



# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### NOTICE OF FILING AND REQUEST FOR COMMENTS

D.P.U. 17-164

March 6, 2019

Joint Petition of Fitchburg Gas and Electric Light Company d/b/a Unutil, Massachusetts Electric Company and Nantucket Electric Company, d/b/a National Grid, NSTAR Electric Company d/b/a Eversource Energy, for Approval of a Proposed Revised Version of Section 3.4.1 of the Standards of Interconnection of Distributed Generation Tariff

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On March 1, 2019, Fitchburg Gas and Electric Light Company d/b/a Unutil (“Unutil”), Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid (“National Grid”), and NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) (collectively “Electric Distribution Companies”) filed with the Department of Public Utilities (“Department”) a joint proposed revised version of Section 3.4.1 of the Standards of Interconnection of Distributed Generation tariff (“Revised Group Study Proposal”). The Revised Group Study Proposal includes, but is not limited to, the following revisions to the Electric Distribution Companies’ initial group study proposal filed with the Department on October 20, 2017.

- **Time Frames.** The Revised Group Study Proposal includes a number of specific process time frames applicable to the Electric Distribution Companies as well as group members. Specifically, without limitation, the Revised Group Study Proposal includes a standard window for the closure of the group (Section 3.4.1.a), deadlines for the Electric Distribution Companies to deliver and for group members to execute the Group Study agreement (Section 3.4.1.c), a time frame for the Electric Distribution Companies to complete the Group Study (Section 3.4.1.d); and time frames for the delivery of an executable Interconnection Service Agreement (Section 3.4.1.h). With one exception in Section 3.4.1.h., these time frames are specific and do not require mutual agreement. Under the Revised Group Study Proposal, Group Study time frames would not be subject to the Electric Distribution Companies’ time frame enforcement metric established pursuant to Department Order D.P.U. 11-75-F (see Section 3.4.1.d).
- **Removal from the Group.** The Revised Group Study Proposal includes a process by which a group member can “cure” a tariff non-compliance and maintain status in the group (Section 3.4.1.e).

- **Project Changes and Extension Requests.** The Revised Group Study Proposal includes a process by which a group member can request a project change (Section 3.4.1.i) or seek an extension of a tariff time frame (Section 3.4.1.j).
- **Preceding Study.** The Revised Group Study Proposal specifies when a preceding study is considered to be “in process,” and allows the Electric Distribution Companies, at their discretion, to commence a Group Study before or after the preceding study is complete (Section 1.2., Preceding Study definition). The Revised Group Study Proposal also takes into account that there may be situations where it is necessary and appropriate to include an interconnecting customer with a preceding study in an interconnection solution for the group. (See Section 3.4.1.j; see also Section 3.4.1.d).
- **Cost Allocations for Common System Modifications.** Under the Revised Group Study Proposal, where an inverter-based facility with integrated energy storage is subject to an export limiting scheme, the Electric Distribution Companies will take the export limiting scheme into account when determining common system modification costs allocations among group members (Section 3.4.1.g).
- **Affected System Operators.** The Revised Group Study Proposal includes language outlining Affected System Operators’ requirements (Section 3.4.1.l). This concept is addressed throughout the tariff (e.g., Standard Process, Section 3.4.b; Table 3, n. 1), including, without limitation, in part, in the pilot Group Study Provision (Tariff, n.3 and Section 3.4.1.k).

The Department seeks written comments on the Revised Group Study Proposal. Specifically, the Department seeks input on which revisions are agreed upon by stakeholders, and for revisions that are not agreed upon, the Department seeks proposed alternative revisions. The Department will accept initial written comments until 5:00 p.m. on **March 20, 2019** and reply written comments until 5:00 p.m. on **March 27, 2019**. Any person who desires to file written comments shall file an original of such written comments with Mark D. Marini, Secretary, Department of Public Utilities, One South Station, Boston, Massachusetts, 02110, and send an electronic copy to the D.P.U. 17-164 distribution list, [Kate.Tohme@mass.gov](mailto:Kate.Tohme@mass.gov), and [dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov).

Documents filed with the Department will be available for public inspection at its offices during business hours and through our website by looking up the docket by its number in the docket database at <https://eeaonline.eea.state.ma.us/DPU/Fileroom/dockets/bynumber> (insert 17-164). To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), contact the Department’s ADA coordinator at [DPUADACoordinator@state.ma.us](mailto:DPUADACoordinator@state.ma.us) or (617) 305-3500.

Any person desiring further information regarding the Electric Distribution Companies’ filing should contact their respective Counsel: Unitol, Gary Epler, Esq. at (603) 773-6440; National Grid, Linda P. Moore, Esq., Bowditch & Dewey at (508) 879-5700; and Eversource, John K. Habib, Esq., or Ashley S. Wagner, Esq., Keegan Werlin LLP at (617) 951-1400. For

further information regarding this notice, please contact Kate Tohme, Hearing Officer, Department of Public Utilities, at (617) 305-3500.