

Bingham, Gerry (ENE)

From: Bingham, Gerry (ENE)
Sent: Wednesday, June 14, 2023 3:24 PM
To: 'Kalsaria, Dishit'; 'Ahirrao, Vishal'; 'Kern, William'; 'brett.jacobson@eversource.com'; 'wmdg@eversource.com'; 'Bonazoli, John'; 'Bucceri, Julia'; 'Boyd, Ryan'
Cc: Meserve, Samantha (ENE); Troy, Joanna K (ENE)
Subject: RE: DOER DG Monthly Reporting for January 1 2009 to May 2023
Attachments: Copy of Aggregated DG Applications_05_20231.xlsx

Hello, EDC representatives:

We continue to have issues with the reporting from each of the utilities (issues DOER raised in response to reporting from last month – see below).

As has been the practice in the past, I am attaching the Aggregated Reporting that will be posted today with a callout in Column A delineating the offending columns.

Regarding cells with dates, there are a variety of fixes required to ensure the data is in date format. I have fixed the dates so that the data can be analyzed by stakeholders. So, I recommend looking at your original submission(s) to ensure the non-complying cells are in compliance with the agreed upon protocols for future submissions (for example, Eversource had many records with a space in front of the date, which can be readily identified by using the filter on the data for each column with a date).

We are open to discussing these issues more if you would find this helpful before the next round of reporting.

As agreed in past TSRG meetings, if issues continue to go unresolved, we will seek to address this matter in the TSRG (or the IIRG, if the issue is moved there).

In order for this data to be useful to those analyzing it, DOER is posting this submission on the Reporting web page.

With this posting DOER is welcoming stakeholders to provide feedback about the accuracy of the reporting to DOER at any time.

Regards,
Gerry

Gerry Bingham, MBA
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Creating a Clean, Affordable and Resilient Energy Future for the Commonwealth

From: Bingham, Gerry (ENE)

Sent: Tuesday, May 9, 2023 11:20 AM

To: 'Kalsaria, Dishit' <Dishit.Kalsaria@nationalgrid.com>; Ahirrao, Vishal <Vishal.Ahirrao@nationalgrid.com>; Kern, William <William.Kern@nationalgrid.com>; brett.jacobson@eversource.com; wmdg@eversource.com; Bonazoli, John <bonazoli@unitil.com>; 'Bucceri, Julia' <julia.bucceri@eversource.com>

Cc: Meserve, Samantha (ENE) <samantha.meserve@mass.gov>

Subject: RE: DOER DG Monthly Reporting for January 1 2009 to April 2023

Importance: High

Hello EDCs:

We would like to take this opportunity to thank all of the utility staff for all of your hard work meeting the regulatory obligations of your company. We know the last 2+ years have posed unique challenges and your efforts have been greatly appreciated.

I am writing because it has been pointed out to DOER that the monthly reporting from the utilities has had some issues that make it difficult (or impossible) to analyze what's being reported. Upon review, we find that a number of these issues would be resolved if the reporting was brought back into the standard approaches we agreed upon in the beginning. It is of paramount importance that we continue this reporting consistent with the agreements we have made in the past.

Below are the areas where DOER feels the reporting needs work. While DOER recognizes it could take some time to resolve all of this, we consider all of these items to need attention as quickly as possible (***noting the incomplete items with emphasis in bold italics***).

- 1) The reporting should be consistent in all fields for all of the utilities. In the past, we are aware the utility representatives have met independently to establish agreed upon formats and protocols. The columns are inconsistent across utilities:
 - a. Only National Grid uses a column for Legacy ID (Column D)
 - b. Only Eversource East starts with column A. All others start with column B.
 - c. Only National Grid and Eversource East use "Date of Info Request" (Column BB)
 - d. Only Eversource East uses extra columns for batteries (Columns F and G)
 - e. Fuel Type should only use the terms and protocols established at the beginning of monthly reporting. (see below re: Other and Battery/Storage)
- 2) Town and ZIP: The naming of cities/towns should be consistent within the reporting and uniform across utilities. For instance, "West Yarmouth" and "W Yarmouth" do not filter the same way leading to improper results. ZIP Code format should be used (to enable the 0 in front of some ZIPs).
- 3) Date Fields should always be formatted as dates. The field is not formatted properly if it displays more dates under the year categories in the filters (EXAMPLE: see Eversource East "Date Application Deemed Complete"). This can be fixed by selecting the column and clicking Text to Columns in the Data Tools available in the top menu bar. Also note that a date appearing as 1900 is a clear error that needs to be resolved.
- 4) Capacity should always be a number and should never say zero ("0"). There should be no text in this field. And, because the reporting is considered to be a historical document we cannot accept reporting that claims a capacity of 0 (zero) kW. When a project has been withdrawn, it does not mean the project proposed zero kW for interconnection. The capacity used should reflect what was in the application to interconnect. This is not an EDC judgment based upon the status of the project (whether incomplete, TBD, or withdrawn).
 - a. ***National Grid has 619 records*** claiming to have a capacity of 0 kW. ***We consider the reporting to be "incomplete" until this issue is resolved. Please submit by the agreed upon deadline of the 15th of each month for the close of the prior month.***
 - b. ***Eversource East has 56 records*** claiming to have a capacity of 0 kW. ***We consider the reporting to be "incomplete" until this issue is resolved. Please submit by the agreed upon deadline of the 15th of each month for the close of the prior month.***

- 5) Fuel Type = "Other": The utilities should follow the agreed upon protocol for all fuel types. In the past, we are aware the utility representatives have met independently to agree upon uniform terms for Fuel Type. DOER believes the EDCs should properly document uniform Fuel Types consistent with past reporting. DOER notes that "Other" has been used in various ways; sometimes to indicate storage. DOER recognizes the complexity of tracking Solar + Storage projects. DOER recommends the EDCs work together to report uniformly.
- 6) Circuits. The naming of circuits should be consistent within the reporting and match the EDC reporting in other data reporting. Developers have informed us that the monthly reporting seldom matches the Hosting Maps or the Pre-Application Report from the EDC during similar periods. DOER would like to determine the cause of this and work together with the EDCs to resolve so that the process can be more streamlined for all parties.
- 7) NOTES Field: This field can be useful for a user to sort through the status of projects. While no agreement was ever reached on having a STATUS field, DOER feels it would be helpful if the EDCs used this field in a uniform manner using protocols for terms consistently and uniformly (with mutually agreed upon meanings of terms like Withdrawn, Revised, On Hold, etc.) If it is found that some EDCs use the column as a status label and others use it to keep project specific notes, DOER recommends two columns to serve those two distinct purposes individually. It has been pointed out by a developer that they have found numerous projects of their own that have been withdrawn and are not noted in the reporting. This overstates the level of saturation on a circuit and should be resolved when pointed out.
- 8) ASO Studies and Group Studies. It has been brought to our attention that projects in these two sets are not consistently appearing in the interconnection reporting. DOER feels that this reporting is intended to track all interconnection projects under review by the EDC. DOER believes this would be a good reason to have a STATUS column that indicates whether the project is in an ASO or Group Study, allowing developers to "build to the standard" in areas where they can be accommodated without unnecessary work conducted by developers *and EDC representatives*.

DOER plans to raise the issue of Monthly Reporting in a future TSRG meeting if we feel it needs broader discussion. Of particular concern is whether the accuracy should be questioned when other sources seem to reflect different information. In past TSRG meetings, the EDCs agreed to this approach of raising the items by email first and raising unresolved issues at the TSRG if needed.

Please feel free to reach out if you have questions about any of these items.

Thank you,

Gerry

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