

MEMORANDUM

To: Commissioners
Cc: PUC Staff
From: Cindy Wilson-Frias
Date: October 9, 2019
Re: Proposed Distributed Generation Interconnection Reporting (includes Reporting Requirements)

Background:

On May 22, 2019, the Massachusetts Department of Public Utilities (DPU) opened D.P.U 19-55, an inquiry to investigate the interconnection of distributed generation (DG) in Massachusetts. The goal of the inquiry is to revise the Massachusetts DG Interconnection Tariff. The DPU conducted a technical session and sought comments on the Affected System Operator (ASO) Studies.¹ DPU Staff has also been conducting biweekly calls with at least one electric distribution company. Following the technical session and review of comments, on September 25, 2019, the DPU Hearing Officer issued an Interim Guidance – Affected System Operator Studies. The Interim Guidance has two main parts – information to be provided to DG applicants (numbers 1-3 on page 2) and information provided to the DPU and posted on the electric distribution company’s website (numbers 4-10 on pages 3-5). The Interim Guidance can be found at: <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/11239621>.

The purpose of the Interim Guidance is to provide more timely and consistent information about ongoing or potential ASO studies to the DG applicants and regulator in the interest of transparency. I have been informally advised that stakeholders may be interested in proposing inclusion of these reporting processes in a final revised tariff. Therefore, the implications are (1) they believe the information will be useful; and (2) if it is seen as a best practice, a similar proposal may be made to the PUC. While Rhode Island and Massachusetts are not the same in all respects, what we have seen through comments from developers in both states is concern about the ASO studies and a desire for more information and transparency into the process.

Proposal:

The PUC should consider adopting the reporting requirements set forth in the Interim Guidance – Affected System Operator Studies in Rhode Island, with some modifications, applicable to The Narragansett Electric Company d/b/a National Grid.

On Tuesday, October 8, 2019, I held a call with representatives from National Grid to discuss the Interim Guidance to determine if it would make sense to present this to the PUC for its consideration. National Grid (RI) can follow the same processes that are included in the Interim Guidance. National Grid (RI) is willing to follow the same processes. We discussed some modifications to the timing as discussed below.

¹ Affected Systems are defined as “any neighboring transmission or distribution [electric power system] not under the control of [National Grid] (e.g., a municipal utility, or other regulated distribution or transmission utility, which may include Affiliates, or ISO-NE).” Tariff at Section 1.2 (RIPUC 2180). The need for these studies has resulted in uncertainty in timing and cost for DG applicants.

Pros to adopting similar reporting requirements:

- (1) Consistent categories of information
- (2) Increased transparency to developers, other stakeholders, and the regulator
- (3) Consistency of available information between jurisdictions within the NEPOOL/ISO-NE area
- (4) Consistent reporting of information by the National Grid companies to the relevant state regulator
- (5) Ability to evaluate the usefulness of the information prior to any proposal to include such requirements in a tariff.

Challenges to adopting similar reporting requirements:

- (1) Increased workload in tracking the information
- (2) Number 6 requires a review and ruling by the Department/PUC prior to notification of DG applicants in certain circumstances
- (3) Ensuring the information being provided to the PUC is useful to the PUC.

Many of these challenges are addressed in the proposed modifications.

Proposed modifications to the Interim Guidance:

Require all information be provided on a monthly basis (some items in the Interim Guidance are biweekly, monthly, or bimonthly). We probably do not have the resources to appropriately review any filings on a biweekly basis and monthly updates would likely provide DG applicants with more frequent automatic updates than they are now receiving. Keeping track of multiple reporting time frames is difficult and Narragansett Electric advised that it would not be burdensome to provide reports on a monthly rather than bimonthly basis. This affects paragraphs 2, 4, 7, and 9 of the Interim Guidance.

Require all reporting to be submitted on the 15th of the month. The DPU has some reports on the first of the month and some on the first Friday of the month. Having all of Rhode Island's reporting occur on the 15th of the month (or the Monday after a weekend) would be easier for PUC staff to track and alleviate an administrative burden for the company.

Amend paragraph 9 as follows:

Upon commencement of an ASO study that implicates three or more DG applications or more than 15 MWs of DG capacity, the EDC shall ~~coordinate biweekly conference calls with the Department and~~ provide monthly written updates to the PUC and all affected DG applicants (including posting on the EDC's website) that include: (a-h). A call with PUC staff may be scheduled at a mutually agreeable time to address any questions about the written updates.

DPU staff has been conducting biweekly calls so this makes sense for them. The PUC staff likely does not have resources to conduct biweekly calls. Monthly written updates should be sufficient and manageable. We can always schedule a call, if necessary.

Potential Motion:

If the PUC determines adoption of reporting requirements similar to those contained in the Interim Guidance is desirable, the following is a suggested motion:

Move to adopt reporting requirements similar to those contained in the Massachusetts DPU's September 25, 2019 Interim Guidance with the following modifications:

- (1) Throughout the document, change Department to PUC and omit docket numbers.
- (2) Initially, change EDC to The Narragansett Electric Company d/b/a National Grid (National Grid) and then throughout the remainder of the document, change EDC to National Grid.
- (3) Paragraph 2 on page 2, change biweekly to monthly.
- (4) Paragraph 4 on page 3, change bimonthly to monthly.
- (5) Include a sentence that all monthly written reports will be due on the 15th of the month.
- (6) Amend paragraph 9 to strike, in the second sentence, "coordinate biweekly conference calls with the Department and"
- (7) Add to the end of paragraph 9 after subpart h., "A call with PUC staff may be scheduled at a mutually agreeable time to address any questions about the written updates."

