

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

D.P.U. 25-48

May 27, 2025

Investigation by the Department of Public Utilities On Its Own Motion Into the Interconnection Implementation Review Group's Proposed Revisions to the Model Standards for Interconnection of Distributed Generation Tariff.

VOTE AND ORDER OPENING INVESTIGATION

I. INTRODUCTION

Pursuant to its oversight authority under G.L. c. 164, § 76, its ratemaking authority under G.L. c. 164, § 94, and our inherent authority to regulate in the public interest,¹ the Department of Public Utilities (“Department”) opens an investigation to review the Interconnection Implementation Review Group’s (“IIRG”) proposal for revisions to the Standards for Interconnection of Distributed Generation tariff (“DG Interconnection Tariff”)^{2, 3} (“2025 IIRG Filing”). As explained in Section III below, the 2025 IIRG Filing contains revisions to the DG Interconnection Tariff governing: (1) the Simplified and Expedited Processes including associated definitions; (2) the interconnection process for energy storage systems (“ESS”); and (3) Group Study provisions that allow for exemptions for certain expedited facilities. The IIRG submitted its 2025 IIRG Filing to the Department’s DG and Clean Energy Ombudsperson (“Ombudsperson”) on March 25, 2025. Subsequently, the Ombudsperson provided the 2025 IIRG Filing to the Department Secretary for docketing and entry in the Department’s File Room.

¹ See Zachs v. Department of Public Utilities, 406 Mass. 107, 223 (1989) (“the mission of the agency is to regulate in the public interest”).

² The DG Interconnection Tariff sets forth the process and requirements for an interconnecting customer to connect a power-generating facility to an electric distribution company’s electric power system (“EPS”), including discussion of technical and operating requirements and metering options. DG Interconnection Tariff, § 1.1. Each electric distribution company (singularly “Distribution Company,” collectively “Distribution Companies”) has a Department-approved DG Interconnection Tariff.

³ The Distribution Companies are Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”), NSTAR Electric Company d/b/a Eversource Energy (“NSTAR Electric”), and Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”). Each Distribution Company’s currently effective DG Interconnection Tariff is: Unitil, M.D.P.U. No. 452; NSTAR Electric, M.D.P.U. No. 55B; and National Grid, M.D.P.U. No. 1579.

The Department has docketed this matter as D.P.U. 25-48.⁴ The 2025 IIRG Filing is available at <https://eeaonline.eea.state.ma.us/DPU/Fileroom> (enter “25-48”); all subsequent documents filed in this matter will be available at this link.⁵

II. IIRG

We summarize the structure and operations of the IIRG to illustrate how it has operated transparently to facilitate dispute resolution and consensus building among stakeholders. On June 6, 2023, the Department established the IIRG as a stakeholder working group to provide a forum for identifying and discussing issues related to DG interconnection and to ensure

⁴ The Department refers to this type of proceeding as a notice of inquiry or notice of investigation (“NOI”). An NOI is a non-adjudicative proceeding that the Department initiates to examine and to establish policies across a regulated segment or applicable to all regulated entities. Also, the Department makes use of an NOI to establish or to revise a model tariff. In opening an NOI on policy matters, the Department exercises its supervisory authority under G.L. c. 164, § 76 and its inherent authority to regulate in the public interest. When an examination of a model tariff is added, the Department exercises its broad ratemaking authority under G.L. c. 164, § 94.

A model tariff establishes a standard structure for a utility service or program; this structure is intended to provide consistency among all affected utilities. After the Department establishes or revises a model tariff, each affected utility will file a tariff that contains details, such as prices or charges, that are specific to the Distribution Company. A key feature of an NOI is the Department’s engagement of stakeholders for input and experience to inform the Department in the proceeding.

The Department intends to conduct this examination into the IIRG’s proposed revisions to the DG Interconnection Tariff as an NOI into a model tariff as described above, not as an adjudicatory proceeding. Depending on the outcome of this NOI, each Distribution Company may be required to file a company-specific DG Interconnection Tariff for review and approval by the Department. The Department may conduct that review as an adjudicatory proceeding.

⁵ The 2025 IIRG Filing contains the following ten documents: (1) IIRG Cover Letter; (2) Appendix A: DG Interconnection Tariff Redlines; (3) Appendix A: Change Log; (4) Appendix A: Summary Simplified Revision Timeline; (5) Appendix A: Summary Expedited Revision Timeline; (6) Appendix A: Group Exempt Illustrative Example; (7) Appendix B: Interconnection Report Reform Notice; (8) Appendix B: IIRG Monthly Reporting; (9) Appendix B: Interconnection Report Reform Attachment A; and (10) Appendix C: Memorandum ESIRG Transition Notice.

continued review of DG interconnection standards and procedures. Distributed Generation Interconnection, D.P.U. 19-55-F at 1-2 (2023). There, the Department directed the Ombudsperson to offer participation in the IIRG to the Distribution Companies, the Department of Energy Resources (“DOER”), the Attorney General of the Commonwealth (“Attorney General”), entities on the Department’s DG Stakeholder Electronic Distribution List,⁶ and other entities that the Ombudsperson considered beneficial to the IIRG. D.P.U. 19-55-F at 6. We further directed the Ombudsperson to work with these stakeholders to consider an operating construct for the IIRG, including, but not limited to, leadership, membership, interaction with the Technical Standards Review Group (“TSRG”)⁷ and the ESIRG,⁸ development of a scoping document identifying initial issues for discussion, and establishing a process for submittal of recommendations to the Department. D.P.U. 19-55-F at 6 (2023).

Responding to the Department’s guidance, on August 11, 2023, the IIRG adopted a charter setting forth the IIRG’s purpose, membership, operating procedures, topics for

⁶ The Department has compiled a list of email addresses for parties, participants, and other entities interested in being involved in processes at the Department addressing distributed generation, interconnection with the EPS, net metering, renewable energy, and solar energy. We have compiled this list over an extended period of time through the course of pending and completed rulemakings, policy initiatives, adjudicatory proceedings, and non-docketed inquiries. The Department refers to this list as the “DG Stakeholder Electronic Distribution List.” The Department uses this list to provide notice when new proceedings involving DG commence and to provide pertinent information and resources to the DG stakeholders.

⁷ The Department established the TSRG to develop and propose updates and modifications to the Technical Standards Manual, which sets out common standards for DG development. Distributed Generation Interconnection, D.P.U. 11-75-E (citing “Proposed Changes to the Uniform Standards for Interconnecting Distributed Generation in Massachusetts,” at 30, September 14, 2012).

⁸ The Department established the ESIRG to undertake a coordinated examination of ESS interconnection issues to inform the Department in the development of appropriate policies. Energy Storage Interconnection Review Group, D.P.U. 19-55-E at 5 (2022).

discussion, and a process for making submissions to the Department (“IIRG Charter”).⁹ The standing membership group consists of one person each from the Attorney General and DOER, two persons each from each Distribution Company, and six people from the DG industry with specific qualifications (IIRG Charter at 1).¹⁰ Only standing members have voting rights on matters before the IIRG (IIRG Charter at 1). The IIRG is led by Co-Chairs – one from a Distribution Company and one from the DG industry (IIRG Charter at 2). The IIRG makes use of an Advisory Panel to provide input, insight, and perspectives on relevant matters; the Advisory Panel does not have voting rights (IIRG Charter at 1-2).¹¹ The IIRG can engage consultants subject to the vote of the standing members (IIRG Charter at 2). The IIRG encourages non-members (interested stakeholders) to attend IIRG meetings and to review written IIRG communications (IIRG Charter at 2-3). Only standing members and Advisory Panel

⁹ The IIRG Charter is available at <https://gridforce.my.site.com/s/article/Interconnection-Implementation-Review-Group>. Pursuant to 220 CMR 1.10(2), the Department takes official notice of the IIRG Charter as set out at this link. For purposes of docket management, the Hearing Officer downloaded a copy of the IIRG Charter and provided it to the Department Secretary for posting to this docket at the Department’s File Room. Consistent with 220 CMR 1.10(2), any interested person may contest such official notice by a written submission to the Department in this docket no later than Tuesday, June 17, 2025.

¹⁰ Current members of the IIRG are Brett Jacobson (NSTAR Electric), Naera Haghazarian (NSTAR Electric), Michael Porcaro (National Grid), William Kern (National Grid), John Bonazoli (Unitil), Jeremy Kites (Unitil), Kate Tohme (New Leaf Energy), Courtney Feeley Karp (Klavens Law Group), James Manzer (ReVision Energy), Clair Loe (Bluewave Solar), Andrew Hickock (Solect Energy), Ben Underwood (Resonant Energy), Gerry Bingham (DOER), and Christopher Modlish (Office of the Attorney General).

¹¹ The Advisory Panel consists of one person each from ISO New England Inc., the Alliance for Climate Transition (“ACT”) (f/k/a Northeast Clean Energy Council), Massachusetts Clean Energy Center (“MassCEC”), and the Interstate Renewable Energy Center (IIRG Charter at 1-2). MassCEC and ACT can relay the concerns and ideas of their members to the IIRG.

members can actively participate (IIRG Charter at 3). Non-members are encouraged to reach out to standing members and Advisory Panel Members to share thoughts and recommendations for discussions by the IIRG (IIRG Charter at 3). Substantive topics must be substantially focused on the Department's DG interconnection process as outlined in the DG Interconnection Tariff (IIRG Charter at 1). Potential substantive topics can be submitted by any individual in writing to the Co-Chairs (IIRG Charter at 3). The Co-Chairs determine the priority of substantive topics for consideration by the IIRG (IIRG Charter at 3). The Co-Chairs inform the TSRG of each substantive discussion topic and provide the TSRG with the opportunity to collaborate (IIRG Charter at 3).

To enhance stakeholder engagement, the IIRG has developed: (a) an electronic distribution list; and (b) a website¹² (IIRG Charter at 1; IIRG Charter at 3). The electronic distribution list consists of standing members, Advisory Panel members, and non-member interested stakeholders (IIRG Charter at 1). Any individual can contact the Co-Chairs in writing to be included on the electronic distribution list (IIRG Charter at 1).

The Ombudsperson assists the IIRG with procedural guidance and facilitation (IIRG Charter at 3). The IIRG has identified the following five categories of internal resolution for further procedural guidance by the Ombudsperson:

1. Limited Intervention – The IIRG seeks limited Department intervention to allow for additional stakeholder process, such as a technical conference, a discovery exchange, or a comment period.
2. Consensus – The IIRG has reached consensus on a resolution, and it seeks procedural guidance for seeking Department review and approval.

¹² The IIRG website is <https://gridforce.my.site.com/s/article/Interconnection-Implementation-Review-Group>.

3. Partial Consensus – The IIRG has some consensus and some disagreement on a topic requiring Department intervention. The IIRG will prepare a filing package for submission to the Department with: (a) a summary of agreed-to topics/issues; (b) a redlined version of the DG Interconnection Tariff, if applicable; (c) a summary of differing positions; and (d) a comprehensive description of the work conducted by the IIRG on the topics.
4. No Consensus - The IIRG has conducted significant work on topics/issues and has not reached agreement. The IIRG will prepare a filing package for submission to the Department with: (a) a comprehensive description of the work conducted by the IIRG on the topics; and (b) justification for Department intervention.
5. Creative Solution – The IIRG has developed a novel approach to a topic for consideration by the Department. The IIRG will prepare a filing package for submission to the Department with a summary of the topic and its proposed solution.

(IIRG Charter at 4).

III. 2025 IIRG FILING

The scope of the IIRG's assignment is limited to DG interconnection and associated processes within the Department's jurisdiction (IIRG Charter at 1). As the result of a year and a half of collaboration, the IIRG requests that the Department review its proposed revisions to the Simplified and Expedited interconnection process requirements set forth in the DG Interconnection Tariff (IIRG Cover Letter at 1).¹³ These processes set out operational actions necessary for a DG facility to connect with a Distribution Company's EPS

For the Simplified Process, the revisions proposed in the IIRG filing are intended to:

- (1) increase the amount of DG projects that qualify for the Simplified Process and to align

¹³ The DG Interconnection Tariff provides three basic paths for interconnection of DG facilities to the EPS: the Simplified Process, the Expedited Process, and the Standard Process. DG Interconnection Tariff, § 3.0.

system capacities with Net Metering rules; (2) meet the needs of ESS and other new technologies allowing for more flexible interconnections with limited energy export capacity and other field control concepts; and (3) understand and explore ways to address system modification costs for projects under the Simplified Process (IIRG Cover Letter at 1-2; Appendix A, § 3.1).

For the Expedited Process,¹⁴ the IIRG proposal includes broad revisions, the focus of which is to create more predictability for owners and developers that apply for interconnection to the EPS (IIRG Cover Letter at 2; Appendix A, § 3.3). The scope of work of the IIRG subgroup that reviewed the Expedited Process included:

- Applying new tariff language and approaches from the Simplified Process to the Expedited Process;
- Identifying and evaluating each Distribution Company's triggers that cause a project in the Expedited process to require an Impact Study;¹⁵
- Identifying and evaluating each Distribution Company's triggers that cause a project in the Expedited process to require a Group Study;

¹⁴ The Expedited Process streamlines the connection of DG facilities to the EPS, particularly for smaller-scale installations like rooftop solar facilities. DG Interconnection Tariff, § 3.3.

¹⁵ The DG Interconnection Tariff permits the Distribution Companies to conduct several different types of studies to evaluate a proposed project's effects on the EPS. Relevant to this NOI are the Affected System Operator Study ("ASO Study"), the Impact Study, and the Group Study. Each of these studies is defined in Section 1.2 of the DG Interconnection Tariff. Generally:

An ASO Study seeks to identify whether a DG project impacts the EPS of neighboring Distribution Companies, and the extent that EPS modifications are required to maintain the safe and reliable operation of the region's EPS.

An Impact Study is a detailed analysis conducted to assess the potential effects of a new or modified DG or ESS project on the existing EPS.

A Group Study looks at the collective impact of several DG projects on the EPS to understand what system modifications (e.g., complimentary group solutions) would be required to support these DG projects when interconnected.

- Exploring increasing the Distribution Companies' size thresholds for projects to qualify for the Expedited Process, contingent on certain EPS conditions; and
- Exploring co-locating ESS to mitigate the factors that otherwise might trigger an Impact Study.

(IIRG Cover Letter at 2; Appendix A, § 3.3).

Some of the IIRG's proposals from the subgroups' efforts include:

1. A Group Study exemption process as depicted in Appendix A(4) of the 2025 IIRG Filing (IIRG Cover Letter at 4). The IIRG recommends that the Department set out this exemption in the DG Guidelines¹⁶ (IIRG Cover Letter at 4; Appendix A(4)).
2. If the Department approves this exemption process, the IIRG proposes that the Department direct the Distribution Companies to provide the IIRG with relevant information for discussion regarding the efficiency and success of the exemption process (IIRG Cover Letter at 4).
3. The IIRG will follow that discussion with a report to the Department with possible recommendations for refinements to the exemption process (IIRG Cover Letter at 4).

The IIRG makes a specific request that the Department process examining the 2025 IIRG Filing provide a forum for all interested stakeholders to participate (IIRG Cover Letter at 3). The IIRG also recommends that the Department hold a meeting with the Co-Chairs and standing members with knowledge of the substantive topics in the 2025 IIRG Filing to allow for explanation of the submission and to answer any Department questions (IIRG Cover Letter at 3). In addition, the IIRG made an informational filing of: (1) proposed revisions to the monthly

¹⁶ As part of the Department's broad ranging proceeding Distributed Generation Interconnection, D.P.U. 19-55, the Department first issued interim guidance related to ASO Studies in 2019. D.P.U. 19-55, Hearing Officer Memorandum, ASO Interim Guidance (September 25, 2019). In 2020, the Department followed with more comprehensive interconnection guidance with the issuance of DG Guidelines. Distributed Generation Interconnection, D.P.U. 19-55-C, Attachment A (August 6, 2020). Later that year, the Department issued revised DG Guidelines. Distributed Generation Interconnection, D.P.U. 19-55-D, Attachment A (September 16, 2020).

interconnection report submitted to DOER; and (2) a notice of the inclusion of the ESIRG as a standing subcommittee of the IIRG (IIRG Cover Letter at 1).¹⁷

IV. PUBLIC HEARING AND PROCEDURAL MATTERS

The Department will conduct a virtual public hearing to receive comments on the 2025 IIRG Filing. Consistent with the IIRG's request, representatives from the IIRG will have an opportunity to comment on the 2025 IIRG Filing directly following the public hearing.¹⁸ Leading up to the public hearing and informational discussion, the Department encourages the IIRG to continue to work towards consensus recommendations regarding revisions that may be advanced.

During the public hearing, any member of the public will be able to provide comments. The Department will conduct a public hearing on **Tuesday, June 17, 2025**, beginning at 2:00 p.m. Attendees can join by entering the link <https://us06web.zoom.us/j/81327462826>, from a computer, smartphone, or tablet. No prior software download is required. For audio-only access to the hearing, attendees can dial in at 1 (646) 558-8656 (not toll free) and then enter the Webinar ID number: 813 2746 2826. If you anticipate providing comments via Zoom during the public hearing, please send an email by **Friday, June 13, 2025** to katie.zilgme@mass.gov, katherine.e.stock@mass.gov, annemarie.belle@mass.gov, and kristen.lommele@mass.gov with your name, email address, and mailing address. Alternatively, any person who desires to provide

¹⁷ An informational filing is a submission of useful/instructive information and data that are not essential to the proceeding. An informational filing does not require permission, approval, or authorization by the Department. Typically, an informational filing is made at the direction of the Department, but an informational filing can be made at the discretion of a petitioner.

¹⁸ The IIRG informal presentation may be transcribed with the public hearing; however, the IIRG's informal presentation will not be part of the decisional record in this matter.

written comments on this matter may submit their comments to the Department no later than the close of business (5:00 p.m.) on **Tuesday, June 17, 2025**.

The Department has prepared an accompanying Notice of Filing, Public Hearing, and Request for Comments. This Notice can be further distributed to promote involvement in this proceeding by interested people. Accordingly, the Department directs the IIRG as soon as practicable after the date of this Order to: (1) transmit electronically the Notice of Filing, Public Hearing, and Request for Comments to its distribution list as provided in its Charter; and (2) post the Notice of Filing, Public Hearing, and Request for Comments in a prominent place on its website as provided in its Charter. This posting shall extend through the date of the public hearing. The IIRG shall make return of service at the public hearing. In addition, the Department directs the Secretary of the Department as soon as practicable after the date of this Order to: (1) ensure the Notice of Filing, Public Hearing, and Request for Comments is sent electronically to the Department's DG Stakeholder Electronic Distribution List as referenced herein; and (2) ensure the Notice of Filing, Public Hearing, and Request for Comments is posted in the Events section of the Department's website.

V. ORDER

Accordingly, the Department

VOTES: That, consistent with our oversight authority under G.L. c. 164, § 76, our authority to regulate in the public interest, and our ratemaking authority under G.L. c. 164, § 94, to open an investigation into the Interconnection Implementation Review Group's filing on proposed revisions into the Model Standards for Interconnection of Distributed Generation Tariff; and it is

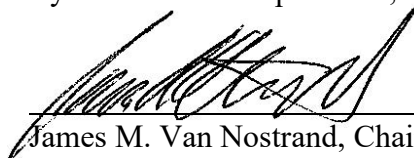
ORDERED: That the Secretary of the Department shall send by electronic means a copy of this Order to each electric distribution company subject to the jurisdiction of the Department

under G.L. c. 164 and to all entities in the Interconnection Implementation Review Group as established in Interconnection Implementation Group, 19-55-F (2023); and it is

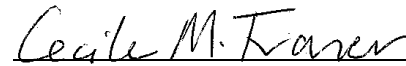
FURTHER ORDERED: That the Interconnection Implementation Review Group shall comply with the directives contained in this Order regarding the distribution and posting of the accompanying Notice of Filing, Public Hearing, and Request for Comments; and it is

FURTHER ORDERED: That the Secretary of the Department shall comply with the directives contained in this Order regarding the distribution and posting of the accompanying Notice of Filing, Public Hearing, and Request for Comments.

By Order of the Department,



James M. Van Nostrand, Chair



Cecile M. Fraser, Commissioner



Staci Rubin, Commissioner