

February 4, 2022

By E-Filing

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: Distributed Energy Resource Planning and Assignment and Recovery of Costs for the Interconnection of Distributed Generation – D.P.U. 20-75

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid”), enclosed for filing in the above matter are National Grid’s Responses to the Department’s January 28, 2022 Information Requests. Each individual Information Request Response is submitted in a separate PDF file. In addition, all of the Information Request Responses are submitted as a single PDF file. National Grid also is filing a Motion for Protective Treatment of Confidential Information.

Thank you for your attention to this matter. Please contact me if you have any questions regarding this filing.

Sincerely,



Nancy D. Israel, Esq.

Enclosures

cc: Katie Zilgme, Hearing Officer

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Investigation by the Department of Public Utilities)	
On Its Own Motion Into Electric Distribution Companies')	
(1) Distributed Energy Resource Planning and)	D.P.U. 20-75
(2) Assignment and Recovery of Costs for the)	
Interconnection of Distributed Generation)	

**NATIONAL GRID
MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid” or the “Company”), hereby requests that the Department of Public Utilities (“Department”) grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding in accordance with G.L. c. 25, § 5D.

I. BACKGROUND

On February 4, 2022, National Grid is filing responses to the Department’s January 28, 2022 Request for Information From Electric Distribution Companies. The CONFIDENTIAL Attachment to Information Request 3 (“Confidential Document”) contains confidential information. National Grid requests that the developer names in the Confidential Document be protected from public disclosure. The developer, i.e., customer (“Customer”), name is customer-specific information that the Company treats as confidential information that only the Customer has the right to decide to disclose.

The Company has filed a redacted version of the Confidential Document with confidential information removed for the public record. The Company has provided a copy of the Confidential Document directly to the Hearing Officer, under seal, on the premise that these materials will be

held in confidence in the Department's offices and will not be distributed publicly unless the Department denies this Motion.

II. LEGAL STANDARD

Confidential information may be protected from public disclosure by the Department under G.L. c. 25, § 5D and 220 C.M.R. § 1.04(5)(e). G.L. c. 25, § 5D states in part:

[T]he [D]epartment may protect from public disclosure, trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which such protection is sought is public information and the burden shall be upon the proponent of such protection to prove the need for such protection. Where such a need has been found to exist, the [D]epartment shall protect only so much of the information as is necessary to meet such need.

This establishes the three requirements which must be met for confidential treatment to be granted. First, the information must be "trade secrets, confidential, competitively sensitive or other proprietary information." G.L. c. 25, § 5D. Second, the moving party must prove the need for confidential treatment to overcome the presumption that the information is public. Id. Third, if confidential treatment is necessary, the Department will then only protect information to the extent it meets the need for confidential treatment. Id.

To overcome the presumption that documents in the Department's possession are public record, a party must file a written motion for a protective order. 220 C.M.R. § 1.04(5)(e). The motion must include: the time period for proposed confidential treatment; the reason the information was submitted to the Department and the date; a precise description of the protected information; reasons for confidentiality and proof that an exemption from public disclosure applies; the harm of public disclosure; extent of other disclosures and status of requests for confidentiality; and a certification that the information is not customarily available in the public domain to the best of the party's knowledge. Id.

III. BASIS FOR PROTECTIVE TREATMENT OF CUSTOMER-SPECIFIC INFORMATION

The Department may protect information from public disclosure pursuant to G.L. c. 25, §5D to the extent that the information is: 1) a trade secret; 2) confidential; 3) competitively sensitive; or 4) proprietary. National Grid submits that the Customers' names in CONFIDENTIAL Attachment to Information Request 3 should be protected from public disclosure in accordance with G.L. c. 25, § 5D in that this information is confidential customer information.

The harmful impact of disclosing customer-specific information is familiar to the Department. The Department has previously recognized that customer-specific information may be protected from public disclosure because this information is “proprietary to the customer, and only the customer has the right to indicate whether his or her information should be available to anyone else or the public in general.” National Grid Quarterly Reports of Significant Interruptions for the Period 2005-2012, Hearing Officer Ruling, at 4 (Feb. 20, 2013) (citing Fitchburg Gas and Electric Light Company, D.P.U. 08-ARR-4, Hearing Officer Ruling, at 4 (Apr. 7, 2008)).

Unlike financial or competitive bidding information in which the competitive value and the harm caused by disclosure erodes over time, the harmful impact of disclosing customer-specific information does not abate or lessen within a set period of time. Therefore, the Company is not proposing a sunset provision for confidential treatment. See Motion of National Grid for Protective Treatment of Confidential Information (Dec. 8, 2020), D.P.U. 20-GC-10, Hearing Officer Stamp Grant (Jan. 22, 2021) (granting indefinite protection for customer-specific usage information, energy efficiency incentives and payments made and received, and the Customer's account number); Motion of National Grid for Protective Treatment of Confidential Information (Mar. 22, 2019), D.P.U. 19-GC-11, Hearing Officer Stamp Grant (Apr. 30, 2019) (same); Boston Gas Company d/b/a National Grid, D.P.U. 17-GC-08, Letter Order at 3 (2017); Colonial Gas Company

d/b/a National Grid, D.P.U. 17-GC-09, Letter Order at 3 (2017) (granting indefinite protection for customer-specific usage information). In the alternative, if the Department is not inclined to give protective treatment for an unlimited duration, National Grid believes it would be appropriate for protection of such information to sunset one year after the Customer ceases to be a customer of the Company. See National Grid Quarterly Reports of Significant Interruptions for the Period 2005-2012, Hearing Officer Ruling, at 4 (Feb. 20, 2013).

IV. CONCLUSION

A Customer's name is customer-specific information that the Company treats as confidential and only the Customer has the right to decide to disclose it. Accordingly, the customer-specific information should be protected from public disclosure, as requested, in accordance, with the provisions of G.L. c. 25, § 5D.

WHEREFORE, National Grid respectfully requests that the Department grant its motion for protective treatment as stated herein.

Respectfully Submitted,

**MASSACHUSETTS ELECTRIC COMPANY
and NANTUCKET ELECTRIC COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



Nancy D. Israel, Esq.
40 Sylvan Road
Waltham, MA 02451
(332) 201-1206

Dated: February 4, 2022

Information Request 1

Request:

Provide the timeline for each eligible group study identified in D.P.U. 20-75-B to reach the “Completion Date” as defined in D.P.U. 20-75-B. As part of your response, provide a detailed explanation for the determination of each “Completion Date” including why the “Completion Date” meets the requirements set forth in D.P.U. 20-75-B.

Response:

D.P.U. 20-75-B at 35 identified the following eight Central/Western MA Group Studies as eligible National Grid Group Studies:

1. Barre – Athol
2. Monson – Palmer – Longmeadow East
3. Gardner – Winchendon
4. Millbury – Grafton
5. Spencer – Rutland
6. Webster – Southbridge – Charlton
7. Ayer - Clinton
8. Shutesbury

A timeline summary for each Group Study to reach the “Completion Date” as defined in D.P.U. 20-75-B is provided in the table below:

Group Study Milestone	Barre- Athol	MPL - East	Gardne r- Winche ndon	Millbur y Grafto n	Spence r - Rutlan d	Webste r- Southb ridge- Charlto n	Ayer- Clinton	Shutes bury
Group Study Start Date	4/5/21	4/5/21	3/22/21	3/22/21	3/22/21	4/5/21	4/5/21	4/12/21
Group Study Outreach Session Dates: Discussion of preliminary results and window for customer design changes	7/15/21	7/15/21	7/15/21	7/15/21	7/16/21	7/16/21	7/15/21	12/2/21
ASO Study Start Date: (Group Study put on hold)	9/1/21	9/1/21	9/1/21	9/1/21	9/1/21	9/1/21	9/1/21	N/A

Massachusetts Electric Company
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Group Study Milestone	Barre-Athol	MPL - East	Gardner-Winchester	Millbury Grafton	Spencer - Rutland	Webster-Southbridge-Charlton	Ayer-Clinton	Shutesbury
RC Meeting: ASO Study results reviewed	6/15/22	6/15/22	6/15/22	6/15/22	6/15/22	6/15/22	6/15/22	N/A
Distribution Study Resumes (ASO hold lifted)	6/16/22	6/16/22	6/16/22	3/15/22	6/16/22	3/15/22	3/15/22	N/A
Estimated Group Study Completion Date: Per DPU 20-75-B	10/19/22	10/19/22	11/3/22	8/2/22	11/8/22	7/19/22	7/19/22	3/15/22

The “Completion Date” for each Group Study in the above table meets the requirements of D.P.U. 20-75-B because by these dates the Company expects to notify the applicable Group Study members and the Department of the results of the completed distribution Group Study and associated ASO transmission study, including the distribution system modifications required to interconnect the participants in that Group Study and the cost of those system modifications estimated at +/- 25%, and of any ASO transmission system upgrades that will be required to interconnect participants in that Group Study and charged to that Group Study, through a letter filed in D.P.U. 20-75 per D.P.U. 20-75-B at 30. The Company also plans to have an outreach session with each Group Study. Separately, the Company also will notify each Group Study member of their individual site costs to connect to their point of interconnection. As neither the ASO study nor the distribution Group Studies have been completed yet, the Completion Dates are estimated dates based on the processing times as described in Section 3.4.1 of the Standards for Interconnection of Distributed Generation, M.D.P.U. No. 1468.

Specifically, the Completion Date projections are based on the Company’s transmission provider, New England Power Company (“NEP”), completing the ASO study and submitting the proposed solutions and Proposed Plan Applications (“PPAs”) for recommended approval by the NEPOOL Reliability Committee (“RC”) at the RC meeting scheduled for June 2022, and on ISO-NE subsequently making a final determination consistent with the RC’s recommendation, and which would enable the issuance of all the associated PPAs. If any of those events do not occur or Group Study members do not provide any required information NEP needs to complete the ASO study on that schedule and/or FERC applications studied ahead of the proposed Group

Study projects and included in the base case for the associated ASO study are not completed in time and/or other FERC applications surface that will be studied ahead of the Group Study projects, NEP likely will be unable to submit the ASO study results to the June 2022 RC meeting. In that event, NEP would hope to submit the ASO study results at the July RC meeting; each month that NEP is delayed in putting the ASO study results on the RC agenda will delay all of the Completion Dates by a similar amount of time.

Information Request 2

Request:

Provide the expected timeline for submission of a CIP for each eligible group study, including a final deadline in compliance with the requirements of D.P.U. 20-75-B. As part of your response, provide a detailed explanation for the determination of each timeline including why the timeline meets the requirements set forth in D.P.U. 20-75-B.

Response:

Below are expected timelines for submission of a CIP proposal for each eligible Group Study. The Company intends to submit each such CIP proposal within 40 business days after the Completion Date for the Group Study in compliance with the timeline requirements of D.P.U. 20-75-B. The Company will make all efforts in its control to advance submission of CIP proposals, as well as to work on various CIP proposal components concurrently while the Company identifies scope, cost and construction schedules for each eligible Group Study. Where feasible, the Company may submit CIP proposals for multiple Group Studies at the same time, in separate dockets.

Group Study	Notification to Affected Interconnecting Customers: Company notifies Group Study whether Company will file a CIP proposal	Company's Estimated CIP Proposal Filing Target Date (if eligible)	Estimated CIP Proposal Final Deadline as Per D.P.U. 20-75-B (40 Business Days from notification to affected Interconnecting Customers, i.e., Group Study members)
Shutesbury	3/30/2022	5/12/2022	5/25/2022
Webster-Southbridge-Charlton	8/2/2022	9/14/2022	9/27/2022
Ayer-Clinton	8/2/2022	9/14/2022	9/27/2022
Millbury Grafton	8/16/2022	9/28/2022	10/12/2022
Barre-Athol	11/2/2022	12/16/2022	12/30/2022
MPL -East	11/2/2022	12/16/2022	12/30/2022
Gardner-Winchendon	11/18/2022	1/4/2023	1/18/2023
Spencer -Rutland	11/23/2022	1/9/2023	1/25/2023

Information Request 3

Request:

For each eligible group study identified in D.P.U. 20-75 provide a list of the facilities included in the group, identifying the developer, location of the proposed facility (city/town only), and facility size. If possible, also identify whether a facility is front-of-the-meter or behind-the-meter. Do not include any personal identifiable information.

Response:

The Company's eligible Group Studies are identified in the Response to DPU-1. Please refer to Attachment Information Request 3 for the information requested, under the separate tab for each Group Study. The Company has identified whether a facility is front-of-the-meter or behind-the-meter in column F of Attachment Information Request 3.

Information Request 4

Request:

Provide the Distribution Company’s plan for notifications to affected interconnecting customers from the date of the response to this request through the conclusion of any associated adjudicatory proceeding.

Response:

Below is the Company’s intended plan for notifications to affected interconnecting customers from the date of the response to this Request through the conclusion of any associated adjudicatory proceeding.

Notification	Timeline	Notification Plan
Progress and Challenges	Ongoing	Ongoing communications with Group Study members relating to the progress of the Group Study results as solutions evolve. In addition, challenges that require Group Study member direction and engagement will continue to be communicated.
Completion Date for Group Study	See table in Response to Information Request 1 for Completion Dates for each Group Study	Notify Group Study members of the Completion Date by copy of the letter filed with the Department as required by D.P.U. 20-75-B. This will be followed by a virtual meeting with the Group Study members shortly thereafter to review the distribution system modifications and any ASO transmission upgrades identified for the Group Study area, alternatives considered, related cost estimates, and explanations for said conclusions. The Company also will communicate its initial view as to whether it will file a CIP proposal.

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Inform Group Study Members Whether the Company Will File a CIP Proposal	10 BD after Completion Date	Written notice to Group Study members whether the Company will file a CIP proposal. If not, the Company will notify Group Study members of its determination that no EPS upgrades identified for the Group Study will be included in a CIP and will resume communications with Group Study members in accordance with the Group Study process in M.D.P.U. 1468, Section 3.4.1.
File CIP Proposal	40 BD after Completion Date	Written notice to Group Study members that the Company has filed a CIP proposal and the adjudicatory process will begin.
Final Order Issued in Adjudicatory Proceeding	After Final Order is Issued	Written notice that the Department has issued the final order and that as of that date the Company will resume communications with the Group Study members in accordance with the Group Study process in M.D.P.U. No.1468.

Information Request 5

Request:

Provide the Distribution Company's plan for engaging with the other Distribution Companies, the Office of the Attorney General, the Department of Energy Resources, and solar and energy storage stakeholders during the CIP proposal preparation process.

Response:

The Company has begun informal engagement with other entities in preparation for developing CIP proposals and is in the process of developing a more formal engagement plan. The Company is engaging with the other Distribution Companies ("EDCs") on an on-going basis to develop common approaches to the various elements of a CIP proposal.¹ The Company also has on-going engagement with participants in the Group Studies identified in the Company's Response to Information Request 1. The Company will be reaching out to the Office of the Attorney General ("AGO") and the Department of Energy Resources ("DOER") when the Company has more fully developed approaches to applicable elements of the CIP proposal preparation process to share with them and will be reaching out to the broader community of solar and energy storage stakeholders as well.

In its comments on a long-term planning process, the Company identified three steps of the planning process where the EDCs anticipate external stakeholders could provide meaningful advice and feedback: forecast assumptions, plan development and a targeted review of the recommended plan. See, e.g., National Grid Reply Comments Concerning its System Planning Analysis Proposal at 3 (June 16, 2021). The scale and complexity of developing potential CIPs within the timeframe outlined in D.P.U. 20-75-B will be challenging to achieve and as a result, the opportunities for external stakeholder engagement in the comparable steps of the CIP proposal preparation process will be more focused and limited than in a long-term planning process.

Specifically, the Company will seek input from the development community of solar and storage facilities for insights to the interest in and availability of buildable land for such facilities in each Group Study area, as well as from either the internal analytics group, or an independent contractor specializing in GIS data analysis including ground mounted solar land availability. The Company also will explore developers' interest in creating community solar projects in the Group Study areas that would benefit low-income and Environmental Justice communities in

¹ Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil"), which does not anticipate filing any CIP proposals in the Provisional System Planning Program, is participating in these EDC discussions.

those areas. In addition, the Company will preview its views and seek input from municipal officials in the Group Study areas to provide opportunity for input on the Company's views of DG and non-DG DER development in those specific communities. This input step will occur early in the process of developing the DER forecast for the particular Group Study area to further inform the Company's projection of the additional capacity on the Company's Electric Power System needed in that area for such projects.

Second, the Company will provide at least one web-based review of its DG and DER forecasting methodology and outputs that would support the desired level of capacity for both DG development and any multi-value investments that would serve future customer load, reliability, and resilience needs. This review would include AGO, DOER, municipal officials, and DG developers. Input on the methodology and outputs would then result in an iterative adjustment of the planned capacity levels if needed in the Company's discretion.

Third, during the CIP proposal development process for a particular Group Study, the Company would review with AGO and with DOER the prospective CIP Fee for that area, the amount of revenue requirement to be borne by all customers via the Reconciling Charge for each CIP, and the proposed treatment and collection of transmission related upgrade costs. The Company similarly would review such information with the Group Study members. While few major adjustments would be possible at this stage of CIP proposal development, the input would help inform the Company's approach towards the goal of achieving a high a degree of consensus on the final CIP proposals to the Department. Please see the Response to Information Request 4, which outlines the Company's plan for notifications to Group Study members.