



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### MEMORANDUM

TO: Electronic Distribution List in D.P.U. 19-55

FROM: Andrew Strumfels, Hearing Officer

RE: Distributed Generation Interconnection, D.P.U. 19-55 - Next Procedural Steps

DATE: August 25, 2021

CC: Mark Marini, Secretary

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#### I. INTRODUCTION

In opening this Inquiry, the Department of Public Utilities (“Department”) announced five initial phase topics: (1) methods to manage high-volume queues for Distributed Generation (“DG”) interconnection; (2) process related to affected system operator studies conducted during DG interconnection; (3) interconnection of energy storage systems (“ESS”); (4) Timeline Enforcement Mechanism (“TEM”); and (5) interconnection process for DG facilities interconnecting to the transmission system. Later, the Department identified and investigated five additional topics: (6) metering; (7) implementation of IEEE 1547 2018; (8) state versus federal jurisdiction; (9) qualifying facilities; and (10) cost allocation. In the

wake of the identification of these topics the Department has facilitated extensive process in this docket. This memorandum sets forth the next procedural steps in D.P.U. 19-55.

## II. UPDATES

### A. IEEE 1547-2018

The Massachusetts Technical Standards Review Group (“TSRG”) continues to discuss discrete topics related to IEEE 1547-2018 identified by the Department (March 4, 2020 Hearing Officer Memorandum). On June 10, 2021, the TSRG submitted to the Department a summary of the meetings held from February 18, 2021 through May 20, 2021 by the TSRG IEEE 1547-2018 Sub Committee. This summary and its attachment are posted to the Department’s online file room in this docket. To the extent the meetings convened by the TSRG identify interconnection implementation issues more suited for Department facilitation, we will announce additional Department facilitated process. TSRG meetings are open to the public and the logistics of these meetings will be posted online.<sup>1</sup> The Department seeks to keep attendance at the meetings related to IEEE 1547-2018 at a reasonable size to allow for productive conversation and, as such, encourages only those stakeholders with specialized knowledge of this discrete issue to participate.

### B. D.P.U. 20-DG and D.P.U. 21-DG

The Department recently established the dockets D.P.U. 20-DG and D.P.U. 21-DG to provide public access to DG and clean energy related informational filings that do not

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<sup>1</sup> See <https://sites.google.com/site/massdgc/home/interconnection/technical-standards-review-group>.

otherwise have a designated docket. As such, the electric distribution companies' ("EDCs") affected system operator bimonthly reports established in this docket will now be located in D.P.U. [Year]-DG dockets. You can access D.P.U. 20-DG and D.P.U. 21-DG through the Department's online file room,

<https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber> (enter "20-DG" or "21-DG") or through the Department's Interconnection Filings and Tariffs webpage, [www.mass.gov/info-details/interconnection-filings-and-tariffs](http://www.mass.gov/info-details/interconnection-filings-and-tariffs).

In addition, the EDCs should file affected system operator bimonthly reports electronically in D.P.U. [Year]-DG dockets in accordance with the Department's filing requirements moving forward.<sup>2</sup> The EDCs are not required to submit paper filings of the affected system operator bimonthly reports.

### III. NEXT STEPS

#### A. STATE VERSUS FEDERAL JURISDICTION CONFERENCE CALL

In the Hearing Officer Memorandum issued in this docket on March 10, 2021, Hearing Officer Katie Zilgme communicated that the Department expects to issue an Order on state versus federal jurisdiction in the near term. Since that time, it has been brought to Department's attention that some stakeholders believe new or changing jurisdictional issues require the Department's attention. To ensure that all interested stakeholders have an opportunity to be heard, the Department will hold a conference call on

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<sup>2</sup> See [www.mass.gov/how-to/file-comments-or-pleadings-with-the-dpu](http://www.mass.gov/how-to/file-comments-or-pleadings-with-the-dpu).

**Thursday, September 23, 2021, beginning at 2:00 p.m.** to discuss any outstanding significant concerns regarding the topic of state versus federal jurisdiction. This call is an opportunity to discuss new concerns or concerns that require an update due to the emergence of new factual circumstances; it is not an opportunity to restate points already made through public comment in this docket. To participate in the call please enter the link, <https://zoom.us/j/97331281845> from a computer, smartphone, or tablet. The Meeting Passcode is **649654**. No prior software download is required. For audio-only access to the hearings, attendees can dial in at **(301) 715-8592** (not toll-free) and then enter the Meeting ID# **973 3128 1845** and the Meeting Passcode: **649654**.

B. TEM

In Timeline Enforcement Mechanism, D.P.U. 11-75-F (2014), the Department required, among other things, EDCs to report annually their compliance in meeting established interconnection timeframes to issue an executable Interconnection Service Agreement (“ISA”) measured from January 1 through December 31, for various interconnection tracks. D.P.U. 11-75-F at 4. The Department further established that projects in the Group Study<sup>3</sup> track would be subject to the TEM in 2022. Revisions to

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<sup>3</sup> “Group Study” means a single modified combined Impact and Detailed Study that may be performed at the same time for a Group, instead of each Interconnection Application undergoing such study separately (either sequentially or in parallel as determined by the Company). The Group Study will produce an estimate for the cost of System Modifications to the Company’s EPS within +/- 25%. The Company may elect to commence a Group Study before or after the Preceding Study, if any, is completed.

Section 3.4.1 of the Standards of Interconnection of Distributed Generation Tariff,

D.P.U. 17-164, at 13 (2020). In 2020, the Department required an additional informational filing from the EDCs with their 2020 TEM filings related to Group Studies.<sup>4</sup>

D.P.U. 17-164, at 13-14. Additionally, in this docket, the Department directed the EDCs to report the number of Pre-Application reports issued and the length of time to issue each report from the date of request. D.P.U. 19-55-D at 3, 17-18 (2020).

The EDCs filed their most recent TEM data with the Department in April of this year.<sup>5</sup> Upon review, the Department has concerns with the quality and completeness of the data provided. For example, the data include only preliminary Group Study data, and other data related to project “holds” and construction timeframes are reported inconsistently across the EDCs. Due to these concerns, the Department directs the EDCs to file interim TEM

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<sup>4</sup> Including: (1) an explanatory filing letter; (2) the number of group studies conducted; (3) the total capacity (in MW AC) for each of the group studies; (4) the total time to complete each group study; (5) the number of project applicants in each group; (6) the number of projects per group; and (7) information for each group on any and all Distribution Company directed holds, including, but not limited to (a) if and when the Distribution Companies put the group on hold; (b) the length of each hold; and (c) the reason the hold was instituted. D.P.U. 17-164, at 13-14.

<sup>5</sup> Petition of NSTAR Electric Company for approval of its 2020 Interconnection Timeline Enforcement Mechanism Report, D.P.U. 21-42, Petition (April 1, 2021); Petition of Fitchburg Gas and Electric Light Company for approval of its 2020 Interconnection Timeline Enforcement Mechanism Report, D.P.U. 21-43, Petition (April 1, 2021); and Petition of Massachusetts Electric Company and Nantucket Electric Company for approval of its 2020 Interconnection Timeline Enforcement Mechanism Report, D.P.U. 21-37, Petition (April 1, 2021).

data<sup>6</sup> six months from the date of this Memorandum, or on **February 25, 2022**. This additional data shall be an informational filing in the present docket. The Department will continue its investigation of the TEM and associated DG interconnection timeline concerns after we are in receipt of and have an opportunity to review the interim TEM data.

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Hearing Officer Andrew Strumfels at [andrew.w.strumfels@mass.gov](mailto:andrew.w.strumfels@mass.gov).

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<sup>6</sup> The interim 2021 TEM filing should include updated information for the same data requested of the 2020 TEM filing, reported consistently across the EDCs.