

Massachusetts Interconnection Implementation Review Group (IIRG) Meeting Summary

Date: October 1, 2025

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Meeting held as part of the Interconnection Implementation Review Group (IIRG) for discussion on issues related to the DG interconnection process in Massachusetts. Meeting minutes are outlined below. If there are any corrections, additions, or omissions please notify the preparer or Co-Chairs.

Key Topics Discussed: DPU 25-48 Update, Subgroup Updates (Fees, Flexible Interconnection, Report Reform, Energy Storage), Energy Storage Operational Tariff, Eversource Envelio Update, H.R. 1 Impacts, National Grid Professional Engineer (PE) Stamp Requirement, Prioritization of DPU Dockets, and Group Study Timeline Challenges.

Members

First Name	Last Name	Email	Affiliation	Organization	Status	Present
Kate	Tohme	ktohme@newleafenergy.com	Developer	New Leaf Energy	Member (Co-Chair)	Y
Brett	Jacobson	brett.jacobson@eversource.com	EDC	Eversource	Member (Co-Chair)	Y
Michael	Porcaro	michael.porcaro@nationalgrid.com	EDC	National Grid	Member	Y
John	Bonazoli	bonazoli@unitil.com	EDC	Unitil	Member	Y
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Jeremy	Kites	kitesj@unitil.com	EDC	Unitil Energy Systems Inc	Member	Y
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Ben	Underwood	Ben@resonant.energy	Developer	Resonant Energy	Member	Y
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Tim	Snyder	tsnyder@necec.org	Advocate	NECEC	Advisory Panel	N

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Sarah	Cullinan	scullinan@masscec.com	Advocate	MassCEC	Advisory Panel	N

Mission Statement:

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.

Additional information is available at the group website here:

<https://gridforce.my.site.com/s/article/Interconnection-Implementation-Review-Group>

DPU 25-48 Update

The group's initial filing to the Department of Public Utilities (DPU) has been officially docketed as DPU 25-48. A technical conference was held with the DPU the previous week to address non-consensus issues. A key outcome of the conference was clarifying the extent of stakeholder agreement; comments submitted to the DPU had suggested less alignment than actually exists, and the group used the conference to correct this impression and highlight the significant consensus that had been achieved.

Subgroup Updates

- **Updates to Fees (Common System Modification, Application, and Study Fees)**
 - This subgroup meets every two weeks. Its primary focus is to finalize a draft of the Common System Modification (CSM) proposal by **November 30th** for DPU review. Once the CSM draft is complete, the subgroup will address other fees.
 - It was noted that the CSM will likely require a formal adjudicatory proceeding at the DPU. To expedite this process, the subgroup is focused on achieving the broadest possible consensus among stakeholders to streamline the future regulatory review.
- **Flexible Interconnection**
 - This subgroup has held its first meeting and will now meet bi-weekly. The immediate task is to develop a common understanding of the definitions related to flexible interconnection to ensure consistency with the work of the Technical Standards Review Group (TSRG) and other relevant bodies.
 - The next step will be to develop and prioritize specific use cases. The subgroup's goal is to produce a consensus-based plan for short-term use cases within the next

few months, with the hope of avoiding a formal adjudicatory proceeding.

- **Interconnection Report Reform**

- The Electric Distribution Companies (EDCs) have committed to revising their monthly interconnection reports. The key request from stakeholders is for the reports to provide **project-level granularity** on the status of projects within group studies. Specifically, the reports should clearly indicate whether each individual project is currently "in" or "out" of a group study.
- While some of this information is available on the National Grid and Eversource websites, the goal is to have this detail formally included in the monthly reports for clarity and accessibility across utilities.

- **Energy Storage Standing Subgroup**

- This subgroup has concluded its discussions on two initial topics:
 1. **ESS Metering:** The topic summary is currently in draft form.
 2. **Open Loop Response Time (OLRT):** The topic summary is complete. The subgroup believes this topic does not need to be elevated to the DPU.
- The IIRG will review both summaries and provide guidance on the next steps at the upcoming meeting.

Energy Storage Operational Tariff Update

This group has officially reconvened and will now meet on the third Tuesday of every month. The agenda for the next meeting will include **dispatch limiting schedules** and a review of materials from the flexible interconnection subgroups to ensure alignment. The group will continue to focus on battery-specific topics that relate to the work of other IIRG subgroups.

Eversource Envelio Update

Eversource is in the final development sprint for its **Envelio hosting capacity map**. The first external deliverable phase is expected in **early November**.

- **Included Features:** The initial release will feature time-series data, seasonal capacity information, headroom data for bulk stations, and segment-level data for parcels.
- **Excluded Features:** The "Challenging Area" data layer will not be included in the first release.
- A discussion took place regarding the potential to integrate group study information into the map in the future.

Presentation: H.R. 1 Impacts on Residential Solar

A presentation was delivered on the anticipated impacts of H.R. 1, specifically the elimination of the **25D residential clean energy tax credit**.

- The 30% tax credit is scheduled to be eliminated at the end of the year, which is expected to cause a significant "pull back" on residential solar purchases.

- The importance of the Common System Modification (CSM) was highlighted as a mechanism that could help mitigate the financial impact on customers who will lose access to the tax credit.

H.R. 1 and Affected System Operator (ASO) Study Update

A concern was raised regarding facilities larger than 1 MW that require an Affected System Operator (ASO) study. It will be very difficult to coordinate the ASO study with the post-transitional cluster study timelines. This scheduling challenge puts projects at risk of missing the **Investment Tax Credit (ITC) safe harbor deadlines**. The industry is strongly encouraged to review their project timelines and the potential implications of this issue.

Shared Folder Guidelines

The group discussed draft guidelines for establishing a shared folder system on Sharepoint and a public-facing website hosted by DOER. Members offered suggested revisions to clarify that working documents can be shared with organizational/industry cluster stakeholders for feedback (though not broadly with the public), and on approaches to help distinguish between draft and final documents, among other issues. It was agreed that in lieu of a vote, revised guidelines would be distributed and members would indicate their agreement to these guidelines when emailing DOER requesting access to the system.

National Grid (NG) PE Stamp Requirement for Applications <25 kW

National Grid announced a new requirement for Professional Engineer (PE) stamped plan sets for simplified applications, with a proposed effective date of November 1st.

- **National Grid's Rationale:** The utility cited the increasing complexity of these smaller systems and the loss of the Certificate of Completion (COC) requirement as the reasons for needing a PE stamp to ensure safety and quality.
- **Developer Concerns:** Developers expressed significant concern about the sudden and unexpected costs this would impose, particularly given the short notice.
- **Resolution:** After discussion, National Grid agreed to *reconsider the November 1st effective date*. They will take the issue back for internal review and discuss it further with the IIRG before moving forward.

Prioritization of DPU Dockets

The DPU has invited the IIRG to provide recommendations on the prioritization of open dockets. The facilitator noted that this is a **significant opportunity and responsibility** for the group. The IIRG plans to collaborate on these recommendations and submit them to the DPU following the October 29th meeting.

Substantive Topic Discussion: Group Study Timeline Challenges

A procedural schedule was proposed and approved to formally address challenges with group study timelines. Members offered the following observations:

- The approved process relies on offline work in a shared document where members will collaboratively draft and edit ("redline") proposals between meetings. This flexible approach is intended to make live meetings more efficient.
- This initiative is distinct from, but complementary to, the group study exemption process. This new effort is broader, aiming to help any project not requiring an ASO (Affected System Operator) study from being delayed by the ASO process.
- The topic will be addressed by the full group rather than a formal subgroup, although the offline collaborative work is expected to function similarly to a subgroup.
- The schedule is ambitious, requiring significant work between meetings to meet a target of voting on final tariff language in January and preparing a DPU filing in February.

The group **voted to approve a procedural schedule** for tackling the substantive topic of group study timeline challenges, with amendments, with the following votes in favor: Kate Tohme, Sean Burke, James Manzer, Brett Jacobson, Ben Underwood, Naera Haghnazarian, Chris Modlish, Gerry Bingham, Joshua Briggs, Jeremy Kites, Will Kern, Mike Porcaro, John Bonazoli, David Fixler, Greenberg Traurig, David Fixler, Andrew Hickok, Andrew Hickok

The work on this topic will be conducted collaboratively in a shared document between meetings.

Next Steps

- Revised guidelines for the shared folder will be circulated for review in redline, along with instructions on how members will get access to the system.
- Members will indicate their agreement to these guidelines when emailing DOER requesting access to the system.
- Moving forward, members will work in shared documents on sharepoint, using the system's live editing features.
- Members will work with their respective representative groups to develop recommendations for the prioritization of DPU dockets, which will be discussed at the next meeting.
- The next IIRG meeting is scheduled for **October 29th**. It will include talking through sub-topics group study timeline challenges, beginning with the issue of how to move >1MW projects forward to meet safe harbor deadlines. Members should share any concerns about this suggested starting place with the co-chairs.