

Interconnection Implementation Review Group

October 12, 2023



Agenda

- 1:00-1:05 Co-Chair Welcome**
- 1:05-1:15 DG Interconnection Background**
- 1:05-1:30 Group Expectations and Overview**
 - Scope
 - Membership & Group Makeup
 - Leadership
 - Operating Procedures
- 1:30-2:00 Substantive Topics**
 - Topic list
 - Prioritization
 - Meeting/Timing Expectations
- Substantive Topic Discussion: Topic #1 - Simplified Process Revision**
- 2:00-2:15 Frame the Topic**
 - Issue definition
 - Specific ask of the Group
 - Expected output from Group
- 2:15-2:45 Discussion**
- 2:45-2:55 Next Steps and Estimated Timeframe**
- 2:55-3:00 Close Out**
 1. Set date for next meeting
 2. Final comments

MA DG Interconnection Policy Background

- **D.P.U. 11-75** → On September 28, 2011, the DPU opened an investigation into the interconnection of DG in Massachusetts, D.P.U. 11-75.
 - This investigation reviewed the existing DG interconnection standards and application procedure to determine what changes should be implemented to ensure an efficient and effective interconnection process and established the Model DG Interconnection Tariff
 - Department convened a DG working group that submitted a report on “Proposed Changes to the Uniform Standards for Interconnecting Distributed Generation in Massachusetts”
 - The report made recommendations for changes to the DG Interconnection Tariff and additional recommendations that did not fall squarely within the Tariff (i.e. Ombudsperson, TSRG, TEM)
 - Following a technical conference and comment period, the Department approved many of the working group’s proposals
- **DP.U. 17-164** → On April 8, 2020, DPU approved a group study provision as a permanent provision in DG Interconnection Tariff
- **D.P.U. 19-55** → On May 22, 2019, the DPU opened an investigation into the interconnection of DG in Massachusetts, specifying 5 initial topics
- **D.P.U. 20-75** → On October 22, 2022, DPU opened an investigation into DER planning and assignment and recovery of costs for the interconnection of DG
- **Provisional Program** → On November 24, 2021, Department established the Provisional Program. Eleven CIPs have been submitted and docketed (<https://www.mass.gov/guides/provisional-system-planning-program-guide>)

2022 Clean Energy Act- ESMP/GMAC

- **August 2022 → Legislature enacts An Act Driving Clean Energy and Offshore Wind, St. 2022, c. 179 (the “Act”). The Act establishes a new process and requirements for long-term electric system planning. Specifically, each EDC must develop an electric sector modernization plan (“ESMP”).**
 - The process established by the Act effectively establishes a statutory, long-term system planning requirement for enabling DER development to increase timely adoption of renewable energy and distributed energy resources.
 - Act establishes a [Grid Modernization Advisory Council](#) (“GMAC”).
- **September 12, 2022 → DPU finds that its continued investigation of a LTSP in is moot, suspends its investigation and closes D.P.U. 20-75 (D.P.U. 20-75-C).**
 - Urges EDCs to consider the concerns and proposals raised throughout D.P.U. 20-75 as they develop their ESMP.
- **September 1, 2023 → EDC’s submit draft ESMPs to GMAC**
- **January 2024 → EDC’s must file ESMPs with DPU**
- **August 2024 → DPU to issue guidance**

DG Interconnection Working Group Background

- **DPU 11-75 DG Working Group** (No longer in existence)
 - Directed by DPU in 2012 through [DPU 11-75-A](#)
 - Proposed recommendations, later approved, including model DG Interconnection Tariff, Timeline Enforcement Mechanism, Dispute Resolution/Interconnection Ombudsperson
- **Technical Standards Review Group (TSRG)**
 - Establishment approved in 2013 through [DPU 11-75-E](#)
 - <https://www.mass.gov/info-details/massachusetts-technical-standards-review-group>
- **Energy Storage Interconnection Review Group (ESIRG)**
 - Established in 2022 through [DPU 19-55-E](#)
 - <https://gridforce.my.site.com/s/article/Energy-Storage-Interconnection-Review-Group>
 - Has addressed 3 substantive topics
 - Consideration of transformation to subcommittee of IIRG
- **Interconnection Implementation Review Group (IIRG)**
 - Established in 2023 through DPU [19-55-F](#)
 - <https://gridforce.my.site.com/s/article/Interconnection-Implementation-Review-Group>

DPU DG Interconnection Dockets and Orders Issued

- <https://www.mass.gov/info-details/interconnection-filings-and-tariffs>
- **D.P.U. 11-75**, [Orders A-G](#)
 - Established model tariff, TEM, ombudsperson, etc.
- **D.P.U. 17-164**
 - [D.P.U. 17-164](#), Establishing Group Study
 - [D.P.U. 17-164-A](#), Preceding Studies
- **D.P.U. 19-55**
 - [D.P.U. 19-55](#), Vote and Order Opening Investigation
 - [D.P.U. 19-55-A](#), Ombudsperson Role
 - [D.P.U. 19-55-B](#), Interim Guidance for Interconnection of QFs
 - [D.P.U. 19-55-C](#), Affected System Operator Studies
 - [D.P.U. 19-55-D](#), Management of High-Volume Queues
 - [D.P.U. 19-55-E](#), Establishment of ESIRG
 - [D.P.U. 19-55-F](#), Establishment of IIRG
- **D.P.U. 20-75**
 - [D.P.U. 20-75](#), Vote and Order Opening Investigation
 - [Att. A, Straw Proposal/Department Methodology](#)
 - [D.P.U. 20-75-A](#), ISA Timelines
 - [D.P.U. 20-75-B](#), Provisional System Planning Program
 - [D.P.U. 20-75-C](#), Suspending LTSP Investigation
- **Provisional Program**
 - [D.P.U. 22-47](#), Approving Marion-Fairhaven CIP
 - <https://www.mass.gov/guides/provisional-system-planning-program-guide>

Administrative Items

- Refer to IIRG Website for all information related to the group
<https://ngus.force.com/s/article/Energy-Storage-Interconnection-Review-Group>
 - Membership listing
 - Charter
 - Substantive topics
 - Past Meeting Notes
 - Upcoming meeting info and registration link
- Topic List & Summaries
 - Available on website, direct links to summaries to be added here when available
- Other Relevant Groups
 - [TSRG](#)
 - [ESIRG](#)

Group Expectations Overview

- Discuss topics related to DG Interconnection processes under DPU control
- Group will operate independently, advising DPU of outcomes/recommendations
- Each substantive topic will have minimum of:
 - 2 meetings
 - 1 written exchange
 - Result in recommendations write up to DPU
- Meeting frequency will be determined by the group based on topics – typically monthly cadence
- Membership
 - 14 voting members representing industry, utilities, AGO, and DOER
 - 4 non-voting members on advisory panel
 - Non-member participation through advisory panel or members
- Substantive topic list
 - May be added or amended by group
 - Prioritization to be determined by Co-Chairs

Group Expectations Overview (cont.)

- Materials will be disseminated prior to each meeting
 - Website is being set up for materials posting, similar to TSRG and ESIRG
- Providing input
 - Primarily work through a member or advisory board member
 - For other thoughts/concerns, please email MassCEC and/or NECEC
 - Members to aggregate all comments from non-members and provide comment at meetings
- Purely technical topics will be deferred to the TSRG when appropriate and agreed by members
 - TSRG will be kept advised of any non-technical topics for visibility
 - Technical topics that overlap policy may be discussed at IIRG, however decision and/or deep dive into technical topics will be deferred to TSRG

Membership & Advisory Panel List

Last	First	Email	Affiliation	Organization	Member Status
Tohme	Kate	ktohme@newleafenergy.com	Developer	New Leaf Energy	Member (Co-Chair)
Porcaro	Michael	michael.porcaro@nationalgrid.com	EDC	National Grid	Member (Co-Chair)
Bonazoli	John	bonazoli@unitil.com	EDC	Unitil	Member
Walker	Gerhard	gerhard.walker@eversource.com	EDC	Eversource	Member
Sprague	Kevin	Sprague@unitil.com	EDC	Unitil	Member
Iqbal	Shakir	SHAKIR.IQBAL@EVERSOURCE.COM	EDC	Eversource	Member
Kern	William	william.kern@nationalgrid.com	EDC	National Grid	Member
Feeley Karp	Courtney	cfeeleykarp@klavenslawgroup.com	Attorney	Klavens Law Group, P.C.	Member
Mello Guimaraes	Daniel	daniel@bostonsolar.us	Developer	Boston Solar	Member
Ravi	Kavita	kravi@bluewave.energy	Developer	BlueWave Solar	Member
Hickok	Andrew	ahickok@solect.com	Developer	Solect Energy	Member
Aney	Russ	RussA@parallelproducts.com	Developer	Parallel Products	Member
Bingham	Gerry	gerry.bingham@mass.gov	Govt	DOER	Member
Modlish	Chris	Chris.Modlish@mass.gov	Govt	AGO	Member
Smith	Doug	DLSmith@iso-ne.com	ISO	ISO New England	Advisory Panel
Snyder	Tim	tsnyder@necec.org	Advocate	NECEC	Advisory Panel
Stanfield	Sky	stanfield@smwlaw.com	Advocate	Interstate Renewable Energy Council	Advisory Panel
Cullinan	Sarah	scullinan@masscec.com	Advocate	MassCEC	Advisory Panel

Full distribution list available on IIRG website [here](#)

*To request addition to the distribution list email

Michael.Porcaro@nationalgrid.com and ktohme@newleafenergy.com

Operating Procedures

- Group [charter](#) available on IIRG homepage
- Participation
 - Core members and advisory panel expected to attend each meeting or send delegate
 - If exiting the group, replacement shall be provided to the Co-Chairs for discussion at next regularly scheduled group meeting
- Conduct
 - All members expected to actively participate in all meetings and written discussions
 - Lack of participation may result in replacement
 - Non-members are encouraged to attend and participate in meetings, however will not have voting rights
 - Professional debate encouraged toward “good faith” discussions
 - Responsibility of each attendee to keep their respective organization informed of group activities
 - No member or attendee, other than the Co-Chairs, shall speak on behalf of the group
- Any group action is subject to a vote by the Members
 - Responsibility of group members to coordinate with their represented group as needed prior to vote

Substantive Topic Procedures

- Substantive topic list to be agreed upon by membership for general topic definition and prioritization
 - Upon completion of one topic, the topic list will be brought up for review in order to determine prioritization of next topic
 - Suggestion of topics encouraged from anyone (non-members included)
 - New topics must be submitted to the Co-Chairs to be included on the agenda for presentation at the next regularly scheduled group meeting.
- Topic duration is targeted at ~3 months – approx. 3-4 meetings and 2-3 written communications
 - Co-Chairs to advise DPU of each topic being pursued, and approximate timeline
 - Group definition of topic and focus at start of each topic
 - Maintain outcome focused discussions
 - Open to creative ideas for productive process within designated timeline
- Upon topic completion, a summary will be provided to the DPU – example on next slide
 - Process for submittals to the DPU was provided in the Ombudsperson recommendations. Summary template follows Ombudsperson recommendation.
 - Members will have an opportunity to review summary in advance of submittal to DPU.

Substantive Topic Summary - *Example*

General:

The IIRG has conducted all work possible on the specific substantive topic described in this submission. This written narrative summarizes the subject substantive topic including a description of group activity on the topic, group recommendations, and requested procedural guidance by the Department, if any.

There is some consensus on this topic and some disagreement for which the IIRG does not believe it can make any additional progress without Department intervention.

Definition

Brief description of topic discussed, noting any deviations from the original description provided to the DPU at the topic outset.

Group Activity:

The group met for three (3) virtual sessions to discuss the subject topic. The following is a summary of the general discussion topics:

- Bullet point summary of major discussion elements

Group Consensus:

The following identifies topic resolution, including materials and output from the group to address the subject topic. Group consensus denotes that the items has been reviewed with the IIRG membership as a whole and no objections were expressed:

1. Brief description of consensus items and any agreed upon follow up

Non-Consensus Items:

The following identifies non-consensus items, which have been reviewed with the IIRG membership as a whole with a difference of opinion. For each of the below, the topic is identified, with an accompanying position from IIRT membership on the differing opinions:

1. INSERT ITEM DESCRIPTION HERE, FOLLOWED BY EACH REPRESENTED GROUP'S POSITION:
 - a. **EDC Position:**
 - b. **Industry Position:**
 - c. **DOER Position:**
 - d. **AGO Position:**

Requested DPU Action:

INSERT REQUESTED ACTIONS, IF ANY.

Substantive Topics – *Preliminary list for discussion*

Priority	Topic Title	Topic Description
1	Simplified Process Revision	Revisions to the simplified process, including those previously discussed at the TSRG
2	Distribution System Impact Studies	Distribution impact study timelines and costs; including implementation of approved CIPs and streamlining of impact studies for enabled DG applicants
3	System Modification Costs	Utilizing technological innovations to lower infrastructure upgrade costs
4	Increase Transparency	Optimizing and making the interconnection process more predictable, including improving overall communication and information sharing between utilities, local AHJs and solar companies
5	Expedited Process Revision	Revisions to the expedited process, focusing on screening, study requirements and expedited process eligibility
6	Hosting Capacity Maps	Revising hosting capacity map requirements to include queue information
7	TSRG-IIRG Alignment	Aligning TSRG and IIRG operating procedures
8	Area Networks	Discuss processes and approaches to increase opportunity for DER penetration in downtown area networks

Substantive Topic #1: Simplified Process Revision

Daniel Mello Guimaraes
Presentation next meeting

[IIRG Homepage Link](#)

Issue Definition:

Revisions to the simplified process, including those previously discussed at the TSRG.

Specific Group Ask:

- Screening criteria update; includes elimination of screen #2, 15%
- Export definitions and export capacity considerations; UL1741 CRD power control systems as a means of regulating export
- Increased capacity size to qualify for Simplified to 60kW (25kW export single phase, 50kW nameplate; 60kW export 3 phase, 120kW nameplate); consider queue implications to other projects
- Planning process for EDCs to perform a study when substantial aggregate simplified have connected (using **simplified study rate**); simplified study rate would cover moderate system modifications and be used toward the EDC aggregate studies as needed
- Shared **common system modification** fee 20-75 (which has been closed per 20-75C, deferred to ESMP process)
 - Procedural question for the DPU – for green and yellow
- Consider incorporation of ESS into simplified system designs
- Consider timelines for screening review
- Closeout procedures; stand alone-interconnection considerations;
- Better alignment across companies on single parcel rule