Dear Ombudsperson Zilgme,

The Massachusetts Interconnection Implementation Review Group (“IIRG”) submits the attached filing package to the Distributed Generation (“DG”) and Clean Energy Ombudsperson and the DG Group. This submission package is a result of substantive discussions at the IIRG addressing potential revisions to the Simplified and Expedited interconnection processes currently included in each of electric distribution company’s (“EDC”) Standards for Interconnection of Distributed Generation tariff (“DG Tariff”). As noted herein, the IIRG seeks approval by the Department of Public Utilities (“Department”) of a revised model DG Tariff that includes: (1) revised provisions governing the Simplified and Expedited Processes including associated definitions; (2) revised provisions governing the interconnection process for energy storage systems (“ESS”); and (3) revised Group Study provisions allowing for exemptions for certain Expedited facilities. To that end, the following documents are included for Department review:

* Redlined DG Tariff, including comments on consensus and non-consensus provisions (Appendix A)
  + Change log spreadsheet (Appendix A(1))
  + Process summary for Simplified Process provisions (Appendix A(2))
  + Process summary for Expedited Process provisions (Appendix A(3))
  + Expedited projects group study exemption process illustrative table (Appendix A(4))

The IIRG also proposes a process below for consideration by the Department to review these proposed DG Tariff revisions.

For information purposes only, the filing also includes additional information addressed by the IIRG. Specifically, the IIRG is notifying the Department of: (1) potential revisions to the monthly interconnection report submitted to the Department of Energy Resources (“DOER”) (see Notice of interconnection report reform (Appendix B and related attachments); and (2) a Notice of the inclusion of Energy Storage Interconnection Review Group (“ESIRG”) as a standing subcommittee of the IIRG (Appendix C).

Background on Proposed DG Tariff Revisions

The IIRG collaborated over the past year and a half to identify proposed revisions to the Simplified and Expedited interconnection processes to address challenges identified within the processes and increase process efficiencies.

The mission in updating the Simplified Process was to: (1) increase the amount of projects that qualify for the Simplified process and align system capacities with new Net Metering Rules; (2) build on the consensus in D.P.U. 19-55 to meet the needs of ESS and other new technologies allowing for more flexible interconnections with limited export capacity and other field control concepts; and (3) understand, and explore ways to address, system modification costs for Simplified Process projects.

The IIRG pursued reform to the Expedited Process in order to create more predictability for project owners and developers that apply to the Expedited Process for interconnection. The key outcome of reform is a process that enables more projects, including ESS projects, to be evaluated through the Expedited track and not get moved to the Standard track.

This IIRG Expedited subgroup reviewed Expedited interconnection processes, including key evaluation and decision criteria, costs, and timelines. The scope of work focused on the following areas:

* Apply new tariff language and approaches included in the Simplified process update to Expedited process.
* Identify and evaluate each EDC’s triggers that cause an Expedited project to require an Impact Study.
* Identify and evaluate each EDC’s triggers that cause an Expedited project to be included in a Group Study.
* Explore how to increase the EDCs’ size threshold for projects that can qualify for the Expedited Process, contingent on certain grid conditions.
* Explore how co-located ESS can be used to mitigate the factors that might otherwise trigger an Impact Study.
* Leveraging the participation of Brian Lydic, Chief Regulatory Engineer at the Interstate Renewable Energy Council (IREC), to benchmark the technical screens in MA to expedited interconnection processes in other states with similarly high levels of DER penetration.

The IIRG conducted other substantive work in parallel with these substantive topics. Work on these topics included full ESIRG and IIRG group discussions, small group and subgroup meetings, and written exchange of information and redline proposals. Through June 2024, the ESIRG and IIRG conducted parallel processes for revisions to the Simplified and Expedited processes. Following group discussions and guidance from the Department, the ESIRG and IIRG combined their work into a single process and developed a detailed procedural schedule that was followed with modification as needed through the fall and winter. The final product of these efforts, submitted here, is a comprehensive proposal for revisions to the DG Tariff for the Simplified and Expedited processes.

The proposed DG Tariff revisions also address ESS interconnection issues. In D.P.U. 19-55, the Department addressed the topic of the interconnection of ESS, including a directed process for stakeholder collaboration resulting in the filing of consensus and non-consensus proposals for revisions to the DG interconnection tariff. The ESIRG and IIRG used the consensus redline proposal from D.P.U. 19-55 as a foundation for the proposed ESS-related DG Tariff revisions included in this submission. As such, the IIRG recommends that the Department discontinue review of the consensus redlines submitted in D.P.U. 19-55 on the topic of ESS interconnection and instead review the proposed revisions included in this submission, which incorporate the consensus revisions identified in D.P.U. 19-55.

The proposed revisions are reflected in the attached redlined DG Tariff and change log spreadsheet. The IIRG provides both consensus and non-consensus proposed revisions, delineated in the change log with proposal rationale and party positions. This filing is the result of significant collaboration and reflects many areas where the IIRG was able to reach consensus amongst members. During collaboration, members consulted with interested stakeholders that they represent on the IIRG and incorporated public stakeholder feedback into the collaboration and the resulting revision proposals included here. While the IIRG finds that it has exhausted the productivity of collaboration on these topics, members believe that additional consensus may be reached with Department intervention and facilitation.

The IIRG notes that the tariff revision process commenced on an earlier version of the DG model tariff prior to EDC’s filing (and in some instances approval) of revisions to the DG tariff under other dockets, including, without limitation, DPU. 21-100 and DPU 23-140 (“Docket DG Tariff Revisions”). The changes represented in this filing are in addition to these Docket DG Tariff Revisions and not intended to modify or replace any DG Docket Tariff Revision language unless it is inconsistent with the IIRG’s proposal as determined and agreed on by the IIRG or Department.

Procedural Request

The IIRG requests that the Department review the included consensus and non-consensus proposed revisions to the Simplified and Expedited processes in the DG Tariff through a Department investigation, allowing for all interested stakeholder participation. The IIRG suggests that the Department use this submission to open an investigation and that significant progress towards further consensus may be achieved through a public comment period and one or more Department-facilitated technical sessions. IIRG members note that, for the most part, the consensus and non-consensus revisions are integrated and need to be reviewed wholistically. However, members are still working to identify whether any consensus revisions can be advanced separately and, if possible, will provide further recommendation to the Department in advance of its investigation or through public comment.

In creating this proposal for revisions to the DG Tariff, the IIRG sought to facilitate the Department’s work in investigating challenges in the existing Simplified and Expedited processes. To ensure we achieve this goal, the IIRG recommends the Department hold a meeting with the Co-Chairs and participant members active on these topics to allow for explanation of information included in this submission and to answer any questions the Department may have in advance of opening a formal proceeding.

To further inform the Department’s procedural determination, the IIRG notes that although the IIRG was not able to reach consensus on revisions to the Simplified process that would implement a “simplified common system modification” and cost sharing (Section 3.1.c), all IIRG members support further discussions with the Department on Simplified process interconnection costs, including discussions exploring cost sharing mechanisms.

In addition, while IIRG members have reached consensus on a group study exemption process for certain Expedited interconnection process facilities, IIRG industry members’ support for the DG Tariff revisions is contingent on the inclusion of the illustrative table (Appendix A(4)) in the DG Interconnection Guidelines, and the Department directed evaluation process proposed below. All IIRG members agreed to request the illustrative table be included in the DG Interconnection Guidelines. If the Department were to approve the proposed revisions establishing the group study exemption process for certain Expedited interconnection process facilities, the IIRG requests that the Department also direct an associated evaluation process as follows:

* Following one year of implementation, the EDCs will bring relevant information to the IIRG to allow IIRG member discussion of the efficiency and success of the process
* The IIRG will file a report with the Department within three months of commencement of this discussion, indicating whether IIRG members believe further refinement of the process is necessary to ensure success and efficiency
* If the EDCs believe additional time is needed beyond the first year of implementation to allow for a productive evaluation discussion, the EDCs will propose an extension to the IIRG and provide notice to the Department

Thank you for your consideration.

Sincerely,

IIRG Members

(list members)