



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: Service Lists
Massachusetts Electric Company and Nantucket Electric Company, each d/b/a
National Grid, D.P.U. 23-115
Fitchburg Gas and Electric Company, d/b/a Unitil, D.P.U. 23-117
NSTAR Electric Company, d/b/a Eversource Energy, D.P.U. 23-126

FROM: Katherine Stock, Hearing Officer
Annemarie Belle, Hearing Officer

RE: Procedural Conference Agenda

DATE: May 15, 2025

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

I. INTRODUCTION

On October 31, 2023, each electric distribution company (“Distribution Company”)¹ submitted to the Department of Public Utilities (“Department”) an Operational Parameters for Energy Storage Systems² (“ESS,” also known as battery energy storage systems) Tariff pursuant

¹ The Distribution Companies are Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”), Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”), and NSTAR Electric Company d/b/a Eversource Energy (“NSTAR Electric”).

² As defined by G.L. c. 164, § 1, ESS is:

to Section 72, Chapter 179 of the Acts of 2022 (“ESS Tariff”).³ The Department docketed these matters as D.P.U. 23-115 (National Grid), D.P.U. 23-117 (Unitil), and D.P.U. 23-126 (NSTAR Electric).

Following the initial filing of company-specific ESS Tariffs, at the Department’s direction, the Distribution Companies jointly filed a Model ESS Tariff on May 10, 2024. The ESS Tariffs are intended to govern the operational parameters applicable to ESS interconnected to each Distribution Company’s electric power system (“EPS”). These parameters include proposed operational and technical restrictions on an ESS facility, such as a charging and discharging schedule, the ability of the facility to incorporate future distributed energy resource management (“DERMS”) technology, and limitations on the facility’s capacity based on the grid’s infrastructure limitations (Model ESS Tariff, §§ 5.1, 5.6, 6.2).

Citing a substantive change to a Distribution Company proposal after the close of the discovery, the Department determined that it was necessary (1) to postpone evidentiary hearings scheduled for November 2024; and (2) extend the discovery period for the limited purpose of allowing additional discovery until December 31, 2024 (Hearing Officer Memorandum, November 6, 2024; Hearing Officer Memorandum, November 29, 2024).

On March 27, 2025, the Department issued a Notice of Technical Conference and Updated Procedural Schedule announcing a technical conference on May 9, 2025 (Hearing Officer Memorandum, March 27, 2025). On May 9, 2025, the parties met for a Technical Conference. While highly productive, this session did not touch on many unresolved issues in

a commercially available technology that is capable of absorbing energy, storing it for a period of time and thereafter dispatching the energy and which may be owned by an electric distribution company; provided, however, that an energy storage system shall: (i) reduce the emission of greenhouse gases; (ii) reduce demand for peak electrical generation; (iii) defer or substitute for an investment in generation, transmission or distribution assets; or (iv) improve the reliable operation of the electrical transmission or distribution grid; and provided further, that an energy storage system shall: (1) use mechanical, chemical or thermal processes to store energy that was generated for use at a later time; (2) store thermal energy for direct heating or cooling use at a later time in a manner that avoids the need to use electricity at that later time; (3) use mechanical, chemical or thermal processes to store energy generated from renewable resources for use at a later time; or (4) use mechanical, chemical or thermal processes to capture or harness waste electricity and to store the waste electricity generated from mechanical processes for delivery at a later time.

³ An Act Driving Clean Energy and Offshore Wind (“2022 Clean Energy Act”).

these proceedings. Therefore, this Memorandum is intended to: (1) put the parties on notice of a second Technical Conference scheduled for **Thursday, May 22, 2025**; (2) set forth an updated detailed agenda for the technical conference; and (3) provide guidance for the scope and timing of the limited discovery period.

I. TECHNICAL CONFERENCE LOGISTICS

The Department will hold a technical conference in D.P.U. 23-115/23-117/23-126 on May 22, 2025 from **9:30 a.m. to 4:00 p.m.** There will be a 15-minute break mid-morning, as well as a 45-minute break for lunch around 1:00 p.m.

For in-person attendees, the technical conference will be held at the Department's offices at 1 South Station, 3rd Floor, Boston, Massachusetts 02110. For Parties actively participating in the technical conference virtually, a panelist link will be emailed to you directly.

Members of the public that wish to observe may do so by following the link <https://us06web.zoom.us/j/83236084840>, from a computer, smartphone, or tablet. No prior software download is required. For audio-only access to the hearing, attendees can dial in at 1 (646) 558-2656 (not toll free) and then enter the Webinar ID number: 832 3608 4840. **PLEASE NOTE:** this is a separate link and Webinar ID number from what we provided for the May 9, 2025 technical conference. Please use this information in order to observe the meeting.

The Department initiated this technical conference to facilitate an open dialogue between the parties. To that end, Department staff will make a brief presentation on the background of each topic and start the conversation, as well as pose the specific questions outlined above directly to the relevant Party. We invite the Parties to contribute their own questions within the scope of that topic and look forward to a robust, active discussion.

If any of the Parties have prepared slides or other visual aids responsive to the questions outlined in our May 2, 2025 Hearing Officer Memorandum, please provide an advance copy to the Hearing Officer no later than **Monday, May 19, 2025**. Please limit your responses to ten minutes.

II. TECHNICAL CONFERENCE AGENDA

To allow parties to further prepare for the technical conference Department staff

offers the following agenda, updated from the agenda provided in the May 2, 2025 Hearing Officer Memorandum.^{4,5} The questions listed below are examples and may be revised or elaborated based upon discussion.

- **Introduction**
- **Discussion Topic #1: Dispatch Limiting Schedule**
 - What are the methodologies the Distribution Companies used to derive the Dispatch Limiting Schedule?
 - What are the operational and technical challenges preventing Distribution Companies from offering a more flexible Dispatch Limiting Schedule?
- **Discussion Topic #2: Flexible Interconnection**
 - Are there short term, market ready flexible interconnection solutions available for implementation?
 - Should interconnecting customers who agree to a Dispatch Limiting Schedule be able to migrate to an alternative flexible interconnection scheme when DERMS becomes available?
 - Are the 20-year restrictions contemplated by the Model Tariff appropriate given the evolving technology and grid demands?

⁴ The March 27, 2025 Hearing Officer Memorandum directed the Distribution Companies to make a joint filing of an illustrative Operating Agreement, as referenced in Section 2.15 of the Model ESS Tariff in advance of the technical conference. This document was timely filed. While we do not plan to discuss the Distribution Companies' filing during the technical conference, we will include the Illustrative Operating Agreement within the scope of the limited discovery period. Parties are welcome to ask questions in the technical conference about the Illustrative Operating Agreement if time permits.

⁵ In its surrebuttal testimony filed August 22, 2024, ACT raised, for the first time, a proposal for a flexible interconnection program. NECEC-JW/CB-Sur-Rebuttal-1 at 6-7; NECEC-JW/CB-Sur-Rebuttal 3. At the time the testimony was filed, the deadline to issue discovery was August 23, 2024. Given the timing, the Department declines to consider the proposal and will not discuss it during the technical conference.

- **Discussion Topic #3: Disconnect/Reconnect Provisions**

- Are the disconnect/reconnect provisions in the DG Interconnection Tariff sufficient for ESS facilities, or are more specific provisions required?
- Under what conditions, if any, should the Distribution Companies pay for an ESS facility's expenses in the event of an erroneous disconnection?

- **Discussion Topic #4: Queue Management**

- Are there possible alternatives to the provisions of Section 5.7 of the Model ESS Tariff that allow a Distribution Company to allocate system capacity to new customer load requests ahead of ESS facility interconnection requests until a System Impact Study is completed?

- **Discussion Topic #5: System Impact Study Process**

- Are there alternatives or modifications to Section 5.1 of the Model ESS Tariff that will allow ESS facilities to be studied without operating time restrictions or a Dispatch Limiting Schedule in the initial stages of the System Impact Study?
- How much additional time and cost would a two-scenario study scenario require?

- **Discussion Topic #6: SCADA Requirements**

- Attorney General Slides to aid response to question(s) posed by Department in May 2nd Hearing Officer Memorandum
 - Refer to AG-CKV-1 at 10, 23-35; NECEC-JW/CB-1 at 64, JU-Rebuttal-1 at 48-51. Specifically note the Attorney General's proposal that the Distribution Companies should modify the Model ESS Tariff to use IEEE 1547-2018, IEEE 3020.5, UL 3141, and Common Smart Inverter Profiles ("CISP") as alternatives to the Distribution Companies' requirement that each customer who wished to install an ESS over 250 kW also pay to install a local SCADA device to ensure compliance with the terms of the Operating Agreement. AG-CKV-1 at 24. Please provide additional analysis supporting or opposing the position that SCADA can be replaced with smart inverters without

compromising EPS safety and reliability while providing sufficient ESS facility monitoring. Please consider a range of use cases, including but not limited to compliance with the Dispatch Limiting Schedule and ESS paired with on-site load.

- Are there modifications or alternatives to Section 5.6.2 of the Model ESS Tarff which requires an interconnecting ESS Facility 250 kW or greater to install SCADA for operational purposes at their own expense?
 - How does the SCADA requirement impact the total costs of interconnection for ESS customers?
 - What functions does SCADA provide that cannot be provided by IEEE 2030.5 compliant smart inverters? Why are these functions necessary to protect the safety and reliability of the EPS? Compare Massachusetts EPS requirements to CA Electric Rule 21.
- **Open Discussion (Time Permitting)**
 - **Next Steps**

III. **Discovery**

Parties may begin to issue discovery based on the discussions in the May 9, 2025 technical conference, as well as the illustrative Operating Agreement, as soon as practicable. Furthermore, parties may issue discovery based on the forthcoming technical conference as soon as practicable thereafter.

For further information regarding this memorandum, please contact Katherine Stock or Annemarie Belle at katherine.e.stock@mass.gov or annemarie.belle@mass.gov.