



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

TO: Department's Distributed Generation Service List

VIA: Electronic Mail Only

FROM: Katherine Stock, Hearing Officer

RE: Interconnection Implementation Review Group's Proposed Revisions to the Model Standards for Interconnection of Distributed Generation Tariff,
D.P.U. 25-48 – Procedural Schedule and Directed Questions

DATE: July 25, 2025

CC: Mark D. Marini, Department Secretary

I. INTRODUCTION

On March 25, 2025, the Interconnection Implementation Review Group ("IIRG") submitted to the Department of Public Utilities ("Department") proposed revisions to the Model Standards for Interconnection of Distributed Generation Tariff ("DG Interconnection Tariff") ("IIRG Filing"). On May 27, 2025, the Department opened an investigation into the IIRG Filing. Department Investigation Into Interconnection Implementation Review Group's Proposed Revisions to the Model Standards for Interconnection of Distributed Generation Tariff,¹ Vote and Order Opening Investigation (May 27, 2025). The Department docketed this matter as D.P.U. 25-48.

On June 17, 2025, the Department held a public hearing to receive comments from members of the public on the IIRG Filing and an informational discussion to allow representatives of the IIRG to provide additional context on the IIRG Filing, as well as to allow the Department to ask clarifying questions. On June 20, 2025, the Department requested,

¹ We refer to this Tariff as the DG Interconnection Tariff.

through a Hearing Officer Memorandum, that: (1) representatives of the IIRG memorialize the consensus procedural recommendation made during the public hearing and procedural discussion for the Department to accelerate its review of two consensus topics and (2) participants in the proceeding collaborate and jointly propose a procedural schedule (D.P.U. 25-48, Hearing Officer Memorandum on Request for Proposed Procedural Schedule at 2 (June 20, 2025) (“June 20 Hearing Officer Memorandum”)). On July 9, 2025, the IIRG filed a jointly proposed procedural schedule and its consensus procedural recommendation (“IIRG Procedural Schedule and Recommendation”).²

II. CONSENSUS PROCEDURAL RECCOMENDATION FOR DEPARTMENT TO ACCELERATE REVIEW OF TWO CONSENSUS TOPICS

In its July 9, 2025 filing, the IIRG provided a consensus recommendation for expedited review of the following two consensus topics:

² On June 26, 2025, NSTAR Electric Company d/b/a Eversource Energy (“NSTAR Electric”), Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”), and Fitchburg Gas and Electric Light Company d/b/a Unitil (“Unitil”) (collectively, “Distribution Companies”), filed a Motion for Extension of Time to file the jointly proposed procedural schedule and a consensus procedural recommendation on potential expedited consensus topics from June 27, 2025 to July 9, 2025. On June 27, 2025, the Department granted the Motion.

- Revise the threshold in the DG Interconnection Tariff for Simplified Process eligibility from 15 kilowatts (“kW”) to 25kW, to align the DG Interconnection Tariff with the rules for Net Metering (as modified on November 29, 2024 in Rulemaking Pursuant to the Acts of 2022, c. 179, § 54, G.L. c. 30A, § 2, and 220 CMR 2.00 to Amend the Net Metering Regulations at 220 CMR 18.00, D.P.U. 23-140-A (2024)); and
- Establish Group Study Exemption process for certain Expedited Process facilities:
 - Revise the DG Interconnection Tariff;
 - Revise DG Guidelines to include diagram depicting project progression, base case considerations, and periods whereby Group Exemption may occur;
 - Direct process to evaluate and report on implementation:
 - Following one year of implementation, the Distribution Companies will bring relevant information to the IIRG to allow IIRG member discussions 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; and
 - If the Distribution Companies believe additional time is needed beyond the first year of implementation to allow for a productive evaluation discussion, the Distribution Companies will propose an extension to the IIRG and provide notice to the Department.

IIRG Procedural Schedule and Recommendations at 1.

As contemplated in the procedural schedule below, stakeholders may provide comments on these recommendations. Following the receipt of any comment submissions, the Department will determine next steps on these two consensus recommendations.

III. **DIVISION OF CAPITAL ASSET MANAGEMENT AND MAINTENANCE REQUESTS**

On June 13, 2025, the Division of Capital Asset Management & Maintenance (“DCAMM”)³ submitted a [letter](#) in this proceeding as public comments that it had originally submitted to the Department’s Commission on March 7, 2025.⁴ In their comments, DCAMM raised concerns regarding some of the language included in the DG Interconnection Tariff.⁵ In particular, DCAMM requested that the Department investigate:

³ DCAMM is responsible for capital planning, public building construction, facilities management, and real estate services for the Commonwealth. <https://www.mass.gov/orgs/division-of-capital-asset-management-and-maintenance>

⁴ On June 13, 2025, DCAMM also filed [supplemental comments](#) and read both the letter and supplemental comments into the record during the June 17, 2025 public hearing.

⁵ Each Distribution Company has a Department-approved DG Interconnection Tariff. The currently effective DG Interconnection Tariffs for each Distribution Company are: Unitil, M.D.P.U. No. 474; NSTAR Electric, M.D.P.U. No. 55C, and National Grid, M.D.P.U. No. 1599. This Tariff describes the process and requirements for an interconnecting customer to connect a power-generating facility to the Distribution Company’s electric power system, including discussion of technical and operating requirements, metering and billing options, and other matters. See, e.g., M.D.P.U. No. 55A, § 1.1 (Applicability).

- The use of licenses in lieu of easements;
- Maintaining assets under existing Interconnection Service Agreements (“ISAs”);
- Established timeframe for initial interconnection requests; and
- Maintenance and repair of Commonwealth Energy Intelligence (“CEI”) meter equipment.

Given the common questions of law and fact between the issues raised by DCAMM and our existing investigation into the proposed revisions to the Model DG Interconnection Tariff, the Department finds it reasonable to expand the scope of our present investigation to incorporate these topics. Pursuant to our oversight authority under G.L. c. 164, § 76, our ratemaking authority under G.L. c. 164, § 94, and our inherent authority to regulate in the public interest,⁶ the Department, therefore, expands the scope of our investigation to cover additional topics identified by DCAMM through public comment.

IV. PROCEDURAL SCHEDULE

The Department sets the following procedural schedule for this docket:

⁶ See Zachs v. Department of Public Utilities, 406 Mass. 107, 223 (1989) (“the mission of the agency is to regulate in the public interest”).

DATE	ACTION
August 8, 2025	Initial Comments Due ⁷
August 22, 2025	Reply Due ⁸
August 25, 2025	Consensus procedural recommendations on potential expedited consensus topics conference call, if necessary ⁹
September 24, 2025	Technical Conference ¹⁰
September 25, 2025	Technical Conference continuation, if necessary
October 10, 2025	Deadline for Department to request additional information following the Technical Conference Initial Comments on DCAMM Requests Due
October 24, 2025	Reply Comments on DCAMM Requests Due

⁷ The initial comment period affords IIRG the opportunity to provide any update on additional progress or relevant information related to the IIRG Filing and for other stakeholders to provide comments on relevant issues , including common system modification fee proposals; support for any specific redline revisions submitted by the IIRG; objection to any specific redline revisions submitted by the IIRG; additional redline revisions proposed that were not included in the original IIRG Filing; support or objection to the IIRG’s recommendation for an expedited process for two topics (as detailed in IIRG July 9th submission); and proposed topics for discussion at the technical conference. See IIRG Procedural Schedule and Recommendations.

⁸ The reply comment period affords stakeholders an opportunity to express support or objection to any of the additional information provided by the IIRG in the initial comment period as well as to respond to common system modification fee proposals and

The Department finds that the above procedural schedule promotes efficient resolution of the issues presented in this docket; the Department may modify the procedural schedule if necessary. Stakeholders should note that the initial comment period is limited to the revision of the Simplified and Expedited Processes in the DG Interconnection Tariff and redline revisions submitted in the IIRG Filing, as well as an opportunity to provide support or objection to the IIRG's redline revisions and provide alternative redline revisions. It is not an opportunity for narrative commentary alone. Such commentary must be accompanied by redline revisions that propose a resolution to an issue.

V. DIRECTED REQUESTS

The Department seeks input from the Distribution Companies **no later than 5:00pm on Wednesday, October 8, 2025** in response to the following:

provide brief and narrow responses to initial comments. This is not an opportunity to introduce new issues or respond to comments submitted in the initial comment period.

⁹ If stakeholders raise concerns regarding the consensus topics recommended for accelerated review through written comments that could be addressed or resolved through a conference call, the Department will do so here.

1. Refer to DCAMM's letter and supplemental comments filed in this proceeding on June 13, 2025. Please describe the process and any concerns with allowing for the use of licenses in lieu of easements for distributed energy resource ("DER") owned or operated by Commonwealth agencies seeking to interconnection to the Distribution Companies' electric power systems.
2. Refer to DCAMM's letter and supplemental comments filed in this proceeding on June 13, 2025. Following repair of an existing interconnected DER, if there is little to no increase in capacity, describe whether the Distribution Companies could:
 - (a) create a separate and defined process for instances in which an existing DER (with an executed ISA) would be "repowered" after repair or component replacement and would maintain its original ISA; and
 - (b) work collaboratively with DCAMM to create such a process for the Commonwealth agencies. If not, please provide a detailed explanation.
3. Refer to DCAMM's letter and supplemental comments filed in this proceeding on June 13, 2025. Describe whether the Distribution Companies can provide a timeframe (from two weeks up to two months) within which an initial "fatal flaw" ruling could be provided to the Interconnecting Customer for both new interconnecting facilities and/or the repowering of existing interconnected facilities. If providing this ruling is not possible, please provide a detailed explanation.
4. Refer to DCAMM's letter and supplemental comments filed in this proceeding on June 13, 2025. Please describe the process and any concerns with ensuring that with all meter replacements at state facilities the Distribution Companies will provide the site and DCAMM with the new meter number and the pulse value and/or multiplier from the new meter, and that the pulse communication device is reconnected to the applicable meter, demarcation box, or communication cable.

VI. GROUND RULES

Please refer to the Standard Ground Rules, which can be found at the Department's website at <https://www.mass.gov/how-to/file-comments-or-pleadings-with-the-dpu>, and the following exceptions to the Standard Ground Rules applicable to this proceeding.

a. Exceptions to Standard Ground Rules

i. Filing

In all instances where the Standard Ground Rules reference paper filing or service, please disregard. The Department is currently working in hybrid mode, with most proceedings being

conducted with electronic-only filings. Until further notice, all filings in this docket, including those to the Department and parties, should be submitted only in electronic format. All materials shall be deemed to be filed or received on the date on which the email containing the material is received by the Department.

ii. Protected Materials

As with all other filings, materials for which confidential protection is sought, or may constitute CEII, shall be submitted in electronic format only, marked and distributed via email appropriately according to the Standard Ground Rules, and the filing party must retain original paper versions to be filed at a later date determined by the Department.

iii. Technical Conference Arrangements

Arrangements for technical conferences and any other process will be decided by the Department and communicated to stakeholders prior to the scheduled event.

For further information regarding this Memorandum, please contact Katherine Stock, Annemarie Belle, and Kristen Lommele Festin, Hearing Officers, Department of Public Utilities, at katheirne.e.stock@mass.gov, annemarie.belle@mass.gov, and kristen.lommelle@mass.gov.