



June 8, 2021

Mark D. Marini, Secretary

Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Via Email: dpu.efiling@mass.gov; katie.zilgme@mass.gov

RE: D.P.U. 20-75 Comments Questions to Discussion Topic #5: What are we missing?

Dear Secretary Marini,

We appreciate the opportunity to submit comments to the last topic of discussion for the DPU Technical Conference, held on Thursday June 3, 2021. The comments and questions below adds the last topic of discussion - What Are We Missing? - which was not covered during the meeting due to a scheduling conflict.

- Discussion Topic #5: What are we missing? (3:15-3:45 pm)
 - 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.
 - Are there other issues or information that the Department should consider in its investigation?

We submit the following feedback to the Department's Information Requests:

Comments

- Provisional Program Key Required Components
 - A clear \$/kW fee structure and schedule that will enable these projects to execute an ISA. The current \$/kW structure is not feasible for these projects and does not allow for an ISA execution.
 - Allow developers to work with EDCs to overcome timing constraints and cost allocation, such as working with pre-approved contractors and/or participating more actively in the process.
- Stakeholders claim that Developers lack site control - multiple stakeholders claimed that the full extent of the upgrades will not be utilized because developers have submitted for interconnection applications but do not have site control.
 - Galehead and other developers have submitted the interconnection applications following the established guidelines for each utility service territory. Galehead guarantees that all our projects in the queue secured site control through either a Lease Option or Purchase



Option prior to submitting an interconnection application. If the utilities are concerned with the validity or feasibility of these projects, then please feel free to request proof of site control and Galehead will gladly provide evidence of such. We understand the utility's concern that these are substantial upgrade requests, but disagree with the presumption that they will not be utilized by our projects under active development.

- For example, the New York VDER program requires **Appendix H** - New York State Standardized Acknowledgement of Property Owner Consent Form - to be submitted before any interconnection application is accepted into the queue. If the same practice is implemented to the SMART program, developers would be able to confirm site control and this open question could be addressed.

Questions

- How are utilities dispatching projects in cluster studies?
 - Are all projects in a cluster and/or on a feeder turned on at the same time?
 - Doesn't the MA SMART program allow utilities to dispatch generation as needed?
 - If utilities have control over the resources, couldn't they dispatch pockets of generation in a scaled manner, so as not to overload transmission facilities?
 - If not, why not?
- Can the utilities share the data showing what the typical interconnection costs are for their areas?
- What is the standard deviation of the interconnection costs presented during the meeting? (ie proportion of outliers vs the central population for interconnection costs)
 - For what time period does the interconnection cost data represent? Is that current data for the ongoing interconnection projects in the queue or is it historical data from +1 year ago?
- Would developers be able to coordinate directly with pre-approved subcontractors to build the upgrades for interconnecting our projects, especially if this could provide advantages for schedule or a cost savings?

Sincerely,
Matt Marino

DocuSigned by:

4F8C019A71E54CA...

Matt Marino
Chief Executive Officer
617-910-8035
matt.marino@galeheaddev.com