

# The Commonwealth of Massachusetts

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## DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 19-55-F

June 6, 2023

Inquiry by the Department of Public Utilities on its own Motion into Distributed Generation Interconnection.

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ORDER ESTABLISHING INTERCONNECTION IMPLEMENTATION REVIEW GROUP

## I. INTRODUCTION AND PROCEDURAL HISTORY

On May 22, 2019, the Department of Public Utilities (“Department”) opened an investigation to review the current standards and procedures by which distributed generation (“DG”) facilities are interconnected to the distribution companies’ (singularly “Distribution Company,” collectively “Distribution Companies”)<sup>1</sup> electric power system (“EPS”) under the Standards for Interconnection of Distributed Generation tariff (“DG Interconnection Tariff”). Distributed Generation Interconnection, D.P.U. 19-55, Vote and Order Opening Inquiry (2019). Since that time, the Department has conducted significant work on: affected system operator studies; management of high volume queues; issues related to qualifying facilities; interconnection of energy storage systems (“ESS”); federal versus state jurisdiction; timeline enforcement mechanism/timelines for interconnection; metering; IEEE 1547; and cost allocation. The Department has issued five Orders and three interim guidance documents, established the Department’s Guidelines for DG Interconnection, held many technical conferences and meetings, offered numerous public comment periods, and directed multiple stakeholder collaborations.

While the Department has addressed many topics in this docket to identify what changes should be implemented to ensure an efficient and effective interconnection process, we recognize that due to the complex and evolving nature of DG interconnection there are

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<sup>1</sup> 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 (“NSTAR Electric”).

more topics that may require consideration. As such, we direct establishment of a stakeholder working group to provide a forum for identification and discussion of issues related to DG Interconnection to ensure continued review of DG Interconnection standards and procedures.

## II. INTERCONNECTION IMPLEMENTATION REVIEW GROUP

### A. Background on Working Groups

On September 28, 2011, the Department opened an investigation into the interconnection of DG in Massachusetts. Interconnection of Distributed Generation, D.P.U. 11-75 (2011). On January 23, 2012, the Department convened a working group and tasked it with (1) determining what issues should be resolved regarding the current DG interconnection standards and application procedure to ensure an efficient and effective interconnection process, and (2) deliberating with the goal, to the extent possible, of reaching consensus on a resolution of those issues for Department review and approval (“DG Working Group”). Distributed Generation Interconnection, D.P.U. 11-75-A at 4, 7 (2012).

On September 14, 2012, the DG Working Group submitted its final report to the Department, “Proposed Changes to the Uniform Standards for Interconnecting Distributed Generation in Massachusetts” (“Report”). The Report contained many recommendations for changes to the DG Interconnection Tariff and additional non-tariff recommendations, including the creation of a technical standards manual and the Technical Standards Review

Group (“TSRG”).<sup>2</sup> The key function of the TSRG is to develop and propose updates and modifications to the Technical Standards Manual, which sets out common standards for DG interconnection. Report at 30 (D.P.U. 11-75, September 14, 2012).

Since its establishment, the TSRG has created the Technical Standards Manual and has met regularly to discuss common and Distribution Company-specific DG interconnection technical standards. The TSRG has provided a forum for non-Distribution Company members to provide input on DG interconnection technical standards, has been successful in addressing numerous technical issues related to DG interconnection, and has assisted the Department on technical issues when requested.

In this docket, the Department has directed and facilitated a number of collaborative processes on topics such as affected system operator studies, ESS, and metering. Similarly, in Revisions to Section 3.4.1 of the Standards For Interconnection of Distributed Generation Tariff, D.P.U. 17-164, at 2-3 (2020), the Department directed a collaborative process concerning the potential addition of a group study provision of the DG Interconnection Tariff. All of these collaborative processes have resulted in productive discussions amongst stakeholders and significantly informed Department investigations.

Furthermore, in this docket, the Department established the Energy Storage Interconnection Review Group (“ESIRG”) to undertake a coordinated examination of ESS

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<sup>2</sup> The TSRG is composed of seven members: (i) one representative from each of the four Distribution Companies; and (ii) three non-utility representatives who are engineers with electric supply systems experience with DG interconnection experience. Report at 30 (D.P.U. 11-75, September 14, 2012).

interconnection issues to inform the Department in the development of appropriate policies. D.P.U. 19-55-E at 5 (February 9, 2022). To help concentrate the ESIRG, the Department directed the Department's DG and Clean Energy Ombudsperson ("Ombudsperson") to facilitate a stakeholder collaboration to establish an ESIRG. D.P.U. 19-55-E at 8. The Ombudsperson worked with stakeholders to establish an operating construct for the ESIRG, including but not limited to, leadership, membership, interaction with the TSRG, development of a scoping document identifying issues for discussion, and a process for submittal of recommendations to the Department.<sup>3</sup> The ESIRG was established and has been operational since the spring of 2022. Based on feedback from stakeholders and members and from submissions received at the Department, we determine that the ESIRG has been successful in meeting its intended objectives.

B. Interconnection Implementation Review Group

Interconnection issues related to the implementation of DG are expected to continue to play an important role in the evolution of the EPS as the Commonwealth continues to increase its use of clean energy resources to reduce greenhouse gas emissions associated with the electric generation sector. Development of interconnection standards and operation requirements are necessary for the maximization of the value of DG for the power grid, subject to the need for safe, reliable, secure, affordable, and resilient operation of the Distribution Companies' EPS. The Department would benefit from the coordinated input of

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<sup>3</sup> While the Ombudsperson assisted in the establishment of the ESIRG, the Ombudsperson does not participate in the working group.

a broad set of stakeholders to address issues related to the implementation of the DG interconnection process.

During the past few years, the Department has directed several collaborative processes to address specific topics under investigation in D.P.U. 19-55. Through these processes and stakeholder comments in this docket, we received requests for continued collaborative processes and consideration of a more expansive process or working group to address implementation of the evolving DG interconnection process (Attorney General May 29, 2020 Comments at 1; Distribution Companies May 29, 2020 Comments at 2; DOER May 28, 2020 Comments at 1; IREC and NECEC May 29, 2020 Comments at 1-4; Attorney General March 11, 2020 Comments at 2; Distribution Companies March 11, 2020 Comments at 4; DOER March 11, 2020 Comments at 3; JESS March 11, 2020 Comments at 9-10, 28, 30).

The TSRG and the ESIRG have been successful and useful tools for the Commonwealth and the DG interconnection process. We also agree with stakeholders that it may be beneficial to have an established forum and process in Massachusetts, outside of a Department investigation, to address issues related to implementation of the DG interconnection process. Therefore, in recognition of the importance of the emerging issues surrounding the implementation of DG interconnection, we direct the Department's Ombudsperson to facilitate a stakeholder collaboration to establish an interconnection implementation review group ("IIRG"). The IIRG will work in parallel and in coordination with the TSRG.

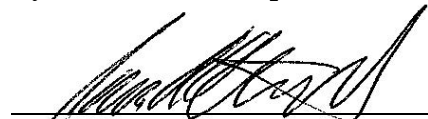
The Ombudsperson shall work with interested stakeholders<sup>4</sup> to consider an operating construct for the IIRG, including but not limited to, leadership, membership, interaction with the TSRG and ESIRG, development of a scoping document identifying initial issues for discussion, and process for submittal of recommendations to the Department.

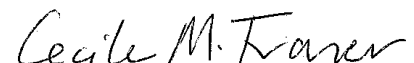
III. ORDER

Accordingly, after due consideration it is

ORDERED: That an Interconnection Implementation Review Group be and hereby is established as outlined herein.

By Order of the Department,

  
James M. Van Nostrand, Chair

  
Cecile M. Fraser, Commissioner

  
Staci Rubin, Commissioner

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<sup>4</sup> The Ombudsperson shall offer participation in the IIRG to the Distribution Companies, DOER, the Attorney General, entities on the Department's DG Stakeholder Electronic Distribution List, and other entities that the Ombudsperson considers would make beneficial contributions to the IIRG.