



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Electronic Distribution List in D.P.U. 20-75

FROM: Katie Zilgme, Hearing Officer

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

DATE: February 24, 2022

CC: Mark Marini, Secretary

I. INTRODUCTION

On October 22, 2020, the Department of Public Utilities (“Department”) opened this inquiry to investigate (1) distributed energy resource planning and (2) the associated assignment and recovery of costs related to the distributed generation (“DG”) process and infrastructure modifications needed to interconnect distributed generation to an electric distribution company’s (singularly “Distribution Company”, collectively “Distribution Companies”)¹ electric power system (“EPS”). This inquiry was opened pursuant to the Department’s ratemaking authority under G.L. c. 164, § 94 and its superintendence authority under G.L. c 164, § 76.

¹ The Distribution Companies are Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”), 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”).

On November 24, 2021, the Department issued an Order establishing a new, provisional framework for Distribution Companies' planning and for the funding of essential upgrades to the EPS to foster timely and cost-effective development and interconnection of DG ("Provisional Program"). Provisional System Planning Program, D.P.U. 20-75-B (2021). The Department established the Provisional Program while it examines possible long-term planning solutions for the interconnection of DG while ensuring a safe and reliable electric distribution system. D.P.U. 20-75-B at 1. The Department set forth eligibility criteria for the filing by each Distribution Company of capital investment project ("CIP") proposals with the Department. D.P.U. 20-75-B at 34-40. In addition, the Department set forth a timeline (a) for advance notification by a Distribution Company to the Department and Affected Group Studies² for filing a CIP proposal with the Department for an associated eligible group study and (b) for the filing date for an eligible CIP proposal. D.P.U. 20-75-B at 30-31.

On January 28, 2022, the Department sought information from the Distribution Companies in this docket concerning the timeline for CIP proposal submissions set forth in D.P.U. 20-75-B. On February 4, 2022, Eversource and National Grid filed their responses.³

² National Grid identifies the following Affected Group Studies: (1) Ayer-Clinton; (2) Barre-Athol; (3) Gardner-Winchendon; (4) Millbury-Grafton; (5) MPL-East; (6) MPL-Northwest; (7) Shutesbury; (8) Spencer-Rutland; and (9) Webster-Southbridge--Charlton (Exh. EDC-1 (National Grid) at 2-3).

Eversource identifies the following Group Studies: (1) Marion-Fairhaven; (2) Plymouth; (3) Cape Cod; (4) Freetown; (5) Dartmouth-Westport; (6) New Bedford; and (7) Plainfield-Blandford (Exh. EDC-1 (Eversource) at 2).

Provisional System Planning Program, D.P.U. 20-75-B at 26-27 n.27 (November 24, 2021).

³ The Department understands that, currently, Unitil does not have any group studies in its service territory that are eligible for the Provisional Program. As such, the January 28, 2022 requests were directed at Eversource and National Grid and Unitil was not required to file responses. For the purposes of this memorandum only, Distribution Companies refers to Eversource and National Grid.

II. DISTRIBUTION COMPANIES' PROJECTED TIMELINES

Based on information previously filed in this docket by the Distribution Companies and indicated to the Department and interconnecting customers through written updates required under the DG Interconnection Guidelines, the Department expected the first CIP filings for Affected Group Studies to be submitted earlier in 2022 than the timeframe indicated by the Distribution Companies in their February 4, 2022 responses. The Department seeks to expedite the processing of proposals submitted under the Provisional Program as much as possible; however, it can be inefficient and ineffective to impose a timeline that results in the production of incomplete, missing, or defective data and analysis. We find that, in their February 4th responses, the Distribution Companies provided reasonable explanations for the estimated Completion Dates⁴ and that, at this time, it would not benefit any party to direct the Distribution Companies to further expedite their impact study process to the detriment of thorough and complete analysis. Nevertheless, the Department is concerned with the overall timelines that the Affected Group Studies have faced and with the implications that these timelines may have on the issuance of timely decisions in the Provisional Program. General timeline processing is a policy issue that will be investigated through the Timeline Enforcement Mechanism filings and in Distributed Generation Interconnection, D.P.U. 19-55.

The Department fully expects that, based on the estimated submission dates for eligible CIP proposals, any CIP proposal submitted shall be comprehensive and the result of significant collaboration. The CIP proposal should contain the requirements set forth in D.P.U. 20-75-B, as well as additional information to facilitate an efficient adjudicatory process. Thus, for any CIP that a Distribution Company intends to submit to the Department, we urge the Distribution Company to provide opportunities for interested

⁴ Completion Date refers to the date following the completion of a distribution and transmission (if applicable) impact study for Affected Group Studies. D.P.U. 20-75-B at 30.

stakeholders to effectively inform the Distribution Company in the preparation of its CIP proposals. Distribution Companies should consider holding discussion forums and opportunities for written comments and questions from interested stakeholders. Prior stakeholder engagement and providing responses to questions within a CIP proposal can minimize the need for elongated discovery during the Department's review of any CIP proposal. These stakeholder engagement opportunities should be offered to affected interconnecting customers, and representatives from the energy storage and solar industry, the Office of the Attorney General, the Department of Energy Resources, the other Distribution Companies, and other resources that the Distribution Company finds useful.

Furthermore, Provisional Program proposals will be subject to expedited procedural schedules. The Department intends to manage the CIP proposal proceedings in an orderly and prompt manner with attention to the efficient use of time and resources. Thus, the Department encourages all interested stakeholders to collaborate in advance of the filings and to coordinate in their participation in the proceedings to avoid procedural delays and to effectively economize resources.⁵ Requests for extensions of established deadlines will face a high burden for approval.

For further information regarding this memorandum or to request addition to or removal from the electronic distribution list, please contact Katie Zilgme at katie.zilgme@mass.gov.

⁵ The Department intends to seek procedural uniformity amongst CIP proposal proceedings and urges the Distribution Companies and stakeholders to strive for uniformity of filings, where possible.