

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO:	Service List in Department Investigation on Distributed Generation
	Interconnection, D.P.U. 11-75

FROM: Mike Wallerstein, Hearing Officer

RE: Interconnection Timeline Enforcement Mechanism

DATE: November 5, 2013

CC: Mark D. Marini, Secretary

On September 14, 2012, the distributed generation working group¹ ("Working Group") issued its final report, Proposed Changes to the Uniform Standards for Interconnecting Distributed Generation in Massachusetts ("Report") and submitted it to the Department of Public Utilities ("Department"). On March 13, 2013 the Department issued its Order, D.P.U. 11-75-E, which, among other things, directed the Working Group to submit to the Department its final proposal for an interconnection timeline enforcement mechanism by October 1, 2013. D.P.U. 11-75-E at 37-39. On October 1, 2013, the Working Group filed its timeline enforcement mechanism proposal with the Department. To better understand the details of the Working Group's proposal, the Department will hold a technical conference.

The Department will hold a technical conference on **Thursday**, **December 5 at 10:00 A.M.**, at the Department's offices, One South Station, 5th floor, Boston, Massachusetts 02110. The technical conference will address, at a minimum, the following questions:

¹ On January 23, 2012, the Department convened the Working Group and tasked it with (1) determining what issues should be resolved regarding the current distributed generation interconnection standards and application procedure to ensure an efficient and effective interconnection process; and (2) deliberating with the goal, to the extent possible, of reaching a consensus on a resolution of such issues for Department review and approval. D.P.U. 11-75-A at 4, 7 (January 23, 2012).

- 1) Why are the following applications excluded from the metric: Expedited applications requiring a Supplemental Review; Simplified Spot and Area Network applications; and Applications with Time Frames negotiated by mutual agreement?
- 2) Why are different interconnection tracks weighted differently in the metric?
- 3) Would the proposed adoption of a central administrator and online application for tracking and interconnection application process reduce or eliminate the need for the Ombudsperson to review disputed interconnection timelines?
- 4) Are the caps on penalties and offsets appropriate?
- 5) Is the 5% deadband, too wide, too narrow, or appropriate?
- 6) Should penalties and offsets increase exponentially instead of linearly?
- 7) Are the penalties and offsets significant enough to motivate behavior?
- 8) Should the proceeds of penalties go to the developers whose projects are delayed?
- 9) Why should projects that have their application fee refunded be excluded from the metrics?
- 10) What is the proposed source of funds for both offsets and penalties?

At the technical conference, the Department will determine a schedule for any additional process. If you have questions, please contact me at: (617) 305-3724.