

April 8, 2026

D.P.U. 25-20
Interconnection Implementation Review Group
Flexible Interconnection Subgroup Update

The Interconnection Implementation Review Group (“IIRG”) Flexible Interconnection (“Flex IX”) subgroup (“Flex IX Subgroup”) submits this update to the Department of Public Utilities (“Department”) in response to the Department’s request in the Interlocutory Order on Scope of Proceeding in Docket D.P.U. 25-20 for “a written update from the IIRG [Flex IX S]ubgroup that includes a summary of progress made on the development of a [Flex IX] process proposal, the timing of when a filing may be made with the Department, and any additional information that will aid the Department’s investigation.”

The Flex IX Subgroup’s current scope is limited to developing common, comprehensive Flex IX offerings, as well as estimated implementation plans. Individual electric distribution companies (“EDCs”) may also consider additional, utility-specific Flex IX options at their discretion. Incentive compensation and the Long-Term System Planning Process (“LTSP”) are outside the scope of the Flex IX Subgroup’s work at this time.

The purpose of this letter is to provide an update to the Department on the objectives, progress, and next steps for the Flex IX Subgroup.

Background

On May 28, 2025, the IIRG voted on its substantive topic list and whether to establish subgroups to address certain high priority substantive topics. During this meeting, the IIRG voted to establish a Flex IX Subgroup. On July 23, 2025, the IIRG established co-chairs and participants for the Flex IX Subgroup and determined an initial procedural schedule to kick-off the Flex IX Subgroup’s work.

The Flex IX Subgroup is co-led by three IIRG member co-chairs: Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”), BlueWave, and the Attorney General’s Office (“AGO”), with the AGO volunteering to 1) schedule and facilitate meetings and 2) work with co-chairs to develop and coordinate materials

for each meeting. The Flex IX Subgroup consists of approximately 15 additional IIRG members and subject matter expert participants.¹

The Flex IX Subgroup co-chairs met in August 2025 and commenced Subgroup meetings in September 2025. The Subgroup met four times from September 2025 through January 2026² and achieved the following objectives for the development of a Flex IX program proposal:

1. Developed a common understanding of Flex IX and current state for EDCs (October 2025)
2. Developed an initial set of Flex IX option(s) and use cases for program development (October 2025)
3. Identified key programmatic elements and open questions to address to develop common Flex IX offering(s) (November 2025)
4. Developed offering details and implementation roadmap to achieve priorities (January 2026)
5. Organized and held an in-person multi-day workshop³ to address Flex IX offering details (March 2026).⁴

Next Steps and Timing

Moving forward, the Flex IX Subgroup intends to incorporate feedback from its members and the March 2026 workshop to develop common comprehensive materials to begin implementing Flex IX offerings, including the following steps:

1. **Objective:** Develop a statewide common comprehensive set of Flex IX offerings for distributed generation (“DG”)⁵ interconnection applicants in an iterative manner based on system, customer and market needs, which are expected to include:

¹ Volunteers were solicited at the July IIRG meeting. IIRG members agreed that subgroup participants could include IIRG members (including Energy Storage Standing Subcommittee members), and subject matter expert representatives appointed by IIRG members.

² The Co-Chairs have also met frequently to prepare for Subgroup meetings, including a full day in person meeting with a small group of subject matter experts to prepare for the Subgroup’s second meeting. The slides associated with the meetings can be found on the IIRG website: <https://www.mass.gov/info-details/utility-interconnection-in-massachusetts#interconnection-implementation-review-group>.

³ The Flex IX Subgroup Co-Chairs worked with the [Charged Initiative](#) to facilitate a two-day workshop with approximately 66 in person and 42 virtual attendees. The workshop provided background information on Flex IX, an update on the work the Flex IX Subgroup has conducted to date including proposals, and addressed twelve key Flex IX topics/challenges through full group and break out discussions. The Charged Initiative compiled feedback and notes from the workshop for Flex IX Subgroup participants to utilize moving forward.

⁴ Flex IX Subgroup participants conducted outreach to their represented industries to solicit input and feedback on programmatic details from a larger group of stakeholders, in advance of the in-person workshops. IIRG members will also conduct outreach to obtain feedback on any proposals in advance of any submission to the Department.

⁵ For the purposes of the Flex IX Subgroup and this letter, the IIRG defined distributed generation to include energy storage systems.

- a) Dynamic curtailment
 - b) Dispatch limiting schedules
 - c) Flex IX as a bridge to wires
2. **Scope:** Prioritize 1) development of Flex IX offerings that can accelerate DG integration in the near-term for DG projects seeking to mitigate federal legislation/tax credit impacts (e.g., bridge to wires) and 2) development of Flex IX offerings that represent a scalable, long-term framework (e.g., dynamic Flex IX).
3. **Deliverables:** The group anticipates developing several coordinated deliverables: 1) a Flex IX Guidelines document detailing different Flex IX approaches and program details, including but not limited to curtailment strategy, technical analyses, and design expectations; 2) Implementation Plan document(s) detailing concrete steps for each EDC to make dynamic Flex IX offerings available; and 3) templates to support the Flex IX offerings (e.g., curtailment studies, interconnection agreements, and technical requirements).

The Flex IX Subgroup intends to accomplish these steps under the following estimated timeline:⁶

1. Develop draft Flex IX Guidelines and Implementation Plan document(s) (Apr-Jul 2026)
2. Present Flex IX documents to full IIRG for comment (Jul-Aug 2026)
3. Present Flex IX Guidelines and Implementation Plan to the Department (Q3-Q4 2026)⁷
4. Make available the first iteration of Flex IX offerings (TBD - based on program design, EDC capabilities, and required Department review)

⁶ The Flex IX Subgroup presents a conservative estimated timeline to develop a comprehensive and consensus Flex IX implementation plan. If the Flex IX Subgroup is unable to reach significant consensus the Subgroup will revise the estimated timeline and may seek the Department's procedural guidance at an earlier date. The Subgroup intends to expedite development as possible and to present Flex IX Guidelines and Implementation Plan to the Department as soon as possible. The Flex IX Subgroup will revise the estimated timeline and process as needed based on how discussions develop over the next 1-3 months.

⁷ The Flex IX Subgroup believes it may be possible to begin implementation of some aspects of a Flex IX program in advance of memorialization of programmatic rules through Department order. In advance of presenting to the Department, the Subgroup intends to seek procedural guidance from the Department on what aspects of the program proposal should be submitted for review versus notification.

The IIRG anticipates seeking the Department's procedural guidance on the nature and structure of any submission in advance of filing. Please let us know if you have any questions.

Respectfully submitted by,

Flex IX Subgroup Co-Chairs

Massachusetts Electric Company and
Nantucket Electric Company, each
d/b/a National Grid

Massachusetts Attorney General's
Office

BlueWave