



March 20, 2020

Mark D. Marini, Secretary
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D.P.U. 19-55

Pope Energy Comment Letter – High Volume Interconnection Queues
Submitted by Doug Pope, President

Dear Secretary Marini:

We appreciate the Department of Public Utilities exploring the use of working group sessions to engage developers, utilities and public policy stakeholders in deliberative discussions of how to facilitate installation of increasing levels of solar PV and energy storage to achieve GWSA goals in Massachusetts. In a typical adjudicated proceeding, our participation, if allowed as an intervener, would be difficult if not prohibitively expensive, and if through an industry association, diffused. We very much appreciate this working group format.

ISA In-Series Application - A Case Study:

Despite the often-public statements of a more progressive policy of Eversource towards renewables, the old policy of reviewing solar projects in series in the interconnection study process continues, even after working group discussions in DPU 19-55.

On or about August 14, 2018, SRE Energy filed a Standard Application to interconnect a 1 MW AC, 1.391 MW DC solar PV system at 4 Wildberry Way, Westport, MA, 02790. SRE was informed that there were 4-5 projects ahead of the 1 MW project on Wildberry Way in the Impact Study queue and that the process could take 1.5 to 2 years to process the Impact Study, as Eversource was handling Impact Studies in series, as opposed to in aggregate or in a parallel process as is the practice with other utilities. Pope Energy is the originator of the project and the local developer on behalf of SRE Energy.

A Distributed Generation professional from Distributed Generation at Eversource has been working with an experienced Project Developer from SRE Energy relative as to the queue position status of this project. As of approximately two months ago, this project is third in the queue behind a 4.5 MW and a 2 MW project respectively. While the 1 MW Westport project does not require a transmission study, those projects ahead of this project do require transmission studies and, as Eversource policy dictates, the Wildberry Way project will not get started until the other projects have been studied in conjunction with the transmission study which will not be complete until December of 2020.



Eversource will study these projects in series and, if complete, hold the ISAs until the transmission study is complete.

As stated at the DPU 19-55 working session, I believe that the position of Eversource to conduct interconnection applications in series is against public policy. This is contrasted with Unitil and National Grid, who have approached developers as customers. Unitil has been a pleasure to do business with, as has National Grid, albeit they have had problems with growth and integrating solar into their system. To be clear, those management decisions and attendant growth pains have caused great financial risk to developers, but the use of economic power or “leverage” was never part of the problem.

Legislators, regulators at both DOER and the D.P.U. have often observed available capacity in both net metering and SMART in Eversource territory as evidence that there is ample capacity left in the solar programs. However, in the SMART program, due to the in-series, ISA study policy of Eversource, developers are unable to access that available capacity. As former Assistant Attorney General of Massachusetts, John Roddy has been known to say, “If it seems unfair, seems unjust, it is probably illegal.”

In Stat. 2016 c. 75 (11), the legislature directed DOER to “develop a statewide incentive program to encourage the continued development of solar renewable energy generating resources by residential, commercial, governmental and industrial electricity customers throughout the commonwealth.”

Does it seem reasonable to have a solar program seeking to encourage solar investment within Massachusetts and have those investors wait for two years or greater to know if those investments are financially feasible? Does it seem reasonable for landowners, farmers, corporations, non-profits and public entities to have a solar developer approach them for a solar project, a land or roof lease, a parking lot canopy project or a behind-the-meter application and have to wait two years and expect that proposal to be credible? Is this what was intended by Stat. 2016 c. 75 (11), by all the revisions to the Green Communities Act, by *Kain vs. MassDEP*?

In both the 19-55 working group sessions and for years at D.P.U. hearings, Eversource, in contrast to the other EDC’s has been “requesting direction from D.P.U.”

The direction from D.P.U. in guidance documents and eventual litigation of the 19-55 tariff, as well as within the Grid Mod and rate setting proceedings, should set clear program parameters for the EDCs and never let this kind of “leverage” currently exercised by Eversource intentionally delay the implementation of state policy.

This includes the D.P.U. setting performance standards in both guidance, tariffs and baseline assumptions at the TSRG. If ISO-NE accepts 2 minutes or 30 seconds as response times in certain equipment currently, then those are the timeframes that should form the basis for baseline assumptions. Yes, it may be advantageous for the grid to have different timeframes in the future. But the EDCs should not have the ability to unilaterally cause delay by adopting unreasonable standards through a process where “the Utilities have the final decision” within the TSRG.

Planning Interconnections for Solar and Other DER Through 2030

At the working session, I inquired if the transmission studies being conducted by each respective utility were studying a static condition, just those whose applications have been received, or greater interconnection requirements based upon legislation, court cases and regulations already in place. The answer from all of the utilities was a static condition, just those applications received.

At some point the D.P.U., DOER, and DEP, together as departments under EOEEA, need to internalize the obligations, including both the cost and the benefits of achieving net zero energy emissions by 2050. It would appear that the 2050 Roadmap process currently under consideration by EOEEA is perhaps the start of this process.

The 2020 Regional Electricity Outlook report by ISO-NE has been the most dynamic report of its kind from this organization, describing the transition to renewables by the New England states. True to form, ISO-NE does not forecast DER penetrations beyond contracted or publicly stated programs. ISO-NE looks to the states to determine the amount of DER that is to be installed to meet that state's renewable energy goals.

Why would the EDCs only be studying the static condition of existing interconnection applications when the SMART program is going to be expanded by some number and the compliance obligations are well above even that number? Will the Boston area, let's call it the 128 Transmission System Upgrade RFP due March 4, 2020, be conducted to build to static conditions? Are large amounts of solar DG together with the "electrification of everything"¹ going to be coordinated with wind transmission lines pushing north and west?

To assist in long-term system planning, D.P.U. 19-55 should be about setting targets to be interconnected each year and tying those targets to rate based ROI returns for the EDCs. The policy of restricting EDC responsibility to install DERs as percentage of load should be discontinued. With DER generation being pushed up onto transmission and with the "electrification of everything," the cost of DER generation should be leveled across all ratepayers. Without long-term system and interconnection planning, the deployment of DERs will continue to be choppy, poorly coordinated between regulatory departments and will not be made in the best interest of having net-zero emissions by 2050.

The Brattle Group, in their [Achieving 80% GHG Reduction in New England by 2050](#) September 2019 report, indicated that "between 2019 and 2050 between 3.5 GW and 6.6 GW of renewable capacity, including 2-5 GW of solar and 2-3 GW of wind, will need to be added each year on average" to meet the targets New England has for itself. Since Massachusetts consumes approximately 45% of ISO-NE load, that would equal 0.9 -2.5 GW of solar and 0.9 – 1.35 GW of wind per year from 2019 until 2050.

¹ 2020 Regional Electricity Outlook Report, ISO-NE, Page 35

19-55 Interconnection – Guidance

In the interim, the D.P.U. needs to instruct all EDCs to conduct aggregated, group interconnection applications and Impact Studies for solar and solar + storage projects with all haste. No in-series review of solar projects is allowed. No solar or solar + storage project should take more than 55 business days, and under no circumstance should the entire process, including ISO-NE, take more than 180 calendar days. As systems are automated, the timeframes for the completion of Impact Studies should shrink substantially and the EDCs should be rewarded for speeding up the processes.

The D.P.U. may need to work with ISO-NE in the streamlining of their portion of DER review. Area Studies should be calculated to deal with as-incurred solar and solar + storage applications while the entire system is being reviewed. If bona fide issues arise for a particular substation under unique circumstances, that substation could be identified to the Department and an extra 3 months could be provided for that particular application.

If there are conditions that encourage the development of solar projects, such as permissive zoning, then the EDCs should step up their efforts to accommodate such demand.

In no way should any EDC be allowed to take two years to complete an Area Study, holding off DER interconnection approval until completion of the study. Means and methods should be established to allow the interconnection of DERs while larger studies are conducted.

Privacy: As a policy, it should be part of tariff, including a guidance document, that all ISA applications may have the following information disclosed to encourage communication amongst common circuit or substation applicants: 1) the Applicant Entity's name; 2) the person representing the Applicant; 3) the active phone number and email address for said person; 4) the mailing address of the Applicant; 5) the size of the solar in AC as well as the storage facility in AC, if any.

With annual interconnections of DER set as goals per year, the EDCs could either hire qualified engineers internally or seek additional outside utility-scale engineering firms and attract them to servicing interconnection requirements of Massachusetts. It is our understanding that the engineering firms that service the EDCs is a select handful of firms and they are often overloaded with work or very expensive due to lack of competition.

The D.P.U., along with all other departments under EOEEA, should set a clear path to 2030 for the interconnection of DER projects in conjunction with the Brattle Group recommendations. In so doing, D.P.U. and EOEEA would set the planning parameters for accomplishing Governor Baker's net-zero goals for 2050, set planning direction for the EDCs and transmission companies, and allow the development and installation companies to see a clear path for building companies and employing skilled personnel.

At this writing, we are all dealing with the coronavirus with an uncertain economic landscape once this is over. If the above recommendations are put in place, long-term employment would be provided for thousands of workers for over ten years.



Thank you for your consideration.

Best Regards,

A handwritten signature in black ink, appearing to read "Doug Pope", with a stylized flourish at the end.

Doug Pope