TO: Katie Zilgme, Distributed Generation and Clean Energy Ombudsperson

FROM: Kate Tohme and Brett Jacobson, IIRG Co-Chairs and Michael Porcaro and Greg Hunt, ESIRG Co-Chairs

DATE: March XX, 2025

RE: Notice of integration of ESIRG into IIRG, while maintaining autonomy and priority for storage interconnection challenges

Dear Ombudsperson Zilgme,

The Energy Storage Interconnection Review Group (“ESIRG”) was created by the Department of Public Utilities (“DPU”) to develop “effective interconnection standards and operational requirements” and directed to “work in parallel and in coordination with the TSRG.” (Order in DPU 19-55-E, 2/9/22). The DPU also ordered that “the ESIRG will be limited in scope to implementation aspects of the interconnection of ESS and coordinate with the Technical Standards Review Group (“TSRG”) with regards to all related technical standards.”

In June 2023, the Interconnection Implementation Review Group (“IIRG”) was created to facilitate the “coordinated input of a broad set of stakeholders to address issues related to the implementation of the DG interconnection process.” (Order in DPU 19-55-F, 6/6/23). As with the ESIRG, the IIRG was directed to “work in parallel and in coordination with the TSRG.” The DPU also ordered that the “Ombudsperson shall work with interested stakeholders to consider an operating construct for the IIRG, including but not limited to, leadership, membership, interaction with the TSRG and ESIRG, development of a scoping document identifying initial issues for discussion, and process for submittal of recommendations to the Department.”

Since the IIRG was first created, there have been informal discussions between members of the IIRG and ESIRG regarding the degree of overlap in the stated mission of each group and the similarities in the organization structure of each group. Members of both groups expressed a desire for coordination, administrative efficiency, and a need to avoid duplicative effort. IIRG and ESIRG members determined the best method to achieve these outcomes is to restructure the ESIRG as a standing sub-committee of the IIRG.

ESIRG membership and advisory council provided notification of support of this transition, with the following criteria to ensure that the work of the ESIRG continues as envisioned.

“While we support ESIRG becoming a standing sub-committee of the IIRG that would coordinate with and report back to IIRG, we maintain that it is vital for the ESIRG to retain autonomy over the following:

* Agenda and priority setting;
* Frequency of meetings; and,
* The ability to elevate concerns to the DPU, after consultation with IIRG, but not requiring the full IIRG approval of such action.

As there are many of the same organizations and even individuals participating in both groups, we believe this change could improve communication and help ensure that activities are not at cross-purposes.

However, the ESIRG membership is in alignment that the issues unique to the storage industry should have a continued and distinct focus, thus we are advocating for a degree of autonomy in how ESIRG would continue to function as part of the IIRG. Furthermore, we understand that the IIRG could seek to assign work topics to the ESIRG.”

Following this notification and further discussions, both the full ESIRG and IIRG voted in favor of restructuring the ESIRG as a standing sub-committee of the IIRG. The full ESIRG and IIRG also worked together to propose IIRG charter revisions to incorporate this transition. As instructed, we will also file notification of this transition in D.P.U. 19-55 and D.P.U. 25-DG.

Thank you.