

Fox, Julia (ENE)

From: Russ Aney <RussA@parallelproducts.com>
Sent: Thursday, June 13, 2024 12:31 PM
To: MA-GMAC (ENE)
Subject: Avoiding CIP DPU Review Delays In Near-Term

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

The recent DPU Provisional Program's CIP Group Studies introduced a couple of important precedents:

- 1) When the DER development triggers the need for utility distribution system upgrades, the utilities should seek to economically accommodate expected near-term, future DER interconnections and not just the needs of the projects in a recent Group Study; and
- 2) Many of the Distribution System capacity upgrades triggered by and paid for entirely by DER customers also provide benefits to ALL utility customers given the state's mandates to electrify transportation and heating loads, and all beneficiaries of the upgrades should fund those upgrades equitably

The utilities (National Grid, Eversource) are proposing to use CIP-style cost allocation methods to allocate system upgrade costs for near-term future Group Studies (and perhaps individual Impact Studies?). Developers are very concerned that adding on a CIP proposal review through a DPU-adjudicated process at the end of a Distribution Study could extend significantly the time required to obtain an Interconnection Service Agreement. Can the GMAC please communicate this concern to the DPU and utilities, and perhaps come up with a set of rules or principles that the utilities can apply to an updated cost allocation method (vs. the historical "cost causation" approach where the projects pay for 100% of the costs needed to interconnect their system(s)) that does NOT require an adjudicated process at the DPU, potentially adding years to the interconnection process?

To be clear, the developers desire the "beneficiary pays" and "build for the future" cost allocation principles introduced through the recent CIP dockets, but we fear that attaching a DPU review process to apply such cost allocation principles will further slow significantly the pace of interconnections in Massachusetts.

Thanks,

Russell Aney

Sr. Project Developer
100 Duchaine Blvd.
New Bedford, MA 02745