

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

DOCKET NO. 17-12-03RE06

PURA INVESTIGATION INTO DISTRIBUTION SYSTEM PLANNING OF THE ELECTRIC DISTRIBUTION COMPANIES –INTERCONNECTION STANDARDS AND PRACTICES

100-DAY SPRINT WORKING GROUP REPORT

(December 20, 2024)

Table of Contents

I.	INTRODUCTION	3
II.	SPRINT PROCESS	4
1	. Meeting Topics and Format	4
2	. Voting Procedure	5
III.	CONSENSUS PROPOSALS	7
1	. Updates to PowerClerk or EDC Data	11
2	. Updates to the Interconnection Guidelines	13
3	. Updates to EDC Processes or Procedures	14
4	. Timeline and Cost Estimates	21
IV.	NON-CONSENSUS PROPOSALS	25
1	. Updates to PowerClerk or EDC Data	27
2	. Updates to the Interconnection Guidelines	30
3	. Updates to EDC Processes or Procedures	33
V.	CONCLUSION	37
VI.	MEETING MINUTES AND ATTENDEES	44
1	. Kickoff Meeting	44
2	. Shortening Interconnection Timelines	57
3 T	. Addressing Ambiguities in Interconnection Approval Processes and imelines	66
4 △	. Improving Communication Between the EDCs and Interconnection pplicants	80
5	. Resolve Insufficient Hosting Capacity for New Projects	93
6	. Opportunity to Discuss Additional Issues	104
7	. Opportunity to Discuss Additional Issues	114
8	. Opportunity to Discuss Additional Issues: Voting from Meeting 6	127
9	. Final Meeting (Review Draft Sprint Report)	139

I. INTRODUCTION

In a Final Decision in the current docket, the Public Utilities Regulatory Authority (Authority or PURA) established an Interconnection Working Group to address interconnection challenges as they arise in the state's clean energy programs. Decision, Nov. 25, 2020, pp. 2-4. Since the Working Group's formation, numerous interconnection issues have emerged within the Non-Residential Renewable Energy Solutions (NRES) and Energy Storage Solutions (ESS) Programs, including application delays and unclear requirements.¹

On September 12, 2024, the Authority issued a Procedural Order in the present docket establishing a "100-Day Sprint." <u>See</u> Procedural Order, Sept. 12, 2024. During this period, the Interconnection Working Group was tasked with developing comprehensive solutions to address outstanding interconnection challenges impacting the state's clean energy initiatives. <u>Id</u>. The 100-Day Sprint concluded on December 21, 2024, upon which the Interconnection Working Group produced a report (Sprint Report) that included the following:

- (1) recommendations for addressing all identified interconnection problems, including but not limited to: (a) delays in EDC-led interconnection approval processes; (b) ambiguities in interconnection guidelines and approval timelines; (c) insufficient hosting capacity for new distributed energy resources; (d) communication breakdowns between project developers and the EDCs; (e) slow response times from the EDCs to developer inquiries; (f) inconsistencies in interconnection guidance or approvals among EDC departments; and (g) the potential need for a pre-submission checklist to inform developers of interconnection requirements before application submission;
- (2) evidence and rationale supporting the recommendations;
- (3) a summary of all views expressed during the working group meetings; and
- (4) the dates and attendees of each meeting.

¹ The Authority has previously endeavored to direct changes to interconnection processes within individual clean energy program proceedings. See UI Order No. 22 Compliance, Feb. 1, 2024, Docket No. 23-08-03; Motion No. 19, Docket No. 23-08-03, Annual Non-Residential Renewable Energy Solutions Program Review – Year 3; Motion No. 20; Docket No. 23-08-03; UI Order No. 32 Compliance, Aug. 1, 2024, Docket No. 24-08-03; Eversource Order No. 32 Compliance, Aug. 15, 2024, Docket No. 24-08-03; Eversource Order No. 26 Compliance, Aug. 1, 2024, Docket No. 24-08-05; UI Order No. 26 Compliance, July 30, 2024, Docket No. 24-08-05. Annual Energy Storage Solutions Program Review – Year 4; Order No. 28 Compliance, Aug. 1, 2024, Docket No. 24-08-05. However, the lack of tangible improvements to interconnection outcomes to date and stakeholder feedback indicate the need for comprehensive interconnection solutions across clean energy programs. See Procedural Order, Sept. 12, 2024.

Procedural Order, Sept. 12, 2024, pp. 1-3. The 100-Day Sprint was led by members of PURA's Decisional Staff, Christopher Arpin, Brandon Cavanaugh, and Max Melnick, who drafted the Sprint Report based on discussions and evidence from eight Interconnection Working Group meetings. The Great Plains Institute (GPI) and PURA's Office of Education, Outreach, and Enforcement (EOE) also supported the facilitation of the Sprint. To ensure accuracy, the draft Sprint Report was shared with Working Group members for feedback, capturing a comprehensive representation of the deliberations and views expressed throughout the 100-Day Sprint.

Furthermore, participants in the 100-Day Sprint were invited to submit written comments and feedback on the 100-Day Sprint Report and the interconnection topics it addressed. The EDCs and the Connecticut Solar and Storage Association (ConnSSA) provided comments to PURA's Decisional Staff, which have been included as attachments to the Sprint Report.

II. SPRINT PROCESS

1. Meeting Topics and Format

During the 100-Day Sprint, Decisional Staff led nine meetings with specific topics outlined as follows:

A. Kickoff Meeting

• Date: October 3, 2024

• Time: 11:00 AM - 12:30 PM EST

B. Shortening Interconnection Timelines

• Date: October 8, 2024

Time: 1:30 PM - 3:30 PM EST

C. Addressing Ambiguities in Interconnection Approval Processes and Timelines

• Date: October 18, 2024

• Time: 12:00 PM - 2:00 PM EST

D. Improving Communication Between the EDCs and Interconnection Applicants

• Date: October 31, 2024

• Time: 2:00 PM - 4:00 PM EST

E. Resolving Insufficient Hosting Capacity for New Projects

• Date: November 8, 2024

Time: 10:00 AM - 12:00 PM EST

F. Opportunity to Discuss Additional Issues

Date: November 14, 2024Time: 1:00 PM - 3:00 PM EST

G. Opportunity to Discuss Additional Issues

Date: November 21, 2024Time: 1:00 PM - 3:00 PM EST

H. Opportunity to Discuss Additional Issues: Voting

Date: November 26, 2024

• Time: 10:00 AM - 10:45 AM EST

I. Final Meeting (Review Draft Sprint Report)

Date: December 9

• Time: 11:00 AM - 1:00 PM EST

To ensure discussions remained focused on actionable solutions within PURA's jurisdiction, Decisional Staff discouraged topics or proposals unrelated to PURA's authority, such as interconnection delays stemming from Independent System Operator (ISO) or Federal Energy Regulatory Commission (FERC) policies. The topical meetings were structured as follows:

- 1. **Voting** on any policy proposals discussed at the last meeting.²
- 2. Overview of the meeting topic presented by Decisional Staff.
- 3. **Moderated discussion** with stakeholder input and presentations.
- 4. **Proposing votes** on policy ideas for the next meeting.

2. Voting Procedure

Decisional Staff utilized the voting process established in the Interconnection Policy Working Group's governance framework to assess consensus on policy proposals discussed during Working Group meetings for the Sprint Report. The governance framework specifies the following voting members:

- Connecticut Industrial Energy Consumers (CIEC): one vote
- Clean Energy Developers: two votes
- Department of Energy and Environmental Policy's Bureau of Energy and Technology Policy (DEEP): one vote
- Connecticut Light and Power Company d/b/a Eversource Energy (Eversource): one vote

² After the first topical meeting held on October 8, 2024, stakeholders requested that any votes be held at the beginning of the next Working Group meeting, to give voting members enough time to consider how their votes on any proposals discussed.

- Office of Consumer Counsel (OCC): one vote
- United Illuminating Company (UI): one vote

<u>See PURA Corresp.</u>, Jan. 8, 2021, Interconnection Policy Working Group Governance.

DEEP was unable to participate as a voting member during the 100-Day Sprint. See DEEP Corresp., Sept. 27, 2024. Since the governance framework did not specify the developer voting representatives, Decisional Staff appointed the ConnSSA and the Solar Energy Industries Association (SEIA) as the primary voting representatives for developers during the 100-Day Sprint. SHR Energy Management, LLC (SHR Energy) was designated as an alternate if either ConnSSA or SEIA was unavailable to vote. This decision aimed to ensure that developer voting rights were assigned to associations representing multiple developers, rather than to individual developers who may not reflect the broader community's views. Additionally, SHR Energy was assigned as an alternate voting member during the 100-Day Sprint because SHR Energy had previously represented developers in the Connecticut Distributed Generation Policy Working Group on September 20, 2021, without any objections from participating developers (see the Working Group's webpage for meeting minutes).

The specific voting representatives identified by Decisional Staff are as follows:

1. CIEC4:

- Primary: Amanda De Vito Trinsey (<u>adevito@couchwhite.com</u>)
- Alternate: Jay Goodman (jgoodman@couchwhite.com)

2. ConnSSA:

- Primary: Michael Trahan (<u>miket@connssa.org</u>)
- Alternates: SHR Energy, Noel Lafayette (<u>nlafayette@shrenergy.com</u>);
 ACT, Tim Snyder (tsnyder@joinact.org)

3. Eversource:

- Primary: Carl Nowiszewski (<u>Carl.Nowiszewski@eversource.com</u>)
- Alternates: Brian Rice (Brian.Rice@eversource.com), Joseph Debs (Joseph.Debs@eversource.com)

4. **OCC**:

- Primary: James "Jamie" Talbert-Slagle (James. TalbertSlagle@ct.gov)
- Alternate: John "J.R." Viglione (John.Viglione@ct.gov)

5. **SEIA**:

Primary: Valessa Souter-Kline (vsouterkline@seia.org)

³ Additionally, the Alliance for Climate Transition (ACT) was appointed as a secondary alternate voting member for developers in the event that SHR Energy and/or ConnSSA and SEIA were unable to attend a Sprint meeting.

⁴ CIEC's votes were based on the assumption that there will be an opportunity to consider costs in the future before the policies are formally adopted by PURA.

Alternate: SHR Energy, Noel Lafayette (<u>nlafayette@shrenergy.com</u>);
 ACT, Tim Snyder (<u>tsnyder@joinact.org</u>)

6. **UI**:

- Primary: Joseph Marranca (<u>Joseph.Marranca@uinet.com</u>)
- Alternate: Cornelius Stevenson (Cornelius.Stevenson@uinet.com)

Voting members could propose a vote on specific policy proposals near the end of a meeting. Votes were then held at the beginning of the following meeting, allowing members adequate time to consider their positions. A proposal was deemed a consensus solution if all voting members agreed or abstained from voting. Non-consensus proposals are also noted in this Report to provide the Authority with a comprehensive view of all discussions during the 100-Day Sprint. These non-consensus solutions are clearly marked in the Sprint Report. Consistent with the Interconnection Policy Working Group's governance framework, absences from voting were interpreted as consent to any decisions made. See PURA Corresp., Jan. 8, 2021, Interconnection Policy Working Group Governance. Lastly, Decisional Staff encouraged voting representatives to voice any objections or concerns during voting, ensuring those concerns could be communicated to the Authority in the Sprint Report.

III. CONSENSUS PROPOSALS

The following 26 proposals were recognized as consensus proposals during the 100-Day Sprint and were approved by all members voting at the relevant meeting. A summary table of all consensus proposals is provided first, followed by their categorization into three distinct groups:

- (1) updates to PowerClerk or EDC data:
- (2) updates to the Interconnection Guidelines; and
- (3) updates to EDC processes or procedures.

For each proposal, a high-level summary of stakeholder views expressed during the 100-Day Sprint meetings is included, where applicable.

In some instances, voting members expressed support for the proposals in principle, with the understanding that additional implementation details would need to be finalized by the Interconnection Working Group. For the consensus policies related to PowerClerk improvements, UI clarified that the actual solutions may differ slightly from the proposals as outlined below, depending on the capabilities of UI's internal systems. Additionally, the EDCs clarified that while some proposals are specific to certain incentive programs (e.g., RRES, NRES), their interconnection procedures and practices currently apply to all projects. The EDCs expressed a preference for maintaining this unified approach, rather than managing separate interconnection processes for projects participating in specific incentive programs.

Table 1: Consensus Proposals

Proposal #	Proposer (2nd)	Proposal	Outcome
1	Eversource	The EDCs raise the Level 1 interconnection application threshold from 25 kW to 50 kW for residential applications only	Passed
2	UI	Review current interconnection processes to identify potential new or more specific process tracks for projects with different needs and/or specifications (e.g., a specific track for small/medium C&I facilities with onsite load).	Passed
3	ConnSSA	Expedited interconnection for 50kW-500kW projects; Create a new and separate expedited interconnection process for C&I projects in the 50 kW - 500 kW size range that are co-located with on-site load (can be either Buy-All or Netting systems, as long as they are co-located with on-site load).	Passed
4	ConnSSA	Formally establish that once an interconnection application has been submitted, developers have the option to request an early-process field meeting with the appropriate EDC staff to review their proposed design (applicable to both Netting and Buy-All applications).	Passed
5	ConnSSA	NRES – functionality; Add a "chess clock" functionality to PowerClerk so that for the duration of the interconnection application it tracks whether it is either the EDC's or the Customer's turn to provide a deliverable in order to progress the application to the next step. This information will help the EDC and Customer get on the same page as to what is required as a next step for the application to proceed, as well as provide meaningful data for PURA and other stakeholders to measure what steps are delaying the interconnection application process.	Passed
6	ConnSSA	RRES – job number tracking, UI ONLY; Include the job number assignment in the quarterly data list.	Passed
7	ConnSSA	RRES – functionality, UI ONLY; Develop a retrieval bar for customers using PowerClerk, similar to Eversource's process, to streamline data entry and eliminate the need for manual input.	Passed
8	ConnSSA	RRES – functionality, UI ONLY; Make the signature and application pages a part of the PowerClerk application.	Passed
9	ConnSSA	RRES – functionality, UI ONLY; When correcting PowerClerk application errors, eliminate unneeded fields (i.e., the BEN field is required for corrections but not for the original application).	Passed
10	ConnSSA	RRES – functionality, UI ONLY; Eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times).	Passed
11	ConnSSA	RRES – functionality, UI ONLY; Instead of asking for SITE, LINE, and TECH pages, just make one space for the entire full set.	Passed
12	ConnSSA	RRES – functionality, UI ONLY; Include actual timeframes for each stage in PowerClerk.	Passed
13	SHR Energy; Eversource	To ensure applications are complete, consistent, and correct, create a presubmission checklist for the PowerClerk interconnection application process.	Passed
14	ConnSSA	Establish an initial full review and approval process for a subset of projects over 25KW and make any necessary changes to timelines for projects that opt to participate in this initial full review and approval process	Passed
15	ConnSSA	Establish an improved communication process for the Single Point of Contact for all projects over 25kW	Passed

SFIA	Establish redundant method of communication:	Passed
	Our experience has been that emails are not always a foolproof communication.	. 43364
	method	
	generates an automatic text message to a cell phone number on the	
SEIA		Passed
ConnCCA		Deced
Connosa		Passed
ConnSSA		Passed
COIIIISSA		rasseu
	additional costs are warranted	
ConnSSA	EDCs will provide a cost component breakdown of the total estimated cost of	Passed
	interconnection	
	EDCs will affer the appartunity for the applicant to discuss the cost estimate	
	Somponome war are 2500	
	EDCs will provide a true-up of actual vs. estimated costs within six months of the	
ConnSSA	Should Proposal 25 (below) be voted on? [If there is a unanimous vote of "yes",	Passed
0 00 4		D
ConnSSA		Passed
	resulting Contingent Approval document to be issued after such a comprehensive	
	review will be a ready-for-construction approval with documented approvals from	
	is the developer's responsibility to ensure their designs meet all applicable	
	standards and requirements.	
		ConnSSA Under 1 MW, non-RRES: Establish that the DG Group project manager assigned by the EDC will be the single point of contact for UI) and NRES projects whether the be BUS are view process to determine review timelines and discuss whether or not additional costs are warranted ConnSSA Under 1 MW, non-RRES: Establish that the DG Group project manager assigned by the EDC will be the single point of contact whether or not additional costs are warranted ConnSSA Under 1 MW, non-RRES: Establish that the DG Group project manager assigned by the EDC will be the single point of contact for all Rate 980 (for ES) and SG2 (for UI) and NRES projects whether they be Buy-All or Netting. ConnSSA ConnSSA Under 1 MW, non-RRES: IXWG members to collaborate with EDCs on new IX review process to determine review timelines and discuss whether or not additional costs are warranted EDCs will provide a cost component breakdown of the total estimated cost of interconnection EDCs will offer the opportunity for the applicant to discuss the cost estimate components with the EDCs EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate — exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months; in the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such, and will provide a best gues of when the true-up will be provided. ConnSSA ConnSSA

26	SEIA	Add the following information to the public interconnection queue:	Passed
		Additional data points for projects in queue: -Developer name, including the parent company and not simply the LLC name (with developer approval to share as a checkbox added to the application) -POI location (latitude/longitude) (developer to enter the data) -Contracted export capacity (instead of nameplate)	
29	ConnSSA	PURA to establish a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop a specific model for implementing a uniform program for flexible interconnection in Connecticut. IXWG is to file the model for PURA's consideration within six months of the 100 Day Sprint report to PURA.	Passed
		PURA is to instruct the stakeholder working group to include (but not limited to) the following elements:	
		A brief comparison of the different principles of access and a proposal for adoption of one achieved through consensus amongst the stakeholder group members.	
		Contemplation of how a determination could be made to offer a flexible interconnection option in lieu of upgrades.	
		 A process by which EDCs study and consider flexible interconnection options during system impact studies and include flexible interconnection options in the system impact study results. 	
		The stakeholder working group shall be facilitated by one DER industry member and one EDC member and include	
		a. two representatives from each EDC (the co-chair included),	
		b. one or more representatives from both the Connecticut Department of Energy & Environmental Protection and the Connecticut Office of Consumer Counsel, and	
		c. six representatives from the DER industry, appointed through a process conducted by CONNSSA and SEIA.	
		 Identify in the filing with PURA – to be made no later than six months after PURA's Order – the extent to which consensus was achieved and those issues on which consensus could not be reached. 	
30	SEIA	IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters including defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets as part of a 'technical sub-group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group.	Passed
44	ConnSSA	(IA Costs): EDCS to provide developers the option to elect to have a post-study meeting to review study results, costs, and payment schedule for these costs prior to the issuance of the IA. EDCs shall breakdown (line item) costs for site upgrades covered by developers.	Passed

1. Updates to PowerClerk or EDC Data

- A. Proposal 5: Non-Residential Renewable Energy Solutions (NRES) PowerClerk functionality⁵; The EDCs will add a "chess clock" functionality to PowerClerk so that for the duration of the interconnection application it tracks whether it is either the EDC's or the Customer's turn to provide a deliverable in order to progress the application to the next step. This information will help the EDC and Customer get on the same page as to what is required as a next step for the application to proceed, as well as provide meaningful data for PURA and other stakeholders to measure what steps are delaying the interconnection application process.
 - a. Independence Solar: Points out that the reasons for lengthy stays in the interconnection queue are often unclear. To address this, they propose adding a "chess clock" feature to PowerClerk, which would help identify why an application is on hold and what stage of review it is in. This tool would be crucial for developers to understand the reasons for interconnection delays and what is still pending. The "chess clock" would indicate which party—either the developer or EDC—holds responsibility for advancing the interconnection application, enabling stakeholders to better assess the duration of queue times.
 - b. **Eversource**: Working towards implementing this proposal.
 - c. **UI**: Emphasizes the need to ensure the effectiveness of this idea and wants to communicate any changes clearly to all stakeholders, preferring not to rush the proposal's implementation through PowerClerk.
- B. Proposal 6: Residential Renewable Energy Solutions (RRES) job number tracking, UI ONLY; UI will include the job number assignment in the RRES quarterly data list.
 - a. **ConnSSA**: States that the job number is sometimes absent from the interconnection application, despite being necessary for municipal officials to issue project permits.
 - b. **Trinity Solar**: Reports that it has hundreds of UI projects pending job numbers and advocates for the automation of this process.
 - c. **UI**: Acknowledges that it has a solution in development but needs to address other outstanding projects before implementation.
- C. Proposal 7: RRES PowerClerk functionality, UI ONLY; UI will develop a retrieval bar for customers using PowerClerk, similar

-

⁵ While some of these votes pertain to specific clean energy programs, PURA Sprint Staff recommends that PURA consider expanding these policies wherever possible to encompass all clean energy initiatives, including the Shared Clean Energy Facilities (SCEF) and Energy Storage Solutions (ESS) Programs. This approach would promote consistency across the state's clean energy programs and maximize the benefits of the proposals for as many interconnection applications as possible.

- to Eversource's process, to streamline data entry and eliminate the need for manual input.⁶
- **D. Proposal 8: RRES PowerClerk functionality, UI ONLY**; UI will make the signature and application pages a part of the PowerClerk application.
- E. Proposal 9: RRES PowerClerk functionality, UI ONLY; When correcting PowerClerk application errors, UI will eliminate unneeded fields (i.e., the BEN field is required for application corrections but not for the original application).
- **F. Proposal 10: RRES PowerClerk functionality, UI ONLY**; UI will eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times).
- **G.** Proposal 11: RRES PowerClerk functionality, UI ONLY; Instead of asking for SITE, LINE, and TECH pages, UI will make one space for the entire full set.
- H. Proposal 12: RRES PowerClerk functionality, UI ONLY; UI will include actual timeframes for each stage in PowerClerk.
- I. Proposal 17: Establish redundant method of communication in PowerClerk; Emails are not always a foolproof communication method. Consequently, the Working Group recommends the EDCs use a redundant communication pathway (text message) to reduce the likelihood of a missed communication. Specifically, the Working Group recommends that when PowerClerk generates an automatic email, it also generates an automatic text message to a cell phone number on file.
 - a. CPower: Asserts that email communications are not always reliably received. CPower recommends text messages as an additional, redundant communication channel. They believe that increasing the volume of communications sent by EDCs to developers will enhance effectiveness.
 - b. **Eversource**: Supports the concept but notes that further investigation is needed. To implement this proposal, Eversource would need to design, build, test, and deploy an intermediary service to capture the email trigger and generate the text message through a service provider.
 - c. **UI**: Also supports the idea but emphasizes the need to assess feasibility and determine the associated implementation costs.
- J. Proposal 26: Public Interconnection Queue Data Enhancements; The EDCs will add the following information to the public interconnection queue:

⁶ Some consensus proposals received no comments from the members of the Interconnection Working Group. Additionally, some proposals were specific to individual EDCs, as they were intended to address issues unique to a single EDC.

- a. **Developer Information**: Developer name, including the parent company and not simply the LLC name, with developer approval to share via a checkbox added to the interconnection application
- b. **Point of Interconnection (POI) Location**: Latitude and longitude coordinates, to be entered by the developer.
- c. Contracted export capacity: instead of nameplate capacity.
- d. **New Leaf**: Currently, approximately half of the desired data points are available in the public interconnection queue. Expanding the information in the queue would be beneficial to developers.
- e. **CPower**: Supports New Leaf's proposal but is disappointed that a project's interconnection status is not included in the public interconnection queue data in PowerClerk.
- f. **Eversource Perspective**: Clarifies that this proposal refers to future projects and would be based on what the applicant provides in their application.

2. Updates to the Interconnection Guidelines

- **A. Proposal 1: Level 1 Residential Interconnection**; The EDCs will raise the Level 1 interconnection application threshold from 25 kW to 50 kW for residential applications only.⁷
 - a. **Eversource**: Believes this proposal would better facilitate residential interconnection applications, as some residential-owned projects fall under the Level 2 commercial process track (e.g., residential solar plus battery projects).
- **B. Proposal 4: Early-Process Field Meeting**; The EDCs will formally establish that once an interconnection application has been submitted, developers have the option to request an early-process field meeting with the appropriate EDC staff to review their proposed design (applicable to both Netting and Buy-All applications).
 - a. **Eversource**: States that any interconnection project can request a field visit. To schedule a meeting, applicants simply need to contact their EDC point of contact.
 - b. **Independence Solar**: Recommends summarizing this option in writing to ensure all developers are aware that it is available to them.
- C. Proposal 30: Export Capacity and Power Control Guidelines: The Interconnection Working Group Sprint voting members support addressing and exploring solutions to various interconnection technical matters, including:

⁷ OCC clarified that its vote in favor of this proposal was contingent upon the absence of any associated cost recovery.

a. Defining Export Capacity and Power Control Systems:

- Develop clear definitions for "Export Capacity" and "Power Control Systems."
- Advocate for their inclusion in relevant PURA dockets as a part of a technical sub-group within the existing Working Group forum.

b. Issuance of an Order by PURA:

- i. Support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the addressed matters.
- c. **PosiGen**: Power control systems should be explored as a potential solution to avoid the need for interconnection upgrades.
- d. **SEIA**: This is a critical issue that the clean energy industry is deeply concerned about.
- e. **EDCs**: Resolving this issue will require time and further discussions.

3. Updates to EDC Processes or Procedures

- A. Proposal 2: Review Need for New Process Tracks; The EDCs will review current interconnection processes to identify potential new or more specific process tracks for projects with different needs and/or specifications (e.g., a specific interconnection track for small/medium C&I facilities with onsite load).
 - ui: Notes that creating more specific interconnection tracks could improve the interconnection experience for certain project subsets.
- B. Proposal 3: Expedited interconnection for 50kW-500kW projects⁸; The EDCs will create a new and separate expedited interconnection process for commercial projects in the 50 kW 500 kW size range that are co-located with on-site load, or that are served by on-site infrastructure (the projects can be either Buy-All or Netting systems).
 - a. Independence Solar: Believes that smaller commercial projects experience quicker approval timelines compared to larger projects, which often require lengthy studies. The inclusion of both small and large commercial projects in the same interconnection process can slow down approvals. Therefore, Independence Solar advocates for a separate track specifically for smaller commercial projects.
 - b. **UI**: Recommends removing the 50-kW minimum.

⁸ UI recommended that this proposal be adjusted to include any commercial projects less than 50 kW.

- C. Proposal 22: Under 1MW, non-RRES Interconnection Review process; Working Group members are to collaborate with EDCs on new IX review process to determine review timelines and discuss whether or not additional costs are warranted.
- D. Proposal 13: Pre-Submission Interconnection Application Checklist; To ensure applications are complete, consistent, and correct, the EDCs will create a pre-submission checklist for the PowerClerk interconnection application process.
 - a. Checklist Benefits: Several stakeholders noted that a presubmission checklist could significantly reduce errors at the outset of the interconnection application process, which would, in turn, shorten review timelines for all projects. This checklist would help ensure that developers are fully informed of the interconnection application requirements before application submission.
 - b. Chance to Review Checklist: Developers request that the checklist be reviewed by the Interconnection Working Group before it is finalized by the EDCs.
 - c. Non-Consensus Items: The Working Group did not reach consensus on whether the checklist should be a mandatory component of the interconnection application or simply provided by the EDCs for informational purposes. Additionally, the Working Group did not reach consensus on whether the checklist should be presented as a standalone document or integrated directly into the PowerClerk application software.
 - d. Checklist Items: After the proposal was approved by vote, the EDCs recommended that the following checklist components be added to PowerClerk before an interconnection application is submitted:
 - i. Application Fee to be Paid by Check / ACH / Credit Card
 - ii. Customer has Signed and attached Application (yes/no)
 - iii. Accurate One Line Drawing is included and clearly shows all existing (if any) and new generation, utility meters, transformer, and switch gear compartments (PE Stamp required 50 kW or greater) (yes/ no)
 - iv. Site Plan is included showing PV system meter, utility meter, transformer with AC disconnect co-located on the exterior. Existing and new locations of any meters and/or switches are clearly shown (yes/no)
 - v. The design of my project including metering and application information including billing account information are consistent with all the requirements of the compensation/incentive programs the project plans to participate in. (yes/ no)

- vi. I am familiar with all Eversource standards and requirements for this proposed interconnection and my proposed design is, and my installation will be, in full compliance with those requirements (yes/no)
- vii. If answer to above is no: open a text box titled Explanation and description of non-compliance.
- viii. I am requesting a deviation from the Eversource standards and requirements (yes/no)
- ix. Reason why a deviation is needed: text
- x. Who can we contact to discuss the requested deviation: Name, Company, Cell phone, email.
- xi. Completed Proof of Lease or Ownership form included with application (yes/no)
- xii. For any projects with battery storage: Operational requirements, including the charge and discharge schedule reflected by the Operating Narrative and Proposed System Operating Parameters in PowerClerk, is included (yes/no)
- xiii. Customer's Proof of Insurance is included (yes/no).
- E. Proposal 14: Review of Projects over 25 kW; The EDCs will establish an initial full review and approval process for a subset of projects over 25 kW and make any necessary changes to timelines for projects that opt to participate in this initial full review and approval process.
 - a. **UI and Eversource**: Note they could agree to this "in general."
- F. Proposal 24: Table Proposal 20 in favor of voting on Proposal 25; Should Proposal 25 (below) be voted on? [If there is a unanimous vote of "yes", Proposal 20 which was adopted from the beginning of Meeting 4 will be nullified in light of Proposal 25 below.]
 - a. This proposal was originally scheduled for a vote in Meeting 5, but Eversource indicated they needed more time to review it. As a result, it was tabled and voted on during Meeting 6.
 - b. In Meeting 6, UI voted "yes" but stated that further discussion within the Working Group was needed to finalize the details.
- G. Proposal 25: Opt-in for comprehensive review; The EDCs will allow for an interconnection applicant to opt in (i.e. by including a checkbox in the PowerClerk interconnection application) to a comprehensive review by the metering department, new service department, field engineering department, and any other EDC departments that will be involved in the construction, inspection, and approval of a project; and the resulting Contingent Approval document to be issued after such a comprehensive review will be a ready-for-construction approval with documented approvals from all relevant EDC departments. If the opt-in box is not checked, the default interconnection process will be a review and approval of the transformer and grid capacity only, not the

comprehensive review process as previously described. Additionally, if a developer opts out of this comprehensive review as part of the interconnection process workflow, it will still ultimately be required as part of the service process workflow and it will be the developer's responsibility to ensure their designs meet all applicable standards and requirements.

- a. This proposal was originally scheduled for a vote in Meeting 5, but Eversource indicated they needed more time to review it. As a result, it was tabled and voted on during Meeting 6.
- b. **Earthlight**: Argues that a more thorough upfront review would minimize back-and-forth between EDCs and developers during the interconnection review and approval process. They also believe this approach could prevent EDCs from repeatedly reviewing the same materials.
- c. UI: Abstained from voting, but emphasized that more thorough upfront interconnection reviews could extend timelines. UI also notes that it has been using a comprehensive upfront review model for an extended period.
- H. Proposal 15: Single Point of Contact; The EDCs will establish an improved communication process for the Single Point of Contact for all projects over 25 kW.
 - a. **NRES Order**: The <u>Year 3 NRES Decision</u>, issued on November 8, 2023 in Docket No. 23-08-03, <u>Annual Non-Residential Renewable Energy Solutions Program Review Year 3</u>, includes the following order (Order No. 22):
 - i. "No later than February 1, 2024, the EDCs shall assign a single point of contact for <u>all</u> interconnection matters related to each NRES project, to alleviate developer confusion over the NRES interconnection process. Additionally, contact information for the single point of contact for each project shall be made available to the relevant NRES project developer upon request."
 - ii. <u>See</u> Section IV.H, <u>Interconnection</u>, for additional information.
 - b. Earthlight: Highlights a discrepancy in the definition of a "single point of contact," noting that it means different things to different stakeholders. They believe it should refer to a project manager who coordinates with all EDC departments to obtain necessary approvals and relay them back to the applicant. While Earthlight appreciates that their current point of contact is housed within the EDCs' distributed generation group, Earthlight still needs to engage with other contacts in the EDC field and metering groups, leading to multiple additional meetings. Earthlight emphasizes the challenges of receiving piecemeal instructions, which forces

- them to navigate multiple EDC departments and can result in significant cost implications. Earthlight argues that the current process falls short of the true definition of a single point of contact.
- c. SHR Energy: Stresses the importance of a clear line of authority and decision-making that remains consistent and accountable, avoiding contradictory guidance from different EDC staff members or departments. SHR Energy is aware of issues with single points of contact primarily in Eversource projects, though they acknowledge that this issue may also affect UI projects. SHR Energy believes that the interconnection process lacks clarity when projects receive conflicting instructions from various EDC departments.
- d. Eversource: Explains that a single point of contact cannot be a single individual with comprehensive knowledge of all interconnection requirements. Instead, a single point of contact serves as a coordination function. This person is responsible for tracking responses but does not engage in fieldwork due to a lack of experience or authority. Eversource argues that certain interconnection issues must be addressed in the field, necessitating direct interactions with personnel outside of the designated contact. Eversource would like feedback on whether this is perceived as a systemic issue, as they have not recently received many reports of this problem. Nevertheless, Eversource ultimately agrees with Proposal 15 "in general."
- e. **Verogy**: Acknowledges improvements by Eversource in reducing conflicting information and ambiguity in the NRES interconnection process for newer projects. However, Verogy notes that it is difficult to assess the effectiveness of these changes until the new projects begin construction.
- f. UI: Assigns a point of contact analyst to every project in the interconnection queue, including residential ones, with contact details available in PowerClerk. While UI clarifies that the distributed generation department does not manage every aspect of the interconnection process, they can facilitate requests across EDC departments. UI is still developing its analyst resources to ensure a manageable workload per analyst and believes progress is being made in communication. The single point of contact, housed within UI's distributed generation group, is designed to guide requests to the appropriate individuals or departments involved in the interconnection process.
- I. Proposal 19: Under 1MW, non-RRES Single Point of Contact; The EDCs will establish that the Distributed Generation Group project manager assigned by the EDC will be the single point of contact for all

- Rate 980 (for Eversource) and SG2 (for UI) applications and NRES projects whether they be Buy-All or Netting.
- J. Proposal 18: Call before withdrawing project from Interconnection Queue; The EDCs will make a phone call before withdrawing a project from Interconnection Queue. If a project is set to be withdrawn from the Queue and 15-day notice has been sent with no read receipt in PowerClerk or acknowledgement via email, the EDCs will make a courtesy call to the developer to ensure they have received the notice and understand the consequences of not providing requested information.
 - a. **Eversource**: Supports this proposal, noting that they have already requested this feature to be added. They also mention that applicants will need to provide a phone number with 24/7 availability in PowerClerk.
 - b. **UI**: Supports the proposal as well, but indicates that further investigation is needed, as implementing this could involve additional time and costs.
- K. Proposal 23: Interconnection cost breakdown; EDCs will provide a cost component breakdown of the total estimated cost of interconnection. EDCs will offer the opportunity for the applicant to discuss the cost estimate components with the EDCs. EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months. In the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such and will provide a best guess of when the true-up will be provided.
 - a. This proposal was originally scheduled for a vote in Meeting 5, but Eversource indicated they needed more time to review it. As a result, it was tabled and voted on during Meeting 6.
- L. Proposal 44: Interconnection Cost Review Option; The EDCs will provide developers the option to request a post-study meeting to review study results, costs, and payment schedules prior to the issuance of the Interconnection Agreement (IA). Additionally, the EDCs shall provide a line-item breakdown of costs for site upgrades covered by developers.
- M. Proposal 29: Uniform Flexible Interconnection; PURA will establish a stakeholder process within the Connecticut Interconnection Working Group (IXWG) to develop a specific model for implementing a uniform program for flexible interconnection in Connecticut. The IXWG will file the model for PURA's consideration within six months of the 100-Day Sprint report to PURA. The model shall include (but not be limited to) the following elements:

a. Comparison of Access Principles:

i. A brief comparison of the different principles of access.

ii. A proposal for adoption achieved through consensus among stakeholder group members.

b. Flexible Interconnection Options:

i. Contemplation of how a determination could be made to offer a flexible interconnection option in lieu of upgrades.

c. EDC Process Integration:

- i. A process by which EDCs study and consider flexible interconnection options during system impact studies.
- ii. Inclusion of flexible interconnection options in the system impact study results.

d. Stakeholder Working Group Composition:

- i. Facilitation by one DER industry member and one EDC member.
- ii. Inclusion of:
 - Two representatives from each EDC (the co-chair included);
 - 2. One or more representatives from both the Connecticut Department of Energy & Environmental Protection and the Connecticut Office of Consumer Counsel; and
 - 3. Six representatives from the DER industry, appointed through a process conducted by CONNSSA and SEIA.

e. Consensus Reporting:

 Identification in the filing with PURA – to be made no later than six months after PURA's Order – of the extent to which consensus was achieved and the issues on which consensus could not be reached.

f. Meeting Member Opinions:

- i. **ConnSSA**: Flexible interconnection can address the challenge of limited hosting capacity.
- ii. **New Leaf**: By utilizing smart inverters, interconnection upgrades can be deferred, reducing both costs and timelines.
- iii. **SHR Energy**: Flexible interconnection is the most efficient solution to ensure the continued deployment of DERs.
- iv. **Eversource**: Abstained from voting. While Eversource supports the proposal in principle, it does not agree with all of the requirements outlined. Eversource also believes that flexible interconnection is a challenge that is more technical in nature than administrative.

4. Timeline and Cost Estimates

Sprint Staff requested that the EDCs provide cost and timeline estimates for all consensus proposals adopted by the Working Group by December 21, if feasible. In response, the EDCs submitted cost and timeline estimates for the consensus proposals as part of their written comments. However, in many cases, these estimates remain uncertain. Additionally, the estimates should be considered preliminary and may be subject to change. The EDCs also stated that they will require PURA's approval for any cost recovery related to the implementation of the consensus proposals before moving forward with their execution.

Table 2: EDC Preliminary Cost and Timeline Estimates

Proposal #	Proposal	Cost Estimates	Timeline Estimates
1	The EDCs raise the Level 1 interconnection application threshold from 25 kW to 50 kW for residential applications only	none/ minimal	2 months
2	Review current interconnection processes to identify potential new or more specific process tracks for projects with different needs and/or specifications (e.g., a specific track for small/medium C&I facilities with onsite load).	uncertain	6 months
3	Expedited interconnection for 50kW-500kW projects; Create a new and separate expedited interconnection process for C&I projects in the 50 kW - 500 kW size range that are co-located with on-site load (can be either Buy-AII or Netting systems, as long as they are co-located with on-site load).	uncertain	6 months
4	Formally establish that once an interconnection application has been submitted, developers have the option to request an early-process field meeting with the appropriate EDC staff to review their proposed design (applicable to both Netting and Buy-All applications).	none	immediate
5	NRES – functionality; Add a "chess clock" functionality to PowerClerk so that for the duration of the interconnection application it tracks whether it is either the EDC's or the Customer's turn to provide a deliverable in order to progress the application to the next step. This information will help the EDC and Customer get on the same page as to what is required as a next step for the application to proceed, as well as provide meaningful data for PURA and other stakeholders to measure what steps are delaying the interconnection application process.	uncertain	6 months
6	RRES – job number tracking, UI ONLY; Include the job number assignment in the quarterly data list.	uncertain	6 months
7	RRES – functionality, UI ONLY; Develop a retrieval bar for customers using PowerClerk, similar to Eversource's process, to streamline data entry and eliminate the need for manual input.	uncertain	6 months
8	RRES – functionality, UI ONLY; Make the signature and application pages a part of the PowerClerk application.	uncertain	6 months

9	RRES – functionality, UI ONLY; When correcting PowerClerk application errors, eliminate unneeded fields (i.e., the BEN field is required for corrections but not for the original application).	uncertain	6 months
10	RRES – functionality, UI ONLY; Eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times).	uncertain	6 months
11	RRES – functionality, UI ONLY; Instead of asking for SITE, LINE, and TECH pages, just make one space for the entire full set.	uncertain	6 months
12	RRES – functionality, UI ONLY; Include actual timeframes for each stage in PowerClerk.	uncertain	6 months
13	To ensure applications are complete, consistent, and correct, create a pre-submission checklist for the PowerClerk interconnection application process.	None/ minimal	1 month
14	Establish an initial full review and approval process for a subset of projects over 25KW and make any necessary changes to timelines for projects that opt to participate in this initial full review and approval process	uncertain	6 months
15	Establish an improved communication process for the Single Point of Contact for all projects over 25kW	none/ minimal ⁹	immediate
17	Establish redundant method of communication: Our experience has been that emails are not always a foolproof communication method We recommend using a redundant communication pathway (text message) to reduce the likelihood of a missed communication Recommendation is that when PowerClerk generates an automatic email, it also generates an automatic text message to a cell phone number on file	Uncertain total cost – outside services estimated the initial costs to be at \$50,000-\$100,000.	6 months after approval
18	Make a phone call before withdrawing a project from IX Queue: If a project is set to be withdrawn from the Queue and 15-day notice has been sent with no read receipt in PowerClerk or acknowledgement via email, make a courtesy call to the developer to ensure they have received the notice and understand the consequences of not providing requested information	none	immediate
19	Under 1 MW, non-RRES: Establish that the DG Group project manager assigned by the EDC will be the single point of contact for all Rate 980 (for ES) and SG2 (for UI) and NRES projects whether they be Buy-All or Netting.	none	immediate ¹⁰
22	Under 1 MW, non-RRES: IXWG members to collaborate with EDCs on new IX review process to determine review timelines and discuss whether or not additional costs are warranted	uncertain	6 months

⁹ The final cost estimate will depend on the solution identified.

10 The EDCs assert that this solution has been in place for months.

23	EDCs will provide a cost component breakdown of the total estimated cost of interconnection EDCs will offer the opportunity for the applicant to discuss the cost estimate components with the EDCs EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate — exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months; in the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such, and will provide a best guess of when the true-up will be provided.	none	immediate ¹¹
24	Should Proposal 25 (below) be voted on? [If there is a unanimous vote of "yes", Proposal 20 which was adopted from the beginning of Meeting 4 will be nullified in light of Proposal 25 below.]	N/A	N/A
25	Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service department, field engineering department, and any other departments that will be involved in the construction, inspection, and approval of a project; and the resulting Contingent Approval document to be issued after such a comprehensive review will be a ready-for-construction approval with documented approvals from all relevant EDC departments. If the opt-in box is not checked, the default IX process is a review and approval of the transformer and grid capacity only, not the comprehensive review process as previously described. Additionally, if a developer opts out of this comprehensive review as part of the IX process workflow, it is still ultimately required as part of the service process workflow and is the developer's responsibility to ensure their designs meet all applicable standards and requirements.	minimal cost	3-6 months
26	Add the following information to the public interconnection queue: Additional data points for projects in queue: -Developer name, including the parent company and not simply the LLC name (with developer approval to share as a checkbox added to the application) -POI location (latitude/longitude) (developer to enter the data) -Contracted export capacity (instead of nameplate)	Adding fields to PowerClerk-minimal cost publish data in queue- uncertain cost	2 months to add new field. Full implementation tied to ongoing hosting capacity map improvements (1 year or more).

¹¹ For new applications moving forward.

29	PURA to establish a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop a specific model for implementing a uniform program for flexible interconnection in Connecticut. IXWG is to file the model for PURA's consideration within six months of the 100 Day Sprint report to	uncertain	uncertain
	PURA. PURA is to instruct the stakeholder working group to include (but not limited to) the following elements: 1. A brief comparison of the different principles of access and a proposal for adoption of one achieved		
	through consensus amongst the stakeholder group members. 2. Contemplation of how a determination could be made to offer a flexible interconnection option in lieu of upgrades.		
	A process by which EDCs study and consider flexible interconnection options during system impact studies and include flexible interconnection options in the system impact study results. The stakeholder working group shall be facilitated by:		
	 4. The stakeholder working group shall be facilitated by one DER industry member and one EDC member and include a. two representatives from each EDC (the co-chair included), 		
	b. one or more representatives from both the Connecticut Department of Energy & Environmental Protection and the Connecticut Office of Consumer Counsel, and		
	 c. six representatives from the DER industry, appointed through a process conducted by CONNSSA and SEIA. 5. Identify in the filing with PURA – to be made no later 		
20	than six months after PURA's Order – the extent to which consensus was achieved and those issues on which consensus could not be reached.	I mooute!	umanuta!:-
30	IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters including defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets as part of a 'technical sub-group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group.	uncertain	uncertain

44	(IA Costs): EDCS to provide developers the option to elect to have a post-study meeting to review study results, costs, and payment schedule for these costs prior to the issuance of the IA. EDCs shall breakdown (line item) costs for site upgrades covered by developers.	none	immediate
----	---	------	-----------

IV. NON-CONSENSUS PROPOSALS

The following 18 proposals did not reach consensus among all voting members during the 100-Day Sprint. A summary table of all non-consensus proposals is provided first, followed by their categorization into three distinct groups:

- (1) updates to PowerClerk or EDC data;
- (2) updates to the Interconnection Guidelines; and
- (3) updates to EDC processes or procedures.

For each proposal, a high-level summary of stakeholder views expressed during the 100-Day Sprint meetings is included, where applicable.

In certain instances, additional perspectives not covered during Sprint meetings were highlighted in written comments. For further details, please refer to the stakeholder comments included as attachments to this Report.

Table 3: Non-Consensus Proposals

Proposal #	Proposer (2nd)	Proposal	Outcome
16	ConnSSA	Determine whether and if so, how, to provide project work #s automatically upon initial application (both residential and commercial)	Not voted on ¹²
20	ConnSSA	Under 1 MW, non-RRES: Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service, field engineering, and any other departments that will be involved in the construction and the resulting Contingent Approval be a ready-for-construction approval with documented approvals from all EDC departments. If the box is not checked, the default is a review and approval of the transformer and grid capacity only.	Nullified ¹³
21	ConnSSA	Under 1 MW, non-RRES: Provide a checkbox or similar option in PowerClerk for a project to EITHER require the comprehensive review by all departments OR a review and approval of the transformer and grid capacity only. Should this review option be selected, specific interconnection methods need not be provided for this high-level review	Not voted on
27	SEIA	IXWG Sprint voting members support the establishment of a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop an updated queue management proposal that will specifically (but not exclusively) address: -Status of interconnection, including dates for when each milestone was	No

¹² Some proposal votes were postponed by the voting member who originally introduced them and were not brought up for reconsideration in subsequent meetings.

¹³ This proposal was superseded by Proposal 25.

		reached: application submitted; screening in progress; study agreement issued; impact study in progress; impact study report issued; interconnection agreement issued; under construction; and interconnected (final list of milestones to be included will be determined in the working group). -Regularly updated information about interconnected generation	
		-Consideration of milestones following execution of an interconnection agreement to establish project viability/forward progress, while considering the full development landscape (e.g. NRES solicitations, ASO Studies etc.)	
28	Eversource; UI	In an effort to improve overall IX process/queue efficiency, add the topic "how to achieve more clarity of proposed projects as they enter the IX process" to the IXWG's agenda for 2025, beginning with the January meeting. This effort would include exploring possible solution ideas such as but not limited to decoupling the incentive program process from the IX process and realigning them in a serial manner (incentive program first, followed by IX), potential guardrails to be added or more strictly enforced as prerequisites to attain/maintain an IX queue position, and better overall harmonization between incentive program rules and IX process guidelines.	No
31	ConnSSA	Reverse jurisdiction over interconnection location or interconnection methods that occur outside of EDC-owned transformers back to the local building official and reviewed against NEC standards similar to the successful 10-year jurisdiction policy 2012-2022. This reversal shall apply regardless of the system type, including both Buy-All and Netting arrangements. EDCs currently have jurisdiction.	No
32	ConnSSA	EDC's Distributed Generation (DG) department project manager (PM) will supply fault current data / impedance data / transformer size upon request from the developer. Data will be provided in full to the developer within 7 business days.	No
33	ConnSSA	REC meter ordering and payment will be added as a process in PowerClerk once CA/IA are received. Payment will be allowed by credit card, ACH, or check (similar to IX application payment) WAM and/or PowerClerk will show meter status (i.e. meter order/payment complete, meter installation date scheduled [show date], meter installation complete [show date].	No
34	ConnSSA	The Interconnection Working Group recommends that ISO-NE cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects. The IX Working Group urges the Public Utility Regulatory Authority and the Department of Energy and Environmental Protection to also recommend to ISO-NE that cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects.	No
35	SEIA	IXWG Sprint Voting Members support creating a stakeholder working group, potentially as a subgroup to the IX Working Group, to explore developing a proactive system planning program in CT to enable hosting capacity for distributed energy resources. IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the working group. Topics to be considered by the working group: o Factors that drive the development of DG by enabling hosting capacity in specific locations that benefit the state as a whole and further the state's clean energy objectives (e.g., availability of technically developable land for solar, land cost, proximity to existing transmission and distribution infrastructure, upgrade costs, and forecasted electrification demand to co-optimize infrastructure deployment for solar and electrification enablement)	No
		o Cost allocation The working group should draw on the experiences of other states pursuing proactive planning such as MA, NY IL, MD, MN, and CO.	

36		interconnection process or EDC standards issues to the monthly- meeting Interconnection Working Group for thorough discussion and resolution, if possible. Developers must contact their designated single point of contact for all specific project-related issues and follow clearly defined escalation paths within the EDCs if satisfaction is not reached in a timely manner. Only if satisfaction is not reached after the conclusion of the above processes should developer/applicants pursue other available remedies for their Distributed Energy Resources interconnection-related concerns.	No
37	ConnSSA	EDC's will update I&R Guidelines to reflect their proposal in Docket No. 22-08-03 – for meter relocations. (Eversource) • 100' for current transformer cabinets with a main disconnect of 1800A or less (Eversource I&R 2024 still states 50'). • 150' for current transformer cabinets with a main disconnect greater than 2000A. (UI) UI did not propose a change to the allowable distance between meter and instrument rated transformer enclosure in this docket.	No
38	ConnSSA	For NRES projects where no service work is being performed (only interconnecting solar), EDC's will no longer use this application as a trigger for requiring all systems services to comply with the most current I&R manual standards. Examples include allowing existing interior revenue meters to remain interior, and existing interior service disconnects. New production meters will be required to be installed on the exterior of the building grouped with the solar AC disconnect. Directory plaques will be used to call out component locations in conformance with existing NRES/RRES plaque requirements. This puts policy back in line with what was successfully done during the LREC/ZREC program.	No
39	ConnSSA	(Reference - Eversource 2024 I&R Page 16, section 7) For solar-only interconnections, remove the requirement for an additional switch to be installed on the load side of the utility meter.	No
40	ConnSSA	from an allowable 3' distance from instrument rated transformer enclosure to main switch to previous I&R guideline of 25' allowable distance from instrument rated transformer enclosure to main switch.	
41	ConnSSA	(Reference – Eversource 2024 I&R Pg. 63, section 808) Utility may not require a customer to take a utility-controlled outage for service work of any kind if there is already an existing means of disconnect (switch or main breaker).	No
42	ConnSSA	EDCs to improve upon internal processes to expediate meter procurement, programming, and installation so that PTO can be obtained within 15 days of AHJ approval [as it was during the ZREC program].	No
43	ConnSSA	(Supplement IA): Once an IA has been executed, and the customer is compliant with all requirements of that agreement including the cost and payment schedule, the EDC does not have the right or ability to issue supplemental IA with additional costs.	No

1. Updates to PowerClerk or EDC Data

- **A. Proposal 16: Project Work #'s;** The EDCs will determine whether and, if so, how to provide project work numbers automatically upon initial application (both residential and commercial).
 - a. **ConnSSA**: While originally discussed in a commercial context, ConnSSA prefers this approach to apply to both commercial and residential solar and storage projects.

- b. **Eversource**: Believes the proposal needs further investigation, as a Level 2 project could involve multiple work numbers. They emphasized the need to clarify the exact requirements.
- c. **OCC**: Motioned to table the proposal.
- d. **ConnSSA**: Accepted the motion to table and intends to revisit the proposal in a subsequent Working Group meeting.
- **B. Proposal 27: Updated Queue Management**; The Interconnection Working Group (IXWG) Sprint voting members will support establishing a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop an updated queue management proposal. This proposal will specifically (but not exclusively) address:
 - a. Status of Interconnection Milestones:
 - i. Include dates for when each milestone is reached:
 - 1. Application submitted
 - 2. Screening in progress
 - 3. Study agreement issued
 - 4. Impact study in progress
 - 5. Impact study report issued
 - 6. Interconnection agreement issued
 - 7. Under construction
 - 8. Interconnected
 - ii. (Final list of milestones to be determined by the working group.)
 - b. **Interconnected Generation Information**: Provide regularly updated information about interconnected generation.
 - c. **Post-Interconnection Agreement Milestones**: Consider milestones following the execution of an interconnection agreement to establish project viability and forward progress, while considering the full development landscape (e.g., NRES solicitations, ASO Studies, etc.).
 - d. Meeting Member Opinions:
 - i. **Eversource**: States that they would have supported a less-specific proposal. Their primary concern focused on the inclusion of specific dates for key milestones in the interconnection process.
 - ii. **New Leaf**: Clarifies that this proposal involves adding new information to the existing public queue data.
- C. Proposal 32: Accelerated Data Delivery; The EDCs' Distributed Generation (DG) department project manager (PM) will supply fault current data / impedance data / transformer size upon request from the developer. Data will be provided in full to the developer within 7 business days.
 - a. Meeting Member Opinions:
 - i. ConnSSA:
 - 1. Believes this would improve the predictability and efficiency of the interconnection process.

2. Notes that providing this data could help developers avoid costly redesigns later in the process.

ii. Earthlight Technologies:

1. States that it takes several weeks and multiple calls/emails to obtain this data. While flexible on the timeframe, there is a preference for a clearer, more reliable, and shorter turnaround time.

iii. Eversource and UI:

- 1. Support the sharing of data but express concern about the 7-day timeline.
- 2. Note that certain data, such as fault current data, may take longer to procure.
- 3. Data could possibly be provided with the contingent approval.
- D. Proposal 20: Under 1 MW, non-RRES Comprehensive Review Opt-in; The EDCs will allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service, field engineering, and any other EDC departments that will be involved in the construction and the resulting Contingent Approval, which will be a ready-for-construction approval with documented approvals from all EDC departments. If the box is not checked, the default will be a review and approval of the transformer and grid capacity only.
 - a. This proposal passed but was later nullified and replaced by Proposal 25. The nullification occurred because the language was revised in real time, which led to unclear wording and insufficient time for voters to fully evaluate the changes.
- E. Proposal 21: Under 1 MW, non-RRES Comprehensive Review Opt-in; The EDCs will provide a checkbox or similar option in PowerClerk for a project to EITHER require a comprehensive review by all EDC departments OR a review and approval of the transformer and grid capacity only. Should this review option be selected, specific interconnection methods will need not be provided for this high-level review.
 - a. This proposal was not voted on, as its content was incorporated into the updated Proposal 20 language that was voted on.
- F. Proposal 33: REC Meter Integration; EDCs will add REC meter ordering and payment as a process in PowerClerk once Contingent Approval (CA) and the Interconnection Agreement (IA) are received. Payment will be allowed by credit card, ACH, or check (similar to the interconnection application payment). WAM and/or PowerClerk will display meter status, including: (1) Meter Order/ Payment Complete; (2) Meter Installation Date Scheduled [show date]; and (3) Meter Installation Complete [show date].\

a. Meeting Member Opinions:

i. ConnSSA:

- 1. Seeks to simplify the payment process, possibly through handling payments via PowerClerk and/or expanding payment options.
- 2. Aims to centralize REC meter-related activities

ii. Eversource:

- 1. Describes the solution as overly prescriptive, noting there may be other options or potential challenges.
- 2. Acknowledges ongoing efforts to improve meter processing but suggests that Proposal 33 is not the best approach.
- 3. Indicates that this approach may not be suitable for all projects.

iii. UI:

- 1. Finds the solution too prescriptive, echoing Eversource's sentiment.
- 2. Raises concerns about how this new feature may impact existing backend systems.

2. Updates to the Interconnection Guidelines

A. Proposal 37: Meter Relocation Distance Updates; EDCs will update I&R Guidelines to reflect their proposal in Docket No. 22-08-03 for meter relocations. Eversource: (1) 100' for current transformer cabinets with a main disconnect of 1800A or less (Eversource I&R 2024 still states 50'); and (2) 150' for current transformer cabinets with a main disconnect greater than 2000A. UI did not propose a change to the allowable distance between meter and instrument rated transformer enclosure in this docket.

a. Meeting Member Opinions:

- i. **Earthlight**: Meter relocations can result in lengthy lead times for equipment procurement and drive up project costs. In some buildings, particularly older ones, meter relocations are not feasible. Recently, 50% of commercial projects have required meter relocations.
- ii. **SHR Energy**: Seeks clarity on the rationale behind this new requirement.
- iii. **CIEC**: Abstained from voting, citing potential conflicts with future rulings.
- iv. **UI:** Abstained from voting, explaining that they had not had the opportunity to thoroughly review the proposal internally with their subject matter experts.

v. Eversource:

1. Notes that changes have not been finalized via their internal review process.

- 2. Expresses concern about the proposal's "blanket" application to all services.
- 3. Notes that not every project will be feasible.
- 4. Meter relocation was not required under the LREC/ZREC Program, but is required under the NRES Program to support EDC meter access.
- 5. States that the 50-foot standard is "doable."
- B. Proposal 38: NRES Solar Interconnection Standards; For NRES projects where no service work is being performed (only interconnecting solar), the EDCs will no longer use this application as a trigger for requiring all system services to comply with the most current I&R manual standards. Examples include: (1) allowing existing interior revenue meters to remain interior; (2) allowing existing interior service disconnects; (3) new production meters will be required to be installed on the exterior of the building grouped with the solar AC disconnect; and (4) directory plaques will be used to call out component locations in conformance with existing NRES/RRES plaque requirements. This proposal will put interconnection policy back in line with what was successfully done during the LREC/ZREC program.
 - a. Meeting Member Opinions:
 - ConnSSA: Notes inconsistencies in the enforcement of meter relocation requirements, making it difficult to accurately estimate project costs upfront. Suggests reverting to practices similar to the LREC/ZREC program.
 - ii. **Earthlight**: In cases where meter relocation is necessary—approximately 50% of our projects in recent years—service relocation is often required as well. This can result in additional costs of up to \$90k, potentially rendering the project financially infeasible.
 - iii. **Eversource**: Notes issues with meter relocation under the LREC/ZREC program. Under the current NRES program, Eversource owns and installs production meters, meaning they must abide by the I&R book, which mandates exterior placement.
 - iv. UI: Echoes Eversource's concerns. Advocates for caseby-case assessments. Suggests that some NRES projects, even those classified as "behind the meter," may still require comprehensive reviews to ensure safety and compliance with applicable standards.
- C. Proposal 39: Solar-Only Switch Removal; (Reference Eversource 2024 I&R Page 16, section 7) For solar-only interconnections, the EDCs will remove the requirement for an additional switch to be installed on the load side of the utility meter.

a. Meeting Member Opinions:

- i. Eversource:
 - 1. Expresses concerns about safety implications, as the vetting process for solar-only interconnections has not been completed.
 - 2. Therefore, Eversource is unable to assess the safety risks and voted "no" on this proposal.
- ii. **UI**: Raises concerns about blanket rulings and emphasized the need for case-by-case reviews.
- **D. Proposal 40: Transformer Enclosure Distance Reversion**; (Reference Eversource 2024 I&R Pg. 28, section 659) EDCs will revert the allowable distance from instrument-rated transformer enclosures to main switches from 3 feet back to the previous I&R guideline of 25 feet.
 - a. Meeting Member Opinions:
 - i. Eversource:
 - 1. Still reviewing the developer's request and has not yet fully vetted the proposal.
 - 2. Stresses that safety continues to be a top priority and key consideration for Eversource personnel.
 - ii. **UI**:
 - 1. Notes a lack of an internal review and requires more time to consult subject matter experts before making a decision.
 - 2. States that the internal review is still pending.
- E. Proposal 41: No Utility- Controlled Outages with Existing Disconnect; (Reference Eversource 2024 I&R Pg. 63, section 808) The EDCS will not require a customer to take a utility-controlled outage for service work of any kind if there is already an existing means of disconnect (switch or main breaker).
 - a. Meeting Member Opinions:
 - i. Eversource:
 - 1. Acknowledges that the request is reasonable but argues against its broad application.
 - 2. Suggests a case-by-case approach, emphasizing safety considerations as a priority.
 - ii. UI:
 - 1. Agrees with Eversource's concerns about the blanket nature of the proposal.
 - 2. States that UI has historically handled such situations on a case-by-case basis for NRES projects.

3. Updates to EDC Processes or Procedures

- A. Proposal 28: Interconnection Process Clarity Enhancement; The Interconnection Working Group (IXWG) will add the topic "How to Achieve More Clarity of Proposed Projects as They Enter the IX Process" to its agenda for 2025, beginning with the January meeting. This effort will include exploring possible solution ideas such as, but not limited to:
 - a. Decoupling and Realigning Processes:
 - i. Decoupling the incentive program process from the IX process.
 - ii. Realigning them in a serial manner (incentive program first, followed by IX).
 - b. **Establishing Guardrails for IX Queue Position:** Adding or more strictly enforcing potential guardrails as prerequisites to attain or maintain an IX queue position.
 - c. **Harmonizing Rules and Guidelines:** Achieving better overall harmonization between incentive program rules and IX process guidelines.
 - d. Meeting Member Opinions:
 - SEIA: Acknowledges the importance of queue management discussions but expresses concern about the level of detail in the proposed solutions for achieving greater project clarity.
- **B. Proposal 31: Interconnection Jurisdiction;** EDCs will revert jurisdiction over interconnection locations or methods that occur outside of EDC-owned transformers back to the local building official. These interconnection methods will be reviewed against NEC standards, similar to the successful 10-year jurisdiction policy from 2012-2022. This reversal applies regardless of the system type, including both Buy-All and Netting arrangements. Currently, EDCs have jurisdiction over these aspects.
 - a. Meeting Member Opinions:
 - i. ConnSSA:
 - Believes these aspects should be reviewed against NEC standards, similar to the policy from 2012-2022.
 - 2. Suggests that this action will ideally lead to a streamlined interconnection process.
 - ii. Earthlight Technologies: Advocates for reinstating standards similar to those established during the ZREC program, emphasizing that the Authority Having Jurisdiction (AHJ) should be responsible for inspecting and approving customer-owned equipment.

iii. Eversource:

- 1. States that EDCs and local inspectors have always maintained separate jurisdictions, and that no change has occurred or is necessary.
- 2. Explains that Eversource would not be comfortable delegating the safety of its personnel to municipal inspectors.
- iv. **UI:** States that they are not aware of any prior reversal of jurisdiction, meaning that, in their understanding, local building officials have always retained their authority, while EDCs have maintained theirs.

v. OCC:

- 1. Expresses concerns about potential overlap.
- 2. Highlights the need for a clearer delineation of responsibilities between EDCs and local officials.
- C. Proposal 34: ISO-NE Studies; The Interconnection Working Group (IXWG) Sprint voting members will urge ISO-New England (ISO-NE) to cease requiring any studies for projects under 5MWs and instead require the Electrical Distribution Companies (EDCs) to provide only a notification of the projected in-service date for such projects. Additionally, the IXWG will urge the Public Utility Regulatory Authority (PURA) and the Department of Energy and Environmental Protection (DEEP) to recommend to ISO-NE that it cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects.

a. Meeting Member Opinions:

i. ConnSSA:

- 1. Believes that removing/simplifying the interconnection process for smaller projects would accelerate clean energy deployment.
- 2. A simpler process also implies a cheaper application process, which would improve the overall economics of small projects.

ii. Eversource:

- Expresses concern that the wording implies the EDCs were advising ISO-NE on its procedures, which is outside the EDCs' purview.
- 2. Clarifies that Eversource was not taking a position for or against the proposal but believed it was more appropriate for developers and trade groups to directly engage with ISO-NE on this issue.
- **D. Proposal 35: Proactive Hosting Capacity Planning;** The Interconnection Working Group (IXWG) Sprint voting members will support creating a stakeholder working group, potentially as a subgroup to the IXWG, to explore developing a proactive system planning program in Connecticut to enable hosting capacity for Distributed Energy

Resources (DG). Additionally, the IXWG Sprint voting members will support the issuance of an Order by the Public Utility Regulatory Authority (PURA) requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the working group.

a. Topics to be Considered by the Working Group:

i. Factors Driving DG Development:

- 1. Availability of technically developable land for solar.
- 2. Land cost.
- 3. Proximity to existing transmission and distribution infrastructure.
- 4. Upgrade costs.
- 5. Forecasted electrification demand to co-optimize infrastructure deployment for solar and electrification enablement.

ii. Cost Allocation:

1. Learning from Other States: Drawing on the experiences of other states pursuing proactive planning, such as Massachusetts (MA), New York (NY), Illinois (IL), Maryland (MD), Minnesota (MN), and Colorado (CO).

b. Meeting Member Opinions:

i. **CIEC**: Found the proposal's language overly prescriptive and expressed concerns about directing PURA's actions.

ii. Eversource:

- 1. Believes the issue is already being addressed in existing dockets and working groups.
- 2. Opposes duplicating efforts across multiple forums.
- iii. **UI**: Acknowledges the importance of the issue but believes a working group is not the appropriate format for addressing it.
- **E. Proposal 36: Interconnection Dispute Resolution**; Developers and applicants must, and the Public Utility Regulatory Authority (PURA) is encouraged to, first refer all interconnection process or EDC standards issues to the monthly Interconnection Working Group (IXWG) meetings for thorough discussion and resolution, if possible.

a. Escalation Steps:

 Initial Referral: Refer all interconnection process or EDC standard issues to the monthly IXWG meetings for discussion and resolution.

ii. Project-Specific Issues:

- Developers must contact the designated single point of contact for all specific project-related issues.
- 2. Developers must follow clearly defined escalation paths within the EDCs if satisfaction is not reached in a timely manner.

iii. **Pursuit of Remedies**: Only if satisfaction is not reached after the conclusion of the above processes should developers/applicants pursue other available remedies for their Distributed Energy Resources (DER) interconnection-related concerns.

b. Meeting Member Opinions:

i. CIEC: Raises concerns about the proposal's prescriptive language, particularly subjective terms like "satisfaction" and "timely manner," which could lead to inconsistent interpretations and complications.

ii. ConnSSA:

- 1. Argues that developers should retain the right to approach PURA directly at any time.
- 2. Acknowledges some reasonable aspects of the proposal and indicated they could support a split version of it.
- iii. **Eversource**: Emphasizes that the goal is to establish a structured internal process for issue resolution before escalating to PURA.
- **F. Proposal 42: Metering Procurement;** EDCs will improve upon internal processes to expediate meter procurement, programming, and installation so that Permission to Operate can be obtained within 15 days of authority-having-jurisdiction approval [as it was during the ZREC program].

a. Meeting Member Opinions:

i. Eversource:

- 1. Believes the 15-day timeframe is "overly restrictive" and not feasible in many circumstances.
- 2. Notes that Eversource is actively working to enhance meter related processes but anticipates that changes will occur gradually.
- ii. UI: Echoes Eversource's concerns, noting that other factors, such as "witness tests," also impact the overall timeline.
- **G. Proposal 43: Supplemental Interconnection Costs;** Once an Interconnection Agreement has been executed, and the customer is compliant with all requirements of that agreement including the cost and payment schedule, the EDC will not have the right or ability to issue a supplemental Interconnection Agreement with additional costs.

a. Meeting Member Opinions:

i. **Verogy:** Argues that supplemental interconnection application costs should only be issued if cost increases exceed a predetermined accuracy threshold.

ii. Eversource:

1. Highlights that cost fluctuations, particularly with material costs, may occur after the 90-day window.

2. Warns that locking in prices beyond this period could potentially burden ratepayers.

iii. UI:

- 1. Notes challenges with the proposed restriction, especially during a comprehensive engineering review.
- 2. Points out that developers accept a level of cost uncertainty when they opt out of a detailed review, which could otherwise identify potential costs earlier in the process.

V. CONCLUSION

Sprint Staff respectfully request that PURA Decisional Staff approve the consensus proposals put forth by the Interconnection Working Group, with the understanding that some proposals may require further refinement of language and implementation details. Notably, certain proposals may need additional discovery and evidence regarding EDC-incurred costs and timelines, which PURA may need to establish. Clear timelines will also be crucial to ensuring the timely implementation of these proposals.

While some recommendations are specific to particular programs (e.g., NRES, RRES), Sprint Staff recommend that PURA consider implementing consensus policies statewide across all clean energy programs wherever possible. This approach would better ensure the interconnection of a diverse range of resources and help resolve issues that may be present across different state programs. Sprint Staff also respectfully urge PURA Decisional Staff to address the unresolved non-consensus issues identified during the 100-Day Sprint, and, as appropriate, forward them to the legislature for resolution.

Sprint Staff have also observed that, while progress was made on less technical issues such as communication challenges, slower progress was seen on more technical matters, such as power control requirements and adjustments needed to facilitate flexible interconnection. To address these complex technical issues, Sprint Staff respectfully suggest that the Working Group be granted an opportunity to continue its work on these technical items. A process similar to the 100-Day Sprint—co-led by PURA staff with a clear deadline—could provide the necessary focus and structure. Additionally, Sprint Staff note that orders from PURA that include a high degree of specificity, like the September 12, 2024 Procedural Order establishing the 100-Day Sprint, tend to produce more effective outcomes from the Working Group.

Overall, Sprint Staff believe that the Working Group was productive during the 100-Day Sprint. Over the course of nine meetings, the process engaged a broad and diverse group of participants, including EDCs and developers, leading to the successful resolution of many outstanding issues through open dialogue and collaboration.

Finally, Sprint Staff have included a summary table following this paragraph, outlining all 44 proposals considered by the Interconnection Working Group during the 100-Day Sprint. The table includes all proposals seconded by a voting member of the Working Group. Non-consensus proposals that were discussed but not seconded by a voting member are not included, as they were never brought to a vote.

Table 4: All 100-Day Sprint Proposals

Proposal #	Proposer (2nd)	Proposal	Outcome
1	Eversource	The EDCs raise the Level 1 interconnection application threshold from 25 kW to 50 kW for residential applications only	Passed
2	UI	Review current interconnection processes to identify potential new or more specific process tracks for projects with different needs and/or specifications (e.g., a specific track for small/medium C&I facilities with onsite load).	Passed
3	ConnSSA	Expedited interconnection for 50kW-500kW projects; Create a new and separate expedited interconnection process for C&I projects in the 50 kW - 500 kW size range that are co-located with on-site load (can be either Buy-All or Netting systems, as long as they are co-located with on-site load).	Passed
4	ConnSSA	Formally establish that once an interconnection application has been submitted, developers have the option to request an early-process field meeting with the appropriate EDC staff to review their proposed design (applicable to both Netting and Buy-All applications).	Passed
5	ConnSSA	NRES – functionality; Add a "chess clock" functionality to PowerClerk so that for the duration of the interconnection application it tracks whether it is either the EDC's or the Customer's turn to provide a deliverable in order to progress the application to the next step. This information will help the EDC and Customer get on the same page as to what is required as a next step for the application to proceed, as well as provide meaningful data for PURA and other stakeholders to measure what steps are delaying the interconnection application process.	Passed
6	ConnSSA	RRES – job number tracking, UI ONLY; Include the job number assignment in the quarterly data list.	Passed
7	ConnSSA	RRES – functionality, UI ONLY; Develop a retrieval bar for customers using PowerClerk, similar to Eversource's process, to streamline data entry and eliminate the need for manual input.	Passed
8	ConnSSA	RRES – functionality, UI ONLY; Make the signature and application pages a part of the PowerClerk application.	Passed
9	ConnSSA	RRES – functionality, UI ONLY; When correcting PowerClerk application errors, eliminate unneeded fields (i.e., the BEN field is required for corrections but not for the original application).	Passed
10	ConnSSA	RRES – functionality, UI ONLY; Eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times).	Passed

11	ConnSSA	RRES – functionality, UI ONLY; Instead of asking for SITE, LINE, and TECH pages, just make one space for the entire full set.	Passed
12	ConnSSA	RRES – functionality, UI ONLY ; Include actual timeframes for each stage in PowerClerk.	Passed
13	SHR Energy; Eversource	To ensure applications are complete, consistent, and correct, create a pre-submission checklist for the PowerClerk interconnection application process.	Passed
14	ConnSSA	Establish an initial full review and approval process for a subset of projects over 25KW and make any necessary changes to timelines for projects that opt to participate in this initial full review and approval process	Passed
15	ConnSSA	Establish an improved communication process for the Single Point of Contact for all projects over 25kW	Passed
16	ConnSSA	Determine whether and if so, how, to provide project work #s automatically upon initial application (both residential and commercial)	Not voted on ¹⁴
17	SEIA	Establish redundant method of communication: • Our experience has been that emails are not always a foolproof communication method • We recommend using a redundant communication pathway (text message) to reduce the likelihood of a missed communication • Recommendation is that when PowerClerk generates an automatic email, it also generates an automatic text message to a cell phone number on file	Passed
18	SEIA	Make a phone call before withdrawing a project from IX Queue: If a project is set to be withdrawn from the Queue and 15-day notice has been sent with no read receipt in PowerClerk or acknowledgement via email, make a courtesy call to the developer to ensure they have received the notice and understand the consequences of not providing requested information	Passed
19	ConnSSA	Under 1 MW, non-RRES: Establish that the DG Group project manager assigned by the EDC will be the single point of contact for all Rate 980 (for ES) and SG2 (for UI) and NRES projects whether they be Buy-All or Netting.	Passed
20	ConnSSA	Under 1 MW, non-RRES: Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service, field engineering, and any other departments that will be involved in the construction and the resulting Contingent Approval be a ready-for-construction approval with documented approvals from all EDC departments. If the box is not checked, the default is a review and approval of the transformer and grid capacity only.	Nullified ¹⁵
21	ConnSSA	Under 1 MW, non-RRES: Provide a checkbox or similar option in PowerClerk for a project to EITHER require the comprehensive review by all departments OR a review and approval of the transformer and grid capacity only. Should this review option be selected, specific interconnection methods need not be provided for this high-level review	Not voted on

¹⁴ Some proposal votes were postponed by the voting member who originally introduced them and were not brought up for reconsideration in subsequent meetings.
15 This proposal was superseded by Proposal 25.

22	ConnSSA	Under 1 MW, non-RRES : IXWG members to collaborate with EDCs on new IX review process to determine review timelines and discuss whether or not additional costs are warranted	Passed
23	ConnSSA	EDCs will provide a cost component breakdown of the total estimated cost of interconnection EDCs will offer the opportunity for the applicant to discuss the	Passed
		cost estimate components with the EDCs EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate — exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months; in the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such, and will provide a best guess of when the true-up will be provided.	
24	ConnSSA	Should Proposal 25 (below) be voted on? [If there is a unanimous vote of "yes", Proposal 20 which was adopted from the beginning of Meeting 4 will be nullified in light of Proposal 25 below.]	Passed
25	ConnSSA	Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service department, field engineering department, and any other departments that will be involved in the construction, inspection, and approval of a project; and the resulting Contingent Approval document to be issued after such a comprehensive review will be a readyfor-construction approval with documented approvals from all relevant EDC departments. If the opt-in box is not checked, the default IX process is a review and approval of the transformer and grid capacity only, not the comprehensive review process as previously described. Additionally, if a developer opts out of this comprehensive review as part of the IX process workflow, it is still ultimately required as part of the service process workflow and is the developer's responsibility to ensure their designs meet all applicable standards and requirements.	Passed
26	SEIA	Add the following information to the public interconnection queue: Additional data points for projects in queue: -Developer name, including the parent company and not simply the LLC name (with developer approval to share as a checkbox added to the application) -POI location (latitude/longitude) (developer to enter the data) -Contracted export capacity (instead of nameplate)	Passed
27	SEIA	IXWG Sprint voting members support the establishment of a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop an updated queue management proposal that will specifically (but not exclusively) address: -Status of interconnection, including dates for when each milestone was reached: application submitted; screening in progress; study agreement issued; impact study in progress; impact study report issued; interconnection agreement issued; under construction; and interconnected (final list of milestones to be included will be determined in the working group).	No

		-Regularly updated information about interconnected generation	
		-Consideration of milestones following execution of an interconnection agreement to establish project viability/forward progress, while considering the full development landscape (e.g. NRES solicitations, ASO Studies etc.)	
28	Eversource; UI	In an effort to improve overall IX process/queue efficiency, add the topic "how to achieve more clarity of proposed projects as they enter the IX process" to the IXWG's agenda for 2025, beginning with the January meeting. This effort would include exploring possible solution ideas such as but not limited to decoupling the incentive program process from the IX process and realigning them in a serial manner (incentive program first, followed by IX), potential guardrails to be added or more strictly enforced as prerequisites to attain/maintain an IX queue position, and better overall harmonization between incentive program rules and IX process guidelines.	No
29	ConnSSA	PURA to establish a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop a specific model for implementing a uniform program for flexible interconnection in Connecticut.	Passed
		IXWG is to file the model for PURA's consideration within six months of the 100 Day Sprint report to PURA.	
		PURA is to instruct the stakeholder working group to include (but not limited to) the following elements:	
		A brief comparison of the different principles of access and a proposal for adoption of one achieved through consensus amongst the stakeholder group members.	
		Contemplation of how a determination could be made to offer a flexible interconnection option in lieu of upgrades.	
		3. A process by which EDCs study and consider flexible interconnection options during system impact studies and include flexible interconnection options in the system impact study results.	
		The stakeholder working group shall be facilitated by one DER industry member and one EDC member and include	
		a. two representatives from each EDC (the co-chair included),	
		b. one or more representatives from both the Connecticut Department of Energy & Environmental Protection and the Connecticut Office of Consumer Counsel, and	
		c. six representatives from the DER industry, appointed through a process conducted by CONNSSA and SEIA.	
		5. Identify in the filing with PURA – to be made no later than six months after PURA's Order – the extent to which consensus was achieved and those issues on which consensus could not be reached.	
30	SEIA	IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters including	Passed

1			
31	ConnSSA	defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets as part of a 'technical sub-group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group. Reverse jurisdiction over interconnection location or	No
		interconnection methods that occur outside of EDC-owned transformers back to the local building official and reviewed against NEC standards similar to the successful 10-year jurisdiction policy 2012-2022. This reversal shall apply regardless of the system type, including both Buy-All and Netting arrangements. EDCs currently have jurisdiction.	
32	ConnSSA	EDC's Distributed Generation (DG) department project manager (PM) will supply fault current data / impedance data / transformer size upon request from the developer. Data will be provided in full to the developer within 7 business days.	No
33	ConnSSA	REC meter ordering and payment will be added as a process in PowerClerk once CA/IA are received. Payment will be allowed by credit card, ACH, or check (similar to IX application payment) WAM and/or PowerClerk will show meter status (i.e. meter order/payment complete, meter installation date scheduled [show date], meter installation complete [show date].	No
34	ConnSSA	The Interconnection Working Group recommends that ISO-NE cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected inservice date of such projects. The IX Working Group urges the Public Utility Regulatory Authority and the Department of Energy and Environmental Protection to also recommend to ISO-NE that cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects.	No
35	SEIA	IXWG Sprint Voting Members support creating a stakeholder working group, potentially as a subgroup to the IX Working Group, to explore developing a proactive system planning program in CT to enable hosting capacity for distributed energy resources. IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the working group. Topics to be considered by the working group: o Factors that drive the development of DG by enabling hosting capacity in specific locations that benefit the state as a whole and further the state's clean energy objectives (e.g., availability of technically developable land for solar, land cost, proximity to existing transmission and distribution infrastructure, upgrade costs, and forecasted electrification demand to co-optimize infrastructure deployment for solar and electrification enablement) o Cost allocation	No
		The working group should draw on the experiences of other states pursuing proactive planning such as MA, NY IL, MD, MN, and CO.	
36	Eversource/UI	Developer/Applicants must, and PURA is encouraged to first refer all interconnection process or EDC standards issues to the monthly- meeting Interconnection Working Group for	No

		thorough discussion and resolution, if possible. Developers	
		must contact their designated single point of contact for all specific project-related issues and follow clearly defined escalation paths within the EDCs if satisfaction is not reached in a timely manner. Only if satisfaction is not reached after the conclusion of the above processes should developer/applicants pursue other available remedies for their Distributed Energy Resources interconnection-related concerns.	
37	ConnSSA	EDC's will update I&R Guidelines to reflect their proposal in Docket No. 22-08-03 – for meter relocations. (Eversource) • 100' for current transformer cabinets with a main disconnect of 1800A or less (Eversource I&R 2024 still states 50'). • 150' for current transformer cabinets with a main disconnect greater than 2000A. (UI) UI did not propose a change to the allowable distance between meter and instrument rated transformer enclosure in this docket.	No
38	ConnSSA	For NRES projects where no service work is being performed (only interconnecting solar), EDC's will no longer use this application as a trigger for requiring all systems services to comply with the most current I&R manual standards. Examples include allowing existing interior revenue meters to remain interior, and existing interior service disconnects. New production meters will be required to be installed on the exterior of the building grouped with the solar AC disconnect. Directory plaques will be used to call out component locations in conformance with existing NRES/RRES plaque requirements. This puts policy back in line with what was successfully done during the LREC/ZREC program.	No
39	ConnSSA	(Reference - Eversource 2024 I&R Page 16, section 7) For solar-only interconnections, remove the requirement for an additional switch to be installed on the load side of the utility meter.	No
40	ConnSSA	(Reference – Eversource 2024 I&R Pg. 28, section 659) EDCs revert back from an allowable 3' distance from instrument rated transformer enclosure to main switch to previous I&R guideline of 25' allowable distance from instrument rated transformer enclosure to main switch.	No
41	ConnSSA	(Reference – Eversource 2024 I&R Pg. 63, section 808) Utility may not require a customer to take a utility-controlled outage for service work of any kind if there is already an existing means of disconnect (switch or main breaker).	No
42	ConnSSA	EDCs to improve upon internal processes to expediate meter procurement, programming, and installation so that PTO can be obtained within 15 days of AHJ approval [as it was during the ZREC program].	No
43	ConnSSA	(Supplement IA): Once an IA has been executed, and the customer is compliant with all requirements of that agreement including the cost and payment schedule, the EDC does not have the right or ability to issue supplemental IA with additional costs.	No
44	ConnSSA	(IA Costs): EDCS to provide developers the option to elect to have a post-study meeting to review study results, costs, and payment schedule for these costs prior to the issuance of the IA. EDCs shall breakdown (line item) costs for site upgrades covered by developers.	Passed

VI. MEETING MINUTES AND ATTENDEES¹⁶

1. Kickoff Meeting

These minutes document the Kickoff Meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The Kickoff Meeting was held virtually on **Thursday, October 3rd, 2024 from 11:00am–12:30pm EST**.

The Kickoff Meeting agenda is as follows. These meeting minutes follow the same structure as the agenda, with the addition of a list of meeting participants.

- Welcome and introductions
- Overview of Procedural Order
- 100-Day Sprint process and participant expectations
- IX WG voting bylaws
- 100-Day Sprint topics and process report
- Discussion and Q&A
- Next steps
- · List of meeting participants

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Kickoff Meeting. The process will be led by PURA Staff with support from EOE and GPI.

Christopher Arpin (PURA) covered the rest of the meeting material, excluding participant discussion and Q&A. Unless specifically indicated otherwise, Christopher Arpin presented the content summarized in Sections I–V of these meeting minutes.

- 1. Christopher Arpin (PURA) provided an overview of the agenda for the 100-Day Sprint Kickoff Meeting, summarized below:
 - a. Agenda overview
 - b. Welcome, Introductions, and Agenda Overview.
 - c. Overview of Procedural Order
 - d. Discuss 100-Day Sprint process and participant expectations
 - e. Review interconnection working group voting bylaws
 - f. Discussion of Sprint meeting topics
 - g. Remaining time for stakeholder discussion and Q&A at the end.
- 2. PURA Staff introduced themselves. PURA Staff will be facilitating and moderating the 100-Day Sprint Process.

¹⁶ The meeting minutes were prepared by the Great Plains Institute, the consultant for the Interconnection Working Group.

- a. Brandon Cavanagh, Associate Research Analyst: Lead Staff on Non-Residential Energy Solutions (NRES) and Shared Clean Energy Facilities (SCEF) dockets, works on PURA's Clean and Affordable Energy Unit. With PURA since June 2024.
- b. Max Melnick, Clean Energy Innovation Fellow: Support Staff on non-wires solutions (NWS) dockets. With PURA since August 2024.
- c. Christopher Arpin, Rate Specialist: Lead Staff on the energy storage solutions dockets and provides support for the NRES, Residential Renewable Energy Solutions (RRES), and other Clean Energy Programs. Also, non-Decisional Staff on the Innovative Energy Solutions (IES) program. Works on PURA's Clean and Affordable Energy unit. With PURA since August 2022.
- 3. The mission statement of the Interconnection Policy Working Group Mission Statement, provided below:

To accelerate safe, reliable and economical interconnections of distributed energy resources in Connecticut, through a transparent and informal public forum where technical and policy stakeholders openly share their experience, knowledge and challenges, on common ground, where solutions and recommendations to policy makers strive for consensus, so that renewable energy in Connecticut can flourish, while leading the nation through an example of mutual respect and collaboration.

B. Overview of Procedural Order

- 1. Christopher Arpin (PURA) provided an overview of the September 12, 2024 Procedural Order in Docket No. 17-12-03RE06, PURA investigation into distribution system planning of the electric distribution companies—interconnection standards and practices. The Procedural Order establishes and outlines the 100-Day Sprint Process—several important points from the Order are listed below (refer directly to the Procedural Order for full language):
 - a. "Rather than address [interconnection] issues on a case-by-case basis ... the Authority directs the remaining interconnection issues to ... the Interconnection Working Group."
 - b. "The 100-day sprint will be led by members of the Authority's Decisional Staff [who] will draft the Interconnection Report based on the discussions and evidence from the Interconnection Working Group."
 - c. "Consensus recommendations shall follow the process outlined in the Interconnection Policy Working Group's governance."
 - d. "[E]ach working group member must ensure their views are accurately reflected in the final report."

- 2. The Procedural Order directs Staff to use the processes described in the Interconnection Policy Working Group's governance document (available here under "Other Resources"). The governance document outlines a voting process that will be used to determine consensus recommendations during the Sprint process and provides a specific definition of what constitutes consensus. The voting process and definition of consensus are summarized later in the meeting minutes.
- 3. It is up to each working group member to ensure that their views are accurately reflected in the final report, which.
 - a. PURA Staff will review a report draft before submitting it to PURA.
 - b. Report is due to PURA on December 21, 2024.
- 4. The Procedural Order directs the IX WG to address the following seven specific interconnection issues that the during the Sprint process. Because of natural areas of overlap between several of these topics, the topics will be addressed through four topic-specific meetings.
 - a. Delays in the EDC-led interconnection approval process
 - b. Ambiguities in interconnection guidelines and approval timelines
 - c. Insufficient hosting capacity for new DERs,
 - d. Communication breakdowns between project developers and the EDCs
 - e. Slow response times from the EDCs to developer inquiries
 - f. Inconsistencies in interconnection guidance or approvals among EDC departments, and
 - g. The potential need for a pre-submission checklist during the interconnection process to inform developers of interconnection requirements before application submission.
- 5. Because the Procedural Order states that, "this group is tasked with finding solutions for current and future interconnection issues, including but not limited to" these topics, we will have opportunities to discuss other DER interconnection-related topics, time-permitting (separate meetings beyond the four mentioned above will be dedicated to these additional topics, or, if needed, further discussion on the seven topics required under the Procedural Order).
 - a. Any additional issues should be pervasive issues (i.e., not niche issues that might only affect one or two projects) and should be issues that fall under PURA's jurisdiction.

C. 100-Day Sprint Process and Participant Expectations

1. IX WG Sprint process roles and expectations, as presented during the meeting, are summarized in the following table:

Role	Expectations and Responsibilities
PURA Decisional Staff (Brandon Cavanaugh, Max Melnick, Christopher Arpin)	 Facilitating, moderating, and steering meeting discussions to try to reach consensus on the issues outlined in the Procedural Order. Distributing guiding questions and agendas to the working group. We will aim to do that at least 48 hours in advance. That might be difficult leading into the next meeting, which is scheduled for next Tuesday, but moving forward we will try send agendas and guiding questions for the meeting at least 48 hours in advance. Writing the Sprint Report, which will be filed for PURA's consideration
IX WG members (any participants on the call)	 Engagement: Expect members to come prepared to actively participate in Sprint discussions. If people are not prepared or willing to speak on these, the IX WG won't be able to reach consensus, and the Sprint report will be less helpful. Presentations: Relying on IX WG members to bring information, suggestions, and policy solutions to meetings so that we can actively discuss those and have policies to present to PURA. IX WG members wishing to present must notify the IX WG Decisional Staff of the presentation length and provide any slides (if applicable) at least 72 hours prior to the meeting (72-hour requirement waived in advance of the upcoming 10/8 meeting, please just inform Staff ASAP). Member presentations will be time permitting. If five people want to present and they would all be long presentations, Staff will limit the number of minutes that each group can present to allow enough time for discussion.

2. IX WG members are asked to adhere to the following participant expectations:

- a. *Maintain Respect:* Focus on identifying and discussing solutions to the issues at hand rather than casting blame on specific parties or groups.
- b. *Use the raise hand function* during meetings and please introduce yourself and your affiliation before speaking. This will help us accurately reflect who is represented in the meeting minutes we submit to PURA
- c. We also *encourage equal participation*. We want to ensure that no single party dominates the discussion. If many people wish to present, we may skip over someone who has taken up a lot of time to give others the opportunity to share their thoughts.
- 3. Overview of general Sprint meeting format:
 - a. Overview: PURA Staff will outline the problem to be discussed and the meeting goals.
 - b. Moderated Discussion: PURA staff will moderate the discussion, and we hope that policy solutions and supporting evidence will come from stakeholders. We will monitor stakeholder questions, presentations, feedback, and proposed solutions. If any proposals arise that you wish to vote on, we will address that later in the presentation. To ensure we stay on track, discussions will be limited to the topic introduced at the beginning of the meeting.
 - i. Participants must focus on the topics intended for discussion at each specific meeting to ensure that progress towards identifying solutions.
 - c. *Voting:* We will conduct a vote to adopt any proposed solutions that emerge from the discussion. Not everyone can vote; the bylaws specify who the voting members are for policy solutions. We will describe the voting process in greater detail in a moment.
 - d. *Conclusion:* PURA Staff will provide an overview of next steps and introduce the next topic that will be discussed in the Sprint process.

D. IX WG Voting Bylaws

- 1. Decisional Staff are required by the Procedural Order to adhere to the governance document.
 - a. The governance document lists the parties that will be IX WG Voting Members.
 - b. The power to identify who the voting members to represent developers falls on us on PURA staff. We propose that developer associations have those votes.
 - c. PURA reached out to each of the parties listed in the governance document to identify which individuals will serve as Voting Member for this 100-Day

- Sprint process. Under the governance document, primary Voting Members can name an alternate to represent themselves or their organization.
- d. The governance document establishes that the EDCs have two votes (one for Eversource and one for UI). developers have two votes, CEIC has one vote, OCC has one vote, and DEEP's BETP has one vote.

Party	Voting Members
	Primary: Carl Nowiszewski
Eversource	Alternates: Brian Rice, Joe Debs
111	Primary: Joe Marranca
UI	Alternate: Cornelius Stevenson
	Primary: Valessa Souter-Kline (SEIA)
Developers	Primary: Michael Trahan (ConnSSA)
	Alternate: Noel Lafayette (SHR Energy)
CIEC	Primary: Amanda De Vito Trinsey
CIEC	Alternate: Jay Goodman
000	Primary: Jamie Talbert-Slagle
OCC	Alternate: JR Viglione
BETP	N/A—waived voting rights.

- 2. The voting process establishes that any voting member can propose a vote on a policy proposal or idea.
 - a. Staff will allocate at least 10min for voting on identified policy proposals at the end of each meeting.
 - b. For a solution to be included in the report as a consensus recommendation, it needs to have unanimous consensus from all voting members. However, non-consensus recommendations will still be documented in meeting minutes and identified in the report.
 - c. Votes will be cast publicly at the end of each meeting via roll call.
 - PURA Staff will call on each group alphabetically and ask them to say yes or no on a specific policy proposal (if any proposals are identified)
 - ii. Voting Members are encouraged to explain their votes, either during the meeting when we're discussing the policy or as a quick statement while voting. This will improve the record of why stakeholders voted a certain way for the final report.
- The Sprint will adhere to the absence policy described in the governance document—a Voting Member's absence from the meeting will be treated as consent to the decisions made (and will be documented as such in the Sprint report).
 - a. Aim to identify meeting times that work best for Voting Members.

- b. If the primary Voting Member cannot attend or is unable to speak at the meeting, their alternate can vote on their behalf.
- 4. DEEP's BETP filed a correspondence in the docket waiving their voting rights. Unless DEEP expresses otherwise, PURA will assume that DEEP consents to any consensus recommendations identified through the voting process.
 - a. Eric Annes (DEEP): DEEP's motion was not intended to imply consent to any items—by waiving voting rights, DEEP neither consents nor objects to any recommendations.
- 5. The governance document is somewhat ambiguous with respect to how Voting Members can/should represent developers. PURA—which has the authority and the power to choose these Voting Members—selected developer associations (SEIA and ConnSSA) to represent developers' interests, with an individual developer (SHR Energy) as an alternate. The intent is that the developer associations are able to represent the perspectives of many developers, and the individual developer who is filling the alternate role was the Voting Member representing commercial developers when the IX WG has used the voting processes in the past (2021).
 - a. Since many of the issues we aim to address through this process are bigger problems for commercial developers, PURA Staff felt that having the alternate be a prior Voting Member representing commercial developers was a reasonable and appropriate decision.
 - b. The representative from SHR Energy can act as an alternate Voting Member on behalf of either SEIA or ConnSSA.
 - c. Developers are free to reach out to the IX WG PURA Staff via email if they have concerns related to these decisions.

E. Sprint Meeting Topics and Sprint Process Report

- 1. We will cover the seven topics requiring discussion under PURA's Procedural Order over four topic-focused meetings (following this kickoff meeting). There will be another two meetings dedicated to "additional" topics that may arise, and a final meeting to discuss the final report.¹⁷
 - a. Meeting 1 (Tuesday, October 8, 2024): Recommendations to shorten interconnection approval timelines
 - b. Meeting 2 (Friday, October 18, 2024): Ways to address ambiguities in the interconnection approval process and timelines
 - c. Meeting 3 (Thursday, October 31, 2024): Ways to improve communications between the EDCs and interconnection applicants

¹⁷ At the time of the kickoff meeting, only Meeting 2 (10/8) was scheduled. However, all remaining meetings were scheduled shortly afterwards and are all listed in these minutes for clarity and consistency purposes.

- d. Meeting 4 (Friday, November 8, 2024): Resolving issues related to insufficient hosting capacity for new projects¹⁸
- e. Meeting 5 (Thursday, November 14, 2024): Opportunity to discussion additional issues or revisit topics from previous meetings
- f. Meeting 6 (Thursday, November 21, 2024): Opportunity to discussion additional issues or revisit topics from previous meetings
- g. Meeting 7 (Monday, December 9, 2024): Review and discuss final report
- 2. Topics discussed during Meetings 5 and 6 must be pervasive issues affecting many projects, or high-level policy issues, rather than highly niche issues specific select projects.
- 3. Final meeting will be an opportunity for the group to review the final report to ensure that it accurately reflects what was discussed during the Sprint meetings.
 - a. Final meeting will **not** be an opportunity to re-vote on items voted on at previous meetings.
- 4. The Sprint Report is due to PURA by on December 21, 2024, per the Procedural Order.
 - a. The 100-Day Sprint began on the date that the Procedural Order was issued (September 12, 2024), *not* 100 days from this kickoff meeting.
 - b. Sprint report will include:
 - i. All include all consensus recommendations adopted by the IX WG through the voting process.
 - ii. Meeting attendance
 - iii. Meeting minutes
 - iv. any evidence that stakeholders want to provide to Pura in support of their policies (participants can send us evidence or can discuss evidence at the meetings).
- 5. Once the Sprint Report is filed, PURA will evaluate whether to adopt the consensus recommendations. Though there are no guarantees, it is likely that PURA will adopt the recommendations in the report given the broad range of participating stakeholders and voting members.
 - a. In accordance with ex parte communications requirements, the PURA Decisional Staff responsible for the IX WG 100-Day Sprint and the Sprint Report (Brandon Cavanagh, Max Melnick, and Chris Arpin) will not be

¹⁸ At the time of this kickoff meeting, the tentative Meeting 3 topic was identifying solutions related to insufficient hosting capacity for new projects. However, a meeting participant (Mrinmayee Kale, New Leaf Energy) noted that because this topic is particularly involved and highly complex, it may require more time to enable pre-meeting coordination. This participant asked if this meeting topic could be held later in the Sprint Process; nobody expressed any opposition to that proposal, and it was adjusted to be the Meeting 5 topic.

- communicating with the PURA Staff responsible for evaluating the Sprint Report.
- b. From the Procedural Order: "If the Interconnection Working Group fails to offer recommendations to resolve outstanding interconnection problems, the Authority will address these issues as appropriate, including submitting possible recommendations to the General Assembly."
 - i. If these issues cannot be resolved and must be addressed through other venues, that process is likely to have more limited opportunities for feedback and participation.
- 6. Stakeholders are free to meet with one another and discuss these issues outside of the seven established meeting dates for this process, but for policies to be adopted as recommendations, they will still need to be identified, discussed, and voted on at an IX WG Sprint process meeting.

F. Discussion and Q&A

Because this portion of the Kickoff Meeting was an active discussion and Q&A session, all speaker names are identified for clarity.

- 1. Christopher Arpin (PURA) transitioned the meeting to the following discussion questions:
 - a. What days and times would be the most effective for scheduling the Sprint Meetings?
 - b. Are there any pervasive interconnection issues not addressed in the Procedural Order?
 - c. What feedback do stakeholders have on the proposed meeting topics and dates?
 - d. How can we enhance the process to ensure a successful 100-day sprint?
 - e. What suggestions do stakeholders have for fostering collaboration and building consensus on potentially contentious topics?
- 2. Brandon Cavanagh (PURA): At a minimum, the group must discuss and identify solutions to the seven issues identified in the Procedural Order. Beyond that, the group is free to discuss and identify solutions related to any other "gaps" that align with the direction from the order. Are there any gaps/topics not listed in the procedural order that should be covered?
 - a. Carl Nowiszewski (Eversource): The performance-based rate docket in which the scorecard metric for Level 2 projects is being discussed—group could discuss the kind of metrics that are most meaningful to developers.
 - b. Ed Brolin (RWE): Need an effective interconnection queue to enable a well-functioning interconnection process.
 - c. Dana Glubiak (Scale Microgrids): Improving communications with ISO-NE regarding cluster studies, solar-plus-storage projects, etc.

- i. Christopher Arpin (PURA): That seems like an acceptable topic, but seems like it would still fall under PURA jurisdiction.
- d. Mike Trahan (ConnSSA): Flexible interconnection (Flex IX)—is a way to get projects deployed that otherwise seem like they may require upgrades with the current infrastructure/equipment in place.
- 3. Noel Lafayette (SHR Energy): Acknowledged that the relationships between solar developers and EDCs have taken significant steps forward.
- 4. Ed Brolin (RWE): The report should list all proposals (regardless of whether consensus was achieved) and identify who voted for and who voted against them. The Procedural Order states, "While the designated Decisional Staff are encouraged to seek consensus on interconnection recommendations whenever possible, the Authority will not require consensus for the report."
 - a. Christopher Arpin (PURA): The report will include meeting minutes and any policy evidence or proposals that stakeholders want to add as appendices.
 - b. Ed Brolin (RWE): Recommended that rather than including non-consensus proposals in meeting minutes, they be included in the report as an actual potential solution for Connecticut.
 - c. Joseph Marranca (UI): The mission statement demonstrates that the group should show good faith in striving for consensus. Though some topics can be contentious, there is a middle ground and progress that can be made on these issues.
- 5. Mike Trahan (ConnSSA): What is the difference between the topics for Meetings 1 and 3?
 - a. Christopher Arpin (PURA): Meeting 1 aims to identify ways to shorten interconnection timelines, whereas Meeting 3 aims to addressing general ambiguities and improve clarity regarding interconnection requirements and timelines.
- 6. Christopher Arpin (PURA): The final meeting (week of December 9th), PURA Staff will go through the report in draft form (will aim to provide to participants in advance). Staff can then revise/edit the report as needed before filing it on December 21st.
- 7. Noel Lafayette (SHR Energy): In the past, there have been challenges in which developers reach an agreement with, for example, the head of an EDCs' DG group, but then something changes or is executed differently in another department Should the head of all EDC departments that are involved in the interconnection process (e.g., metering, field engineers, etc.) also be on these calls?
 - a. Brandon Cavanagh (CT PURA): We encourage any stakeholders to attend these calls, but also encourage stakeholders to meet together outside of these calls to do "pre-work" if they'd like, get alignment across teams and organizations, etc. Meeting with all relevant EDC departments in advance of a call to identify issues and potential solutions may be more efficient than having

- many representatives from many different departments each independently attending.
- b. Carl Nowiszewski (Eversource): In agreed with Brandon—once the agenda for the overall process and individual meetings is finalized, Eversource is committed to bringing the subject matter experts that are needed to address the issue.
- c. Noel Lafayette (SHR Energy): Agree that these Sprint calls probably are not the best place to try to convene across utility departments, but important to find solutions to the silos, which do create challenges.
- 8. Carl Nowiszewski (Eversource): A previous participant identified interconnection timelines as a primary area of concern (see footnote 2 on page 7 of these minutes). Overall, this is a bigger concern for larger commercial projects than it is for residential projects. Are participants interested in focusing the interconnection timelines meeting on larger projects and excluding smaller residential projects?
 - a. Kayte Morales (Earthlight Technologies): How are you defining "larger project" (e.g., MW, hundreds of kW)? Earthlight does many projects in the "hundreds of kW" size range and still face interconnection timeline-related issues; don't want those issues to be neglected in the discussion.
 - b. Carl Nowiszewski (Eversource): "Large" would mean at least Level 2 (>25 kW).
 - c. Mike Trahan (ConnSSA): It does seem like there are more issues with the larger (typically commercial) sized developments, though there are some residential-specific issues that should still be addressed—don't want to exclude those from discussion, but ok to mostly focus on commercial.
 - i. Carl Nowiszewski (Eversource): Agree that don't want to exclude residential from the conversation—98% of Eversource's applications are residential. But residential and commercial applications are treated differently, fall within two different business operations groups, the interconnection processes are different, etc. Just overall using the next meeting to *focus* on one or the other would likely be the best way to make progress.
 - d. Christopher Arpin (PURA): Based on this feedback, next meeting (shortening interconnection timelines) will focus on Level 2 commercial projects, but residential developers are free to participate.
- 9. Eric Annes (BETP): Has PURA assigned counsel to this working group?
 - a. Christopher Arpin (PURA): EOE Staff attorneys are providing support (Jamie Spannhake and Becca Adams). From a procedural perspective, the group will be led by myself, Brandon Cavanagh, and Max Melnick.

G. Next Steps

- 1. GPI to reach out regarding scheduling, calendar invitations for future meetings, etc.
- 2. Next meeting (Meeting 2)—Tuesday October 8, 2024, 1:30–3:30pm EST
 - a. Meeting 2 topic: Recommendations to Shorten Interconnection Approval Timelines (focus on Level 2 projects, but issues and solutions related to smaller residential projects can be discussed and identified)
- 3. Please email PURA Staff (Christopher Arpin, Brandon Cavanagh, Max Melnick) or GPI staff (Aileen Cole, Val Stori) with any questions.

H. List of Meeting Participants

The following individuals attend all or part of the October 3, 2024 Kickoff Meeting for the IX WG 100-Day Sprint Process. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Amanda Trinsey	Couch White
Ben Burnett	SAVKAT Solar
Brad Marszalkowski	ISO New England
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Dana Glubiak	Scale Microgrids
Daniel Huang	Bloom Energy
Darren Hammell	CPower Energy
Deb Roe	PACE
Ed Brolin	RWE

Eric Annes	DEEP
Eric Dahl	Scale Microgrids
Eric Virkler	Earthlight Technologies
Greg Berger	CPower Energy
lan Liebman	Scale Microgrids
James Schwartz	Independence Solar
James Talbert-Slagle	occ
Jenn Runyon	Eversource
Jeff Lounsberry	Scale Microgrids
Joe Debs	Eversource
Joel Kopylec	Avangrid
John Mosher	Solect Energy Development
John Viglione	OCC
Jorge Hernandez	Avangrid
Joshua Briggs	Lodestar Energy
Katherine Wyszkowski	Sunnova Energy
Kayte Morales	Earthlight Technologies
Kyle Wallace	PosiGen
Mike Trahan	CT Solar Association
Mrinmayee Kale	New Leaf Energy
Nick Nagorski	Earthlight Technologies
Nikhil Johnson	Bluewave
Noel Lafayette	SHR Energy
Oliver Sandreuter	Lodestar Energy
Patrick Donahoe	Lightshift Energy
Richard Labrecque	Agilitas Energy
Rob Whelan	Avangrid
Sabrina Xie	DEEP
Sam Valone	Lodestar Energy
Sara Pyne	CT Green Bank
Sean Riel	Earthlight Technologies
Steven Carter	United Illuminating Company
Tim Snyder	ACT
Tom Melone	Allco Renewable Energy
Truman Lease	Scale Microgrids

Valessa Souter-Kline	SEIA
Zak Poston	RWE

2. Shortening Interconnection Timelines

These minutes document the first meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Spring Process established under PURA's September 12, 2024 Procedural Order. The Sprint Process will occur from September 12 2024-December 21, 2024, at which PURA staff will file a Spring Process Report in Docket No. 17-12-03RE06, PURA Investigation into Distribution System Planning of the Electric Distribution Companies—Interconnection Standards and Practices. The Shortening Interconnection Timelines Meeting was held virtually on Tuesday, October 8th, 2024 from 1:30pm–3:30pm EST.

The meeting agenda is as follows. The meeting minutes follow the same structure as the agenda.

- Welcome and Problem Overview
- Stakeholder Discussion
- Guiding Questions
- Voting
- Meeting Wrap-up and Next Steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Meeting 2. The process will be led by PURA Staff with support from EOE and GPI.

- 1. Christopher Arpin (PURA) welcomed attendees and outlined the primary objective of the meeting: addressing the issue of shortening interconnection timelines. The meeting overall focused on Level 2 projects, but discussion pertaining to smaller residential projects was welcome. Christopher Arpin reviewed the meeting agenda, as follows:
 - a. Welcome and introductions
 - b. Problem overview
 - c. PURA-moderated stakeholder discussion
 - d. Vote on proposed policy solution
 - e. Overview of next steps.
- 2. Christopher Arpin (PURA) provided an overview of the 100-Day Sprint process discussed during the previous meeting, highlighting that the group's mission is to accelerate the safe, reliable, and economical interconnection of distributed energy resources in Connecticut.
- 3. GPI continues to act as the consultant for the interconnection working group.

- a. For the IX WG 100-Day Sprint Process, GPI (in collaboration with EOE) will handle administrative responsibilities (e.g., sending out meeting agendas, scheduling meetings, etc.).
- b. Post-Sprint, GPI will continue to facilitate non-Sprint IX WG meetings with EOE, and PURA Decisional Staff will no longer participate.
- c. GPI may also hold other non-Sprint IX WG meeting, even during the Sprint period. Nothing from the Procedural Order precludes the IX WG from holding additional meetings beyond those required under the Sprint.
- Meeting Goal: Reach consensus among all voting members to adopt one or more policy recommendation(s) under PURA's jurisdiction aimed at reducing interconnection approval timelines for distributed energy resource (DER) projects in Connecticut.

B. Problem Overview

Christopher Arpin (PURA) provided a high-level overview of the interconnection challenges to set the context for the stakeholder discussion, as summarized below.

- 1. Average project interconnection wait times for each EDC, based on public interconnection queue data (data as of the week prior to this meeting); exact wait time varies by project.
 - a. Eversource: 729 days (median 580)
 - b. UI: 577 days (median 377)
- 2. Most common causes of interconnection delays, per EDC reports filed in Docket No. 24-08-03:
 - a. Incorrect application submission
 - b. Regulatory compliance challenges
 - c. High volume of applications
 - d. Insufficient staffing and resources
 - e. ISO New England processes
 - f. Project failures to meet fast-track screening criteria
 - g. Inspection delays
 - h. Stakeholder coordination issues
- 3. EDCs offered some recommendations for improvement in their report (some recommendations were only in UI's report, others only in Eversource's report—this is a combined high-level list)
 - a. Additional training for applicants
 - b. Standardizing and automating the review process
 - c. Implementing project management tools and conducting regular meetings
 - d. Increasing staffing and cross-training employees
 - e. Simplifying requirements
 - f. Establishing stronger relationships and contingency plans.
- 4. Approaches to shortening interconnection timelines in other jurisdictions:
 - a. Colorado: Legislation mandates strict interconnection timelines (30 days), with financial penalties for delays.

b. California: Requires utilities to file biannual reports on energization timelines and customer engagement plans, in addition to regulatory actions to maintain interconnection progress.

C. Discussion: Residential Challenges

- 1. Mike Trahan (ConnSSA) highlighted three key challenges that residential projects face:
 - a. Job numbers (or meeting numbers) are sometimes missing form interconnection applications when approved. Some municipalities require job numbers for permit issuance, creating delays when they are missing.
 - Carl Nowiszewski (Eversource): Eversource has invested in integrating its work order generation and management systems with PowerClerk, allowing for a more efficient and reliable job number issuance process.
 - ii. Cornelius Stevenson (UI): UI has some improvements to the job number issue under development.
 - b. The process for submitting interconnection applications through PowerClerk varies between UI and Eversource, resulting in inefficiencies for contractors; has a list of recommended PowerClerk improvements that could streamline this process.
 - i. Mike Farrell (Trinity Solar): UI's PowerClerk system frequently times out during use. Suggests that UI mirroring Eversource's streamlined application process. Would reduce complications and help contractors more efficiently manage projects across both utilities.
 - ii. Cornelius Stevenson (UI): UI has instructed their PowerClerk vendor to model aspects of Eversource's PowerClerk setup to enhance functionality and user experience.
 - c. Legislative changes allow for additional solar installations on existing residential projects, but the interconnection process for these add-ons faces delays, particularly on the net metering side. Mike recommended that UI provide a budget proposal to develop a process for handling these add-on applications as per directives.
- 2. Carl Nowiszewski (Eversource) emphasized the need to distinguish between Eversource and UI processes, as differences exists between the utilities.
- 3. Carl Nowiszewski (Eversource): Some residential projects enter the Level 2 interconnection process due to larger battery sizes or system specifications, which can lead to delays.
 - a. Eversource submitted a proposal to PURA to increase the threshold for residential projects under Level 1 from the current limit to 50 kW.; aims to simplify the process for larger residential systems, allowing more projects to be handled as Level 1.
 - Level 2 projects vary widely (e.g., rural standalone systems or systems installed behind commercial facilities), and thus have varied service requirements.

- c. Upon submittal, PowerClerk classifies projects by maximum capacity, including combined PV and battery capacity.
 - i. Can push residential projects with larger batteries to Level 2, triggering more complex and costly processing.
 - ii. Proposes raising the threshold for Level 1 processing to 50 kW; would reduce the number of residential projects requiring Level 2 processing, lower application fees, and eliminate unnecessary Level 2 requirements for smaller projects.
- d. Would be beneficial to remove smaller residential projects from Level 2 consideration if possible—would eliminate interconnection agreements, interconnection requirements, site control forms, etc.
- 4. Carl Nowiszewski (Eversource): Eversource's residential interconnection process is running smoothly, with continuous efforts to make incremental improvements; no reported problems with Buy-All add-on applications.
 - a. Mike Trahan (ConnSSA) acknowledged that the EDCs manage thousands of annual residential interconnection applications (compared to just a few hundred commercial projects applications). Residential projects have a shorter development phase than commercial projects, and commercial developers typically have established EDC relationships which allow for ongoing dialogue.
 - a. Suggested that upcoming meetings remain focused on timelines and process improvements, such as a fast-track interconnection process for smaller C&I projects (increasing the expedited processing threshold from 25 kW to 50 kW could potentially offer streamlining).

D. Discussion: Commercial Challenges

- 1. Mike Trahan (ConnSSA) highlighted potential areas of improvement for commercial projects:
 - Establishing a single point of contact at the EDCs for developers would allow coordination across EDC teams/departments (DG, metering, field teams).
 - i. Better alignment across departments could help expedite approvals and reduce interconnection timelines.
 - Developers reported difficulties tracking meter installation status in PowerClerk, uploading proof of ownership, and adding necessary follow-up documents.
 - c. Small C&I systems could have an expedited processing pathway to help address their specific interconnection needs.
 - d. EDCs sometimes answer design-related questions and provide guidance late in the process, which can cause delays. Recommended that EDCs provide guidance earlier to avoid prolonging the overall project timeline.
- 2. Christopher Arpin (PURA) clarified that PURA ordered a single point-of-contact in the NRES program last year.
 - a. Mike Trahan (ConnSSA): This proposal aims to address the fact that even with that requirement, there are communications challenges across

- departments, and developers have a difficult time finding the correct person to address issues.
- b. Kayte Morales (Earthlight Technologies) offered clarification between the single point-of-contact required under the NRES order, and what developers currently seek. Developers must still request work orders from other departments, meet with field engineers, etc. Seeking a single pointof-contact to manage all net metering projects and comprehensively by coordinating across multiple departments to streamline approval processes.
- c. Carl Nowiszewski (Eversource): Single point-of-contact currently operates more in a coordination role; administrative coordinator/project manager that seeks out answers to questions as they arise.
 - i. Certain interconnection issues can only be addressed through infield discussions between the developer's technical team and Eversource's metering technicians or field engineers.
- 3. Carl Nowiszewski (Eversource): Current point-of-contact approach was developed with certain large project considerations in mind; because the projects were large, big system upgrades were identified early with details left until later. This may not be the best approach under the current situation with more midsize projects. However, timelines remain a bidirectional issue between developers and EDCs.
 - a. Field visits available upon request; developers should reach out to their assigned point-of-contact to schedule as visit with field engineers or metering specialists as needed.
 - b. Developers can start field coordination as soon as their project application is submitted.
 - c. Recent adjustments have aimed to make the single point-of-contact process more reliable and effective.
- 4. Joseph Marranca (UI): UI assigns a point-of-contact analyst to nearly all residential and commercial projects, with the analyst's contact information available in PowerClerk.
 - a. The single point of contact is organized within the DG group—can direct developers to the appropriate UI departments/team members.
 - b. UI is increasing analyst resources to provide more support to developers.
- 5. Noel Lafayette (SHR Energy): Developers are often given conflicting information due to a lack of a unified single point of contact; a single person-of-contact that can provide non-contradictory instructions would avoid these information consistency issues.
- 6. James Cerkanowicz (Verogy): Early in NRES, project designs and line diagrams that had been reviewed and approved initially were later challenged by field teams unfamiliar with program specifics; field teams sometimes requested equipment that was not initially required in approved plans, leading to unexpected costs. Bringing metering and field departments into the review process earlier would likely address these inconsistency issues.
- 7. Dana Glubiak (Scale Microgrids): We sometimes don't get the feasibility study until two months after submitting the interconnection applications (sometimes it takes that long just to get the quote for the feasibility study). This can interfere with our

ability to be included in ISO-NE studies. If we can trim down these early-stage timelines, it would be a huge improvement.

- a. Proposed that upon submitting the application, PowerClerk automatically provide an informational package with likely feasibility study takeaways informed by the lates available electrical information about the site, electrical equipment and configuration information, etc.
- b. Christopher Arpin, PURA: NRES order last year focused on ways to automate certain interconnection screens—process currently underway. EDCs have submitted a timeline for when those screens could be implemented.
- c. Joe Debs (Eversource): Automation expected late 2025/early 2026.
- d. Joseph Marranca (UI): UI is currently in the RFP phase (concluding mid-November) to select a vendor for upgrading hosting capacity maps and backend systems. UI has also conducted comprehensive upfront, crossdepartmental design review for a long time; can initially increase timelines metrics, but aims to minimize issues later in the project lifecycle.
- 8. Kayte M (Earthlight Technologies): PowerClerk is the biggest points of delay; the need for repeated back/forth to make minor revisions or submit documents after the initial upload is a major bottleneck.
- 9. A potential improvement would be enabling developers to edit their submissions directly or continue uploading documents without requiring project manager intervention.
- 10. Nancy Chafetz (CPower): Communication breakdowns contribute to delays in the interconnection process; in some cases, there haven't been any follow-up communications. Will reserve solutions related to that for that meeting, but the issues are linked.
- 11. James Schwartz (Independence Solar) introduced 3 different proposals:
 - a. Create a separate category for small C&I projects (e.g., 50–500kW); would allow smaller projects to move through screening/approval process more quickly than larger projects, which may require more extensive studies.
 - b. Field meeting option for C&I projects—ensure customers know they can request a meeting with field staff for detailed project discussions.
 - c. Implement a "chess clock" tracking system in PowerClerk to show whether a project delay is due to EDCs awaiting input from the developer or if the developer is waiting for the EDC. Would help developers monitor their project status in PowerClerk and more promptly address issues.
 - i. Clock would start when the developer submits an application.
 - ii. Clock transitions into the "EDC Review" phase when EDC deems application complete. EDC has designated application review timeframe.
 - iii. Clock returns to developer if EDC provides feedback requiring developer action (e.g., application incomplete, study agreement issues, etc.).
 - iv. If a developer requests a hold (due to permitting delays or other issues), the clock will remain on hold and clearly show the cause of the delay to more clearly identify who/what is causing the delay.

- 12. Brandon Cavanagh (PURA) inquired about whether PowerClerk has the functionality to enable this sort of feature.
 - a. Carl Nowiszewski (Eversource): PowerClerk currently doesn't support a "chess clock" approach but is moving in that direction. Currently uses a "bucket" system with each bucket representing different stages or required actions; PowerClerk does track how long a project remains in each bucket.
 - b. Cornelius Stevenson (UI): The proposed PowerClerk changes would require careful planning and resources; UI is currently working on building similar infrastructure for their own internal reporting, which could inform potential changes to PowerClerk.
- 13. Carl Nowiszewski (Eversource): EDCs aren't the only entities with timeline requirements. Many projects in the queue are delayed due to a lack of enforcement of developer responsibilities (e.g., 80% of the projects in the queue could have been removed due to developers not meeting timelines or following guidelines).
- 14. Brian Rice (Eversource): Eversource provides timeline data in their quarterly interconnection reports; reports are not as granular as a "chess clock" but they already exist as a requirement and provide important interconnection milestone data that could help better track timelines and delays.
- 15. Joe Debs (Eversource) clarified that general queue data represents the entire lifecycle of an interconnection application, from the moment it is submitted until the project goes live; does not break down specific interconnection process delays, and the durations include delays that are unrelated to EDC performance (construction delays, regulatory issues, etc.). Timeline data from the interconnection queue alone can be misleading.
- 16. Carl Nowiszewski: Eversource already working on several PowerClerk improvements.
 - a. Working to ensure that the site control form will be presented with (not after) the application. Currently the site control form today must be presented with (not after) the application.
 - b. Application is considered insufficient upon submittal because you need an INT number (which you don't get until submitting). Then developer must go back and re-input that number. Working to address this. So, we are going to streamline that, and find a way to get that form
- 17. Cornelius Stevenson (UI): UI working on a related initiative to streamline and improve their application process by getting more complete information upfront.

E. Voting on Proposed Solutions

Christopher Arpin (PURA) reminded participants and Voting Members of the voting process. During the voting session, participants only voted on one proposed solution. Several other solutions were proposed throughout the meeting, but as documented in the minutes below, one participant requested that votes be held at the beginning of the following meeting to allow voting members more time to consider and discuss the proposals. Voting members supported this change.

- 1. Jay Goodman (CIEC): Any proposals approved by the group should include an estimate of implementation costs from the EDCs; important information for PURA as they decide which proposals to implement.
 - a. Christopher Arpin (PURA): Proposals that put before PURA would include cost data. Would the EDC's object to following up with cost estimates or implementation timelines consensus proposals?
 - i. EDCs will aim to provide this information in a timely manner, to the best of their ability.
 - ii. EDCs can move forward to promptly address small/incremental changes that would benefit everyone (e.g., integrating the site control form into the initial application) without waiting for approval or providing cost estimate data.
- 2. Proposal 1 (from Joe Marranca, UI): Raise Level 1 process threshold to 50kW for residential projects only.
 - a. Jay Goodman (CIEC): Yes; supports conceptually but wants more financial details
 - b. Mike Trahan (ConnSSA): Yes
 - c. Carl Nowiszewski (Eversource): Yes
 - d. John Viglione (OCC): Yes; supports with caveat that there are no cost recovery implications
 - e. Valessa Souter-Kline (SEIA): Yes
 - f. Joe Marranca (UI): Yes
- 3. Valessa Souter-Kline (SEIA) Proposed a two-step voting process under which topics proposed during each meeting are voted on at the start of the following meeting
 - a. Aims to facilitate more thoughtful decision-making by allowing the group to gather input from their respective teams to make a more informed vote
 - b. No voting members opposed this process modification.
 - c. No more votes to be taken today—votes to be taken on several proposals at the start of the next meeting. Voting Members to provide proposals to PURA Staff sufficiently in advance of the next meeting.

F. Overview of Next Steps

- 1. The next meeting scheduled for October 18th, 2024 (12–2pm EST).
 - a. Topic: Addressing ambiguities in the interconnection approval process and timelines.
- 2. Please email PURA Staff (Christopher Arpin, Brandon Cavanagh, Max Melnick) or GPI staff (Aileen Cole, Val Stori) with any questions or additional topics you would like to discuss throughout this process.

G. List of Meeting Participants

The following individuals attend all or part of the October 8, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the

attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Azzie Contreras	Ecogy Solar
Ben Burnett	SAVKAT Solar
Brad Marszalkowski	ISO New England
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Worley	Sunrun
Cornelius Stevenson	UI
Dana Glubiak	Scale Microgrids
Darren Hammell	CPower Energy
Deb Roe	PACE
Ed Kranich	CT Green Bank
Eric Annes	DEEP
Eric Dahl	Scale Microgrids
Eric Virkler	Earthlight Technologies
Greg Berger	CPower Energy
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Schwartz	Independence Solar
James Talbert-Slagle	OCC
Jamie Spannhake	EOE
Jay Goodman	CIEC
Jeff Hintzke	Greenskies
Jenn Runyon	Eversource
Jeff Lounsberry	Scale Microgrids
Joe Debs	Eversource
Joel Kopylec	Avangrid
John Mosher	Solect Energy Development
John Viglione	OCC
Jorge Hernandez	Avangrid

Joseph Marranca	UI
Julia Danahy	Eversource
Julie Castillo	Eversource
Justin Daigle	Earthlight Technologies
Kayte Morales	Earthlight Technologies
Kerry Schlichting	ISO
Kevin Costello	CTEC Solar
Kyle Perry	Verogy
Lavelle Freeman	Eversource
Logan Taricani	Avangrid
Mariel	Ion Solar Pros
Mike Farrell	ConnSSA
Mike Trahan	CT Solar Association
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy
Nicole Riedinger	Trinity Solar
Nikhil Johnson	Bluewave
Noel Lafayette	SHR Energy
Patrick Lewis	Eversource
Rainier Solanzo	Bloom Energy
Renuka Selvaraj	Bloom Energy
Richard Labrecque	Agilitas Energy
Rob Whelan	Avangrid
Robert Cote	Eversource
Sabrina Xie	DEEP
S. Carrillo	CGB
Sara Pyne	CT Green Bank
Sean Riel	Earthlight Technologies
Steve Broyer	United Illuminating Company
Thomas Lefebvre	Eversource
Tim Snyder	ACT
Tom Melone	Allco Renewable Energy
Valessa Souter-Kline	SEIA

3. Addressing Ambiguities in Interconnection Approval Processes and Timelines

These minutes document the second meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Spring Process established under PURA's September 12, 2024 Procedural Order. The Sprint Process will occur from September 12 2024-December 21, 2024, at which PURA staff will file a Spring Process Report in Docket No. 17-12-03RE06, *PURA Investigation into Distribution System*

Planning of the Electric Distribution Companies—Interconnection Standards and Practices. The Addressing Ambiguities in Interconnection Approval Processes and Timelines meeting was held virtually on Friday October 18th, 2024 from 12:00pm–2:00pm EST.

The meeting agenda is as follows. The meeting minutes follow the same structure as the agenda.

- Welcome and Introductions
- Voting on Proposals Discussed in Meeting 2
- Problem Overview
- Stakeholder Discussion
- Proposals to Vote on in Next Meeting
- Meeting Wrap-up and Next Steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Spring Process Meeting 2. The process is led by PURA staff with support from EOE and GPI. Christopher Arpin (PURA) provided an overview of the meeting topic (ways to address ambiguities related to the interconnection approval process and timelines) and the agenda and reminded attendees of the purpose of the Sprint Process.

Christopher Arpin covered the majority of the meeting material, other than participant discussion. Unless specifically indicated otherwise, Christopher Arpin presented the summarized content in these meeting minutes.

B. Voting on Proposals Discussed in Meeting 2

Christopher Arpin reminded participants of the voting process, then asked Voting Members to provide their votes (and, if desired, any justification for their votes) on the proposals from Meeting 2, which focused on strategies to shorten interconnection approval timelines. In several instances, voting members proposed slight modifications to proposal language, which other voting members supported incorporating. This is documented where it occurred.

- 1. Proposal 1: Review current interconnection processes to identify potential new or more specific process tracks for projects with different needs and/or specifications (e.g., a specific track for small/medium C&I facilities with onsite load).
 - a. Proposed by Joe Marranca (UI)
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	Supports so long as there's an effort to estimate proposal costs before they're formally implemented (where relevant);

			should be some form of cost consideration
Noel Lafayet	te (ConnSSA)	Yes	None provided
Carl	Nowiszewski	Yes	None provided
(Eversource)			
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	_	N/A (Note: This Voting Member was present, but was unable to vote due to audio issues)
Joe Marranc	a (UI)	Yes	

c. Proposal 1 adopted

- 2. Proposal 2: Create a new and separate expedited interconnection process for C&I projects in the 50–500 kW size range that are co-located with on-site load (can be either Buy-All or Netting systems, as long as they are co-located with onsite load).
 - a. Proposed by Mike Trahan (ConnSSA)
 - b. Questions/comments on proposal:
 - i. Carl Nowiszewski (Eversource): This should include a provision that this could also include projects that could be served by existing onsite infrastructure (e.g., an automated fast-track projects for projects that are sized appropriately to the existing onsite transformer), avoiding the need to replace the transformer for sites that are co-located with load.
 - ii. Developers were supportive of and helped develop this recommendation in collaboration with EDCs. No voting members objected to its inclusion.
 - iii. PURA will incorporate this revision into the final report, and voting members should consider it part of the proposal they are voting on today.

Voting Mem	nber	Vote	Additional Rationale
Jay Goodma	an (CIEC)	Yes	None provided
Noel Lafaye	tte (ConnSSA)	Yes	None provided
Carl	Nowiszewski	Yes	None provided
(Eversource	·)		
Jamie	Talbert-Slagle	Yes	None provided
(OCC)			
Valessa	Souter-Kline	_	N/A (Note: This Voting Member
(SEIA)			was present, but was unable to
			vote due to audio issues)
Joe Marrand	ca (UI)	Yes	Recommends that that instead
			of having a minimum cap at 50
			kW, allow this for any project
			<500 kW

c. Proposal 2 adopted.

- 3. Proposal 3: Formally establish that once an interconnection application has been submitted, developers have the option to request an early-process field meeting with the appropriate EDC staff to review their proposed design (applicable to both Netting and Buy-All applications).
 - a. Proposed by Carl Nowiszewski (Eversource) and Mike Trahan (ConnSSA)

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Yes	None provided
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	None provided

- c. Proposal 3 adopted
- 4. Proposal 4: Add a "chess clock" functionality to PowerClerk so that for the duration of the interconnection application it tracks whether it is either the EDC's or the Customer's turn to provide a deliverable in order to progress the application to the next step. This information will help the EDC and Customer get on the same page as to what is required as a next step for the application to proceed, as well as provide meaningful data for PURA and other stakeholders to measure what steps are delaying the interconnection application process.
 - a. Proposed by Mike Trahan (ConnSSA)

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Yes	None provided
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

- c. Proposal 4 adopted
- 5. Proposal 5: Include the job number assignment in the quarterly data list. (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)

- b. Questions/comments on proposal:
 - Joe Marranca (UI) sought clarification on what constitutes the quarterly data list in case it's something already submitted to another docket. Wants to ensure that effort is not duplicated.

ii. Kyle Wallace (Posigen): The quarterly data list is intended add the timeline to get the job number as part of the quarterly filing.

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

- c. Proposal 5 adopted
- 6. Proposal 6: Develop a retrieval bar for customers using PowerClerk, similar to Eversource's process, to streamline data entry and eliminate the need for manual input. (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

- c. Proposal 6 adopted
- 7. Proposal 7: Make the signature and application pages as part of the PowerClerk application. (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

c. Proposal 7 adopted

- 8. Proposal 8: When correcting PowerClerk application errors, eliminate unneeded fields (i.e., the BEN field is required for corrections but not for the original application). (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

- c. Proposal 8 adopted
- 9. Proposal 9: Eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times). (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided

Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not
		will) differ slightly from what is
		described, based on internal UI
		system constraints.

c. Proposal 9 adopted

- 10. Proposal 10: Eliminate duplicate questions in the PowerClerk application (i.e., property type is asked twice; in the tariff beneficiary questions the question of who receives the payment is asked multiple times). (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Jay Goodman (CIEC)	Yes	None provided
Noel Lafayette (ConnSSA)	Yes	None provided
Carl Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual
		implemented solution may (not will) differ slightly from what is
		described, based on internal UI
		system constraints.

c. Proposal 10 adopted

- 11. Proposal 11: Instead of asking for SITE, LINE, and TECH pages, just make one space for the entire full set. (applies to UI only)
 - a. Proposed by Mike Trahan (ConnSSA)
 - b. No questions/comments on proposal

Voting Member		Vote	Additional Rationale
Jay Goodman (CIEC)		Yes	None provided
Noel Lafayette (ConnSSA)		Yes	None provided
Carl	Nowiszewski	Abstain	Does not apply to Eversource
(Eversource)			
Jamie	Talbert-Slagle	Yes	None provided
(OCC)			

Tim Snyder (ACT, on	Yes	None provided
behalf of SEIA)		
Joe Marranca (UI)	Yes	Caveat that the actual implemented solution may (not will) differ slightly from what is described, based on internal UI system constraints.

c. Proposal 11 adopted

C. Problem Overview

- 1. To address interconnection ambiguity issues, PURA has done the following:
 - a. <u>November 8, 2023 NRES Decision</u> (23-08-03) directed EDCs to hold at least two annual meetings to clarify the NRES interconnection process and required EDCs to submit an annual NRES interconnection report by August 1st to provide transparency on project status (a similar ESS interconnection report is also required).
 - b. <u>November 29, 2023 RRES Decision</u> (23-08-05) approved a proposal to evaluate storage systems based on expected charging and discharging patterns to clarify the interconnection assessment process.
- 2. Stakeholders provided comments on this issue in both NRES and ESS proceedings. PURA is not expressing support or opposition to these comments and is providing them only for context as to why PURA directed via the Procedural Order this issue be discussed in the Sprint process.
 - a. ConnSSA noted that there were cost transparency issues in Eversource's interconnection agreements; the interconnection agreement only provided total construction cost. CONNSSA requested detailed line-item interconnection cost breakdowns.
 - b. CT Green Bank cited uncertainty in the process, recommending increased guidance for developers. Also suggested making the data from NRES interconnection report publicly available as a spreadsheet, updated weekly for enhanced data transparency, and recommended similar weekly ESS interconnection report updates.
 - c. CPower requested at least monthly (ideally daily) ESS interconnection report updates, to enhance ambiguity.
- 3. The Procedural Order directs the IX WG to discuss "the potential need for a presubmission checklist to inform developers of interconnection requirements before application submission" during the Sprint process. Rather than holding a meeting dedicated to the checklist, it will be discussed during this meeting, as it relates to the topic of addressing interconnection process and timeline ambiguities.
 - a. Checklist would list interconnection requirements to clarify the process; developers would review checklist prior to submitting application. Further checklist details not identified, and the group can/should discuss whether the checklist would be valuable and, if so, what it should include.

D. Discussion

The Procedural Order establishing the 100-Day IX WG Sprint directed the IX WG to "[find solutions for current and future interconnection issues, including but not limited to... the potential need for a pre-submission checklist to inform developers of interconnection requirements before application submission." Because this directive overlaps with interconnection process and timeline ambiguity issues, it is covered during Meeting 2. IX WG participant discussion related to the checklist is summarized below.

- 1. Noel Lafayette (SHR Energy) acknowledged that EDCs have noted repeated delays due to developers submitting incomplete applications.
 - Incomplete applications require additional follow-up, slowing the interconnection process.
 - b. Especially challenging given recent increase in solar applications.
 - c. Proposed pre-submission checklist could benefit all stakeholders by reducing delays associated with incomplete applications, though a checklist alone will not solve all issues.
 - i. Nancy Chafetz (CPower Energy) agrees—does not oppose a checklist, but does not think it would resolve all the problems. Communications breakdowns often occur during back/forth parts of the process, which cannot always be anticipated.
- 2. Carl Nowiszewski (Eversource) does not object to a pre-submission checklist for Level 2 projects (Level 1 process is well-optimized).
 - a. Envisions checklist that would prompt developers to double-check their work (but would not assure that what they submitted is correct).
 - i. Example: Applications requiring a one-line diagram require stamp of approval from a professional engineer. Developer could indicate on the checklist that they provided a complete diagram, but if (upon full application review), Eversource staff find that the professional engineer stamp is not there, the application will not be considered complete.
 - b. Checklist could be a useful guide for newer developers unfamiliar with CT-specific requirements; could reduce preventable errors.
 - c. Checklist items should be based on requirements outlined in the Guidelines.
- 3. IX WG participants discussed what the checklist should potentially look like.
 - a. Marty Timperio (PurePoint Energy) expressed that the checklist should include any/all documents that would need to be completed
 - b. Brandon Cavanaugh (PURA) asked if a potentially viable checklist format (under the PowerClerk system) could include a box for each step. The applicant would need to check the box indicating that they completed each step, including uploading necessary documents. Then on the final screen, there would be a series of mandatory fields that the applicant must work through before proceeding. Better understanding PoweClerk's functionality
 - i. Carl Nowiszewski (Eversource) clarified that PowerClerk already has some mandatory fields and is a logic-based software; answering

- questions certain ways (e.g., Does your project include any energy storage?) opens up additional fields based on the logic flow.
- c. Brandon Cavanaugh (PURA) and IX WG participants noted that a better understanding PowerClerk's functionality could help identify what a checklist could/should look like.
- d. James Cerkanowicz (Verogy) discouraged establishing the checklist as an additional required document, but supported an approach through which PowerClerk would provide a notification within 10 business days if there are any issue with an application/communication (and opportunity for EDCs to explain issues), would be valuable.
 - Carl Nowiszewski (Eversource): If there is to be a checklist, it should be mandatory. For developers with CT experience, it should take ~5mins.
- 4. Carl Nowiszewski (Eversource): There is a need to improve application quality; only 10–20% of the C&I applications that Eversource receives are complete, consistent, and correct (this includes applications from national-level developers). Additional quality control upfront could improve this.
 - a. Brandon Cavanaugh (PURA) expressed that there is a need to better understand why applications are incomplete and incorrect to determine what improvements can/should be made. This could be accomplished through sampling incorrectly submitted applications to identify the exact error(s) and determine how the existing PowerClerk functionality enabled the inaccurate application to be submitted.
- 5. Noel Lafayette (SHR Energy) suggested that the EDCs develop a draft checklist to submit to PURA and/or the IX WG for review.
 - a. Carl Nowiszewski (Eversource) agrees; will work with UI to develop some draft checklist components.
 - b. Christopher Arpin (PURA) noted that this preliminary list could be included in the IX WG 100-Day Sprint Report.

Next, IX WG participants discussed considerations related to publicly posting projects' interconnection queue status, to be updated regularly (weekly, monthly, other). Discussion related to this topic is summarized below.

- 1. Nancy Chafetz (CPower Energy): Queue data updated on a weekly basis would help minimize communications breakdowns, especially if the person who submitted the application (and thus has their email address on the application) is no longer there. Have had things happen on projects that they missed communication about; would be better if up-to-date information was always publicly available.
 - a. Carl Nowiszewski (Eversource): Publishing this data weekly or monthly would be a significant administrative burden, and unsure if it would bring the value developers seek. Regarding email addresses, Eversource

- recommends using a general company email that will go to several email inboxes to prevent missed communications regarding applications.
- b. Nancy Chafetz (CPower Energy) expressed that she is often waiting on the utility to complete steps.
 - i. Carl Nowiszewski (Eversource) and Marty Timperio (PurePoint Energy) noted that the chess clock proposal voted on at the start of the meeting could address some of these issues.
 - ii. Joe Marranca (UI) noted that PURA's order directing that each project has a dedicated single point-of-contact intends to address this.
- c. James Cerkanowicz (Verogy) noted that he already gets automated emails when something is missing from an application, but reporting on the number of days that an application is under a certain status would be useful for developers and EDCs.
- 2. Marty Timperio (PurePoint Energy) would like to be able to extract dates, project status changes, etc. in PowerClerk.
- 3. Sara Pyne (CT Green Bank) reminded the IX WG that in a pre-Sprint IX WG meeting, Joe Debs (Eversource) shared that Eversource has project interconnection information publicly available on their website. Asked if it would be helpful to developers if Eversource combined that information with information required under NRES and ESS orders. If so, could be worked out to decide what developers think would be helpful to have.
- 4. Sara Pyne (CT Green Bank): How long does it take for an application to be cancelled in PowerClerk due to necessary information not being provided?
 - a. Joe Debs (Eversource): Typically, 15 or 30 days. Interconnection process timelines (including timelines for providing requested information) are provided in the guidelines.
 - b. Joe Marranca (UI): Would need to review what data is being shared through the incentive program orders; want to ensure that providing this data does not become unnecessarily administratively burdensome.
- 5. Carl Nowiszewski (Eversource) and Joe Marranca (UI) expressed that the focus should be moving projects through the queue more quickly, not on increasing administration/reporting. The EDC staff completing administrative work are the same staff that are processing interconnection applications; the more reporting they are required to do, they less time they have to work on apps.
- 6. Carl Nowiszewski (Eversource): Eversource is looking into ways to improve granularity regarding a project's status in PowerClerk (e.g., more granular than "under study").

Eric Virkler (Earthlight Technologies) shared some strategies that he believes would reduce the amount of back/forth during the review, revision, and approval process. Discussion related to Erik Virkler's strategies is summarized below.

- Eric Virkler (Earthlight Technologies) summarized the current approval process, which involves review by the EDC's DG team and other teams, though those other teams do not have approval requirements (i.e., if a developer submits drawings, the only department with "approval" authority is the DG team, though other teams conduct reviews later in the process).
 - a. Suggests that DG team have the authority to issue a "contingent approval."
 - b. Upon receiving contingent approval, developer should be able to have an on-site meeting with meter engineering and field services to hear any additional specific requirements.
 - c. Developer can make any necessary minor refinements, thus preventing the EDC from needing to review the same diagrams multiple times).
- 2. Carl Nowiszewski (Eversource): Eversource used to employ this sort of contingent approval approach, and it works well for projects with onsite load. PURA changed the approach so that everything is done together. But PURA changed this, now want everything done together.
 - a. Some of the proposals voted on today that involve separately addressing C&I projects with onsite load could help address some of these issues.
 - b. Joe Marranca (UI): UI's process also used to be similar to what Eric Virkler described. UI still typically does more comprehensive reviews upfront; that typically makes the process take longer upfront, but it is more streamlined post-approval.
- 3. Eric Virkler (Earthlight Technologies): There were issues even under the prior approach. The problems arise from the fact that meters are now owned by the EDC (used to be owned by the customer), which means that the EDC meter engineering teams are now involved, which additional approvals necessary.

E. Voting Recommendations

Participants briefly discussed the material presented during Meeting 2, including several potential proposals related to the following:

- Establishing an application checklist within PowerClerk to ensure that applications are complete, consistent, and correct
- A public spreadsheet or database documenting the status of all projects undergoing the study process
- Contingent project approval by the EDC's DG department only at the start of the application process.

Voting members will submit formal proposals related to these items and other topics discussed writing in advance of the next IX WG Sprint meeting. The proposals will be voted on at the start of the next meeting.

F. Wrap-up and Next Steps

- 1. The next meeting scheduled for October ^{31st}, 2024 (2-4pm EST).
 - a. Topic: Improving communication between the EDCs and interconnection applicants.
 - b. Decisional staff to distribute guiding questions and an agenda to the working group at least 48 hours before the next meeting.
- Please email PURA Staff (Christopher Arpin, Brandon Cavanagh, Max Melnick) or GPI staff (Aileen Cole, Val Stori) with any questions or additional topics you would like to discuss throughout this process

G. List of Meeting Participants

The following individuals attend all or part of the October 18, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Alan Chubbuck	Michaud Law Group
Azzie Contreras	Ecogy Solar
Ben Burnett	SAVKAT Solar
Brad Marszalkowski	ISO New England
Brendan Smith	CT Green Bank
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Cornelius Stevenson	UI
Dana Glubiak	Scale Microgrids
Daniel Crisp	Eversource

Darren Hammell	CPower Energy
Deb Roe	PACE
Ed Brolin	RWE
Emily Basham	CT Green Bank
Eric Annes	DEEP
Eric Dahl	Scale Microgrids
Eric Virkler	Earthlight Technologies
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Desantos	CT Green Bank
James Schwartz	Independence Solar
James Talbert-Slagle	occ
Jay Goodman	CIEC
Jeff Hintzke	Greenskies
Jenn Runyon	Eversource
Jordan Graham	Tesla
Joe Debs	Eversource
Jorge Hernandez	Avangrid
Joseph Marranca	UI
Katherine Wyszkowski	Sunova
Kayte Morales	Earthlight Technologies
Kerry Schlichting	ISO
Kyle Perry	Verogy
Kyle Wallace	PosiGen
Logan Taricani	Avangrid
Marty Timperio	PurePoint Energy
Mike Farrell	CONNSSA
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy
Nicole Riedinger	Trinity Solar
Noel Lafayette	SHR Energy
Patrick Lewis	Eversource
Rob Whelan	Avangrid
Ruthie DeWit	PosiGen
Richard Labrecque	Agilitas Energy

Rob Whelan	Avangrid
Sabrina Xie	DEEP
Sara Pyne	CT Green Bank
Stephanie Bouchard	Trinity Solar
Tim Snyder	ACT
Tom Melone	Allco Renewable Energy
Valessa Souter-Kline	SEIA

4. Improving Communication Between the EDCs and Interconnection Applicants

These minutes document the third meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The "Improving Communication Between the EDCs and Interconnection Applicants" Meeting was held virtually on **Thursday**, **October 31**st, **2024 from 2:00pm–4:00pm EST**.

Meeting 4 aims to identify strategies to improve communication between the EDCs and interconnection applicants. The Meeting 4 agenda is as follows. These meeting minutes follow the same structure as the agenda.

- Welcome and introductions
- Vote on proposals discussed in Meeting 2
- PURA Staff introduce the problem for Meeting 4
- PURA-moderated stakeholder discussion, including presentations from
 - o Mike Trahan (CONNSSA) provided communications suggestions
 - Mrinmayee Kale ("MK") of New Leaf Energy, on behalf of SEIA (presentation on public queue data)
 - Nancy Chafetz of CPower, on behalf of SEIA (presentation on additional communications improvements related to the application process)
- Voting members propose votes on specific ideas (to be voted on at start of next meeting)
- Wrap-up and next steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Kickoff Meeting. Brandon Cavanagh (PURA) led the meeting, which is focused on strategies to improve communication between the EDCs and interconnection applicants. Unless specifically indicated otherwise, Brandon Cavanagh presented the content summarized in these meeting minutes.

B. Vote on Proposals Discussed in Meeting 2

Because Christopher Arpin (PURA) led the discussion at the previous IX WG 100-Day Sprint meeting, he also led the portion of Meeting 4 dedicated to voting on proposals that voting members identified at the end of Meeting 2.

- 1. Christopher Arpin (PURA): Some developers have identified a need for a single point of contact at Eversource to streamline the interconnection process so that all relevant departments are involved. This is similar UI's approach.
 - a. Eversource's distributed generation group currently issues contingent approval confirming that the grid can accommodate the proposed generation. Distributed generation approval does not constitute approval of single line diagram, point of interconnection or interconnection method.
 - b. Distributed generation group does not involve field services or meter engineering departments.
- Eric Virkler (Earthlight Technologies) had recommended several proposals related
 to this topic last week. Following discussions with other developers and the EDCs,
 he recommended that the proposals focused on addressing these topics be tabled
 and voted on next week. He will provide appropriate language for next meeting.
 - a. Proposals 1–3 tabled for voting next meeting (exact proposal language to be determined)
- 3. Group will assess the project's AC kW size against the transformer/grid and either approve it or provide
- 4. Proposal 4: To ensure applications are complete, consistent, and correct, create a pre-submission checklist for the PowerClerk interconnection application process.
 - a. Proposed by Noel Lafayette, SHR Energy and Carl Nowiszewski, Eversource
 - b. Questions/comments on proposal:
 - i. Noel Lafayette (SHR Energy): This could be a dedicated checklist or a more automated modification in PowerClerk that would prevent users from accessing the next step until their current step was fully completed. This proposal does not provide clarification on exactly which approach would be required.
 - ii. Christopher Arpin (PURA) informed the group that this proposal is intended to be high-level in nature, and details can be further refined in the future.
 - iii. Carl Nowiszewski (Eversource) suggested that checklist details can be further discussed during Meetings 5 or 6.

Voting Member		Vote	Additional Rationale
Amanda Trinsey (C	CIEC)	Yes	None provided
Noel La	afayette	Yes	None provided
(CONNSSA)	-		-

Carl	Nowiszewski	Yes	None provided
(Eversource	e)		
Jamie	Talbert-Slagle	Yes	None provided
(OCC)			
Valessa	Souter-Kline	Yes	None provided
(SEIA)			·
Joe Marran	ca (UI)	Yes	None provided

C. Problem Overview

To introduce the communications problems at a high-level, Brandon Cavanaugh (PURA) explained that communication is central to interconnection challenges, as highlighted in several procedural orders. Based on EDC input from NRES 24-08-03, there are multiple communication mechanisms that are built into the interconnection process. This IX WG Sprint meeting intends to clearly identify gaps and opportunities for communication improvement.

Brandon Cavanaugh (PURA) shared five key communications-related issues identified in the Procedural Order, highlighted below. Further details on these issues are available in the Meeting 4 slides.

- Delays in EDC-led interconnection approval processes
- Ambiguities in interconnection guidelines and approval timelines
- Communication breakdowns between project developers and the EDCs
- Slow response times from the EDCs to developer inquiries
- Inconsistencies in interconnection guidance or approvals among EDC departments

Brandon Cavanaugh (PURA) highlighted that solutions to these issues may require identifying several factors including the following:

- The current state of communication between developers and EDCs, including any major communications gaps
- Whether improvements or modifications to existing software tools could address some of these issues (and, if so, what those software improvements might look like)
- Whether interconnection applications have a strong understanding of the interconnection process and all available informational/educational materials (including whether such resources are easily accessible)
 - What the current dispute resolution process looks like, and what types of issues tend to lead to disputes.

D. PURA-Moderated Stakeholder Discussion and Q&A

CONNSSA presentation on communications improvements

Prior to the meeting, ConnSSA reached out to the PURA staff sharing that they wanted to share some material to discuss, and solutions to propose related to communication efficiency to streamline the interconnection process. The discussion below summarizes the significant aspects of the conversation.

- 1. Mike Trahan (CONNSSA) acknowledged that EDCs are managing many applications while navigating program changes, working with numerous contractors, and coordinating across multiple departments. CONNSSA identified four commercial-specific topics/suggestions (listed below) that aim to improve Eversource's internal processes, as developers report better experiences with UI. Recommendations are intended to benefit both EDCs and developers.
 - a. All NRES projects (not just Buy-All or Netting) get a comprehensive review resulting in full approval to construct as designed, with coordinated internal discussion.
 - a. Currently Eversource requires internal coordination across departments only for NRES Buy-All projects.
 - b. CONNSSA identified this as is the core/central issue, as the remaining four issues relate to it.
 - c. Sara Pyne (CT Green Bank): Should qualifier be changed to projects >25kW, rather than NRES projects specifically? Want to ensure that it is inclusive of energy storage systems.
 - i. Mike Trahan (CONNSSA) will check with members
 - b. Any departments involved in the construction, inspection, design, meter installation, etc. process (metering, new service, field engineering, etc.) be part of the application review/approval process with a single point-of-contact (the project Manager) acting as the central corresponding party. The Project Manager should be assigned to the project at the time of submission.
 - a. While a single point-of-contact may not always be feasible, but ensuring that project managers are consistently informed and involved would streamline communication and improve efficiency.
 - c. For projects requiring electrical service work to accommodate the solar installation, the Job Request number should be automatically issued as part of the interconnection process.
 - a. For all projects, the application should be reflective of each department that has reviewed and approved the project as designed; ensures a clear record that the review is complete.
 - b. Update interconnection applications to reflect input from all relevant departments, providing developers with clear and accurate guidance.

- d. Because contractors acknowledge that these improvements will require additional time, suggests a 30-business day processing extension.
- 2. Noel Lafayette (ConnSSA): Unexpected interruptions can raise labor and materials costs. Involving multiple departments from the beginning could also impact application costs; noting that the current DG-only approval costs ~\$2,500. Developers must understand the new time expectations (30 business days) and cost implications to make informed decisions. What are the estimated costs with all these departments working together?
 - a. Carl Nowiszewski (Eversource): Need to differentiate between large standalone projects and smaller, behind-the-meter ones; different project types have distinct revenue and interconnection cost considerations.
 - Providing detailed, accurate assessments to better enable developers to better understand project costs and revenue streams would require more utility time and resources. Cautioned against dedicating costly
- 3. Carl Nowiszewski (Eversource) expressed that Eversource is willing to refine the process, but adjustments may involve increased time and financial commitments from all stakeholders. Will require involving more engineers earlier in the process and across more process phases, which increases costs, and expectations may need to vary by project size.
 - a. Reminded participants that cost estimates may only be good for a certain timeframe (expires in 90 days).
 - b. Joe Marranca (UI): UI has been conducting upfront technical and design reviews for C&I interconnection projects for many years predating RRES. UI feels that there is certainly value to be gained from a More comprehensive upfront engineering review bring value, but takes extra time and money.
 - i. Consider a balanced approach that tailors review timelines based on the specific needs of individual projects while setting realistic timeline expectations for detailed engineering feedback.
- 4. Chris Lobdell (PurePoint Energy) proposed dividing interconnection process into more granular stages, with the option to pay separate fees at each stage (e.g., submit application with fee and receive asset management review; if developer chooses to proceed with further review including a detailed engineering review, they can pay an additional fee and/or agree on a timeline.
 - a. Would help developers avoid tying up resources unnecessarily while focusing on specific tasks, like assessing transformer capacity.
 - b. Would reduce resource intensity for projects that would otherwise require only basic approvals (e.g., transformer capacity checks).

- i. Noel Lafayette (ConnSSA) breaking down into stages, would benefit both developers and EDC staff. It allows the developers to gauge a client's commitment without immediately incurring high costs or committing to lengthy timelines. If a project doesn't proceed after the DG approval stage, it saves time and resources for the utility as well.
- 5. Carl Nowiszewski (Eversource): Does this proposal pertain to midsize C&I projects (e.g., ~25–500 kW, potentially 1 MW)?
 - a. Marty Timperio (PurePoint Energy) suggests using existing size category framework under RRES incentives.
 - b. Joe Debs (Eversource): Anything >500 kW would require telemetering or reclosers; anything greater than 1 MW would require study due to the ISO review. Projects >500 kW that are also behind customer load may not require a closure; don't want to trip customer load.
 - a. Carl Nowiszewski (Eversource): Wanted to raise the Level 1 limit from 25 kW to 50 kW. NRES program is at 25 kW, but batteries are increasing the effective size of RRES projects. Eversource would like to be able to treat residential projects up to 50 kW with batteries the same way they treat 25 kW projects.
- 6. Carl Nowiszewski (Eversource): Eversource has a single point of contact for all projects. Developers should know their assigned point of contact.
 - a. Developers must ensure the application includes accurate and current contact information. Outdated or missing contact details requires additional back/forth and sometimes emails do not go through; this hinders effective communication.
 - b. Suggested that developers:
 - i. Verify and update contact details in the application process to avoid disruptions in communication.
 - ii. Leverage informational resources available on Eversource's website.
 - iii. Proactively engage with designated point-of-contact for updates; escalate concerns to Carl Nowiszewski if issues persist.
- 7. Noel Lafayette (SHR Energy) noted that developers want a single point of contact that works across all three departments; historically, single point of contact is within DG group. Seeking one single point-of-contact that can speak for all three departments.
 - a. Joe Marranca (UI): UI approaching single point-of-contact from a personnel perspective; however, single points-of-contacts are organized within DER Interconnection Services group. Questions from developers regarding interconnection should be directed to that group.

- b. Marty Timperio (PurePoint Energy): Agree that it should be one point-of-contact. Would also support general transparency improvements (e.g., "We're reaching out to X department, will get back to you by X date". Communications break down when an EDC PM is speaking to someone in a different department and the developer is left in an open-ended conversation without clear next steps.
- 8. Kayte Morales (Earthlight Technologies) identified to communications-related issues in PowerClerk:
 - a. Have experienced someone from the EDC responding to a question in PowerClerk (regardless of whether it's the PM assigned to the project) then closing the ticket, even if they didn't actually answer the question. Then the developer needs to re-submit the question.
 - Carl Nowiszewski (Eversource): Eversource is working on improvements. The "ask a question" tool was originally developed to improve communications efficiency. Making incremental improvements over time.
 - b. Once application is submitted in PowerClerk, the fields are locked, preventing updates or document uploads. Users then must email revisions/additional documents directly to the PM, bypassing PowerClerk.
 - i. Joe Marranca (UI): UI is aware of this issue in PowerClerk and is working with a contractor to see what can be done to improve the user interface.

New Leaf Energy presentation on queue data availability

Mrinmayee Kale ("MK") of New Leaf Energy (acting on behalf of SEIA) provided a presentation on queue data availability, with a focus on what queue data would be most useful to make publicly available for developers. Eversource already provides some queue data on the company's website.

- 1. Mrinmayee Kale ("MK," New Leaf Energy) noted that the IX WG had discussed public interconnection queue data before the 100-Day Sprint began. This is an opportunity for further discussion on that topic
 - a. New Leaf Energy develops many front-of-meter projects (would be SCEFeligible projects in CT) and is interested in storage, but is new to CT market
 - b. CT EDCs offer public interconnection queue data; have reviewed what data is available compared to availability in other states.
- 2. Presented that access to the following data would be very helpful; other states provide data related to the following.
 - a. Application ID; Eversource and UI both currently provide
 - Maximum export capacity (proposed contracted); Eversource and UI both currently provide (kW system)
 - c. Maximum import capacity (proposed contracted) for storage

- d. Generator/load type; Eversource and UI provide technology information
- e. Developer/project LLC name and contact info (if allowed by developer)
 - Could be included in an application check-box (developer can check the box if they're ok with their name and contact info being provided in the queue)
- f. Proposed circuit and substation for interconnection and any alternatives; Eversource and UI provide the circuit name, Eversource identifies distribution and bulk substation, UI identifies substation
- g. Interconnection application status
 - i. Aligned with different milestones in guidelines
- h. Town/city name and zip code; Eversource and UI provide town
- i. Lat/long of point-of-interconnection
 - i. Would likely require developer consent
- j. Dates; Eversource and UI provide queue date
 - Would need to be aligned with dates/timelines as outlined in the interconnection tariff and what stakeholders consider to be useful dates to know/keep track of
- k. Interconnected generation
 - i. Especially important information for larger projects—helpful to know how much capacity might be available on a substation or circuit (including what's already interconnected to that circuit) to determine what capacity remains and whether they should pursue a new project on that circuit
- 3. NY and MA provide data in slightly different ways:
 - a. NY: NY DPS maintains central repository for all interconnection data
 - i. All utility queues, hosting capacity maps, etc. available on DPS page
 - ii. Includes dates for application review, preliminary review, study process
 - iii. Includes addition info on upgrade costs, developer name/contact info, upgrade costs for completed studies, etc. Helpful for new developers looking to enter the market and helps regulators understand interconnection cost trends in certain areas, identify whether EDCs need certain resources to accommodate interconnection demand, etc.
 - iv. Relatively standardized format across utilities
 - b. MA DPU posts Utility Interconnection Reports on website
 - i. Reports include "chess clock" as previously discussed
 - ii. Dates recorded for each stage in process (application receipt, screening review, supplemental review, impact study, detailed study, ISA sent, ISA executed, upgrade cost payment received, constriction

timeline commitment, construction begin and completed, witness testing conducted, etc.)

- c. ISOs provide similar level of information to what NY and MA provide
- 4. Carl Nowiszewski (Eversource): Eversource considers developer contact information private, but makes it available upon request. If a developer requests other developers' contact information, Eversource reaches out to queue members and asks if they're ok with contact info being disclosed
- 5. Nancy Chafetz (CPower) expressed support for MK's proposal; thinks the information would be valuable
- 6. Joe Debs (Eversource): Eversource only provides more general location information (e.g., town, not lat/long of the point of interconnection). Some information (e.g., export data) might change up until the interconnection agreement is signed; concerned about publishing potentially incorrect data in the spreadsheet. Also, several years ago IX WG discussed what queue data they wanted. Why is the list of requested data now different?
 - a. Mrinmayee Kale ("MK," New Leaf Energy) noted that this information would be valuable to new developers.
 - Valessa Souter-Kline (SEIA) has also heard this from other developers;
 believes there is room for constant improvement and incorporating best practices
 - c. Sara Pyne (CT Green Bank) also supports
- 7. Joe Debs (Eversource) noted that Eversource has been looking to automate aspects of this process; automation could include data automation. Recommends that stakeholders review Eversource's presentation to PURA regarding their hosting capacity map upgrades. These upgrades do not include providing data via spreadsheet.
- 8. Sara Pyne (CT Green Bank): Would be helpful to know which of these data fields are already able to be explored via PowerClerk reports. Would also like the project point-of-contact on the public spreadsheet?
 - a. Nancy Chafetz (CPower) also interested in understanding what data can be streamlined via PowerClerk reports.
 - i. Joe Marranca (UI): If the field already exists in PowerClerk, it would not be difficult to add additional fields to export to the report. But also need to consider the report's purpose (compared to other reports)
 - ii. Carl Nowiszewski (Eversource): Typically considers PowerClerk data to be confidential between Eversource and the developer.
 - iii. Nancy Chafetz (CPower): Envisioning only information that otherwise would be public.
- 9. Joe Marranca (UI): Open to discussions to identify how to improve this, but important to consider effort it will involve—consider administrative efforts.

a. Nancy Chafetz (CPower): Updating this data once monthly would be helpful (more frequently would be even better)

CPower presentation on improving communications in the interconnection process

CPower (on behalf of SEIA) shared additional proposals intended to improve communications in the interconnection process. The proposals and associated discussion are summarized below.

- 1. Nancy Chafetz (CPower) presented the following proposals
 - a. Clarify that all requests that go out as part of the interconnection process will be handled via the chess clock
 - i. Everything in PowerClerk should go through the chess clock
 - ii. Not necessary as a standalone proposal given that it would already be part of the chess clock proposal
 - b. Add redundant communication method to PowerClerk (text message)
 - i. Email is not always foolproof—recommend redundant communications pathway to reduce likelihood of missed communication
 - ii. Entity shepherding project through the queue isn't always the developer, especially for C&I projects.
 - iii. Option: Emails generated through PowerClerk automatically generate a text message—two methods failing is less likely than one method failing.
 - c. Publicly post summary reports (regularly updated) containing key PowerClerk information (queue position, host business name, total system power in kW, chess clock status including summary of outstanding requests, days in queue).
 - i. Significant overlap with MK's presentation, support her proposal
 - ii. Ideal end-state: Regularly post valuable info that's easy for the EDCs to export via PowerClerk
 - d. Add outreach for resources that are set to be withdrawn from the queue and have not acknowledged 15-day notice (e.g., courtesy phone call to developer)
 - i. Would enable confirmation that developer received notice and understands consequences of not providing requested information
- 2. Carl Nowiszewski (Eversource): Unsure that PowerClerk has technical capability to text, but will look into it, or will see if other third-party apps could be an option. Eversource has reinstated projects when developers were surprised that their project was withdrawn (e.g., because the email went to someone no longer there).

- a. Caveat: Only easy to reinstate if it's been a few days/weeks, not a prolonged period of time. Not a realistic approach if it starts impacting other projects in the queue that are not holding up other projects.
- b. Agrees that emails are sometimes missed; open to additional approaches, will ensure that project PMs are making direct calls if/when needed
- c. Who should the EDCs call? Applicant, owner, engineer?
 - i. Nancy Chafetz (CPower): Maybe there could be an "emergency contact" field in PowerClerk, where the applicant can input the appropriate contact.
- 3. Joe Marranca (UI): UI has reinstated projects when developer was unaware that project was withdrawn. UI has been flexible/lenient, but this did lead to a number of dormant projects over time (>1 year without progress or communication).
 - a. Developers also have responsibilities here—EDCs doing best to move projects forward, but aren't responsible for driving projects.
 - b. Two-way street: Suggests more aggressive work on developer side, more methods of communication via PowerClerk, etc.
 - c. Nancy Chafetz (CPower): Agree it's a two-way street, not seeking lenience regarding getting kicked out of the queue. Just want some additional communications in the queue.

E. Proposals to Vote on Next Meeting

Brandon Cavanaugh (PURA) displayed the proposals that participants made during the meeting, informed by the CONNSSA, SEIA, and CPower presentations, as well as IX WG participant discussion. Participants provided some additional suggestions (summarized below), and PURA Staff will coordinate with Voting Members who provided proposals to confirm proposal language before voting at the beginning of the next meeting.

- 10. Katherine Wyszkowski (Sunnova) suggested an additional two proposals:
 - a. Same-day notification for meter swaps for both the homeowner and the meter installer (currently just the homeowner is notified). Would like notification on the day it's been swapped and if there's a reason why the meter cannot be swapped.
 - i. Carl Nowiszewski (Eversource): Currently need to provide this information at a minimum the next day, because it involves two different systems which only "talk" to one another overnight. Notification via PowerClerk that the meter swap has been (or cannot be) completed is typically provided a day, but same day is not technically realistic.
 - b. For residential projects, improved transparency and shorter timelines for scheduling transformer upgrades (e.g., transformer upgrade date

- scheduled within 24–48 hours of accepting to move forward with an upgrade)
- 11. Nancy Chafetz (CPower) noted that her queue data proposal significantly overlaps with MK's proposal If MK's proposal is approved, CPower's similar proposal may not be needed.

F. Wrap-up and Next Steps

The next IX WG 100-Day Sprint meeting will be held on Friday, November 8, 2024 (10:0am–12:00pm). The meting topic will be **resolving insufficient hosting capacity for new projects**.

G. List of Meeting Participants

The following individuals attend all or part of the October 31, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Alice Horgan	Sunnova
Amanda Trinsey	CIEC
Ben Burnett	SAVKAT Solar
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Chris Worley	Sunrun
Christopher Kellogg	Eversource
Cornelius Stevenson	UI
Daniel Crisp	Eversource
Deb Roe	PACE

Name	Organization	
Darren Hammell	CPower Energy	
Eric Annes	DEEP	
Erica Dahl	Scale Microgrids	
Eric Virkler	Earthlight Technologies	
Graham Jesmer	ISO-NE	
Greg Berger	CPower Energy	
Ian Liebman	Scale Microgrids	
Jaime Smith	Lodestar	
James Cerkanowicz	Verogy	
James Schwartz	Independence Solar	
James Talbert-Slagle	OCC	
Jamie Spannhake	EOE	
Jeff Hintzke	Greenskies	
Jenn Runyon	Eversource	
Joe Debs	Eversource	
John Mosher	Solect Energy Development	
John Viglione	OCC	
Joseph Marranca	UI	
Justin Daigle	Earthlight Technologies	
Kayte Morales	Earthlight Technologies	
Kerry Schlichting	ISO	
Kyle Wallace	PosiGen	
Logan Taricani	Avangrid	
Marty Timperio	PurePoint Energy	
Michael Morrison	CTEC Solar	
Mike Trahan	CT Solar Association	
Mrinmayee Kale	New Leaf Energy	
Nancy Chafetz	CPower Energy	
Nikhil Johnson	Bluewave	
Noel Lafayette	SHR Energy	
Raul Garcia	CSW Energy	
Rob Whelan	Avangrid	
Robert Cote	Eversource	
Robert Sazanowicz	United Illuminating	

Name	Organization
Ruthie DeWit	PosiGen
Sabrina Xie	DEEP
S. Carrillo	CGB
Sara Pyne	CT Green Bank
Sean Riel	Earthlight Technologies
Tim Snyder	ACT
Valessa Souter-Kline	SEIA

5. Resolve Insufficient Hosting Capacity for New Projects

These minutes document the fourth meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The "Resolve Insufficient Hosting Capacity for New Projects" Meeting was held virtually on **Friday, November 8th, 2024 from 10:00am–12:00pm EST**.

Meeting 5 aims to identify strategies to resolve issues related to insufficient hosting capacity, focusing on capacity constraints that impact new projects. The Meeting 5 agenda is as follows. These meeting minutes follow the same structure as the agenda.

- Welcome and introductions
- Vote on proposals discussed in Meeting 4
- PURA Staff introduce the problem for Meeting 5
- PURA-moderated stakeholder discussion
 - Presentation from Kyle Wallace (PosiGen)
 - o Presentation from Mrinmayee Kale ("MK," New Leaf Energy)
- Voting members propose votes on specific ideas (to be voted on at start of next meeting)
- Wrap-up and next steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Kickoff Meeting. Brandon Cavanagh (PURA) led the meeting. Unless specifically indicated otherwise, Brandon Cavanagh presented the content summarized in these meeting minutes.

B. Vote on Proposals Discussed in Meeting 4

Voting Members' feedback on proposal language is provided where applicable. In some cases, participants provided feedback on proposals which led to language refinements.

With the exception of Proposal 7, Proposal language below reflects the most updated version of proposals, with participant feedback incorporated.¹⁹

- Proposal 1: Establish an initial full review and approval process for a subset of projects over 25 kW and make any necessary changes to timelines for projects that opt to participate in this initial full review and approval process
 - a. Proposed by CONNSSA

b. No comments/questions on proposal

Voting Member Vote		Vote	Additional Rationale			
Amanda Tr	insey (CEIC)	Yes	None provided			
Mike Traha	n (CONNSSA)	Yes	None provided			
Carl	Nowiszewski	Yes	Details will require further			
(Eversource	e)		refinement			
Jamie	Talbert-Slagle	Yes	None provided			
(OCC)						
Valessa	Souter-Kline	Yes	None provided			
(SEIA)						
Joe Marran	ıca (UI)	Yes	Details will require further			
			refinement			

- c. Proposal 1 adopted
- 2. Proposal 2: Establish an improved communication process for the Single Point of Contact for all projects over 25 kW.
 - a. Proposed by CONNSSA

b. No comments/questions on proposal

Voting Member		Vote	Addition	al Rati	onale	
Amanda Trinsey ((CEIC)	Yes	None pro	vided		
Mike Trahan (CO	NNSSA)	Yes	None pro	vided		
Carl Nov	viszewski	Yes	Details	will	require	further
(Eversource)			refinemer	nt		
Jamie Talbe	ert-Slagle	Yes	None pro	vided		
(OCC)						
Valessa Sou	uter-Kline	Yes	None pro	vided		
(SEIA)			-			
Joe Marranca (UI)	Yes	Details	will	require	further
			refinemer	nt		

- c. Proposal 2 adopted
- 3. Proposal 3: Determine whether and if so, how, to provide project work #s automatically upon initial application (both residential and commercial)
 - a. Proposed by CONNSSA
 - b. Comments/questions on proposal

¹⁹ Proposal 7 as provided in this document underwent extensive revisions during this meeting and throughout subsequent weeks, and eventually underwent a re-vote at a later date (see Meeting 7 minutes). For this reason, the Meeting 5 minutes retain Proposal 7 language as presented during Meeting 5 to provide clarity on what was first presented versus what was eventually voted on for the final time at a later date.

- i. Carl Nowiszewski (Eversource) acknowledged that this is an issue but suggested that instead of the "provide" terminology (included in the initial draft version of this proposal) consider language that accommodates the fact that EDCs do not yet know whether/how this is feasible in PowerClerk.
- ii. Jamie Talbert-Slagle (OCC) suggested revising to "Supply project work numbers as soon as practicable after application receipt..."
- c. Voting members agreed to table this proposal for voting on at the next meeting, and will work to refine language.
- d. Proposal 3 tabled
- 4. Proposal 4: Establish redundant method of communication: Our experience has been that emails are not always a foolproof communication method. We recommend using a redundant communication pathway (text message) to reduce the likelihood of a missed communication. Recommendation is that when PowerClerk generates an automatic email, it also generates an automatic text message to a cell phone number on file.
 - a. Proposed by CPower, seconded by SEIA

b. No comments/questions on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CEIC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	Yes	Overall supportive of this, with caveat that concerned about the word "establish." Unsure that text is a feasible form of communication in PowerClerk, so need to identify IT capabilities.
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	Yes	Overall supportive, with same caveat as Eversource.

c. Proposal 4 passed

- 5. Proposal 5: Make a phone call before withdrawing a project from IX Queue: If a project is set to be withdrawn from the Queue and 15-day notice has been sent with no read receipt in PowerClerk or acknowledgement via email, make a courtesy call to the developer to ensure they have received the notice and understand the consequences of not providing requested information.
 - a. Proposed by CPower, seconded by SEIA
 - b. No comments/questions on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CEIC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided

Carl (Eversource	Nowiszewski e)	Yes	Yes, with understanding that has overlap with the prior proposal regarding including a 24/7 emergency contact in PowerClerk for all applications
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marran	ca (UI)	Yes	Same caveat as Eversource

c. Proposal 5 passed

- 6. Proposal 6 (for non-RRES projects <1 MW):²⁰ Establish that the DG Group project manager assigned by the EDC will be the single point of contact for all Rate 980 (for ES) and SG2 (for UI) and NRES projects whether they be Buy-All or Netting.
 - a. Proposed by Earthlight Technologies, seconded by CONNSSA

b. No comments/questions on proposal, with the exception of the high-level comments that apply to Proposals 6–8 (see footnote).

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CEIC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski	Yes	Yes, but noted that Eversource is
(Eversource)		already doing this
Jamie Talbert-Slagle (OCC)	Yes	Yes, but noted that proposals should apply consistently to both EDCs (see previous footnote for additional information, as this comment applies to Proposals 6–8).
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	Yes	Suggested including UI's SG2 rate (UI's equivalent to Eversource's Rate 980) in revised version to make inclusive of UI. Alternatively, revision could just make the whole

²⁰ Proposals 6-8 (which exempt all RRES projects) were initially presented as being specific to Eversource and referred specifically to Eversource rates, processes, and procedures. The rationale provided for this is that UI already follows the procedures described in Proposals 6-8.

In response to this, Jamie Talbert-Slagle (OCC) questioned whether it was appropriate to have proposals that are specific to one utility. While UI currently already does what is described in Proposals 6-8, their approach could change. By ensuring that these apply to both EDCs, it would help ensure a consistent standard.

Voting Members were supportive of this perspective and the proposal language provided in these minutes reflect revisions that ensure that the proposals apply to both Eversource and UI.

	proposal	more	general	by	not
	referring t	o any s	specific ra	tes.	

c. Proposal 6 adopted

- 7. Proposal 7 (for non-RRES projects <1 MW): Establish that the interconnection application result in a comprehensive review by the metering department, new service, field engineering, and any other departments that will be involved in the construction and the resulting CA approval be a ready for construction approval with documented approvals from all Eversource departments.
 - a. Proposed by Earthlight Technologies, seconded by CONNSSA
 - b. Participants offered extensive comments, questions, and revised language suggestions on this proposal. While a vote was held on the high-level principle of Proposal 7 during Meeting 4, several participants felt that the language as edited during the meeting required further refinement and a separate vote. The dialogue and vote regarding Proposal 7 is included below, final language and votes for the material are provided in the Meeting 5 and Meeting 6 minutes.
 - i. Carl Nowiszewski (Eversource) identified some potential areas of conflict between this and some subsequent proposals. Sought clarity on whether this would establish that all applications include? Confusing if so, because Proposal 8 (below) includes has a checkbox for bypassing it.
 - ii. Carl Nowiszewski (Eversource): Would prefer an opt-in approach to the comprehensive review; comprehensive review would impact timelines and study costs. Would overall slow the process for everyone.
 - iii. Eric Virkler (Earthlight Technologies): All developers expressed that they supported multi-department comprehensive review being the default/standard even if it makes the process somewhat longer. For rare occasions in which only a high-level review is required, the optout box would be available.
 - iv. Eric Virkler (Earthlight Technologies): To accommodate duplicity, could incorporate checkbox language from Proposal 8 into Proposal 7.
 - v. Kayte Morales (Earthlight Technologies): Looking to accomplish a process change through this proposal that would enable a path forward through which a detailed one-line would not be required, and another path through which it is (and undergoes detailed review).
 - vi. Carl Nowiszewski (Eversource): Engineers review every submitted Level 2 application, including one-line diagrams. Encourages everyone to review guidelines. One-line diagrams are always required, even for residential projects.
 - vii. Chris Lobdell (PurePoint Energy) emphasized that the biggest issues for them is the new program format and deployment/installation requirements for Buy All/Sell All. Would like requirements to be clearly outlined in the I&R Guidelines.

- viii. Joe Marranca (UI) noted that Proposal 7 now has significant overlap with both Proposals 8 and 1; suggested tabling Proposals 7 and 8 for further refinement, discussion.
- ix. Joe Marranca (UI): The line diagram component is a larger question requiring further discussion. EDCs typically not comfortable accepting non-detailed drawings/diagrams, which may eventually require further back/forth to identify gaps and necessary details.
- c. Voting Members voted on Proposal 7 in principle, at only a high level (see votes below). But if a motion passes during a later meeting to re-vote on refined language, that language will be considered the most up-to-date proposal.

Voting Mem	nber	Vote	Additional Rationale
Amanda Trir	nsey (CEIC)	Yes	
Mike Trahan (CONNSSA)		Yes	All Voting Mambara aupported
Carl	Nowiszewski	Yes	All Voting Members supported Proposal 7 in principle, with the
(Eversource)			recognition that it will likely
Jamie	Talbert-Slagle	Yes	undergo extensive revision (and
(OCC)			potentially a revised vote) based
Valessa	Souter-Kline	Yes	on the discussions today.
(SEIA)			on the discussions today.
Joe Marrano	ca (UI)	Yes	

d. Proposal 7 adopted

- 8. Proposal 8 (for non-RRES projects <1 MW): Provide a checkbox or similar option in PowerClerk for a project to bypass the comprehensive review by all departments and opt for a review and approval of the transformer and grid capacity only. Should this review option be selected, specific interconnection methods need not be provided for this high-level review.
 - a. Proposed by Earthlight Technologies, seconded by CONNSSA
 - b. Based on the extensive conversation regarding potential ways to incorporate much or all of Proposal 8 into Proposal 7, participants suggested tabling this proposal It will be voted on at a later date if a Voting Member feels that it is still necessary.
 - c. Proposal 8 tabled
- 9. Proposal 9 (for non-RRES projects <1 MW): IXWG members to collaborate with EDCs on new IX review process to determine review timelines and discuss whether or not additional costs are warranted.
 - a. Proposed by Earthlight Technologies, seconded by CONNSSA

b. No comments/questions on proposal

Voting Member	er	Vote	Additional Rationale
Amanda Trinse	ey (CEIC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl	Nowiszewski	Yes	None provided
(Eversource)			

Jamie (OCC)	Talbert-Slagle	Yes	Yes, but noted similarities/overlap with Proposal 1. Noel Lafayette clarified that Proposal 1 has a 1 MW cap.
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marrar	nca (UI)	Yes	None provided

c. Proposal 9 adopted

C. Problem Overview

Kyle Wallace (PosiGen) presented on SEIA's proposals to address hosting capacity constraint issues. SEIA worked with PosiGen, Tesla, and Sunrun to develop the proposals. Kyle Wallace's presentation and the proposals are summarized below.

- Looking to add definitions for power control systems and export capacity to the <25 kW guidelines. Proposes adding to the appendix. Definitions largely adopted from Massachusetts interconnection work on similar topic.
 - a. Power Control System (PCS): A system or device which electronically limits or controls steady state currents to a programmable limit. A PCS must be tested by a NRTL to the UL PCS Certification Requirements Decision until similar test procedures for PCS are included in the standard.
 - b. Export Capacity: The maximum nameplate capacity of a Generating Facility in alternating current (AC), except that where such capacity is limited by a PCS, the Export Capacity shall be the net capacity as limited through the certified PCS.
 - c. In certain situations, if a PCS is used, can use export capacity rather than nameplate capacity
- 2. Proposes updating Section 3.7, Capacity of Generating Facility, as follows (update identified in underline):
 - a. 3.7.4 The Application shall be evaluated using the maximum continuous nameplate rated capacity of the Generating Facility in kW AC, <u>unless the Generating Facility includes use of a certified PCS, then the Interconnection Application shall be evaluated on the basis of the export capacity of the Generating Facility.</u>
 - b. May need to be added some additional sections as well, and other minor changes might be needed. Section 3.7.4 provided as an example.
- 3. Rationale for proposed revisions:
 - a. Would help avoid certain grid upgrades (e.g., transformers), reducing RRES program costs. Transformer upgrades can lead to delays in a project achieving activation.
 - i. While transformer costs are socialized, the costs are still paid by installers via additional application fees.
 - ii. Overall reducing the number of transformers that need to be upgraded or installed is still beneficial.
 - b. Some inverters (e.g., derated inverters) are designed to be derated using PCS, but are currently evaluated at max nameplate capacity.

- i. Currently evaluated at max output even if that is not the planned implementation.
- ii. Not recognizing PCS and derated capacity limits available hosting capacity that could accommodate other projects.
- c. 93% of utilities where tesla operates allow for PCS to limit system impacts during interconnection process
- d. PCS tested under UL 1741 Certification
- 4. Carl Nowiszewski (Eversource): What level of protection, control, safety would be provided to prevent anyone from changing the control on a device that can output more to be able to output more?
 - a. Safety concern: people trying to increase their system's size without involving the utility or manufacturer
 - b. Mrinmayee Kale ("MK," New Leaf Energy). This is a certified PCS system, which can be password-protected. It can be set up such that the utility sets up the password and does not need to share the password with the homeowner. Someone breaking in to reset the system would be a violation of the interconnection agreement.
- 5. Joe Debs (Eversource): Some of these proposals are consistent with Eversource's 23-08-25 ESS benchmark filing.
 - a. Recommendations are good, but some technical details need refining.
 - b. Could address these issues by January.
- 6. Joe Marranca (UI): Are these PCS systems outside of a unit, or are they software?
 - a. Kyle Wallace (PosiGen): PCS is a software capability within inverter itself.
 - b. Joe Marranca (UI) supports further discussion on this as a possible solution that could be deployed on the residential level, but need more details
- 7. Sean Riel (Earthlight Technologies): Order 28 compliance (proposed final decision in 24-08-05 proposed final decision) aims to incorporate recommendations proposed by EDCs in August 1st filing. PCS systems can be beneficial for residential and commercial applications.
- 8. James Talbert-Slagle (OCC): Concerned about voting on highly technical engineering matters via Sprint process; don't feel qualified to have an opinion on how this could impact grid reliability, etc. Not sure it's appropriate to vote on in a sprint setting. Very different item than addressing procedural issues, providing contact information, etc.
 - a. Chris Lobdell (PurePoint) stated that the topic is important in that it would enable more renewable deployment, enables more export control, etc.
 - b. Brandon Cavanagh (PURA) noted that it could be a docket topic.
 - c. Valessa Souter-Kline (SEIA): Could be discussed via a docket or via later IX WG discussions. Open to voting on how to further discuss it.
 - d. Carl Nowiszewski (Eversource) agreed that this is a good topic for technical IX WG discussions.
- Brian McDermott (Honeywell): Have provided charge/discharge profiles for 2 MW storage; discharge profile is much less than battery's nameplate capacity. very important issue for project financial viability.

- Reviewing at full nameplate capacity impacts timeliness, and an analysis that is reflective of actual planned operation is important for project financial viability.
- b. Joe Marranca (UI): We take intended operation into account in the analysis. Would like clarity on whether the ask is to adjust the screening (to include intended application not just nameplate), or something else?
- 10. Jeff Lounsberry: PG&E has a potential model to explore for behind the meter C&I projects. PCS and relays are approved by utility ahead of time, with generation limited to certain thresholds ahead of time for screen.
 - Carl Nowiszewski (Eversource): It is easier to implement protection and controls for larger projects. Original proposal was for residential systems <25 kW.

Mrinmayee Kale ("MK," New Leaf Energy) presented on flexible interconnection (Flex IX) as a means to proactively mitigate hosting capacity constraints in collaboration with Mike Trahan (CONNSSA).

- 1. Proposes establishing a Flex IX working group or task force.
- 2. Flex IX uses inverters to send or curtail power (as well as other system benefits)
 - a. Flex IX being explored/discussed in multiple states
 - Means to mitigate hosting capacity issues—hosting capacity typically restricted by overvoltage, power quality (harmonics, voltage flickers, etc.), protection issues, and thermal overloading
 - i. Flex IX helps accommodate more DERs within existing technical limits
 - c. If hosting capacity is limited, you can avoid some upgrades by using smart inverter functionality
 - d. Hosting capacity is not static
 - e. NOTE: Even with Flex IX, will still eventually need to invest in upgrading existing infrastructure
- 3. Advantages include lower interconnection costs, faster interconnection timelines, and increased network utilization
- 4. Proposes that PURA establish a stakeholder process (e.g., workgroup, task force) with a targeted outcome that interconnecting customers can be studied for Flex IX rather than just standard interconnection to mitigate DG saturation concerns.
 - a. Described numerous considerations necessary for a successful Flex IX program and provided detail about what directives for a Flex IX working group should be.
- 5. Flex IX will be necessary down the road; makes sense to start process now to be ready for when there is no additional hosting capacity.
- 6. Carl Nowiszewski (Eversource): Eversource appreciates that Flex IX is important topic for the industry, manufacturers, etc.
 - a. Important evolving technology, etc.
 - b. Proposal as written is too detailed.
 - c. Optional approach could be voting on whether to convene an IX WG meeting in January for continued discussions on this. Warrants extensive conversation on technical considerations, cost implications, etc.

- d. Suggests breaking down into two parts (small vs large projects).
- e. Eversource has allowed Flex IX for years in CT under different terminology.
- 7. Joe Debs (Eversource) supports forming a group but doesn't want to duplicate efforts.
 - a. Eversource aims to have somewhat uniform implementation across jurisdictions.
 - b. Doesn't want a group that duplicates MA efforts.
 - c. Working group should focus on what can be implemented on a reasonable timeframe in CT.
- 8. Joe Marranca (UI) supports holding Flex IX discussions in principle but agrees that as presented it is far too detailed. Would support voting on discussing Flex IX via IX WG or another targeted subgroup, but not with such specificity.
- 9. Noel Lafayette (SHR Energy): Would like PURA to oversee this group, which will be highly technical. Should aim to have a Flex IX program in implementation phase within 1.5 years. Proposal should be able to be modified/adjusted in coming years.
- 10. Mrinmayee Kale ("MK," New Leaf Energy) emphasized that working groups are typically most effective when they have a clear, detailed directive.
- 11. Joe Marranca (UI): The issue is less that the system lacks hosting capacity and more that capacity is limited in certain areas. One path could be incentivizing projects to be developed in areas with sufficient hosting capacity.
 - a. Noel Lafayette (SHR Energy): Important consideration—available hosting is in suburban areas, where real estate is too expensive for many installations. Also, expensive to run three-phase lines; a 2 MW project cannot support 1 mile of three-phase line at \$1M per mile.
- 12. Tim Snyder (ACT): This is an involved topic beyond what can realistically be addressed via the Sprint process. too large to address in sprint. Would like a conversation regarding proactive system planning to proactively enable hosting capacity via the appropriate forum.

D. Wrap-up and Next Steps

- 1. Next IX WG 100-Day Sprint to be held on Thursday, November 14th (1–3pm EST)
 - a. Discussion will be on additional topics that participants have suggested throughout the Sprint process
 - b. Complete survey to identify your highest-priority topics

E. List of Meeting Participants

The following individuals attend all or part of the November 8, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA

Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Alice Horgan	Sunnova
Allen Sabins	CSW Energy
Amanda Trinsey	CIEC
Azzie Contreras	Ecogy Solar
Ben Burnett	SAVKAT Solar
Bradley Parsons	Verogy
Brendan Smith	CT Green Bank
Brian Rice	Eversource
Bryan Fitzgerald	Verogy
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Chris Worley	Sunrun
Cornelius Stevenson	UI
Daniel Crisp	Eversource
Darren Hammell	CPower Energy
Erica Dahl	Scale Microgrids
Eric Virkler	Earthlight Technologies
Greg Berger	CPower Energy
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Schwartz	Independence Solar
James Talbert-Slagle	OCC
Jamie Spannhake	EOE
Jenn Runyon	Eversource
Joe Debs	Eversource
John Mosher	Solect Energy Development
Jorge Hernandez	Avangrid
Joseph Marranca	UI
Joshua Briggs	Lodestar Energy
Justin Daigle	Earthlight Technologies
Kayte Morales	Earthlight Technologies
Kyle Wallace	PosiGen
Logan Taricani	Avangrid
Marty Timperio	PurePoint Energy
Mike Farrell	Trinity Solar

Mike Trahan	CT Solar Association
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy
Nick Nagorski	Earthlight Technologies
Nikki Dow	CT Green Bank
Noel Lafayette	SHR Energy
Oliver Sandreuter	Lodestar Energy
Richard Labrecque	Agilitas Energy
Robert Cote	Eversource
Robert Sazanowicz	United Illuminating
Ruthie DeWit	PosiGen
Sabrina Xie	DEEP
Sergio Carrillo	CGB
Sara Pyne	CT Green Bank
Sean Riel	Earthlight Technologies
Tim Snyder	ACT
Valessa Souter-Kline	SEIA

6. Opportunity to Discuss Additional Issues

These minutes document fifth topical meeting for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The Sprint Process will occur from September 12, 2024—December 21, 2024, at which point PURA Staff will file a Sprint Process Report in Docket No. 17-12-03RE06, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies—Interconnection Standards and Practices*. The "Additional Topics" Meeting was held virtually on **Friday**, **November 14**th, **2024 from 1:00pm–3:00pm EST**.

The Procedural Order directed the IX WG to identify solutions to the following seven specific issues for which the IX WG must identify solutions. The Procedural Order also stated that discussions IX WG 100-Day Sprint discussions did not need to be limited to these issues.

- 1. Delays in EDC-led interconnection approval processes;
- 2. Ambiguities in interconnection guidelines2 and approval timelines;
- 3. Insufficient hosting capacity for new distributed energy resources:
- 4. Communication breakdowns between project developers and the EDCs;
- 5. Slow response times from the EDCs to developer inquiries;
- 6. Inconsistencies in interconnection guidance or approvals among EDC departments:
- 7. The potential need for a pre-submission checklist to inform developers of interconnection requirements before application submission.

The IX WG discussed and identified solutions to these seven topics throughout Meeting 2–5. Throughout the Sprint process, IX WG participants were encouraged to submit additional topics (relevant to the IX WG scope) that they would like to discuss during Meetings 6 and 7. In advance of Meeting 6, GPI staff compiled all proposed topics into a survey and sent the survey to all IX WG participants. In the survey, participants were asked to rank the list of proposed additional topics in order of priority for discussion during Meetings 6 and 7. In accordance with participants' survey responses, Meeting 6 focused on the following high-priority topics:

- How to establish an effective and efficient interconnection queue
- Improving communications with ISO-NE regarding cluster studies, solar-plusstorage projects, etc.
- Considerations for solar + storage interconnection applications
- Required relocation of meters

The Meeting 6 agenda is as follows. These meeting minutes follow the same structure as the agenda.

- Welcome and introductions
- Vote on proposals discussed in Meeting 5
- Overview of survey results
- PURA-moderated stakeholder discussion
- Wrap-up and next steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Kickoff Meeting. Brandon Cavanagh (PURA) led the voting portion of the meeting, and Max Melnick ran all other portions of the meeting.

B. Vote on Proposals Discussed in Last Meeting

Several voting members (as well as additional developer and EDC IX WG participants) met in advance of Meeting 5 in an effort to refine proposals to the extent possible before submitting them to PURA Staff to be voted on at the start of the meeting. However, several Voting Members expressed that they still did not feel ready to vote on the proposals. The proposals listed below are provided for informational purposes only; these proposals were *not* voted on during Meeting 5 and will instead be voted on at the start of Meeting 6.

Mike Trahan (CONNSSA) expressed that he felt that even if a Voting Member did not feel ready to vote on a particular proposal at the start of this meeting, they should be required to vote "yes," "no," or "abstain."

1. Proposal 1 (proposed by New Leaf Energy, seconded by SEIA): IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters [including but not limited to a) allowing for flexible interconnection in Connecticut and b) defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets] as part of a 'technical sub-

- group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group.
- 2. Proposal 2 (proposed by Verogy, seconded by CONNSSA): Following the results of a study during the IX application process:
 - a. EDCs will provide a cost component breakdown of the total estimated cost of interconnection
 - b. EDCs will offer the opportunity for the applicant to discuss the cost estimate components with the EDCs
 - c. EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months; in the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such, and will provide a best guess of when the true-up will be provided.
- 3. Proposal 3 (proposed by Earthlight, seconded by CONNSSA): Should Proposal 4 (below) be voted on?
 - a. During Meeting 6, participants discussed this proposal (Proposal 7 from Meeting 5) at length, and suggested numerous revisions to the proposal both during and after the meeting. For this reason, the proposal was tabled for voting during Meeting 5, so long as the group supported voting on it during Meeting 6.
- 4. Proposal 4 (proposed by Earthlight, seconded by CONNSSA): Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service department, field engineering department, and any other departments that will be involved in the construction, inspection, and approval of a project; the Contingent Approval document to be issued after such a comprehensive review will be a ready-for-construction approval with documented approvals from all relevant EDC departments. If the opt-in box is not checked, the default IX process is a review and approval of the transformer and grid capacity only, not the comprehensive review process as previously described. Additionally, if a developer opts out of this comprehensive review as part of the IX process workflow, it is still ultimately required as part of the service process workflow, and is the developer responsibility to ensure their designs meet all applicable standards and requirements.
 - a. Proposal 4 above is the revised version of Proposal 7 from Meeting 5.

C. Overview of Topics

Max Melnick (PURA) provided an overview of the survey process through which participants ranked additional IX WG participant-suggested topics in order of priority, with #1 indicating highest-priority for discussion during Meetings 5 and 6 and #10 indicating lowest-priority. The ranking of topics as determined by the survey is outlined below.²¹ The topics identified with an asterisk (*) are the Meeting 5 discussion topics due to their high ranking.

- 1* How to establish an effective and efficient interconnection gueue
- 2* Improving communications with ISO-NE regarding cluster studies, solar-plusstorage projects, etc.
- 3* Considerations for solar + storage interconnection applications
- 4* Required relocation of meters
- 5 Potential changes to specific communications (timing, content, means, etc.) related to the interconnection application process that could help expedite the overall process
- Recent changes to Eversource's Information and Requirements for Electrical Services (I&R) book
- 7 Additional Supplemental IA costs for developers, beyond costs captured in the issued IA
- 8 Identification of what aspects of in the interconnection application require back and forth before it is successfully submitted (i.e., what, specifically, could be improved in the PowerClerk process to make for a smoother application submission process?)
- 9 Further discussion of what to include in the "pre-submission checklist" voted on during 10/31 meeting
- 10 Alternative approaches through which developers can provide initial payments for construction under the IA.

D. PURA-Moderated Stakeholder Discussion and Q&A

The "how to establish an effective and efficient interconnection queue" and "improving communications with ISO-NE regarding cluster studies, solar-plus-storage projects, etc." discussion topics are both summarized below, as several participants viewed these as intersecting issues and discussed them in overlapping ways.

 Kayte Morales (Earthlight Technologies) expressed that some proposals previously voted on during the Sprint process (those intended to address PowerClerk issues and improve communications) would likely result in queue efficiency improvements by avoiding or minimizing the extent of back/forth between EDCs and developers.

²¹ Note: A topic listed towards the bottom of this prioritization list may still be very important to several Working Group participants. This list is only intended to be used to identify which of these additional topics Working Group participants think are highest priority for addressing in the 100-Day Sprint Process. A topic could be very important to many Working Group members but may not be well-suited to discussion in the Sprint format.

- 2. Chris Lobdell (PurePoint Energy): Has always been difficult to understand where a project is in the process, how long the process will take, etc.
 - a. How long it will take receive a response from the point-of-contact often unknown.
 - b. Already addressing these issues through some of the proposed strategies, but still need improved communication and transparency regarding project timing and status.
 - c. Carl Nowiszewski (Eversource): Time clock estimates for an individual project can be difficult, as other projects may impact that individual project's timeline, especially when identifying system impacts for projects further down in the queue is more speculative. Open to proposals based on innovative approaches in other jurisdictions.
- 3. Carl Nowiszewski (Eversource): Because this seems to predominantly be a large project issue (i.e., typically not an issue for residential projects), suggest defining as large projects on saturated circuits/substations (which are the bigger/more challenging projects). Small projects move quickly through the queue.
 - a. Joe Debs (Eversource): Yes, delays typically occur on larger projects, often for scenarios beyond the EDC's control (e.g., dynamic studies required, PSCAD models, ISO NE studies, etc.).
- 4. Mrinmayee Kale ("MK," New Leaf Energy) noted that a parallel study process is generally the best and most efficient way to move projects through the queue, and inquired about CT's approach.
 - a. Joe Debs (Eversource): Eversource's process is done at least partially in parallel so long as all requirements are met (information, payments, etc.). In CT, the impact study does not need to be fully completed with finalized results before running the next study, and the impact study agreement comes with a timeline.
 - i. Can model whole system in parallel by overlapping studies and running models multiple times in quick sequence. At a minimum, load flow portions are completed in parallel.
 - ii. Unlike ISO NE where one study must be completed before starting another.
 - iii. Need to ensure that projects that failed to submit complete and correct information do not delay other projects that have.
- 5. Carl Nowiszewski (Eversource): Need to recognize that the queue includes many different projects, each with different developers that have different financial situations, risk thresholds, etc. Eversource often receives requests for impact study delays because developers do not always have revenue information because they have not yet received their NRES bid.
 - a. Noel Lafayette (SHR Energy): This is a fair assessment; can be difficult to determine the best ways to allocate capital, especially with multiple projects happening simultaneously.
 - b. James Cerkanowicz (Verogy): Can make some ballpark estimates when looking into projects, including budgeting for studies. However, important to ensure there are realistic pathways to reducing those costs. Queue would be more efficient if developers didn't need lots of capital set aside so far in

advance (distribution system impact study is \$30,000, or \$85,000 when paired with transmission system impact study). Some potential approaches:

- i. Clustering distribution system impact studies
- ii. Graduating fees into multiple payments
- iii. Where feasible, using empirical data that EDCs already have. Also think some of the fees from these studies could be reduced by using some of the empirical data that utilities have.
- c. Joe Debs (Eversource): This overlaps with ISO NE topic—one reason Eversource collects money upfront is to secure a position in the ISO NE queue; otherwise, might need to wait another year before studying.
- 6. Joe Marranca (UI): Optional process paths, one-off situations for scenarios out of the norm, etc. are sometimes necessary, but when done frequently can reduce efficiency.
- 7. Joe Debs (Eversource) noted that though PURA does not have jurisdiction over ISO NE, ISO NE's processes do impact interconnection study timelines, which is an important consideration for PURA. Might need to incorporate ISO NE timeline considerations into EDC interconnection guidelines, including when developers can expect an interconnection agreement.
 - Do not want any developers to be inadvertently excluded from an ISO NE study by missing the opportunity to join the ISO NE queue.
 - i. Noel Lafayette (SHR Energy): Are smaller upfront payments or milestone payments an path to allow projects to get into the study without needing to pay everything upfront?
 - ii. Joe Debs (Eversource): EDCs would also prefer to not have large sums of money waiting and are open to a more graduated payment approach, but some parts of the process (e.g., ISO NE studies) fall outside of EDC control).
 - b. Mrinmayee Kale ("MK," New Leaf Energy) identified three ISO NE-related topics that all fall under state jurisdiction
 - i. Requests update from EDCs on any current/ongoing ASO studies
 - ii. Update on ASO determination window timing/thresholds (still waiting for FERC to approve ISO NE compliance filing)
 - iii. EDC, Developer and ISO-NE co-ordination plan for the study processes and receiving I.3.9 approval
- 8. James Cerkanowicz (Verogy): Recommend looking at CMP's approach. CMP issues interconnection agreements upon conclusion of distribution system impact study. Developer then executes but waits to pay interconnection upgrades until they receive the results of the transmission system impact study. holds off on payment of IX upgrades pending results of transmission impact study.
 - a. Joe Debs (Eversource): This comes with potential restudy risks. Eversource has never done a study this way, and transmission cost impacts are unknown. When the EDC provides the developer with the IA, it indicates that all studies are completed and there will be no additional interconnection cost. With that information, developers will seek funding from financial institutions but may still unexpectedly encounter a multi-million dollar fee.

- James Cerkanowicz (Verogy): Ok with some risk, with bookends/caveats and clear indication that the IA does not include potential transmission costs impacts.
- c. Joe Debs (Eversource) and Carl Nowiszewski (Eversource) identified some legal concerns and considerations related to this approach. If a project is cancelled, the utility could be burdened with stranded assets, and there may be additional utility costs associated with undoing certain project components to return the system to its prior condition.
- d. Joe Marranca (UI) also indicated that this approach would require legal consideration. However, in past scenarios in which the distribution side is generally known but UI is awaiting transmission analysis, UI has been able to provide the developer with a non-executable *draft* IA. The information was helpful to developers seeking to secure financing, but acting on that draft information was done at the developer's own risk.

Considerations for solar + storage interconnection applications:

- 1. Carl Nowiszewski (Eversource): Eversource has been discussing how to update hosting capacity to incorporate load and storage conditions (not just generation)
 - a. Joe Debs (Eversource): Eversource's hosting capacity upgrades will be finalized by end of 2025. Maps are currently solar-focused and provide a general overview, but batteries operate differently. New data will be informative for battery and EV considerations.
- 2. Mrinmayee Kale ("MK," New Leaf Energy): Could the updates include load data (e.g., peak load, timestamp and seasonality for peak load, all at substation data).
 - a. These will be included with the 2025 hosting capacity map updates.
- 3. Joe Marranca (UI): UI is also updating their hosting capacity maps, but is a bit farther behind Eversource in the process. This summer/fall UI submitted RFP results regarding similar updates to PURA; still awaiting PURA's decision.
- 4. John Mosher (Solect Energy): Are the hosting capacity map upgrades incorporating data from prior energy storage processes, which identified draft language for projected load schedules, and practical nameplate capacity for sites using power controllers? [missed this] If this is just specific to the application itself (the admin process), or is this pertinent to the requirements
 - a. Joe Debs (Eversource): HCM automation process will expand the information that Eversource has available today, including the addition of batteries and an updated electric vehicle map.
 - b. Carl Nowiszewski (Eversource): Updates should help battery applicants better understand when they can charge/discharge their systems. Would also enable additional feedback on necessary protection and controls, operating schedules that would potentially avoid system upgrades, etc.

Required Relocation of Meters

1. Justin Daigle (Earthlight Technologies): The I&R guidelines now require IT- and CT-rated NRES services to be relocated outside (50' maximum distance from the

CT compartment to the meter). Docket 22-8-03 extended that to 100' for IT-rated services <1800 amps. Problematic because if the service is located on an old building in the middle of the facility, cables must be extended far.

- a. Typically, an issue in commercial installs, but also sometimes multi-family residential.
- b. New requirement with long lead times at the EDC based on equipment constraints (sometimes over a year)
 - i. Has had sockets on order since 2022, still have not received complete order. Have had projects denied because of older sockets (which aren't on the approved socket list) while waiting for the new ones to arrive.
- c. Project cost impacts—have been charged for outages for meter relocation work, need to schedule work off-hours to address outages (\$4–\$5k)
- d. I&R guidelines provide way to isolate CT compartment for worker safety purposes.
 - i. Earthlight Technologies has had four projects requiring outages this year
- e. Proposed implementing a case-by-case approach for IT- and CT-rated services.
- f. Proposed utilizing cold sequencing-requiring disconnecting switch for meter relocation work in lieu of taking an outage and costing developers and customers more money over time due to the outages, which could be avoided via equipment isolation.
- 2. Eric Virkler (Earthlight Technologies): When meter relocation is required, service relocation is typically also required to be moved outside, (\$80–90k) which can make a project financially infeasible.
- 3. Kayte Morales (Earthlight Technologies): ~50% of projects in recent years have required meter relocation, many also requiring bringing other equipment outside. Some easy, some made the project infeasible (typically older buildings)
- 4. Noel Lafayette (SHR Energy): Utility disconnects are similar; very expensive (\$50k+) and relatively "new" ask, with entire service sometimes asked to be brought outside. But the reasoning behind this new requirement is unclear.
- 5. Carl Nowiszewski (Eversource): EDCs can't ensure that every proposed project will be economical for developers. Some projects won't be feasible due to site conditions, old equipment, etc.
- 6. Noel Lafayette (SHR Energy): Would like clarity on why this new requirement exists. If a project involves 200 kW on a building, and the existing disconnect is up to code, why does it need to be moved outside?
 - a. Carl Nowiszewski (Eversource): Meter relocation is a required part of NRSE. It was not required under LREC/ZREC programs but is required under NRES.
 - b. Noel Lafayette (SHR Energy): If there are legitimate engineering reasons for the meter relocation, understanding those would be helpful for developers, who could look at site characteristics/conditions and choose to pursue/not pursue a project.

- c. Chris Lobdell (PurePoint Energy): Support need to ensure safety, but also want a better understanding *why* this requirement is part of NRES.
- 7. Joe Marranca (UI): This topic was discussed in another docket; EDC engineering groups met with developers to discuss circumstances in which a meter would need to be relocated.
 - a. Noel Lafayette (SHR Energy): Have heard that developers were told that if there is a fire and the fire department needs to disconnect the PV, they may believe that they're turning off all power to the building, but not be doing so. Seems like some of the rationale pertained to fire code.
- 8. Kayte Morales (Earthlight Technologies): Supports looking at where this requirement came from. Improved clarity would be helpful to all, and more information in metering diagrams could be valuable.
 - a. Carl Nowiszewski (Eversource): We'll review I&R book metering requirements.
- 9. Patrick Fam (Eversource): Production meter installer changed with shift to NRES program. Prior to NRES, Eversource would send meter to customer and customer would install it. Meter was customer responsibility. Eversource is now responsible and liable for meters and thus must follow I&R book, which requires the meter to be outside. Unsure how/why it was decided that Eversource had to own the meter.
 - a. Joe Marranca (UI): UI owned meter under prior program, so the change might have been to ensure consistency between the utilities.
 - b. Chris Lobdell (PurePoint Energy): Why does the utility revenue meter need to be moved outside? And why does the developer need to pay to move the utility's revenue meter?
 - i. Patrick Fam (Eversource): Can have customer issues with accessing meters. Outside meter allows Eversource to support project without access issues. To ensure Eversource can properly bill the customer for net credits, they need the revenue meter to be up-to-code and outside. More challenging if meters are in multiple locations.

E. Wrap-up and Next Steps

- 2. Next meeting scheduled for Thursday, November 21, 2024.
 - a. Another meeting for discussing additional topics, based on survey responses.
 - b. Any proposals developed during or following next meeting will be voted on at a dedicated voting session scheduled for Tuesday, November 26, 2024.

F. List of Meeting Participants

The following individuals attend all or part of the November 14, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Alan Chubbuck	Michaud Law
Alex Sahi	PURA
Amy Findlay	Eversource
Brad Marszalkowski	ISO NE
Brendan Smith	CT Green Bank
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Cornelius Stevenson	UI
Darren Hammell	CPower Energy
Deb Roe	PACE
Joe Debs	Eversource
Ed Kranich	CT Green Bank
Eric Virkler	Earthlight Technologies
Graham Jesmer	ISO NE
Greg Berger	CPower Energy
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Schwartz	Independence Solar
James Talbert-Slagle	OCC
Jenn Runyon	Eversource
Jeff Lounsberry	Scale Microgrids
Joe Marinaccio	UI
John Mosher	Solect Energy Development
John Viglione	OCC
Jorge Hernandez	Avangrid
Joseph Marranca	UI
Justin Daigle	Earthlight Technologies
Katherine Wyszkowski	Sunnova Energy
Kayte Morales	Earthlight Technologies
Kevin Costello	CTEC Solar
Kyle Wallace	Posigen
Logan Taricani (Avangrid)	Avangrid
Marty Timperio	PurePoint Energy
Mike Trahan	CONNSSA
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy

Nikki	CT Green Bank
Noel Lafayette	SHR Energy
Patrick Fam	Eversource
Rob Whelan	Avangrid
Robert Cote	Eversource
Robert Sazanowicz	UI
Sabrina Xie	DEEP
Sara Pyne	CT Green Bank
Sergio Carillo	CT Green Bank
Scott Miller	Eversource
Sean Riel	Earthlight Technologies
Thomas Lefebvre	Eversource
Tim Snyder	ACT
Valessa Souter-Kline	SEIA

7. Opportunity to Discuss Additional Issues

These minutes document Meeting 6 for the Distributed Generation Interconnection Working Group (IX WG) 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The Sprint Process will occur from September 12, 2024—December 21, 2024, at which point PURA Staff will file a Sprint Process Report in Docket No. 17-12-03RE06, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies—Interconnection Standards and Practices*. The "Additional Topics" Meeting was held virtually on **Friday, November 21**st, **2024 from 2:00pm—3:40pm EST**.

This meeting is the second meeting intended to serve as a venue to address additional interconnection-related topics that were not specifically identified in the Procedural Order, or to continue discussions on topics from prior meetings. In advance of Meeting 7, participants completed a survey identifying their top-priority topics for discussion during Meetings 7 and 8. Meeting 7 discussion topics are listed below.

- Welcome and introductions
- Vote on proposals discussed prior meetings
- Discussion of additional topics
 - Recent changes to Eversource's Information and Requirements for Electrical Services (I&R) book
 - Additional Supplemental IA costs for developers, beyond costs captured in the issued IA
 - Further discussion of what to include in the "pre-submission checklist" voted on during 10/31 meeting
 - Alternative approaches through which developers can provide initial payments for construction under the IA
- Wrap-up and next steps

A. Welcome and Introductions

Aileen Cole (GPI) welcomed participants to the Interconnection Working Group (IX WG) 100-Day Sprint Process Kickoff Meeting. Max Melnick (PURA) led the remainder of the meeting.

B. Voting on Proposals from Prior Meetings

Proposals from Meeting 5

- 1. Proposal 1: a) EDCs will provide a cost component breakdown of the total estimated cost of interconnection. b) EDCs will offer the opportunity for the applicant to discuss the cost estimate components with the EDCs. c) EDCs will provide a true-up of actual vs. estimated costs within six months of the original estimate exceptions to the six-month timeframe can be made in the event of outstanding circumstances requiring a timeframe longer than six months; in the event of such outstanding circumstances, once they become known the EDCs will immediately notify the applicant of such, and will provide a best guess of when the true-up will be provided.
 - a. Proposed by Verogy, Seconded by CONNSSA
 - b. No questions/comments on proposal

Voting Men	nber	Vote	Additional Rationale
CEIC not pr	esent (CIEC)	N/A	N/A
Mike Trahar	(CONNSSA)	Yes	None provided
Carl	Nowiszewski	Yes	None provided
(Eversource	·)		
Jamie	Talbert-Slagle	Yes	None provided
(OCC)			
Valessa	Souter-Kline	Yes	None provided
(SEIA)			
Cornelius St	tevenson (UI)	Yes	None provided

c. Proposal 1 adopted.

- 2. Proposal 2: Should Proposal 3 (below) be voted on? [If there is a unanimous vote of "yes", the prior version of this proposal, which was adopted from the beginning of Meeting 5 will be nullified in light of this proposal]
 - a. Proposed by Earthlight Technologies, Seconded by CONNSSA
 - b. No questions/comments on proposal
 - c. Note: This proposal is in response to a motion to table voting on a previous proposal (Proposal 7 from Meeting 5) and pertains specifically to whether Voting Members supported voting on a revised version of that proposal (to replace the prior version).

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski	Yes	None provided
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Valessa Souter-Kline	Yes	None provided
(SEIA)		
Cornelius Stevenson (UI)	Yes	Proposal requires further IX
		WG discussion to refine details

d. Proposal 2 adopted.

- 3. Proposal 3 (Proposal 7 from Mtg 4): Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service department, field engineering department, and any other departments that will be involved in the construction, inspection, and approval of a project; and the resulting Contingent Approval document to be issued after such a comprehensive review will be a ready-for-construction approval with documented approvals from all relevant EDC departments. If the opt-in box is not checked, the default IX process is a review and approval of the transformer and grid capacity only, not the comprehensive review process as previously described. Additionally, if a developer opts out of this comprehensive review as part of the IX process workflow, it is still ultimately required as part of the service process workflow, and is the developer responsibility to ensure their designs meet all applicable standards and requirements.
 - a. Proposed by Earthlight Technologies, Seconded by CONNSSA
 - b. No questions/comments on proposal
 - c. Note: Proposal 3 is the same as Proposal 7 from Meeting 5, which was tabled for voting at this meeting.
 - d. Prior proposal language (for reference purposes only): Allow for an interconnection applicant to opt in (i.e. by including a checkbox in the application) to a comprehensive review by the metering department, new service, field engineering, and any other departments that will be involved in the construction and the resulting Contingent Approval be a ready-for construction approval with documented approvals from all EDC departments. If the box is not checked, the default is a review and approval of the transformer and grid capacity only.

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided

Carl	Nowiszewski	Yes	None provided
(Eversource	·)		
Jamie	Talbert-Slagle	Yes	None provided
(OCC)			
Valessa	Souter-Kline	Yes	None provided
(SEIA)			
Cornelius S	tevenson (UI)	Abstain	None provided

e. Proposal 3 adopted.

Proposals from Meeting 6

- 1. Proposal 1: Add the following information to the public interconnection queue. Additional data points for projects in queue: a) Developer name, including the parent company and not simply the LLC name (with developer approval to share as a checkbox added to the application), b) POI location (latitude/longitude) (developer to enter the data), c) Contracted export capacity (instead of nameplate)
 - a. Proposed by SEIA
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	Yes	Voting yes with the understanding that this is for projects going forward, based on information provided by the applicant
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Cornelius Stevenson (UI)	Abstain	None provided

- c. Proposal 1 adopted.
- 2. Proposal 2: IXWG Sprint voting members support the establishment of a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop an updated queue management proposal that will specifically (but not exclusively) address a) Status of interconnection, including dates for when each milestone was reached: application submitted; screening in progress; study agreement issued; impact study in progress; impact study report issued; interconnection agreement issued; under construction; and interconnected (final list of milestones to be included will be determined in the working group)., b) Regularly updated information about interconnected generation; c) Consideration

of milestones following execution of an interconnection agreement to establish project viability/forward progress, while considering the full development landscape (e.g. NRES solicitations, ASO Studies etc.).

- a. Proposed by SEIA
- b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	Does not agree with including the running interconnection status, including dates. Would have supported a less-specific proposal without that component.
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Cornelius Stevenson (UI)	Abstain	None provided

- c. Proposal 2 not adopted.
- 3. Proposal 3: The Interconnection Working Group recommends that ISO-NE cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects. The IX Working Group urges the Public Utility Regulatory Authority and the Department of Energy And Environmental Protection to also recommend to ISO-NE that cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects.
 - a. Proposed by CONNSSA
 - b. CONNSSA voted yes on this proposal, but all other parties (except for CEIC who was not presented) requested that the proposal be tabled for voting at the next meeting. It will be voted on during the dedicated post-Meeting 6 voting session.
- 4. Proposal 4: IXWG Sprint Voting Members support creating a stakeholder working group, potentially as a subgroup to the IX Working Group, to explore developing a proactive system planning program in CT to enable hosting capacity for DER. IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the working group. Topics to be considered by the working group: a) Factors that drive the development of DER by enabling hosting capacity in specific locations that

benefit the state as a whole and further the state's clean energy objectives (e.g., availability of technically developable land for solar, land cost, proximity to existing transmission and distribution infrastructure, and upgrade costs), b) Cost allocation, c) The working group should draw on the experiences of other states pursuing proactive planning such as MA, NY IL, MD, MN, and CO.

- a. Proposed by SEIA
- b. CONNSSA voted yes on this proposal, but all other parties (except for CEIC who was not presented) requested that the proposal be tabled for voting at the next meeting. It will be voted on during the dedicated post-Meeting 6 voting session.
- 5. Proposal 5: In an effort to improve overall IX process/queue efficiency, add the topic "how to achieve more clarity of proposed projects as they enter the IX process" to the IXWG's agenda for 2025, beginning with the January meeting. This effort would include exploring possible solution ideas such as but not limited to decoupling the incentive program process from the IX process and realigning them in a serial manner (incentive program first, followed by IX), potential guardrails to be added or more strictly enforced as prerequisites to attain/maintain an IX queue position, and better overall harmonization between incentive program rules and IX process guidelines.
 - a. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski	Yes	None provided
(Eversource)		
Jamie Talbert-Slagle	Yes	None provided
(OCC)		
Valessa Souter-Kline	No	SEIA is open to a queue
(SEIA)		management discussion but
		not comfortable with defining
		this level of specificity
Cornelius Stevenson (UI)	Abstain	None provided

- b. Proposal 5 not adopted.
- 6. Proposal 6: PURA to establish a stakeholder process within the current Connecticut Interconnection Working Group (IXWG) to develop a specific model for implementing a uniform program for flexible interconnection in Connecticut. IXWG is to file the model for PURA's consideration within six months of the 100 Day Sprint report to PURA. PURA is to instruct the stakeholder working group to include (but not limited to) the following elements: 1) A brief comparison of the

different principles of access and a proposal for adoption of one achieved through consensus amongst the stakeholder group members. 2) Contemplation of how a determination could be made to offer a flexible interconnection option in lieu of upgrades. 3) A process by which EDCs study and consider flexible interconnection options during system impact studies and include flexible interconnection options in the system impact study results. 4) The stakeholder working group shall be facilitated by one DER industry member and one EDC member and include a) two representatives from each EDC (the co-chair included), b) one or more representatives from both the Connecticut Department of Energy & Environmental Protection and the Connecticut Office of Consumer Counsel, and, c) six representatives from the DER industry, appointed through a process conducted by CONNSSA and SEIA. 5) Identify in the filing with PURA – to be made no later than six months after PURA's Order – the extent to which consensus was achieved and those issues on which consensus could not be reached.

a. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
CEIC not present (CIEC)	N/A	N/A
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	Abstain	Supports in concept and open to starting Flex IX discussions soon, but proposal contains too many specific details regarding group membership, administrative specifics (e.g, timeframe), etc.
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Cornelius Stevenson (UI)	Yes	Supports in principle on the condition that details can be more refined/finalized

b. Proposal 6 adopted

7. Proposal 7: IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters including defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets as part of a 'technical sub-group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group.

- a. All parties (except for CEIC who was not presented) requested that the proposal be tabled for voting at the next meeting. It will be further refined then voted on during the dedicated post-Meeting 6 voting session.
- 8. CONNSSA had submitted three additional proposals to be voted on, but chose to redact them from voting at this meeting, continue to refine them as needed, and table them for voting at the post-Meeting 6 voting session.

C. Discussion—Additional Topics

Justin Daigle (Earthlight Technologies) shared some proposals related to **recent changes to Eversource's I&R book**.

- 1. Justin Daigle (Earthlight Technologies) presented several proposals related to the following topics, for which other Voting Members or stakeholders had no comments.
 - a. Reverse jurisdiction over meter interconnection location/methods outside of EDC-owned transformers back to the local building official. Recommends reverting back to ZREC standards.
 - b. NRES projects without service work should not trigger need for compliance with most recent I&R guidelines. Existing internal meters should be allowed to remain, as under the ZREC program.
 - c. Additional switch should not be required on load side of utility meter for solar-only interconnections.
 - d. Return to 25' allowable distance from switch (old I&R standard), compared to current 3' allowable distance.
 - e. EDC should not be allowed to require that the customer take a utility-controlled outage for service work if an alternative means to disconnect exists.
- 2. Proposed that the project manage at the EDC DG department supply data, arc flash coordination studies upon developer request within 7 business days.
 - a. Joe Debs (Eversource): This is sometimes requested for ground configurations. Eversource is ok with providing, but the 7-day turnaround is too short.
 - i. Kayte Morales (Earthlight Technologies): Flexible on timeframe; currently takes several weeks and multiple calls/emails. Would like a more clear, reliable, shorter timeframe.
 - b. Carl Nowiszewski (Eversource) sought clarity on whether developers were just looking for transformer size data.
 - i. Justin Daigle (Earthlight Technologies): Transformer size and impedance data, as early in the process as possible.

- ii. Carl Nowiszewski (Eversource): This could be included in the contingent approval but agree that 7 days is not realistic.
- iii. Robert Cote (Eversource): That would be more realistic than 7 days.
- iv. Justin Daigle (Earthlight Technologies) and James Cerkanowicz (Verogy) would accept that approach.
- c. Carl Nowiszewski (Eversource): Is this needed on every project?
 - Justin Daigle (Earthlight Technologies): It is becoming more prevalent in different AHJs, so it should be a standardized part of the process.
 - ii. James Cerkanowicz (Verogy): Likely needed upfront for C&I projects, so early in the technical review (e.g., with study results) is helpful.
- d. Carl Nowiszewski (Eversource): Will include data with contingent approval, as part of the process (not the 7 days situation)
- e. Cornelius Stevenson (UI): There is a PLC in another docket coordinating much of this information. If this is a request for information, it should be handled as such.
 - Carl Nowiszewski (Eversource): If developers say they need this for every project, it makes sense to include it as part of the standard process.
 - ii. Cornelius Stevenson (UI): If that is the case, it should be part of the initial review and provided with the conditional approval document.
- f. Carl Nowiszewski (Eversource): Eversource will support this next week if the timeline issue is addressed, but if it remains worded like this, they will have to vote no.
- 3. Proposed that utilities improve internal processes to expedite meter procurement, programming, installation to ensure that they can issue the permission-to-operate within 15 days of AHJ approval.
 - a. Carl Nowiszewski (Eversource): 15 days is not practical, but the current timelines could be improved. This requires further discussion.
- 4. Jamie Talbert-Slagle (OCC) noted that all I&R guideline references pertained to Eversource, because that is Eversource's guideline book. However, thinks these should be standardized where feasible, and asked if UI has an analogous document.
 - Justin Daigle (Earthlight Technologies) acknowledged that the concepts should apply to both EDCs, even though only Eversource's I&R guidelines are referenced.
 - b. Cornelius Stevenson (UI): UI is in the process of updating its own guidebook. UI can review and see if the updates will be similar/in alignment to these.

- 5. Proposed that the EDC not have the right/ability to issue a supplemental IA with additional costs once an IA has been executed, so long as the customer is compliant with all requirements.
 - a. Cornelius Stevenson (UI): UI has the ability to amend at any given time, including after the IA is issued.
 - b. Joe Debs (Eversource): The IA has language enabling changes (e.g., addressing deficiencies in estimates)
 - c. Carl Nowiszewski (Eversource): Developers have expressed that they would like cost estimates to be held for 1-1.5 years, which is not realistic.
 - d. James Cerkanowicz (Verogy) suggested that participants review Central Maine Power's approach to this. CMP gives developers the option to review interconnection costs and can discuss timeline and payments, with some line-item costs. This provides developers with a better idea of actual costs.
 - i. Carl Nowiszewski (Eversource): Have we already voted on a poststudy meeting? If so, this would be duplicative of that.
 - ii. Cornelius Stevenson (UI) wants to confirm whether this sort of meeting is already an option in the guidelines.
 - iii. Joe Debs (Eversource): Eversource currently holds meetings with developers if the price would be far beyond expectations.
 - e. EDCs open to this if it is something that developers want, and if it is not duplicative of other efforts.

Carl Nowiszewski (Eversource) shared a proposal regarding interconnection process questions and concerns, and how they could be incorporated into IX WG conversations moving forward.

- 1. Carl Nowiszewski (Eversource) proposed that if a developer wants to question or change the interconnection process for interconnection, they should be required to bring it to the IX WG for discussion. If the issue cannot be resolved there, it can separately be elevated. If developers have an issue with a specific project, they should go directly to the PM at the EDC they are working with, but if their issue is with the IX process more broadly, they should be required to bring the issue to the IX WG to discuss.
 - a. Mrinmayee Kale ("MK," New Leaf Energy) asked if there were any limitations to bringing any interconnection-related topics to the IX WG. Is there a requirement that a certain number of people bring up the issue before it can be discussed?
 - i. Aileen Cole (GPI): There is no requirement that a certain number of people elevate the issue before it can be discussed at the IX WG. The IX WG has typically served as a venue where participants and the EDCs can respond to orders that have been directed to the

- group, but other interconnection-related topics are always valid discussion topics. We just ask that people notify us of their desire to discuss that topic so we can align it with other IX WG schedule needs (e.g., complying with orders by specific dates). In general, we will prioritize "bigger" issues for discussion, but are also able to discuss more specific issues via subgroup meetings.
- b. Valessa Souter-Kline (SEIA): Supportive of using the IX WG when it is the appropriate venue for discussing certain issues, and trade organizations have a role in bringing things to the IX WG. Will never vote to reduce communications channels, so how a proposal like this is framed is very important.

Other Topics

- 1. Mike Trahan (CONNSSA) noted that there may be value in further discussing the ISO-NE topic explored in the previous IX WG 100-Day Sprint meeting (Meeting 5).
 - a. This topic was "Improving communications with ISO-NE regarding cluster studies, solar-plus-storage projects, etc."
 - b. Carl Nowiszewski (Eversource) expressed that clarifying the relationship between ISO-NE and the EDCs could be useful.
 - i. Joe Debs (Eversource): EDC have abstained from this topic because EDCs should not be commenting on ISO-NE issues in this venue. However, industry representatives could submit a letter to ISO-NE suggesting procedural changes.
 - ii. Cornelius Stevenson (UI): UI is in agreement.
 - c. Mike Trahan (CONNSSA): Would DEEP and PURA (rather than the IX WG itself) be open to drafting a letter urging ISO-NE to take up these concerns?
 - d. Eric Annes (DEEP): IX WG could make such a recommendation to DEEP, but DEEP is aware of parties' concerns and has already been in conversations with ISO-NE. However, does not think that ISO-NE would support the "under 5 MW" condition suggested in an earlier proposal.
- 2. Carl Nowiszewski (Eversource) noted that Eversource has been working on drafting a list of materials that could be included in a pre-submission checklist, as discussed at a prior meeting.
- 3. Cornelius Stevenson (UI): UI has been looking at several different potential alternative approaches through which developers could provide initial construction payments.
 - a. Capability would likely involve a third-party vendor. Until then, limited by some internal security restrictions.

D. Wrap-up and Next Steps

- 1. Next IX WG 100-Day Sprint meeting to be held Tuesday, November 26th from 10:00–10:45 am EST.
 - a. Will be exclusively a voting session to vote on proposals to be developed following this meeting, and/or proposals that have been tabled.
 - b. Submit proposals to PURA Staff and Aileen Cole (GPI) ASAP due to tight turnaround.
 - c. Carl Nowiszewski (Eversource) acknowledged that with this tight turnaround, some topics/issues simply might not fit within the Sprint timeline (e.g., Eversource spent months updating I&R Guidelines and is unlikely to choose to reverse those updates on a week's notice, based simply on a vote). Supports continued IX WG discussion to work on issues.
- ^{2.} Final sprint report due to PURA December 21st

E. List of Meeting Participants

The following individuals attend all or part of the November 21, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Alice Horgan	Sunnova
Allen Sabins	CSW Energy
Amanda Trinsey	CIEC
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chelsea Farrell	Maryland Rooftop Solar Coalition
Cornelius Stevenson	UI
Darren Hammell	CPower Energy
Eric Annes	CT DEEP
Erica Dahl	Scale Microgrids

Eric Virkler	Earthlight Technologies
Greg Berger	CPower Energy
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Schwartz	Independence Solar
James Talbert-Slagle	OCC
Jamie Spannhake	EOE
Jenn Runyon	Eversource
Joe Debs	Eversource
Jorge Hernandez	Avangrid
Justin Daigle	Earthlight Technologies
Kayte Morales	Earthlight Technologies
Katherine Wyszkowski	REIA
Logan Taricani	Avangrid
Mariel Arakaki	Ion Solar Pros
Marty Timperio	PurePoint Energy
Matthew Gellner-Garcia	Unknown
Mike Trahan	CT Solar Association
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy
Nick Nagorski	Earthlight Technologies
Nikki Dow	CT Green Bank
Noel Lafayette	SHR Energy
Patrick Fam	Eversource
Raul Garcia	CSW Energy
Robert Cote	Eversource
Robert Sazanowicz	United Illuminating
Sabrina Xie	DEEP
Sergio Carrillo	CGB
Sara Pyne	CT Green Bank
Scott Miller	Eversource
Thomas Lefebvre	Eversource
Tim Snyder	ACT
Valessa Souter-Kline	SEIA

8. Opportunity to Discuss Additional Issues: Voting from Meeting 6

These minutes document the Distributed Generation Interconnection Working Group (IX WG)'s dedicated voting session following Meeting 7 in the 100-Day Sprint Process established under PURA's September 12, 2024 <u>Procedural Order</u>. The Sprint Process will occur from September 12 2024-December 21, 2024, at which PURA staff will file a Spring Process Report in Docket No. 17-12-03RE06, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies—Interconnection Standards and Practices.* Meeting 8 was held on **Tuesday, November 26th**, **2024 from 10:00–10:45am EST**.

The dedicated voting session was held shortly after Meeting 8, which was held on November 21, 2024. The dedicated voting session enabled IX WG Voting Members to vote on proposals made during/immediately following Meeting 7, or that were "tabled" during the voting portions of prior meetings.

Unlike other IX WG meetings, this meeting consisted exclusively of voting and did not include topic-specific discussion. Max Melnick (PURA) led the voting portion of the meeting. Once voting was completed for all proposals, PURA Staff provided a brief overview of next steps in the IX WG 100-Day Sprint process. The voting record and summary of next steps are below.

A. Voting on Outstanding Proposals

- 1. Proposal 30: IXWG Sprint Voting Members support addressing and exploring solutions to various IX technical matters including defining 'Export Capacity' and 'Power Control Systems' and advocating for their inclusion in relevant PURA dockets as part of a 'technical sub-group' of the existing IXWG forum; in addition, IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the technical sub-group concerning the matters addressed by the group.
 - a. Proposed by SEIA

110 900000			
Voting Member		Vote	Additional Rationale
Amanda Tı	Amanda Trinsey (CIEC)		None provided
Mike Traha	an (CONNSSA)	Yes	None provided
Carl	Nowiszewski	Yes	None provided
(Eversource)			
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marrar	Joe Marranca (UI)		None provided

- c. Proposal 30 adopted.
- 2. Proposal 31: Reverse jurisdiction over interconnection location or interconnection methods that occur outside of EDC-owned transformers back to the local building

official and reviewed against NEC standards similar to the successful 10-year jurisdiction policy 2012-2022. This reversal shall apply regardless of the system type, including both Buy-All and Netting arrangements. EDCs currently have jurisdiction.

a. Proposed by CONNSSA

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	This issue pertains to EDC staff safety, which Eversource does not feel is appropriate to delegate to local municipalities/building inspectors.
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	No	Agree with Eversource that this should not fall within the municipality's jurisdiction. Also believe this has always been within EDC jurisdiction. EDCs have right to review and respond accordingly regarding standard compliance, safety and personnel concerns, etc.

- c. Proposal 31 not adopted.
- 3. Proposal 32: EDC's Distributed Generation (DG) department project manager (PM) will supply fault current data / impedance data / transformer size upon request from the developer. Data will be provided in full to the developer within 7 business days.
 - a. Proposed by CONNSSA

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski	No	Cannot be accomplished in
(Eversource)		only 7 business days; voting no
		because the proposal
		prescribes that specific
		number. Does not object to
		providing this data
		(Eversource already provides

			such data). Purely a timeline objection.
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marranca (UI)		No	Same reasons as Eversource

- c. Proposal 32 not adopted.
- 4. Proposal 33: REC meter ordering and payment will be added as a process in PowerClerk once CA/IA are received. Payment will be allowed by credit card, ACH, or check (similar to IX application payment) WAM and/or PowerClerk will show meter status (i.e. meter order/payment complete, meter installation date scheduled [show date], meter installation complete [show date]).
 - a. Proposed by CONNSSA

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	Eversource acknowledges the problem, but this is an overly prescriptive solution. Doesn't apply to all projects, project sizes, developers, etc. and could have unintended consequences. Thinks that other solutions will result in meter processing improvements.
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	No	Similar to Eversource—solution is too descriptive/prescriptive. Could support majority of the described improvements but this involves a lot on the back end; need to further investigate what the appropriate solution would be to improve in these areas. Best solutions may differ between EDCs.

c. Proposal 33 not adopted.

- 5. Proposal 34: The Interconnection Working Group recommends that ISO-NE cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects. The IX Working Group urges the Public Utility Regulatory Authority and the Department of Energy And Environmental Protection to also recommend to ISO-NE that cease requiring any studies for projects under 5MWs and require only a notification from the EDCs of the projected in-service date of such projects.
 - a. Proposed by CONNSSA

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	EDCs do not advise ISO on their procedures. Would rather this sort of recommendation come from the whole IX WG, not EDCs. Encourages others to work with or lobby ISO directly.
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline (SEIA)	Abstain	None provided
Joe Marranca (UI)	No	Same as Eversource.

- c. Proposal 34 not adopted.
- 6. Proposal 35: IXWG Sprint Voting Members support creating a stakeholder working group, potentially as a subgroup to the IX Working Group, to explore developing a proactive system planning program in CT to enable hosting capacity for distributed energy resources. IXWG Sprint Voting Members support the issuance of an Order by PURA requiring tangible output, such as a report, by a to-be-determined deadline in 2025, from the working group. Topics to be considered by the working group: (1) Factors that drive the development of DG by enabling hosting capacity in specific locations that benefit the state as a whole and further the state's clean energy objectives (e.g., availability of technically developable land for solar, land cost, proximity to existing transmission and distribution infrastructure, upgrade costs, and forecasted electrification demand to co-optimize infrastructure deployment for solar and electrification enablement); and (2) Cost allocation. The working group should draw on the experiences of other states pursuing proactive planning such as MA, NY IL, MD, MN, and CO.
 - a. Proposed by SEIA

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	Ok with proposal at a high- level but acknowledges that
		many of these topics are

Mike Trober (CONNECA)	Vac	already being addressed in other dockets and feels that it is too prescriptive overall. Also generally not inclined to direct actions at PURA; would like clarity regarding how exactly this would be presented to PURA. To address overlap with other dockets, could consider incorporating language a la "to the extent not already being explored in open dockets" ²²
Mike Trahan (CONNSSA) Carl Nowiszewski	Yes No	None provided
(Eversource)	NO	Language is very prescriptive and many of these issues are being addressed in other dockets, addressing them in those dockets and through the IX WG duplicates efforts. However, overall prefers working through issues via the IX WG first.
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	No	Supports continued discussion on these issues, but the Sprint effort is not the proper venue given that several of these are ongoing in other dockets (NWS, DER Cost Allocation).

c. Proposal 35 not adopted.

7. Proposal 36: Developer/Applicants must, and PURA is encouraged to first refer all interconnection process or EDC standards issues to the monthly- meeting Interconnection Working Group for thorough discussion and resolution, if possible. Developers must contact their designated single point of contact for all specific project-related issues and follow clearly defined escalation paths within the EDCs if satisfaction is not reached in a timely manner. Only if satisfaction is not reached after the conclusion of the above processes should developer/applicants pursue

²² As the final voting session for the IX WG 100-Day Sprint process, language revisions to proposals were not considered for adoption at this meeting. CEIC's suggested language revision to Proposal 35 is included for informative purposes only.

other available remedies for their Distributed Energy Resources interconnection-related concerns.

a. Proposed by Eversource/UI

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	No	Very prescriptive, overly onerous, and precludes identifying resolutions or remedies on developer's part outside of EDC discretion; what the utility perceives as the correct path is subjective in nature.
Mike Trahan (CONNSSA)	No	Developers should always have the option to approach PURA directly. Encourage members to start with discussions via the IX WG or outreach to the EDC, but shouldn't be precluded from other paths.
Carl Nowiszewski (Eversource)	Yes	None provided
Jamie Talbert-Slagle (OCC)	Yes	None provided
Valessa Souter-Kline (SEIA)	No	Same as CONNSSA's
Joe Marranca (UI)	Yes	None provided

- c. Proposal 36 not adopted.
- 8. Proposal 37: EDCs will update I&R Guidelines to reflect their proposal in Docket No. 22-08-03 for meter relocations. Eversource: 100' for current transformer cabinets with a main disconnect of 1800A or less (Eversource I&R 2024 still states 50'), 150' for current transformer cabinets with a main disconnect greater than 2000A. UI: UI did not propose a change to the allowable distance between meter and instrument rated transformer enclosure in this docket.
 - a. Proposed by CONNSSA
 - b. No questions/comments on proposal
 - i. Amanda Trinsey (CIEC): Does what EDCs proposed in this docket require PURA approval? Is there a chance that PURA could decide to direct them to do something else?

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	Not comfortable voting yes or
		no on this, as PURA could
		direct EDCs to do something

			different from what is
			prescribed here.
Mike Trahai	n (CONNSSA)	Yes	None provided
Carl	Nowiszewski	No	Proposal seeks a blanket
(Eversource	e)		ruling on all services; overly
_			constraining
Jamie	Talbert-Slagle	Abstain	None provided
(OCC)	_		
Valessa	Souter-Kline	Yes	None provided
(SEIA)			-
Joe Marranca (UI)		Abstain	None provided

- c. Proposal 37 not adopted.
- 9. Proposal 38: For NRES projects where no service work is being performed (only interconnecting solar), EDC's will no longer use this application as a trigger for requiring all systems services to comply with the most current I&R manual standards. Examples include allowing existing interior revenue meters to remain interior, and existing interior service disconnects. New production meters will be required to be installed on the exterior of the building grouped with the solar AC disconnect. Directory plaques will be used to call out component locations in conformance with existing NRES/RRES plaque requirements. This puts policy back in line with what was successfully done during the LREC/ZREC program.
 - a. Proposed by CONNSSA

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski	No	Reference to LREC/ZREC as a
(Eversource)		success is an issue.
		LREC/ZREC had specific
		issue with meters not owned
		by developers' system owners, customers, would object to
		returning to how things were
		done under LREC/ZREC.
		Eversource prefers
		considering things on a case-
		by-case basis rather than
		through a blanket policy.
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline	Yes	None provided
(SEIA)		T "11 1 1" 1
Joe Marranca (UI)	No	Too "blanket"—treats every
		project the same. Also prefers
		a case-by-case basis.

Additionally	much of	this is
inconsistent	with	Ul's
approach.		

- c. Proposal 38 not adopted.
- 10. Proposal 39: (Reference Eversource 2024 I&R Page 16, section 7) For solar-only interconnections, remove the requirement for an additional switch to be installed on the load side of the utility meter.
 - a. Proposed by CONNSSA

b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	Agree to look at this requirement as it applies to solar, solar + storage, etc., but it's an important safety issue for workers that requires thorough vetting. T I&R standards took months to develop; not ready to undo any of those standards via a short-term vote.
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	No	Blanket proposal—treats all situations the same; that is not how UI approaches NRES projects.

- c. Proposal
- 11. Proposal 40: (Reference Eversource 2024 I&R Pg. 28, section 659) EDCs revert back from an allowable 3' distance from instrument rated transformer enclosure to main switch to previous I&R guideline of 25' allowable distance from instrument rated transformer enclosure to main switch.
 - a. Proposed by CONNSSA

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	None provided
Mike Trahan (CONNSSA)	Yes	
Carl Nowiszewski	No	Similar to previous rationale;
(Eversource)		continuing to review
		developers' requests, still
		vetting info

Jamie (OCC)	Talbert-Slagle	Abstain	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marran	ca (UI)	No	Under assumption that this is meant for both utilities (only references Eversource), haven't had the chance to review this internally with proper SMEs. If this is being proposed for both EDCs, UI will review internally based on their own rules and requirements.

- c. Proposal 40 not adopted.
- 12. Proposal 41: (Reference Eversource 2024 I&R Pg. 63, section 808) Utility may not require a customer to take a utility-controlled outage for service work of any kind if there is already an existing means of disconnect (switch or main breaker)..
 - a. Proposed by CONNSSA
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Abstain	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	Too broad to apply to all projects; does not support a blanket safety policy for all projects
Jamie Talbert-Slagle (OCC)	Abstain	None provided
Valessa Souter-Kline (SEIA)	Yes	None provided
Joe Marranca (UI)	No	Like Eversource, would rather review on case-by-case basis. Eversource I&R page/section reference is not inclusive of UI.

- c. Proposal 41 not adopted.
- 13. Proposal 42: EDCs to improve upon internal processes to expediate meter procurement, programming, and installation so that PTO can be obtained within 15 days of AHJ approval [as it was during the ZREC program].
 - a. Proposed by CONNSSA
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided

Carl (Eversourc	Nowiszewski e)	No	15-day prescription is overly restrictive and not achievable. Support in principle but timeline is not realistic.
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marrar	nca (UI)	No	Agree with Eversource. From permission-to-operate perspective relative to meter work, there are typically other requirements (e.g., witness test) that must first be met.

- c. Proposal 42 not adopted.
- 14. Proposal 43: (Supplement IA): Once an IA has been executed, and the customer is compliant with all requirements of that agreement including the cost and payment schedule, the EDC does not have the right or ability to issue supplemental IA with additional costs.
 - a. Proposed by CONNSSA
 - b. Questions/comments on proposal
 - i. Amanda Trinsey (CIEC) asked a clarifying question following the vote on this proposal, which is included here for reference. She sought clarity on Carl Nowiszewski's (Eversource) rationale regarding the potential for costs to be passed onto ratepayers. Carl Nowiszewski clarified that some of this is unknown, but the potential cost pass-down risk would arise from the fact that the developer receives a specific cost estimate (good for 90 days) with the IA. If the developer takes a long time to proceed with constructing and actual costs are well beyond the original estimate, but the EDC cannot collect those costs from the developer, there's potential that those excess costs could end up needed to be spread across the EDC's rate base.
 - ii. Carl Nowiszewski (Eversource) expressed that there are many unknowns related to this and it is a good topic to discuss via the IX WG format.

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA)	Yes	None provided
Carl Nowiszewski (Eversource)	No	IA costs are good for 90 days from payment. This would result in any costs exceeding those provided in the IA potentially being charged to ratepayers rather than the

			developer. Also does not include a timeline on when a developer can develop their projects. Eversource likes to offer flexibility, but some developers wait years following IA issuance before proceeding with construction. In these cases, Eversource needs ability to issue additional costs.
Jamie (OCC)	Talbert-Slagle	Yes	None provided
Valessa (SEIA)	Souter-Kline	Yes	None provided
Joe Marrand	ca (UI)	No	Same as Eversource; understand concerns but in some ways conflicts with earlier proposals related to optout, more comprehensive upfront review, etc.

- c. Proposal 43 not adopted.
- 15. Proposal 44: (IA Costs): EDCS to provide developers the option to elect to have a post-study meeting to review study results, costs, and payment schedule for these costs prior to the issuance of the IA. EDCs shall breakdown (line item) costs for site upgrades covered by developers.
 - a. Proposed by CONNSSA
 - b. No questions/comments on proposal

Voting Member	Vote	Additional Rationale
Amanda Trinsey (CIEC)	Yes	None provided
Mike Trahan (CONNSSA) Yes	None provided
Carl Nowiszews	ski Yes	None provided
(Eversource)		
Jamie Talbert-Slag	le Yes	None provided
(OCC)		
Valessa Souter-Klir	ne Yes	None provided
(SEIA)		
Joe Marranca (UI)	Yes	None provided

c. Proposal 44 adopted.

B. Wrap-up and Next Steps

1. Final meeting is going to be a review of the draft sprint report, and will be held on Monday December 9th at 11am EST.

- 2. The sprint report is due on December 21st and will include all recommendations adopted by the working group.
- 3. PURA Staff will distribute sprint report to the working group before the next meeting for comments and feedback, and the working group should be prepared to participate in the discussion.
 - a. Submit written comments on the sprint report by December 16th.
 - b. All comments will be included as appendices to the sprint report.

C. List of Meeting Participants

The following individuals attend all or part of the November 26, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Val Stori	GPI
Alan Chubbuck	Michaud Law Group, LLC
Amanda Trinsey	CIEC
Ben Burnett	SAVKAT Solar
Brad Marzalkowski	ISO New England
Brendan Smith	CT Green Bank
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Cornelius Stevenson	UI
Ed Kranich	CT Green Bank
Eric Virkler	Earthlight Technologies
Ian Lieberman	Scale Microgrids
James Schwartz	Independence Solar
James Talbert-Slagle	OCC

Jenn Runyon	Eversource
Joe Debs	Eversource
Joe Marinaccio	Avangrid
John Viglione	OCC
Jorge Hernandez	Avangrid
Joseph Marranca	UI
Lavelle Freeman	Eversource
Logan Taricani	Avangrid
Marty Timperio	PurePoint Energy
Mike Trahan	CT Solar
Nikki Dow	CT Green Bank
Patrick Fam	Eversource
Ram Arunachalam	CTEC Solar
Sabrina Xie	CT DEEP
Sara Pyne	CT Green Bank
Sergio Carrillo	CT Green Bank
Scott Miller	Eversource
Sean Riel	Earthlight Technologies
Tim Snyder	ACT
Valessa Souter-Kline	SEIA

9. Final Meeting (Review Draft Sprint Report)

On **Monday, December 9, 2024, from 11:00am–12:30pm EST**, the Distributed Generation Interconnection Working Group (IX WG)—established under PURA's September 12, 2024 <u>Procedural Order</u>—met for the final IX WG 100-Day Sprint meeting. While past meetings covered specific topics and issues related to interconnection in Connecticut, this meeting was an opportunity for participants to share comments, thoughts, and feedback related to the Draft Sprint Report.

Participants were sent the report for review in advance of the meeting. The December 9th meeting focused on participants' suggestions based on their review of the draft report. Following the meeting, participants had one week to submit additional comments to be included as an attachment to the final report.

Aileen Cole (GPI) welcomed participants to the meeting. Christopher Arpin (PURA) provided an overview of the report contents and structure. PURA Staff then asked IX WG participants for feedback on the report, including whether the report contained any gaps,

whether the organizational structure and/or formatting worked well, and any other suggestions.

Participant feedback from the December 9th meeting is summarized below.

A. Comments/Feedback on Report Structure, Formatting, and Clarity

- 1. Carl Nowiszewski (Eversource) suggested to more clearly indicate upfront in the report which items the group reached consensus on
 - a. Simple table, bulleted list, etc.
 - b. Could be part of an executive summary
- 2. Carl Nowiszewski (Eversource) requested that participants' rationale for their votes (if provided) be clearly indicated in the report. Could be included in the upfront table, as an additional column in the table listing all proposals, etc.
- 3. Brian Rice (Eversource) noted that many proposals specifically reference RRES, NRES, etc. Suggested that report clearly that that EDC interconnection processes that apply to all projects. This is partially covered on page 24, but recommends including similar language upfront for clarity purposes.
- 4. Eric Virkler (Earthlight Technologies) noted that the conclusion section discussed that some items did not reach consensus because of their very technical nature; some voting members expressed that they were not comfortable voting in supportive of certain highly technical items via a sprint process.
 - a. Suggests that technical considerations related to jurisdictional issues, I&R guidelines, etc. should be included in the list of highly technical items.
 - b. Mike Trahan (CONNSSA) suggested that to expedite implementation on highly technical issues, PURA could hold a technical meeting with participation from technical experts no both sides. Agree with Joe that the IX WG is really valuable for working through long-term issues. Anxious to start regular meeting schedule to continue discussion on broader issues.
 - i. Christopher Arpin (PURA) suggested submitting comments documenting this suggestion by the December 16th deadline.
- 5. Carl Nowiszewski (Eversource) suggested that the conclusion include language noting that some proposals may require further need refinement prior to implementation.

B. Comments/Feedback on Proposals

1. Nancy Chafetz (CPower) requested that CPower's comments about the need to include project interconnection status with public queue data would be included or somehow conveyed in the report.

- a. Proposal originally from New Leaf and seconded by SEIA. The interconnection status is an additional important component beyond New Leaf's/SEIA's proposal.
- b. Pertains to Proposal 26.
- 2. Carl Nowiszewski (Eversource) felt that the EDC perspective on Proposal 29 (Flex IX) was not well represented in the draft. The EDCs supported in principle but had indicated that more refinement was necessary.
 - a. Felt that parts of the proposal were too prescriptive/detailed, and other aspects needed further refinement. EDCs were not supportive of all aspects of Proposal 29 as written.
 - i. Does not think reaching a technical solution in 6 months' time is realistic
 - ii. Brian Rice (Eversource) noted that one concern is the specific list of what must be included. Suggested a less prescriptive revision ("the working group shall evaluate all the following")
 - iii. Joe Marranca (UI) noted that UI voted in support of this proposal with the same caveat
 - b. Christopher Arpin (PURA) noted that both EDCs either agreed or abstained to this proposal, but PURA can make a note that Eversource has some disagreement regarding proposal implementation and supported further consideration of proposal details.
 - Emphasized that proposal language will not be revised today or in the report, but comments provided today can be considered, and feedback submitted by December 16th will be incorporated into the report.
- 3. Carl Nowiszewski (Eversource) and Katye Morales (Earthlight Technologies) noted overlap between several proposals. Recognizes that they should be listed as separately in the report because that's how they were voted on, but could be worth noting in the report and considering whether they could/should be combined. Areas of identified overlap:
 - a. Proposals 2 and 3 accomplish similar outcomes Could keep them separate here, but in practice might be helpful to merge them.
 - b. Proposals 14, 19, 20 all enveloped in Proposal 25.
- 4. Kayte Morales (Earthlight Technologies) noted that while proposal language as included in the table is reflective of the proposal language that was voted on, places in the report where proposals as discussed sometimes lack context and require further clarity.
 - a. Chris Arpin (PURA) recommended that if context seems missing, please submit it by December 16th.

- b. Carl Nowiszewski (Eversource) agreed and expressed that this is in part due to the compressed timeline.
 - i. Suggested that even consensus recommendations may need further refinement to determine details prior to implementation.
- 5. Joe Debs (Eversource) identified that Docket 24-08-05 requires that EDCs update their interconnection guidelines by no later than March 1, 2025. Suggested mentioning in the report that some of these guideline revisions are complex, and issuing two separate guidelines several months apart may not be ideal.
 - a. Christopher Arpin (PURA): This relates to a docket decision that has just been issued.
 - b. Joe Debs (Eversource): Need to align order responsiveness with IX WG conversations, if an item is to be discussed with the IX WG.

C. Other Items

- 1. EDCs had been asked early in the Sprint process whether they could provide cost estimates for proposals. Carl Nowiszewski (Eversource) noted that they are in the process of developing a cost estimate table.
 - a. Costs will largely depend on implementation.
- 2. Joe Marranca (UI) sought clarity on next steps for consensus/non-consensus items.
 - a. Christopher Arpin (PURA) stated that the report will be filed in 17-12-03RE06. PURA decisional staff (not the PURA staff that participated in this Sprint process) will issue a decision on the report.
 - b. IX WG can continue to utilize voting process if they wish to do so.
 - c. Nothing prevents continued discussion of proposals voted on throughout the Sprint process.
 - d. Joe Marranca (UI) noted that because many items require further molding and refinement, the IX WG could be a venue for discussion.
 - i. Chris Arpin (PURA) noted that this was acceptable, but PURA is likely interested in near-term action on several items.

D. Closing Remarks and Next Steps

- 1. IX WG participants can submit additional written comments by Monday, December 16th at 1:00pm EST.
 - a. Comments submitted by this deadline will be included in sprint report (as appendices, before the conclusion TBD)
 - b. Comments must pertain to the IX WG 100-Day Sprint process
- 2. Report will be filed in 17-12-03RE06.
 - a. PURA will review report and will issue order(s) on recommendations.

E. List of Meeting Participants

The following individuals attend all or part of the December 9, 2024 IX WG 100-Day Sprint meeting. Representatives from PURA, EOE, and GPI acted as meeting hosts/facilitators. In some instances, an individual meeting attendee could not be identified (e.g., if the attendee joined by phone and only their phone number was visible to attendees). Excepting these specific cases, all meeting attendees are listed below.

Name	Organization
Brandon Cavanagh	PURA
Christopher Arpin	PURA
Max Melnick	PURA
Becca Adams	EOE
Jamie Spannhake	EOE
Aileen Cole	GPI
Dreek Morgan	GPI
Val Stori	GPI
Allen Sabins	CSW Energy
Amanda Trinsey	CIEC
Ben Burnett	SAVKAT Solar
Brendan Smith	CT Green Bank
Brian Rice	Eversource
Carl Nowiszewski	Eversource
Chris Lobdell	PurePoint Energy
Cornelius Stevenson	UI
Darren Hammell	CPower Energy
Ed Kranich	CT Green Bank
Erica Dahl	Scale Microgrids
Eric Virkler	Earthlight Technologies
lan Liebman	Scale Microgrids
James Cerkanowicz	Verogy
James Schwartz	Independence Solar
James Talbert-Slagle	OCC
Jamie Spannhake	EOE
Jenn Runyon	Eversource
Joe Debs	Eversource
Joel Kopylec	Avangrid
John Viglione	OCC
Joseph Marranca	UI
Joshua Briggs	Lodestar Energy
Kayte Morales	Earthlight Technologies
Logan Taricani	Avangrid

Mariel Arakaki	Ion Solar Pros
Marty Timperio	PurePoint Energy
Mike Trahan	CT Solar Association
Mrinmayee Kale	New Leaf Energy
Nancy Chafetz	CPower Energy
Nick Nagorski	Earthlight Technologies
Noel Lafayette	SHR Energy
Oliver Sandreuter	Lodestar Energy
Patrick Fam	Eversource
Rob Whelan	Avangrid
Robert Cote	Eversource
Sabrina Xie	DEEP
Sara Pyne	CT Green Bank
Sean Riel	Earthlight Technologies
Tim Snyder	ACT
Valessa Souter-Kline	SEIA