



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Department's Distributed Generation Service List

FROM: Katherine Stock, Hearing Officer

RE: Interconnection Implementation Review Group's Proposed Revisions to the Model Standards for the Interconnection of Distributed Generation Tariff, D.P.U. 25-48

Consensus Topics, Technical Conference, and Directive to the Distribution Companies

DATE: August 28, 2025

CC: Mark D. Marini, Department Secretary
Katie Zilgme, DG and Clean Energy Ombudsperson

I. INTRODUCTION

On March 25, 2025, the Interconnection Implementation Review Group ("IIRG") submitted to the Department of Public Utilities ("Department") proposed revisions to the Model Standards for Interconnection of Distributed Generation Tariff ("DG Interconnection Tariff") ("IIRG Filing"). On May 27, 2025, the Department opened an investigation into the IIRG Filing. Department Investigation Into Interconnection Implementation Review Group's Proposed Revisions to the Model Standards for Interconnection of Distributed Generation Tariff,¹ Vote and Order Opening Investigation (May 27, 2025). The Department docketed this matter as D.P.U. 25-48.

¹ We refer to this Tariff as the DG Interconnection Tariff.

On June 17, 2025, the Department held a public hearing to receive comments from members of the public on the IIRG Filing and an informational discussion to allow representatives of the IIRG to provide additional context on the IIRG Filing, as well as to allow the Department to ask clarifying questions. On June 20, 2025, the Department requested, through a Hearing Officer Memorandum, that: (1) representatives of the IIRG memorialize the consensus procedural recommendation made during the public hearing and the procedural discussion for the Department to accelerate its review of two consensus topics; and (2) participants in the proceeding collaborate and jointly propose a procedural schedule (D.P.U. 25-48, Hearing Officer Memorandum on Request for Proposed Procedural Schedule at 2) (June 20, 2025) (“June 20 Hearing Officer Memorandum”). On July 9, 2025, the IIRG filed a jointly proposed procedural schedule and its consensus procedural recommendations (“IIRG Procedural Schedule and Recommendations”).² The Hearing Officer established the procedural schedule on July 25, 2025.

This Memorandum: (1) provides that the record on the consensus topics is now closed; (2) provides formal notice of a Technical Conference; and (3) directs the Distribution Companies to file the information requested by the IIRG Industry Group³ in advance of the Technical Conference scheduled for September 24, 2025.

II. CONSENSUS TOPICS

The IIRG Procedural Schedule and Recommendations presented two consensus topics for accelerated Department review: (1) revise the threshold for the DG Interconnection Tariff for Simplified Process eligibility from 15 kilowatts (“kW”) to 25 kW; and (2) establish a Group Study Exemption for certain Expedited Process facilities (IIRG Procedural Schedule and

² On June 26, 2025, NSTAR Electric Company d/b/a Eversource Energy (“NSTAR Electric”), Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”), and Fitchburg Gas and Electric Light Company d/b/a Until (“Until”) (collectively, “Distribution Companies”), filed a Motion for Extension of Time to file the jointly proposed procedural schedule and a consensus procedural recommendation on potential expedited consensus topics from June 27, 2025 to July 9, 2025. On June 27, 2025, the Department granted the Motion.

³ As indicated below, separate sets of comments were filed by some members of the IIRG and by the Distribution Companies. The subset of IIRG members are listed on page 9 of their August 25, 2025 Comments. This list does not include any of the Distribution Companies, which are IIRG members. For purposes of this Memorandum, this subset is referred to as the IIRG Industry Group.

Recommendations at 1). The comment period on these topics ended on August 25, 2025. As such, the Department considers the record on these two topics closed, and an Order will be the next procedural step.

III. TECHNICAL CONFERENCE

The Department will conduct at least one Technical Conference on September 24, 2025 from 9:30 a.m. to 5:00 p.m. We will also reserve September 25, 2025, if a second Technical Conference is needed: September 24, 2025, from 9:30 a.m. to 5 :00 p.m. Logistical information will be forthcoming. **To facilitate an active conversation, Department staff encourages stakeholders to attend the Technical Conference in person if possible.** However, stakeholders that cannot be at the Technical Conference in person will be able to participate virtually. Please note, Department staff will begin discussions with comments from in-person attendees and then move to virtual attendees, if time allows.

IV. DIRECTIVE TO THE DISTRIBUTION COMPANIES

In comments filed pursuant to the procedural schedule, the IIRG Industry Group requested that the Distribution Companies provide the following information prior to the Technical Conference:

1. Maximum, mean, and median secondary distribution upgrade costs for projects up to 25 kW;
2. The number of projects up to 25 kW triggering upgrades to the distribution system;
3. The number of projects up to 25 kW triggering upgrades to the distribution system other than transformer upgrades; and
4. Any other data that the EDC deems relevant to the calculation of a fee designed to recover 100% of secondary upgrade costs triggered by projects up to 25 kW.

(IIRG Industry Comments at 4-5).⁴

⁴ The IIRG Industry Group Comments are a nine-page document without pagination. The Department's Standard Ground Rules, which apply to this proceeding, require that "Documents of three pages or more without a preexisting referencing system must be marked with consecutive page numbers." Standard Ground Rules, § B, 4. Requiring pagination on filings provides structure, facilitates ease of navigation, and ensures accurate referencing. The participants in this proceeding are directed to comply with this

The IIRG Industry Group seeks this information in its connection with its proposal to provide a Common System Modification Fee (“CSM Fee”) in a revised DG Interconnection Tariff (IIRG Industry Group Comments at 2-6; IIRG Initial Filing, App. A_DG Interconnection Tariff (Redline), § 3.1 Simplified Process (c)). The IIRG Industry Group proposes that the Department undertake implementation of a CSM Fee in this proceeding and to include a CSM Fee on the agenda for the Technical Conference (IIRG Industry Group Comments at 4). The Distribution Companies are supportive of a CSM Fee; however, the Distribution Companies disagree that the Department should expedite consideration of a CSM Fee in this proceeding (Distribution Companies Reply Comments at 3). The Distribution Companies state that the Technical Standards Review Group (“TSRG”) recently established a subgroup to discuss a CSM Fee and they recommend that the subgroup should undertake discussion of the details of a CSM Fee structure before any CSM Fee proposal is submitted to the Department (Distribution Companies Reply Comments at 3). The Distribution Companies do not directly address the IIRG Industry Group’s request for data.

From 2020, the Department has recognized the significance of a possible CSM Fee. In opening an investigation into: (1) DG planning; and (2) assignment and recovery of costs for DG interconnection, the Department presented a Straw Proposal that included a CSM Fee. Distributed Energy Resource Planning and Cost Assignment, D.P.U. 20-75, Att. A at 2, 8-12 (2020). During this investigation, the Department initially established a Provisional Program to address the immediate need a reenvisioned pathway for many solar and energy storage system (“ESS”) projects in the interconnection queue facing a barrier to development of significantly higher than historical interconnection costs. D.P.U. 20-75-B, Order on Provisional Program, at 2 (2021). As the Department established the Provisional Program and followed with adjudication of the association capital investment plans, the Department continued its consideration on an informal basis of a long-term system planning process to include a CSM Fee. Legislative and regulatory initiatives have overtaken the Department’s inquiry into a long-term system planning process. An Act Driving Clean Energy and Offshore Wind, St. 2022, c. 179, § 53; G.L. c. 164, § 92B(a); Electric Sector Modernization Plans, D.P.U. 24-104/ D.P.U. 24-11/ D.P.U. 24-12 (2024).

The Department supports the positions of the IIRG Industry Group and the Distribution Companies agreement for consideration of a CSM Fee. Based on the Department’s continued support for a CSM Fee as part of the interconnection process, we find that the Distribution Companies’ production of the information/data set forth above will be useful. Therefore, the Distribution Companies are directed to provide this information/data no later than **Friday**,

pagination requirement. As provided in the Standard Rules, § B, 4, the Department may not accept documents without an acceptable referencing system.

September 12, 2025. This directive does not necessarily mean that the Department will investigate establishment of a CSM Fee in this proceeding.

For further information regarding this Memorandum, please contact Katherine Stock, Annemarie Belle, and Kristen Lommele Festin, Hearing Officers, Department of Public Utilities, at katherine.e.stock@mass.gov, annemariebelle@mass.gov, and kristen.lommele@mass.gov.