

D.P.U. 20-75 Distributed Energy Resource Planning & Cost Assignment

Technical Conference June 3, 2021



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Agenda

- Introduction (10:00-11:00am)
- Welcome Remarks from Chair Nelson
- Introduction (process and scope of technical conference)
- Department presentation (procedural background/summary of proposal
- Eversource and National Grid presentations (summary of responses to the Department's information requests)
- Department Presentation (summary of Non-EDC Participant responses to the Department's information requests)
- The Department's investigation
- Discussion topic 1: Department follow-up to Eversource and National Grid (11:00-11:30am)
- Discussion topic 2: Due Process (11:30am-12:30pm)
- Lunch (~12:30pm)
- Discussion Topic 3: Construction Timelines (1:15-2:15pm)
- Discussion Topic 4: Where is the breaking point? (2:40-3:15pm)
- Discussion Topic 5: What are we missing? (3:15-3:45pm)
- Next Steps (3:45-4:00pm)



Welcome remarks by Chair Nelson



Technical Conference Rules/Zoom Etiquette

- Muted unless called on
- Update name and organization
- Chat box:
 - <u>Do not type questions into chat box</u>
 - <u>Do</u> type name into chat box to queue for discussion when topic is announced
- Video on while speaking



Introduction: Process

- Review of Terms
 - Provisional Program
 - EDC
 - EPS
- Presentations from Department staff and the EDCs.
- Opportunity for others to contribute when group discussions begin.



Introduction: Scope

The three topics we've identified for investigation in this docket:

- (1) Whether the Department should establish a long-term system planning program to include DER planning requirements and common system modification fees;
- (2) If the Department establishes a long-term system planning program, what the EDC's system planning analysis to develop capital investment project proposals would entail; and
- (3) Whether the Department should establish a provisional system planning program to address imminent DG interconnection concerns.



Introduction: Scope

- Focusing on the Provisional Program only today
 - Given the time sensitive nature of projects being considered for inclusion in a potential Provisional Program, the focus of today's technical conference will be on discreet aspects of the Provisional Program only
 - We will continue our investigation into the possibility of long-term system planning in parallel to our investigation into a Provisional Program



Procedural Background

- What we've accomplished thus far
 - 19-55
 - Initial call for comments/information requests to the EDCs
 - Question and answer session
 - Two additional rounds of information requests
 - Consideration of a Provisional Program
 - Order addressing ISA timelines
 - Technical conference



Summary of Department Proposal

- Capital investment project selection
- Cost assignment and recovery
- Common system modification fees
 - Simplified process facilities
 - Expedited and standard process facilities



Eversource and National Grid Presentations



Summary of Stakeholder Responses

- Department's 1st Set of Discovery to Non-EDC Participants
 - The result of a provisional system planning program should be a clear \$/kW fee structure and schedule that will enable these projects to execute an ISA
 - Current cost causation methodology will result in nearly 100% of projects dropping out at the EDC-estimated costs
 - Provisional program would likely overcome these cost obstacles, but timing would remain a challenge for many projects
 - Most stakeholders suggested a 30-45 business day timeframe for the Department to review proposals filed before us



Summary of Stakeholder Responses

- Department's 2nd Set of Discovery to Non-EDC Participants
 - National Grid's proposal to allocate up to 40% of the DG interconnection costs as system benefits to all customers lacks analytical support and costs remain too high.
 - Non-EDC participants emphasize the need for a cap or a sliding scale. Some stakeholders propose for 100% allocation of transmission costs
 - Needs to be an accelerated process including the EDC's filing of the provisional planning with completion of group studies
 - Decisions to move forward are project specific:
 - Need to consider that additional legal and technical expenses to participate in the adjudicatory proceeding are a factor
 - 9-month adjudicatory proceeding is the max for project viability



The Department's investigation

- Long-term vs. provisional scope of investigation
- Whether to establish a provisional program
- Individual project review
- Construction timelines
- Pool of eligible interconnecting customers
- Balancing of interests



Discussion 1: Department follow-up to Eversource and National Grid

- With the EDCs responses to the Department's second round of information requests, Department staff have additional questions for the EDCs.
- Department staff anticipate taking the full time allotted for this discussion but, if we end early, we will open the floor to stakeholders.



Discussion 2: Due Process

- The Department may be required to conduct the reviews of EDC provisional system planning program proposals through an adjudicatory proceeding, which includes:
 - notice,
 - intervention,
 - discovery on petitioner's filing,
 - opportunity for intervenors to file direct cases, discovery on intervenors' cases,
 - opportunity to present rebuttal testimony,
 - evidentiary hearings,
 - briefs (initial and reply).



Discussion 2: Due Process

- If the Department establishes a Provisional Program what procedural steps would be necessary for the Department's review of an EDC's proposal?
- Discussion of what, when, and how long for each procedural step, and the impacts each procedural step may have on the objectives of a Provisional Program.



Lunch ~12:30-1:15pm

*Contact Katie Zilgme at Katie.Zilgme@mass.gov with any technical concerns



Discussion 3: Construction Timelines

- Summary of EDC responses regarding expected construction timelines
 - National Grid: 5 years
 - All regions have an estimated construction completion timeline of 5 years, year 2027.
 - Unitil: 2-3 years
 - Eversource: 2 to 5 years, depending on region
 - Marion-Fairhaven 2023-2024
 - Plymouth 2022-2026
 - Cape 2022-2024
 - Freetown 2022-2025
 - Dartmouth-Westport 2024-2025
 - New Bedford 2023-2026
 - Plainfield/Blandford 2022-2024



Discussion 3: Construction Timelines

- Non-EDC participant concerns/comments:
 - Certain projects cannot tolerate 3-year construction timelines others say 1 to 3-years is the maximum
 - Critical for EDCs to work with developers to identify opportunities to interconnect projects in advance of comprehensive area upgrades when possible
 - Needed certainty to align the timing of permitting and construction
 - DPU should allow the EDCs to pursue parallel and proactive system upgrades to allow for more reasonable interconnection timelines
 - Additional costs arise from long construction timelines.

Discussion 3: Construction Timelines

- EDCs to open discussion: Can construction timelines be expedited?
- Open the floor to Non-EDC participant concerns

Discussion 4: Where is the breaking point?

- Discussion of key questions in the Department's investigation—If a Provisional Program is established:
 - Will DG currently in the queue be able to interconnect?
 - Will ratepayers recoup funding of Capital Investment Projects?
 - Will a provisional program be beneficial to the Commonwealth as a whole?



Discussion 5: What are we missing?

- The Department's straw proposal, Hearing Officer memorandums, Information Requests, and the discussion today should give you a good idea of the key issues we are considering in our investigation into whether to establish a Provisional Program.
- Are there other issues or information you think the Department should consider in its investigation?



Next Steps

- Department staff to digest feedback received today
- If we decide we do not have enough information to make a recommendation regarding the Provisional Program we will reach out in the very near term for additional information.
- Once the Commission makes a decision of whether or not to move forward with a Provisional Program we will reach out to you to let you know what the decision is



Thank you!

- •DPU will contact electronic distribution list with technical conference notifications and other process updates
- •Email Katie.Zilgme@mass.gov to be added to electronic distribution list