

June 8, 2021

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

dpu.efiling@mass.gov
katie.zilgme@mass.gov

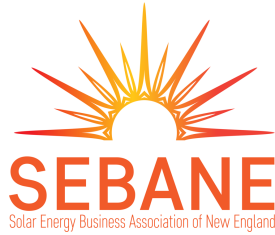
RE: D.P.U. 20-75 6/3 Technical Conference Written Comments

Dear Secretary Marini,

SEBANE encourages the Department to commit to the Provisional Planning Program. SEBANE believes that the preliminary proposals that the EDCs shared during last week's tech session will allow for economical solutions to move forward for most of the projects currently in the 16 targeted Group Studies. Although some developers may not be able to wait until the proposed system upgrades are completed, we expect that others will: (1) be willing to purchase those opportunities (queue positions) from group study developers, and/or (2) proceed with additional projects in the areas that will benefit from the proposed system upgrades. Once a reasonable cost to interconnect has been established, and the prospect of an abbreviated impact study is offered in those service areas, we believe that significant development of DER projects will respond to those critical market signals.

SEBANE requests that the Department consider opportunities to facilitate the interconnection of projects beyond the 16 Group Studies being considered for the Provisional Planning Program. There are many more projects that are facing very high interconnection upgrade costs and schedule delays that are not in one of the targeted 16 Group Studies. Often, it is because they are the project that exceeded a threshold, triggering the need for a major upgrade. Projects beforehand and subsequent projects will not have to pay such a high price because of the proposed upgrades, unfairly burdening the project in the queue. These situations can also bring subsequent projects to a halt as the developer weighs options on whether to proceed or wait on a new group study formation etc. Many developers will attempt to buy time, delaying subsequent development in the area, slowing the attainment of the Commonwealth's goals and putting subsequent projects in jeopardy.

The Long Term joint system planning proposed by the Department should make it easier for DER to find both good places to develop new facilities and to achieve an easier interconnection path, but it will not likely produce fruit for several years. Meanwhile, large project development will face more obstacles throughout the state. Some of those areas/bottlenecks would benefit from subsequent Provisional Planning approaches to resolving how to best prepare for the future and enable current DG interconnection. Others may benefit from the immediate development of long-lead-time system upgrades, like transmission projects that can take 5-7 years to complete. If we can reasonably expect to need those transmission upgrades in several years, it makes sense to consider accelerating the approval process under a similar Provisional Program.



SEBANE does not consider that the department is abandoning Cost Causation in its decision making or regulatory approach. SEBANE notes that the corollary to Cost Causation is “Beneficiary Pays.” No one through the provisional planning process proposals is suggesting that the beneficiary not pay. Instead, SEBANE thinks this more a matter of timing, planning, collaboration and risk mitigation.

In the past, when gradual load growth was normal, developing at a pace and in areas that could generally be anticipated, it may have been prudent to react to economic/building development plans when considering how to upgrade the EPS. Today, new technology adoption is moving much faster than the typical regulatory approaches to system planning can accommodate. A reactionary approach to system upgrades, which is a better way to describe the current regulatory approach, will impede the attainment of the Commonwealth’s clean energy and electrification goals. While there may be some risk to investing in system upgrades before the Department knows definitively where the development will take place, there is currently such enormous need and demand for DG development (for the next few decades), that there is little risk that interconnection capacity upgrades in areas of high development activity will not be utilized. Similarly, it is possible to currently evaluate the magnitude and timing of electrification load growth in areas to a degree that will allow the Department to feel confident in its decision making.

As solar and energy storage technology costs continue to decline, SEBANE believes that demand for solar and storage facilities will accelerate over the next decade, especially as the need for added incentives wanes. If the Department does not act now to address the urgent needs of the 16 Group Study projects, SEBANE is very concerned that the logjam will build faster and that the Department will not have developed an approach for dealing with a rapidly growing interconnection queue.

These 16 Group Studies offer an excellent opportunity to test and iterate on the analyses, exhibits and procedures required to make decisions on multi-value system upgrades. Not only will they better prepare the Department, EDCs and Stakeholders for the Long-term Joint Planning envisioned by the Department, it may also help with how to treat additional projects or Group Studies that arise between now and the finalization of the initial long-term plans. Pursuing the Provisional Plans will install confidence in the DER industry that the Department is serious about trying to alleviate the enormous strain of the current Interconnection process for larger projects. It will help to keep developers engaged in Massachusetts. It will help to reinvigorate growth in an industry that has been on the decline over the last several years. And it will help to meet the demand of the ratepayers who are seeking DG solutions and clean energy options.

SEBANE is grateful for the Departments Provisional Planning proposal and encourages the Department to pursue them as a start to a revised approach to EPS planning that considers both the benefits and the costs of all stakeholders. We are all participants. We will all benefit. We will all share fairly in the cost of achieving the Commonwealth’s goals.

Thank you for providing an opportunity to address the final agenda item from the June 3rd technical conference.

Sincerely,

Jessica Scott, Policy Advisor, Fields Associates, LLC (On behalf of SEBANE)