorandums, Information Requests, and the discussion today should provide a good idea of the key issues that we are considering in the investigation into whether to establish a Provisional Program.

o Are there other issues or information that the Department should consider in its investigation?

General Statement:

Massachusetts has put in place policies intended to bring Massachusetts into compliance with desired Green House emission targets by the year 2050 and interim targets by the year 2030. Renewable energy and electrification being critical to meeting those targets. This is going to happen regardless of who pays for it. It cannot be done for free. The current implementation of “cost causation” makes “Cost Causation” a misnomer when significant portions of the electrical infrastructure need upgrades already due to its age and require significant investment to support the load growth expected to meet our climate policies. If developers cannot interconnect due to costs, then they will lose faith in Massachusetts markets. Without the developer community around to pay for part of the upgrades and renewable generation, the rate payers will absorb 100% of the costs.

Policy Corrections:

A cost allocation guideline in the provisional system plan can be used to correct mistakes in current policies. The current tariffs and group study language, group energy storage with all other DG. This is the opposite of lowering interconnections costs, improving greenhouse emissions and electrification of market sectors. For Example: If a 5MW energy storage project that is under full control of the EDC attempted to interconnect as a non-wires alternative and was followed by 4 small solar projects totaling 1MW it would be force into a group study. If the solar projects triggered a substation upgrade, the energy storage project would be forced to pay 83% of the upgrade even though it could have connected with no upgrades and does not benefit from the upgrade. The same is true if a non-EDC owned Energy Storage project attempted to connect as a Clean-Peak resource under the same scenario. This has the impact of driving away development of ESS resources that ease the burden on the infrastructure. The provisional plan could correct this while a long-term plan is developed that provides Energy storage a separate pathway to interconnection.