



July 27, 2018

Michael Judge  
Director, Renewables Division  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
[DOER.SREC@state.ma.us](mailto:DOER.SREC@state.ma.us)

Re: Solar Massachusetts Renewable Target ("SMART") Program at 225 C.M.R. § 20.00,  
Guideline on Energy Storage

Dear Mr. Judge:

As you know, on July 14, 2018, the Commonwealth of Massachusetts Department of Energy Resources ("DOER") issued its proposed guideline for the participation of energy storage systems ("ESS") and receipt of an ESS adder as an incentive within the SMART solar incentive program ("Guideline"), which is being developed pursuant to Chapter 75, Section 11 of the Acts of 2016, "An Act Relative to Solar Energy". Pursuant to DOER's request for comments on its draft Guideline no later than July 27, 2018, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid ("National Grid") offers the following comments on the proposed clarification to the eligibility requirements associated with "co-located".

The Guideline seeks to clarify the eligibility requirements for a Solar Tariff Generation Unit ("STGU") with an Energy Storage System ("ESS") to qualify for the Energy Storage System Adder ("ESS Adder"), by including among other things a definition of "co-located." As provided on page 3 of the Guideline:

To be deemed co-located, the Solar Tariff Generation Unit and the Energy Storage System must be located on the same or adjacent parcels, and must be interconnected to the same common collector located on the same parcel(s) on which the STGU and ESS facilities are located (i.e. an electric service on such parcel(s) connected to the same circuit at nominal AC voltage or distribution element that serves no other utility customers and no load other than that associated with the parcels on which the Solar Tariff Generation Unit(s) and Energy Storage Unit are located).

If a Generation Unit Owner has a separate ISA for the Energy Storage System, the Owner must also provide that ISA with their Statement of Qualification Application.

By stating that an STGU and an ESS “must be located on the same or adjacent parcels” in order to qualify for the ESS Adder, it seems likely that DOER generally seeks to avoid the main requirement of the “Single Parcel Rule” for net metering: that one project must be located on a single parcel of land, and anything else requires an “optimal interconnection exception” from an electric distribution company. While DOER may seek to provide the SMART program with greater flexibility in siting STGU and ESS projects than exists under net metering today, the rules for net metering are already generally understood by EDCs and customers, and they will still be relevant for some projects in the SMART program. For these reasons, DOER may wish to reconsider its proposed definition of “co-located” and require the STGU and the ESS to be located within the same parcel boundaries, rather than developing a new standard for STGU and ESS projects that seek to qualify for the ESS Adder.

In the remainder of the provision, DOER states that both the STGU and the ESS “must be interconnected to the same common collector located on the same parcel(s) on which the STGU and ESS facilities are located”. It is unclear whether this means, in the case of a STGU and an ESS on adjacent parcels, may they each have a common collector on each parcel, or must they have one common collector on either of the parcels? DOER provides further conditions on the interconnection of a STGU and ESS Adder, stating that “(i.e. an electric service on such parcel(s) connected to the same circuit . . . that serves no other utility customers and no load other than that associated with the parcels on which the Solar Tariff Generation Unit(s) and Energy Storage Unit are located).” As such, DOER’s provision appropriately requires that one circuit must serve both the STGU and the ESS, and neither a circuit for a STGU nor a circuit for an ESS may serve any other load on their parcels.

If DOER wishes to allow an STGU and ESS to be located on adjacent parcels and still qualify for the ESS Adder, it should impose conditions to ensure that projects were appropriately designed. First, while “adjacent” is generally considered synonymous with “contiguous,” replacing “adjacent” with “contiguous” may improve the common understanding of this provision. Also, a STGU and ESS should be required to be located within the same electric distribution company’s service territory. In addition, to that extent that there are separate ISAs for the STGU and the ESS, the Guidelines should require the interconnecting customer and the retail customer to be the same entity to qualify for the ESS Adder. Preferably, the two parcels would also be contiguous and under common ownership. Further, the Guidelines should recognize that a distribution company has an exclusive franchise right to distribute electricity within its service territory, pursuant to G.L. c. 164, §1B(a), and if a customer hopes to distribute electricity across parcel boundaries, the interconnecting customer must seek a written waiver from the distribution company of its franchise rights -- a request that the distribution company would have full discretion to decline. A distribution company’s reasons for declining to provide

such waivers may include but not be limited to safety, reliability, and/or the distance of the circuit being proposed. Finally, to qualify for the ESS Adder, a STGU and an ESS must be designed with the same point of common coupling ("PCC"). Based on all of the above, DOER's definition of co-located could be revised to read:

To be deemed co-located, the Solar Tariff Generation Unit and the Energy Storage System must be located on the same or contiguous parcels within the same distribution company's service territory, under common ownership, and must be interconnected at the same point of common coupling on a parcel where the STGU and/or the ESS facility is located. If a STGU and an ESS are to be located on contiguous parcels, they must be connected to the same circuit at nominal AC voltage and the interconnecting customer must seek and receive the distribution company's written consent, which is discretionary on the part of the distribution company.

If a Generation Unit Owner has a separate ISA for the Energy Storage System, the Owner must also provide that ISA with their Statement of Qualification Application. To the extent that there are separate ISAs for the STGU and ESS, they must identify the same Interconnecting Customer.

If you have questions, please let me know.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY  
and NANTUCKET ELECTRIC COMPANY  
d/b/a NATIONAL GRID



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