

June 8, 2021

Re: D.P.U. 20-75
Matthew Nelson, Chair
Department of Public Utilities
1 South Station
5th Floor
Boston, MA 02110

Dear Chair Nelson,

We write today to urge the Department of Public Utilities to adopt an interconnection cost allocation solution that would help ensure solar initiatives currently in Eversource and National Grid group studies can move forward in a fair, timely, and financially-viable fashion. An interim interconnection solution is not only necessary for solar projects currently in development, but essential to the continued growth and participation of solar energy to achieve the Commonwealth's latest statutory emissions reduction requirements and fundamental clean energy goals.

It is anticipated that without an interim interconnection cost allocation solution that is fair, timely, and financially-viable, our districts potentially stand to lose 6,800 jobs. Municipalities, many of which have already executed PILOT agreements, would go without approximately \$300,000,000 in anticipated municipal revenue at a time when it is needed most. A number of these projects are sited on small family farms that depend on solar lease revenue to exist. All of these considerations are in addition to the Commonwealth's urgent need for significant increases in clean, renewable energy in order to meet its new Net Zero by 2050 statutory emissions requirements and achieve a just transition to a clean energy future.

We appreciate that the Department's March 23 Memorandum in D.P.U. 20-75 acknowledged that while longer-term debate about the best structure for both system planning and cost allocation proceeds, an interim solution is needed for projects that will receive interconnection cost estimates in the next 1-3 years before the system plans are approved. **We strongly support this course of action and urge the Department to move forward with an interim cost allocation solution that sets a fair and financially-viable cost limit by the time the current group studies are completed in August - October 2021.**

In addition to the costs, the anticipated delays may also be prohibitive: some projects in the group studies submitted interconnection applications as long as three years ago, and may have to wait an additional five years for upgrades to be completed.

The electric distribution companies (EDCs) should identify the upgrades that require the longest lead times so that they can be advanced immediately. In addition, the Department should approve resources in a manner that ensures design and engineering can proceed uninterrupted.

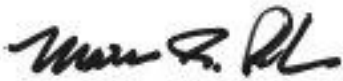
There may also be reasonable methods to allow projects to interconnect on an incremental basis while upgrades are underway. **We therefore request that the Department facilitate additional collaboration between the EDCs and the solar industry to identify alternatives that would allow projects to interconnect in more reasonable timeframes.**

Taken together, the 679 MW of solar projects involved in the Eversource and National Grid group studies represent a significant step toward achieving the Commonwealth's ambitious climate goals. It would be a regrettable and unnecessary setback to allow these projects to be canceled considering the Commonwealth's need to accelerate our progress toward economic recovery and especially our new Net Zero emissions by 2050 requirement.

The implementation of a new system planning and cost allocation framework is urgently needed, because decarbonizing our electricity sector will be impossible if individual projects must bear the burden of upgrading the grid. In addition, employing advanced technologies and study methodologies is necessary to find less infrastructure-intensive solutions, because the Commonwealth as a whole will not be able to bear the costs of decarbonization if interconnecting renewable energy routinely requires upgrades of this magnitude.

We are encouraged that the Department is actively addressing these issues, and we hope that equitable and economically reasonable solutions can be implemented in a timely manner.

Sincerely,



Senator Marc R. Pacheco

/s/

Senator Michael D. Brady

/s/

Representative Brian M. Ashe

/s/

Senator John J. Cronin

/s/

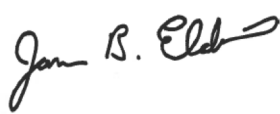
Representative Peter L. Capano

/s/

Senator Julian Cyr



Representative Antonio F.D. Cabral



Senator James B. Eldridge

/s/

Senator Michael O. Moore

/s/

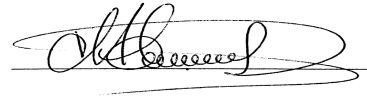
Senator Susan L. Moran

/s/

Senator Michael J. Rodrigues

/s/

Senator Walter F. Timilty



Representative Marcos A. Devers

/s/

Representative Carmine L. Gentile

/s/

Representative Christopher M. Hendricks

/s/

Representative Kathleen R. LaNantra

/s/

Representative Jack Patrick Lewis

/s/

Representative Liz Miranda

/s/

Representative Brian W. Murray

/s/

Representative Tram T. Nguyen

/s/

Representative Jacob R. Olivera

/s/

Representative Steven C. Owens

/s/

Representative Lindsay N. Sabadosa

/s/

Representative Tommy Vitolo

/s/

Representative Steven G. Xiarhos