

KEEGAN WERLIN LLP

ATTORNEYS AT LAW
265 FRANKLIN STREET
BOSTON, MASSACHUSETTS 02110-3113

(617) 951-1400

TELECOPIERS:
(617) 951-1354
(617) 951-0586

September 30, 2014

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

Re: Investigation Into Distributed Generation Interconnection – D.P.U. 11-75-F
Compliance Filing with Group Study Proposal/Clean-Up Edits

Dear Secretary Marini:

On July 31, 2014, the Department of Public Utilities (the “Department”) issued an order in D.P.U. 11-75-F approving a Timeline Enforcement Mechanism (“TEM”) developed by Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid, NSTAR Electric Company, Western Massachusetts Electric Company and Fitchburg Gas and Electric Light Company, d/b/a Unitil (together, the “Companies”), the Massachusetts Department of Energy Resources (the “DOER”) and non-utility members of the Department’s D.P.U. 11-75 Distributed Generation Working Group (“DGWG”). The TEM is designed to measure each distribution company’s performance in meeting interconnection timelines established in each Company’s respective Standards for Interconnection of Distributed Generation tariff (“Interconnection Tariff”). Thereafter, the Department approved a Motion submitted by the Companies requesting an extension of time until September 30, 2014 to file revisions to each Company’s Interconnection Tariff, in compliance with D.P.U. 11-75-F (the “Motion”).¹ The Motion also included a statement of the Companies’ intent to seek approval of additional language developed by the members of the DGWG subsequent to the Department’s previous order issued in D.P.U. 11-75-E, addressing: (1) Group Studies; and (2) various clarifying provisions.

Pursuant to the Department’s D.P.U. 11-75-F Order (as clarified on September 12, 2014) and the Companies’ statement of intent included in the Motion, the Companies have provided herewith clean and redlined versions of a pro-forma revised Interconnection Tariff, for the Department’s review and approval (see Attachments A and B, respectively).² The proposed revisions to the Interconnection Tariff are described below.

¹ In the interim, the Companies submitted a Motion for Clarification and/or Reconsideration regarding the TEM, which the Department approved on September 12, 2014.

² For ease of review, the Companies have attached clean and redlined versions of a single pro-forma Interconnection Tariff, rather than four Company-specific versions of the document. Please note that some formatting issues that appear in redline in Attachment B have been fixed in the clean version of the Interconnection Tariff presented as Attachment A. The Companies will ultimately submit to the Department Company-specific Interconnection Tariffs at the conclusion of the Department’s review of the attached pro-forma document.

► **D.P.U. 11-75-F Compliance Items**

The attached pro-forma Interconnection Tariff includes revisions in Section 9.0 reflecting the Department's decision in D.P.U. 11-75-F to make permanent the role of Ombudsperson to facilitate the resolution of disputes between the Companies and distributed generation applicants (see proposed Section 9.1(b) and revisions to Section 9.2). In addition, the attached pro-forma Interconnection Tariff includes revisions in Screen A (penetration test) to increase the minimum load screen to 100%.

► **DGWG Additional Tariff Revisions**

On November 14, 2013, the DGWG held its last meeting. At that meeting, and during the following several weeks, members of the DGWG continued their collaboration on various proposals that were not finalized prior to the end of the group's pre-determined meeting schedule. The results of this collaboration are addressed below.

● **Group Study Proposal**

Participating members of the DGWG discussed a proposal governing Group Studies of multiple applications for distributed generation interconnection. An agreement has been reached regarding the proposal, and its provisions have been incorporated into Attachments A and B. A Group Study is defined in the Interconnection Tariff as a modified Impact Study that is performed for a Group of applications whenever two or more applications are awaiting completion of a Preceding Study within a Common Study Area.³ The procedure to be followed by the Companies and applicants for applications that trigger the Group Study process is found in the pro-forma Interconnection Tariff in Section 3.4.1. The Group Study process is proposed to be in effect for a one year trial period.

● **Additional Substantive Revisions**

In addition to finalizing the Group Study proposal, participants discussed four further substantive revisions to the Interconnection Tariff, as noted below:

- (1) Section 3.6.2 (On-Going Interconnection Customer Time Frame Compliance) - revisions to this section are being proposed to set a specific time frame for the execution of study agreements, as opposed to the unclear calculation of time frame that presently exists. This change provides necessary clarification for both the Companies and their customers and will lead to consistency in interpretation.
- (2) Section 3.9 (Application Fee Refund) – revisions to this section are being proposed to align with the TEM;
- (3) Exhibits E, F and G (Final Accounting) – revisions to the Final Accounting provisions of the Impact Study, Detailed Study and Interconnection Service

³ The capitalized terms in the definition of the phrase “Group Study” are also defined in the tariff.

Agreement (“ISA”) pro-forma documents are being proposed to clarify that an applicant has 120 Business Days after completion of the construction and installation of System Modifications to seek a Final Accounting associated with these phases of the interconnection process, and the Companies have 120 Business Days to complete the Final Accounting process once requested by an applicant;

- (4) Exhibit G, Attachment 6 (Landowner Agreement) – the addition of a Landowner Agreement to the ISA is being proposed to provide the Companies with assurance that the installation of a distributed generation facility by the Interconnecting Customer on the Property has been approved by the Landowner.

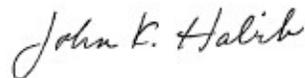
- **Clean-Up Edits**

The DGWG also discussed at its November 14, 2013 meeting and, through the DOER, continued to work together on non-substantive revisions to the remainder of the Interconnection Tariff. These non-substantive revisions are intended to clean up language that the DGWG agreed lacked clarity and has caused confusion for both the Companies and applicants since the Department’s approval of the current Interconnection Tariff on May 1, 2013. The non-substantive revisions proposed are noted throughout Attachment B and are accompanied by comments describing the nature of the proposed revision.

I am authorized to state that Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, NSTAR Electric Company, Fitchburg Gas and Electric Light Company, d/b/a Unitil, Western Massachusetts Electric Company, and the DOER support the proposed revisions to the Interconnection Tariff. In addition, I am authorized by the DOER to state that the DOER has provided the revised Interconnection Tariff (both in full as attached herewith, and in various stages of development since the last meeting of the DGWG in November 14, 2013) to members of the DG development community, including members of the DGWG, and did not receive substantive feedback.

Please contact me at (617) 951-1400, Liana Moore at (508) 725-5627 or Elizabeth Mahony at (617) 626-7323 if you have any questions.

Very truly yours,



John K. Habib

cc: Mike Wallerstein, Esq., Hearing Officer
Service List (by e-mail only)