

To DG Working Group Stakeholders:

On August 9, DOER submitted to members of the DGWG a set of [files for your consideration](#). DOER would like to clarify its intent and add more context so that the DGWG can make best use of this submittal:

- ***The materials are not DOER's current proposal.*** All materials shared to date have been in the spirit of moving the conversation forward. DOER sent the materials on August 9th with the intent of helping the group consider some features and elements in online administration, timelines, and enforcement not yet discussed.
- DOER is not proposing new Legislation;
- DOER is particularly interested in having the DGWG consider the following elements from those documents:

- 1) Reporting Requirements: Annually, no later than January 31, each Utility shall file with the Department an Annual Interconnection Report showing:
 - a) Utility days lapsed since each application submittal [for each stage with timelines];
 - b) Costs to Utility of processing interconnection applications;
 - c) Applications received;
 - d) Complete review of all screens;
 - e) Completed supplemental reviews;
 - f) Completed standard process initial reviews;
 - g) Follow-on studies costs and agreements;
 - h) Impact studies;
 - i) Detailed studies;
 - j) Dates construction promised by Utility;
 - k) Dates construction completed;
 - l) Witness tests; and
 - m) System information for each project [shall] include (1) substation used, (2) annual peak capacity of circuit used, (3) kW of distributed generation on the circuit at the time of study, (4) protective equipment required, and (5) interconnection costs [charged to interconnecting customer].
- 2) Enforcement
 - a) Project Basis
 - i) Upon failure to meet the timelines, the Utility shall promptly refund the application fee and study costs to the customer.
 - ii) For each full 20 business days that the Utility remains in breach of the timelines, the Utility shall pay \$50/kW to the customer in compensatory damages.
 - b) Annual Review
 - i) If greater than 10% of projects exceed timelines, the Utility shall pay a penalty of \$50/kW of projects exceeding timelines.
 - ii) Annual Review penalties shall be paid to the Massachusetts Clean Energy Council ("MassCEC"). Such funds shall be held in an account separate from other accounts of the MassCEC. DOER shall oversee the use of Annual Review penalty funds by the MassCEC, so as to address interconnection streamlining, including but not limited to staffing assistance.
 - c) No Ratepayer Recovery
 - i. The payments described under this section shall not be recoverable through ratepayers.