

June 8, 2021

By E-Mail

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

Re: Re: D.P.U. 20-75 Virtual Technical Conference, June 3, 2021, Supplemental Comments

Dear Hearing Officer Zilgme:

We, the undersigned, greatly appreciate the Department of Public Utilities' (the "Department") hosting of the June 3rd virtual technical conference in Docket D.P.U. 20-75 and its ongoing consideration of a provisional system planning program for distributed energy resource ("DER") projects currently in Group Studies in National Grid's service territory.¹ Prior to the technical conference, National Grid, NECEC and representatives of the solar community worked collaboratively to find common ground and identify potential solutions to the cost barriers to interconnection in these areas. As indicated at the technical conference, these discussions focused on striking a just and reasonable balance for an effective provisional system planning program between costs appropriately allocable to all customers and developer costs, the Commonwealth's clean energy commitments, and project viability. The undersigned hope these collaborative efforts to reach agreement on topics National Grid and the solar community initially approached differently in this docket will be helpful to the Department.

The Commonwealth's clean energy and climate policy objectives as enhanced by the recent climate legislation² have led the undersigned to focus on enabling the interconnection of DG facilities in these Group Studies areas through multi-value infrastructure upgrades that will not only benefit DG developers, but also provide significant system and climate benefits to all customers. These benefits include accelerating the achievement of the Commonwealth's enhanced clean energy and climate objectives through the enablement of transportation and building electrification load growth.

To that end, the undersigned have reached conceptual agreement on the following proposed multi-value investments and cost allocations for National Grid's potential provisional plan for the Group Studies. Our proposal will benefit all customers, including by accelerating achievement of the Commonwealth's enhanced clean energy and climate objectives:

- Enabling reasonably anticipated future DER through transmission and distribution grid upgrades resulting from current Group Studies and associated transmission studies, conducted as part of the D.P.U. 20-75 provisional planning process, to create multi-value

¹ Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid ("National Grid")

² An Act Creating a Next-Generation Roadmap For Massachusetts Climate Policy (Acts of 2021, Section 8)

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opportunities that simultaneously address asset condition and reliability issues with enhanced capabilities to support increased amounts of DER.

- Socializing a proportionate share of bulk transformers and associated equipment costs to all customers based on system benefits, including load growth and electrification.
- Socializing transmission costs as explained in National Grid's presentation at the technical conference to all customers due to the need to strengthen or replace transmission infrastructure to provide overall system benefits.

The undersigned appreciate the Department's consideration of these supplemental comments.

Sincerely,

Gia Mahmoud, Vice President Future of Electric, National Grid
NECEC, Jeremy McDiarmid, Vice President, Policy & Government Affairs
Kaitlin Kelly O'Neill, Northeast Director, CCSA
SEBANE, Mark Sylvia, President
SEIA, David Gahl, Senior Director of State Policy, East
MassSolar, Mark Sandeen, President
Greg Hunt, Principal, Zero Point Development
Dan Berwick, General Manager, Development, Borrego Solar
Kelly Friend, VP, Policy and Regulatory Affairs, Nexamp
Eric Graber-Lopez, President, Bluewave Solar
Jon Mancini, Senior VP, Ameresco
Matthew Doubleday, VP Project Management, SunRaise Investments LLC
Andrew Williams, VP Corporate Affairs, Sol Systems LLC

cc: Kate S. Tohme, Esq.

DG and Clean Energy Ombudsperson