



THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

**CHARLES D. BAKER**  
GOVERNOR

**KARYN E. POLITO**  
LIEUTENANT GOVERNOR

**KATHLEEN A. THEOHARIDES**  
SECRETARY OF ENERGY  
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION  
BOSTON, MA 02110  
(617) 305-3500

**MATTHEW H. NELSON**  
CHAIR

**ROBERT E. HAYDEN**  
COMMISSIONER

**CECILE M. FRASER**  
COMMISSIONER

July 2, 2021

VIA electronic mail ONLY

John Habib, Esq.  
Matthew Stern, Esq.  
NSTAR Electric Company d/b/a Eversource Energy  
[Jhabib@keeganwerlin.com](mailto:Jhabib@keeganwerlin.com)  
[Mstern@keeganwerlin.com](mailto:Mstern@keeganwerlin.com)

Nancy Israel, Esq.  
Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid  
[nancy.israel@nationalgrid.com](mailto:nancy.israel@nationalgrid.com)

RE: Distributed Energy Resource Planning and Cost Assignment, D.P.U. 20-75

Dear Eversource and National Grid:

Enclosed please find the Department of Public Utilities' ("Department") Third Set of Information Requests to Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid and NSTAR Electric Company d/b/a Eversource Energy in the above referenced matter. Please provide responses to the Department before 5:00 p.m. on July 19, 2021.

If you have any questions regarding this matter, please contact me at [katie.zilgme@mass.gov](mailto:katie.zilgme@mass.gov).

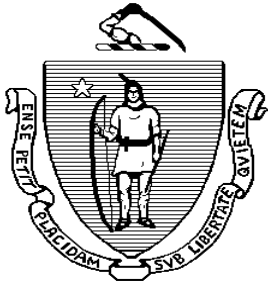
Sincerely,

/s/

Katie Zilgme  
Hearing Officer

Enc.

cc: Service List, D.P.U. 20-75



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

THIRD SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF PUBLIC UTILITIES  
TO MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC  
COMPANY EACH D/B/A NATIONAL GRID, AND NSTAR ELECTRIC COMPANY  
D/B/A EVERSOURCE ENERGY  
D.P.U. 20-75

Pursuant to 220 CMR 1.06(5)(c), the Department of Public Utilities (“Department”) submits to Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”) and NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) its Third Set of Information Requests. Responses should be submitted before 5:00 p.m. on Monday, July 19, 2021.

### Requests

EDC-3-1 **Eversource**: Refer to Eversource’s response to EDC-2-3.

- (a) Please explain how Eversource determined which electric power system (“EPS”) upgrade costs fall into the categories of (1) costs to be recovered from interconnecting customers via Capital Investment Project (“CIP”) fees (\$312 million) and (2) costs to be recovered fully from distribution customers (\$230 million).
- (b) Please describe what factors the company considered when determining whether a specific EPS upgrade should be allocated exclusively to distribution customers versus offset by CIP fees paid by interconnecting customers.

EDC-3-2 **National Grid**: Refer to National Grid’s response to EDC-1.

- (a) Please explain how National Grid arrived at the 40-60 percent figure when determining the percentage of EPS upgrade costs that should be recovered fully from distribution customers and not offset by CIP fees paid by interconnecting customers.
- (b) Please describe what factors the Company considered when determining whether a specific EPS upgrade should be allocated exclusively to

distribution customers versus offset by CIP fees paid by interconnecting customers.

EDC-3-3 **National Grid**: Refer to National Grid’s Response to EDC-1. Please provide high-level planning estimates of expected costs of transmission related EPS upgrades. Provide data in dollar-amount-per-kilowatt (“\$/kW”) and by group, where possible.

EDC-3-4 **Eversource and National Grid**: Please explain in more detail how each Company proposes to recover through a provisional system planning program (“Provisional Program”) costs of transmission related EPS upgrades from distribution customers and/or interconnecting customers.

EDC-3-5 **Eversource and National Grid**: Refer to the Massachusetts Office of the Attorney General’s June 8, 2021 comments. Please explain how the expanded authority for utility-owned solar and energy storage under section 77 of “An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy,” St. 2021, c. 8, intersects with each Company’s proposed provisional plan. Specifically:

- (a) Explain whether this type of utility development would affect planning estimates for EPS upgrades and associated costs and construction timelines for a Provisional Program.
- (b) How would utility-owned solar facilities effect access for interconnecting customers to the hosting capacity enabled by a CIP in a Provisional Program?
- (c) How would utility-owned solar facilities utilizing hosting capacity enabled by a CIP in a Provisional Program effect the benefits of that Provisional Program for distribution customers, including the share of EPS upgrade costs that are paid exclusively by distribution customers versus offset by CIP fees paid by interconnecting customers?

EDC-3-6 **Eversource and National Grid**: Refer to the Department of Energy Resources’ (“DOER”) May 21, 2021 comments at 1.

- (a) Explain whether each company’s Provisional Program proposal aims to establish a fixed percentage for all CIPs, or if the benefits of each project would be individually evaluated to determine a percentage.

- (b) If the proposal is for a fixed percentage of rate base cost share, explain whether lifespan of the asset is a factor when determining allocation of costs for the asset.

- EDC-3-7 **Eversource and National Grid**: Refer to the DOER's June 8, 2021 comments at 1-2. Explain what, if any, safeguards each company has considered in developing their Provisional Program proposals to ensure distribution customer benefits are maximized.
- EDC-3-8 **Eversource and National Grid**: Based on current trends, please describe all external contractor resource constraints that may impact distributed generation ("DG") interconnection construction timelines. Include in your response constraints related to availability of construction workers and costs of construction materials.
- EDC-3-9 **Eversource and National Grid**: Refer to EDC 3-8. Please describe any known or anticipated impacts to DG interconnection timelines and costs due to external contractor resource constraints.
- EDC-3-10 **Eversource and National Grid**: Refer to EDC 3-8. Please describe any known or anticipated impacts to timelines and costs specific to a Provisional Program due to external contractor resource constraints.

Dated: July 2, 2021