

Attachment A

DEPARTMENT OF PUBLIC UTILITIES

DISTRIBUTED GENERATION GUIDELINES FOR INTERCONNECTION

This Guidance Document is applicable to the obligations and responsibilities of the Distribution Companies and Interconnecting Customers.

The definitions contained in the Standards for the Interconnection of Distributed Generation Tariff shall be applicable to these Guidelines.

Section 1: Affected System Operator Studies

A. Definitions

1. The following definitions shall be applicable to these Guidelines.
 - a. “ASO Impact Screen” shall mean an initial screening process conducted by the Company for each Interconnecting Customer to collect the information necessary to determine if an Affected System Operator study is necessary.
 - b. “Distribution Companies” shall mean Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, and NSTAR Electric Company d/b/a Eversource Energy.
 - c. “DG Guidelines” shall mean the Department’s Distributed Generation Guidelines for Interconnection as they may be revised from time to time.
 - d. “Standard Process Initial Review Report” shall mean the report provided by the Company to the Interconnecting Customer and Affected System Operator that includes the information identified in the ASO Impact Screen.

B. Roles and responsibilities

When the interconnection of a DG facility to a distribution EPS has the potential to adversely affect a neighboring EPS (distribution or transmission), a study of potential adverse impacts on that neighboring system is required by ISO-NE, pursuant to the Section I.3.9 Process outlined in the ISO-NE Tariff. ISO-NE applies the Section I.3.9 Process to review any proposed system changes to ensure that the changes do not have a significant adverse impact on the regional power system. Under ISO-NE Planning Procedure No. 5-1 regarding ISO-

NE's review of such changes, a Proposed Plan Application is required for new or increased generation greater than five MW; ISO NE reserves the right to require a Proposed Plan Application for new or increased generation greater than one MW and less than five MW.

ASO studies are conducted by the ASO in coordination with ISO-NE, and in accordance with the ISO-NE Tariff. The ASO and ISO-NE determine the procedural details and timing relating to ASO studies, including whether and when an ASO study is necessary.

The Distribution Companies are responsible for coordinating with the ASO and ISO NE and communicating with Interconnecting Customers and the Department. The Department has regulatory authority over the Distribution Companies in Massachusetts. The Department does not generally have regulatory authority over the ASOs performing ASO studies, nor does it have authority over ISO-NE, which is regulated by the Federal Energy Regulatory Commission.

Resources:

ISO-NE Planning Procedures No. 5-1, Procedures for Review of Governance Participant's Proposed Plans (Section I.3.9, Applications: Requirements, Procedures, and Forms), https://iso-ne.com/static-assets/documents/rules_proceeds/isone_plan/pp05_1/pp5_1.pdf

ISO-NE Transmission Operating Agreement, Art. 3.03(b), https://www.iso-ne.com/static-assets/documents/regulatory/toa/v1_er07_1289_000_toa_composite.pdf

ISO-NE Transmission, Markets, and Services Tariff, § I.3.9, https://www.iso-ne.com/static-assets/documents/regulatory/tariff/sect_1/sect_i.pdf

C. Process for identifying the need for an ASO study

1. Initial Determination Request

- a. Within 20 days of an interconnection application being deemed complete:
 - i. The Company shall conduct an ASO Impact Screen to determine if a Facility has the potential to cause an adverse impact on an ASO resulting in the need for an ASO study.
 - ii. The ASO Impact Screen shall result in a Standard Process Initial Review Report to be provided to the Interconnecting Customer within five Business Days of

completion.

- iii. If the Company finds the potential of adverse impact to an ASO, the Company shall submit information to the ASO and ISO-NE and request a determination by ISO-NE whether the Facility must undergo an ASO study.
- iv. The Distribution Companies shall work with interested stakeholders to determine the appropriate data and information to be considered in the ASO Impact Screen and to be included in the Standard Process Initial Review Report.

2. Additional adverse impact information request

- a. Upon any change in an Interconnecting Customer's application resulting in a potential adverse impact to an ASO, or upon changes to other Facilities in the queue that could necessitate an ASO study, the Company shall submit information to the ASO within ten Business Days and request a determination from the ASO whether the Facility must undergo an ASO study.

3. Interconnecting customer information

- a. Within five Business Days, of any submission of information to the ASO or ISO-NE in 1 or 2 above, the Company shall provide the Interconnecting Customer with a copy of the information submitted.
- b. Within five Business Days of the Company's receipt of any response from ASO or ISO-NE regarding a Facility's potential inclusion in an ASO study, the Company shall provide such information to the Interconnecting Customer.
- c. Within five Business Days following an Interconnecting Customer's receipt of information provided to the ASO or ISO-NE, the Interconnecting Customer may dispute the accuracy of the information by submitting its dispute to the Company in writing.

- d. If the Company and the Interconnecting Customer are unable to resolve the dispute over information accuracy, one or both parties may bring the dispute to the Ombudsperson through Section 9 of the Interconnection Tariff.

D. Time frames, grouping, and prioritization

1. The Company shall work with the ASOs to facilitate efficient, effective, and expedient processing of all ASO study processes.
2. The Company shall take all feasible actions to obtain a determination of whether a Facility will be the subject of an ASO study prior to execution of an Interconnection Service Agreement. If circumstances exist where a Distribution Company is not able to obtain this information seasonably, the Company shall request that the ASOs and ISO-NE prioritize the study of projects that have completed or nearly completed construction and those projects with signed Interconnection Service Agreements.
3. The Company shall work with the ASO to determine criteria for grouping and prioritization for progressing facilities within an ASO study and shall clearly communicate the grouping and prioritization criteria to all affected Interconnecting Customers and to the Department at the earliest time possible in the ASO study process.

E. Communications and reporting

1. If the Company becomes aware that there is the potential need for an ASO study for any Interconnection Application for interconnection of a facility that is less than 5 megawatts (“MW”), the Company must immediately notify the Interconnecting Customer in writing of the potential and must include:
 - a. An explanation of why the Company believes there is a potential need for an ASO study;
 - b. Whether and what additional information is needed to determine if an ASO study is necessary;
 - c. Expected date when the Company will know whether an ASO study is necessary; and
 - d. Potential impact on interconnection timeline and

costs.

2. Following a Company's receipt of initial notification of the need for an ASO study, the Company shall provide written updates to the Interconnecting Customer on the 1st and the 15th of the month. The updates shall include:
 - a. Whether and what additional information is needed to determine if an ASO study is necessary;
 - b. Expected date when the Company will know whether an ASO study is necessary; and
 - c. Potential impacts on interconnection timelines and costs.

3. Upon commencement of an ASO study for any Interconnection Application, the Company shall provide monthly written updates to the Interconnecting Customer, on 1st of the month following the month in which the Company sent invoices for the ASO study to affected Interconnecting Customers. The update shall include:
 - a. Scope and process of the ASO study;
 - b. Roles and responsibilities of all parties involved in executing the ASO study;
 - c. Standards and jurisdiction of the ASO study;
 - d. Estimated timeline for completion of the ASO study;
 - e. Estimated necessary system modifications and associated costs; and
 - f. Study results as they become available.

4. The Company must file a report every two months —with the Ombudsperson (<https://www.mass.gov/forms/submit-distributed-generation-compliance-filings-and-letter-requests-to-the-ombudsperson>) indicating whether it is experiencing DG saturation in any region or at any substation that indicates the potential need for an ASO study that would affect three or more Interconnection Applications or more than 15 MW of DG capacity in the following 6 months, and what actions the

Company is taking to prevent, mitigate, and prepare for such an occurrence. The report is due by the first of the month.

5. If the Company becomes aware that there is the potential need for an ASO study that will implicate three or more Interconnection Applications or more than 15 MW of DG capacity, the Company must immediately notify the Department in writing and include:
 - a. An explanation of why the Company believes there is a potential need for an ASO study;
 - b. Whether and what additional information is needed to determine if an ASO study is necessary;
 - c. Expected date when the Company will know whether an ASO study is necessary;
 - d. Areas/substations potentially impacted;
 - e. Number of Interconnection Applications potentially affected and total associated MW;
 - f. A spreadsheet with details of each affected Interconnection Application, including but not limited to: application number, current application status, substation and town/city at which the Interconnecting Customer is seeking to interconnect, alternating current nameplate capacity, and estimated date on which the project would be authorized to interconnect without the ASO study;
 - g. Details of the Company's communications with ISO-NE and any other Affected System Operators;
 - h. How the situation has impacted interconnection timelines to date;
 - i. If found to be necessary, how the ASO study would impact interconnection timelines;
 - j. Any proposed resolutions the Company is exploring to enable some affected Interconnection

Applications to proceed with the interconnection process prior to completion of the ASO study;

- k. The Company's plan to address the situation and minimize delays to interconnection timelines of affected Interconnection Applications; and
 - l. A draft written notification to potentially affected Interconnecting Customers for Department review. The written notification should include: items i-v above, and potential impacts on interconnection timelines and costs.
6. Once approved by the Department, the Company shall immediately issue the notification to all potentially affected Interconnecting Customers and post the notification on its website or a website dedicated to ASO studies in the Company's service territory.
7. Following initial notification, the Company shall provide written updates to the Department and all potentially affected Interconnecting Customers on the 1st and the 15th of the month. The updates shall also be posted on the Company's website. The updates shall include:
- a. Whether and what additional information is needed to determine if an ASO study is necessary;
 - b. Expected date when the Company will know whether ASO study is required;
 - c. Potential impacts on interconnection timelines and costs;
 - d. Any proposed resolutions that the Company is exploring to enable some affected Interconnection Applications to proceed with the interconnection process prior to completion of the ASO study; and
 - e. The Company's plan to address the situation and minimize delays to interconnection timelines of potentially affected Interconnecting Customers.
8. If the potentially affected Interconnecting Customer pool is modified at any point, the Company shall provide the Department with an updated

spreadsheet highlighting the modifications.

9. Upon commencement of an ASO study that implicates three or more Interconnection Applications or more than 15 MW of DG capacity, the Company shall coordinate conference calls every two weeks with the Department and provide monthly written updates to the Department and all affected Interconnecting Customers (including posting on the Company's website). The monthly updates shall begin on the 1st of the month following the month in which the Company sent invoices for the ASO study to affected Interconnecting Customers. The monthly update shall include:
 - a. Scope and process of the ASO study;
 - b. Roles and responsibilities of all parties involved in executing the ASO study;
 - c. Standards and jurisdiction of the ASO study;
 - d. Estimated timeline for completion of the ASO study;
 - e. Estimated necessary system modifications and associated costs;
 - f. A prioritization system to determine which of the affected Interconnection Applications would be eligible to interconnect first if capacity became available;
 - g. Any proposed resolutions the Company is exploring to enable some affected Interconnection Applications to proceed with the interconnection process prior to completion of the ASO study; and
 - h. Study results as they become available.
10. Throughout the ASO study process, the Company shall (a) provide affected Interconnecting Customers with the contact information of a knowledgeable Company employee who can answer inquiries related to the ASO study in a timely manner and (b) hold stakeholder meetings to provide updates and a forum for Q&A as needed.

Section 2: Management of High-Volume Queues

A. Jurisdictional Communications

- a. Within ten calendar days of receipt of a completed Interconnection Application with the appropriate fee, the Distribution Companies shall initiate conversation with the interconnecting customers on the issue of jurisdiction and to coordinate with ISO-NE on the issue, as appropriate.¹ The Distribution Companies must use best efforts to provide the most up-to-date information regarding whether the interconnecting customer is subject to the Department or ISO-NE interconnection process.
- b. Where an interconnecting customer responds to the Interconnection Application question “Is the project intending to participate in any ISO-NE market?” with “uncertain,” that customer will not lose its position in the DG interconnection queue. Any such interconnecting customer must notify the Distribution Company promptly upon its decision during the application process, affirmative or negative, to participate in wholesale markets.

For purposes of these DG Guidelines

1. Written communications may be via Email.
2. Where a deadline or due date falls on a Saturday, Sunday, or state-observed holiday, the deadline or due date is extended to the next day that is not a Saturday, Sunday, or state-observed holiday.

¹ Interconnecting customers will be able to assess the jurisdictional status of feeders from the Distribution Companies’ hosting capacity maps (Section II).