

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.<sup>1</sup> 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

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<sup>1</sup> 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.