

Interconnection Implementation Review Group (IIRG)

(Aligning with DPU Ombudsperson's Recommendations for IIRG)

Overview

An order establishing the Interconnection Implementation Review Group (IIRG) was issued by the Department of Public Utilities (DPU) as 19-55-F on 6/6/23. The DPU has been involved procedurally for initial assembly of the group, after which the group will operate independently.

Scope of the IIRG is limited to Distributed Generation (DG) interconnection in Massachusetts and processes overseen by the DPU. Topics discussed by the group may tangentially relate to other elements, however each substantive topic must be centrally focused on its relation to the state's DG interconnection processes outlined in the DG Interconnection Tariff. Recommendations from the group shall focus on process recommendations to the DPU for processes under their purview. Technical topics that overlap with policy may be discussed at the IIRG with notification and collaboration with the Technical Standards Review Group (TSRG), with deferral to that group for technical decisions.

An electronic distribution list has been developed for dissemination of written communication from the IIRG. The list consists of IIRG members, Advisory Panel members, and non-member interested stakeholders. Any individual may request to be added to the distribution list as an interested stakeholder by contacting the IIRG Co-Chairs in writing.

Membership

The IIRG shall consist of 14 members, as follows:

- AGO - one person
- DOER - one person
- Nat'l Grid - two people
- Eversource - two people
- Unitil - two people
- DG Industry - six people

At least one small facility developer (conducting majority of work with customers installing systems that are less than 60kW AC and regularly works with residential homeowners)

At least one solar developer

At least one energy storage developer

NECEC and Solar Energy Business Association of New England (SEBANE) shall jointly conduct an election process to determine the DG industry members and ensure members chosen are representative of the DG industry as a whole.

Those individuals in the membership above shall participate in the discussions at each meeting and participate in any written documentation exchanges. Only those individuals in the membership above shall have voting rights.

Representative DG industry member companies shall have active projects in Massachusetts, or have performed work within the state in the last 5 years. Utility members shall be actively employed by the utility and doing business in Massachusetts, or may be a third party appointed by the utility to represent on behalf of the company.

Should any member be unable to attend a meeting, or unable to participate in written communication collaboration, the member may identify an alternate to attend/speak on their behalf. Alternate members must be identified by the member to the Co-Chairs in writing.

Similarly, should any member be unable to continue as a member of the group, that person must coordinate within their respective represented group to identify an appropriate replacement. The replacement must be submitted in writing to the Co-Chairs as soon as practical, and the replacement must be announced at the next regularly scheduled meeting.

Advisory Panel

The IIRG shall have an advisory panel consisting of:

- ISO-NE - one person
- NECEC - one person

MassCEC - one person

IREC - one person

In addition to the above Advisory Panel members, the IIRG membership may elect to engage a consultant to consistently participate throughout all topic discussion, or may elect to employ a different consultant specific to each topic. A consultant is not required and will be at the discretion of the membership. Consultants must be proposed to the membership during a regularly scheduled meeting and unanimous agreement on the consultant must be provided by the voting members.

Advisory Panel members shall participate in the discussions at each meeting, and participate in any written documentation exchanges. However Advisory Panel members shall not have any voting rights.

Should any Advisory Panel member be unable to attend a meeting, or unable to participate in written communication collaboration, the individual may identify an alternate to attend/speak on their behalf. Alternates must be identified by the Advisory Panel member to the Co-Chairs in writing.

Similarly, should any Advisory Panel member be unable to continue as a member of the group, that person must coordinate within their respective represented group to identify an appropriate replacement. The replacement must be submitted in writing to the Co-Chairs as soon as practical, and the replacement must be announced at the next regularly scheduled meeting.

Non-Members

Interested stakeholders that are not members or Advisory Panel members are encouraged to attend meetings and review written communications. All non-members must provide topic thoughts/comments to a member who can then provide comment at meetings and/or written communications to the group. In order to maintain the size and direction of the group non-members will not be permitted to participate in meetings or add to any written communications.

MassCEC and/or NECEC shall provide a means and opportunity for non-member interested stakeholders to share thoughts and concerns on substantive topics that will in turn be shared with the IIRG in a coordinated and concise manner, when appropriate.

Leadership

The IIRG will be led by Co-Chairs. The Co-Chairs shall consist of one Distribution Company member and one DG industry member. Each of the Co-Chairs must be one of the above discussed IIRG members. The Distribution Company Co-Chair shall be elected by the six Distribution Company members and the DG stakeholder Co-Chair shall be elected by the six DG Industry members. Co-Chairs shall be elected annually by April 1 of each year with a 3-year term limit.

Should a Co-Chair have need to leave the IIRG, a replacement shall be elected by the respective represented group, either DG stakeholders or Distribution Companies. At the next regularly scheduled meeting the replacement shall be presented to the membership.

Co-chair responsibilities shall include

- Note taking at meetings, tracking of meeting dates/written communications

- Organization of meetings including issuance of calendar appointments and organization of venue

- Maintenance of membership listing

- Prioritization of substantive topics

- Assembly of documentation for submission to DPU, with support from membership for content

Conduct

It is expected that all participants shall adhere to the following standards of conduct. Failure to adhere may result in removal from individual meeting(s) and/or removal from the IIRG entirely:

- 1) Members and Advisory Panel members will make every attempt to attend all meetings in person, to be on-time, and to review all documents disseminated prior to the meeting. If unable to attend a meeting, the individual must inform, via telephone or email, the Co-Chairs prior to the meeting.

- 2) Members and Advisory Panel members are charged with participating in a constructive forum where diverse points of view are voiced and examined in a professional and balanced way. Personal attacks are not permitted.
- 3) All members and Advisory Panel members agree to act in good faith in the discussions. 'Good faith' means that members will be forthright and communicative about the interests and preferences of their organization.
- 4) It is the responsibility of the all participants to keep their respective organizations informed of developments coming from the group.
- 5) Other than the Co-Chairs, no participant, under any circumstance, shall speak on behalf of the group without the unanimous approval of the membership.

Website

A website shall be dedicated to the IIRG to post notice of meetings, meeting notes/materials, membership listing, and other pertinent information for the group.

Operating Procedures

IIRG meetings shall be held in an open manner that allows for interested stakeholders to observe but only IIRG members and Advisory Panel members shall be allowed to actively participate. Non-member interested stakeholders are encouraged to reach out to IIRG members to share thoughts and recommendations for discussion. It shall be the responsibility of each IIRG member to take feedback from non-member stakeholders and provide comment.

A quorum, consisting of at least 12 members, shall be required to hold a meeting and to vote on matters at the IIRG. However, representations to the Department that an item is "consensus" or "resolved" must have unanimous agreement from all 14 IIRG members.

Any action to be taken by the group or for resolution of any disagreements shall require a vote by the membership. Items for vote shall be submitted to the Co-Chairs in writing at least one week prior to the scheduled meeting for inclusion on the agenda, or may be proposed during the meeting. Deferral of a vote to a future meeting may be required if members feel that additional time is needed to prepare for an informed vote on the topic at hand.

Meeting notes shall be issued to the entire electronic distribution list as soon as practical following each meeting.

Substantive Topics

Any individual may identify potential substantive topics for discussion via written submission to the Co-Chairs. The Co-Chairs shall then determine the priority of substantive topics to be addressed by the IIRG. The Co-Chairs may choose to request input from the IIRG or other stakeholders in establishing a prioritized topic list and may revise the prioritized list at a later date with sufficient notice to IIRG members to allow for preparation for topical discussion. Disagreement between Co-Chairs shall be resolved through a member vote.

Each substantive topic shall involve, at a minimum, two meetings and one written exchange of information. At the first meeting for each substantive topic, the IIRG shall create an estimated timeline. The Co-Chairs shall submit the timeline to the Department's DG and Clean Energy Ombudsperson. Any significant changes to the timeline shall be resubmitted.

If a resolution or determination of next steps is not reached on a substantive topic after four meetings, the topic shall be bypassed or the scope narrowed.

The Massachusetts Technical Standards Review Group (TSRG) shall be informed of each substantive discussion topic and offered an opportunity to collaborate.

DPU Submissions

Any member or Advisory Panel member may contact the Department's DG and Clean Energy Ombudsperson at any time with procedural questions and to request additional facilitation.

The IIRG is encouraged to find resolutions that do not require Department intervention. However if the IIRG determines it has conducted all work possible on a specific substantive topic and that topic requires Department intervention, the IIRG, as a group, shall seek procedural guidance from the Department's DG and Clean Energy Ombudsperson via email and indicate for which of the following scenarios the IIRG seeks procedural guidance:

Limited DPU Intervention: The IIRG requests limited Department intervention to allow for additional stakeholder process, such as a technical conference, discovery exchange, or comment period.

Consensus: There is consensus on a resolution of an existing issue and the IIRG seeks procedural guidance on how to request Department review for approval through Department Order and/or for incorporation in the Department's DG Guidelines for Interconnection ("DG Guidelines") or the Standards for the Interconnection of Distributed Generation Tariff ("DG Interconnection Tariff"):

IIRG shall prepare a concise written narrative summarizing the topic and resolution (including a summary of the work conducted) and a redline of proposed alterations to the DG Guidelines or DG Interconnection Tariff, if applicable

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

The IIRG shall prepare a package that includes a concise written narrative summarizing the topic/issue and agreement, including a redline of the DG Guidelines or DG Interconnection Tariff, if applicable, and written comments from the members with differing opinions, summarizing opinions, and including redline of the DG Guidelines or DG Interconnection Tariff, if applicable. The package narrative shall include a comprehensive recitation of the work conducted on the topic at issue at the IIRG and justification for why the IIRG believes no additional progress can be made without Department intervention.

No Consensus: The IIRG has conducted significant work on a topic but has been unable to reach any consensus or resolution.

The IIRG shall prepare a package that summarizes the topic, issues, and points of disagreement. The package shall include a comprehensive recitation of the work conducted on the topic at issue at the IIRG and justification for why the IIRG believes no additional progress can be made without Department intervention. The package may include individual member submissions with redline of the DG Guidelines or DG Interconnection Tariff, if applicable.

Creative Solution: The IIRG has reached a point at which it seeks Department intervention and has agreed upon a creative approach/proposal for the Department.

The IIRG shall prepare a written summary of the topic, issues, and proposal/request.

Revision History

Date	Description
8/11/2023	Initial establishment