

RAAB ASSOCIATES, LTD.



Date: September 20, 2013

To: Mike Wallerstein, MA DPU Hearing Officer

From: Dr. Jonathan Raab, MA DG Transition WG Facilitator

Re: DG Enforcement and Other DG Related Matters

DG Enforcement

In MA DPU Order 11-75-E (issued March 13, 2013) the DPU ordered the Massachusetts Distributed Generation Transition Working Group (DG WG) to collaborate to develop a timeline enforcement mechanism to encourage utility adherence to interconnection timelines and report the results to the Department by October 1, 2013. The specific language in the Order was as follows:

Consistent with the Working Group's plan for transition tasks, we direct the Working Group to develop a more substantial timeline enforcement mechanism. The Working Group may consider a model that both rewards outstanding compliance (e.g., completing tasks before deadlines), and discourages poor compliance (e.g., failing to meet deadlines). Given the importance of creating the proper incentives we direct the Working Group to consider potential enforcement D.P.U. 11-75-E mechanisms that go beyond, or work independently of service quality metrics. Commenters that have addressed the issue of enforcement mechanisms and service quality metrics are encouraged to participate in the Working Group in order to help formulate a proposal for an enforcement mechanism. We direct the Working Group to submit its final proposal for an enforcement mechanism to the Department by October 1, 2013. (pp. 38-39).

Since the issuance of the DPU's order, the DG WG has worked diligently to develop a DG enforcement mechanism consistent with the DPU's direction. After substantial exploration of alternative approaches, and deliberation among the DG WG members, the discussions are still productive and on-going. The WG members will either collectively or individually file their proposal(s) on or before October 1.

Central Administrator and Online Application Process

One of the tasks that the DG WG agreed to take on as part of its Transition Tasks and Plan was to:

5. Consider central administrator and potential online application for tracking and application process (6 months) (Final Report 9/14/12, p. 33)

Over the six months following the Working Group's Final Report filing to the DPU, the Utilities shall work with DOER, the DPU, and non-utility stakeholders to review the Utility DG Interconnection Tracking and Reporting System and identify issues and opportunities to improve upon the application, timeline assurance, and reporting process. The group shall assess and make recommendations to the DPU by April 1, 2013 on how to best overcome identified limitations and inefficiencies, including, but not limited to, the establishment of a centralized on-line application and reporting process considering both the benefits and costs of having such a centralized process administered by a third-party. (Final Report, p.29)

The DG WG, after discussing this issue at two meetings, agreed that it is probably premature to resolve the central administrator issue in the near-future, given that utilities are still implementing and partially automating their own tracking systems.

Instead, and in the interim, the DG WG agreed that it should move forward with the following tasks to improve the application process and reporting/tracking:

- Improve automated tracking and monthly reporting (to DOER) systems at each utility
- Standardize communication to customers about timeline/milestone related issues across the utilities

The WG also agreed to investigate the costs and benefits of, and the mechanisms for, potentially implementing the following tasks to improve the application process and reporting/tracking:

- Ability for each applicant to look online at each utility and see exactly where they are in the interconnection process
- Electronic application process beginning with the Simplified applications, and then for Expedited and Standard applications (with as much commonality across the utilities as possible-recognizing there may need to be some differences to interface with utility IT systems).

DG WG agreed that each of the four tasks above would be addressed over the next year, and that the central administrator would be revisited sometime thereafter (e.g., 1-2 years)

Other DG Working Group Tasks

Other tasks that the DG WG committed to in its Final Report include the following:

8. Develop ongoing trainings including online modules (6 months)
9. Consider using outside engineers during application and construction (1 year)
10. Consider accessible geographic mapping that will show feeders/circuits and DG activity (including names of sub-stations, circuits served) (1 year)
11. Group Studies process (6-12 months)

12. Standardized customer/utility communication (including step notification, information requests, initial screen report, and signatures) (12 months)

A brief status report on the progress of each of these tasks follows:

- For #8, ongoing trainings and online modules, the utilities, with advice from the DG WG, have refined their on-going trainings, including an annual schedule for monthly meetings hosted by the utilities, but the DG WG has not yet addressed the possibility of online training modules.
- For #11, Group Studies, the DG WG has dedicated portions of numerous meetings on this complicated topic, and has agreed on a Group Study approach and process. The WG plans to file its Group Study approach and process, along with the proposed tariff language changes by the end of this year.
- For #12, we have begun to discuss how to standardize customer/utility communication, and expect to have this task completed by the end of this year.
- For #9, considering using outside engineers, that issue has been referred to the Technical Standards Review Group for resolution, which has not been addressed there yet.
- For #10, regarding accessible geographic mapping, the DG WG has not yet begun to tackle that issue.

The DG Transition WG has agreed to disband by the end of the year following the submittal of the Enforcement Filing(s) by October 1, Group Study process, and tariff changes (for Group Study, Landowner Agreement, and various clean up edits) given that most of its transition tasks are completed. The other transition tasks and any additional DG interconnection issues that may arise will be addressed by the utilities, DOER, and other interested stakeholders on an informal and as-needed basis. The Technical Standards Review Group, however, will continue to meet regularly as per its charter.

I will be out of the country on vacation from September 20th until October 11th, and will be checking email periodically. My Associate Susan Rivo (susan@raabassociates.org) can get in touch with me more quickly if need be.