

Connecticut Distributed Generated Interconnection Working Group Meeting Summary

State of Connecticut Public Utilities Regulatory Authority Office of Education, Outreach & Enforcement

August 12, 2025

Introduction

During the August 12, 2025 IX WG meeting, the IX WG continued discussing strategies to address Proposals 2, 3, 14, and 25 from the <u>100-Day Sprint Working Group Report</u>, which were approved in PURA's March 2025 <u>Interim Decision</u>.

At the July 29th IX WG meeting, the EDCs presented a revised straw proposal that sought to address Proposals 2, 3, 14, and 25.¹ In the interim between the July 29th IX WG meeting and this IX WG meeting, the EDCs and members of CONNSSA received feedback from developers and continued to revise and clarify the straw proposal. During the July 29th meeting, IX WG participants asked if the EDCs could share a written version of the revised straw proposal for review and consideration. The EDCs provided this in advance of the August 12, 2025 meeting, and GPI distributed it to IX WG participants for review.

GPI provided an overview of all four proposals (as included in Table 1 of PURA's Interim Decision) at the beginning of the meeting. Proposal language is provided below for reference. Per the Interim Decision, all five proposals must be implemented by **October 1, 2025**.

- Proposal 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).
- **Proposal 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-All or Netting systems, as long as they are co-located with on-site load).
- Proposal 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.

¹ The revised version of the straw proposal that the EDCs presented at the July 29th meeting took into account IX WG-suggested revisions based on a prior version of the straw proposal that the EDCs had presented at an earlier meeting. The revised version also took into account comments and feedback from developers and CONNSSA from conversations between IX WG meetings.

- Proposal 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.
- Proposal 22: IX WG members to collaborate with EDCs on new interconnection review process (for non-RRES projects under 1 MW) to determine review timelines and discuss whether or not additional costs are warranted

Discussion: Straw Proposal

The EDCs presented their revised straw proposal, developed and revised based on conversations with developers. The straw proposal intends to address problems arising from contingent project approvals. The IX WG discussed the straw proposal, including potential revisions to the straw proposal.

The EDCs had met with CONNSSA representatives in advance of the August 12, 2025 IX WG meeting. CONNSSA expressed that they were satisfied with the proposal, with no further suggestions. Further IX WG discussion regarding the EDCs' revised straw proposal is summarized below.

- One participant emphasized the need to ensure that either the straw proposal address all four proposals (2, 3, 14, and 25). Following review and discussion of the straw proposal during the meeting, this participant was asked if the straw proposal adequately addressed all items, this participant did not provide further feedback.
- Proposed revisions: Have the EDCs provide more granular supplemental study timeline (e.g., two weeks) and good faith cost estimate data (+/- 25%) as part of the application process.
 - EDC concerns: In some circumstances, cost estimates for supplemental reviews, as well as specific supplemental review timeline parameters, might not be realistic without an impact study.
- A participant expressed concern about the potential for smaller projects getting caught behind group studies, which could significantly impact timeline.
 - EDCs clarified that they included a pathway to avoid this in the group study docket, which they recommended the participant review. This approach is intended to mirror MA's group study exception approach.
 - Participant felt that it would be valuable to incorporate such parameters into this application process, in addition to through the group study process. If a small project is on a circuit feeding a substation that is in a group study, then the supplemental review is the time to review that, and it doesn't necessarily get stopped because there is a study at the transmission level.

• EDCs and the IX WG participant that identified some identified revisions clarified that the language being discussed remains draft, and is not formally established in a tariff.

The EDCs requested time following the meeting to review and further consider these potential modifications. Developers and EDCs were in agreement that these potential modifications did not change the overall approach or concepts of the straw proposal, but rather presented some optional modifications related to specific details.

Discussion: Proposal 22

In previous IX WG conversations, the group expressed that they felt that Proposals 2, 3, 14, and 25 needed to be addressed before addressing Proposal 22. While the straw proposal to address Proposals 2, 3, 14, and 25 has not yet been finalized, participants agreed that in concept, they largely support it, and the only remaining items pertain to potentially refining minor details. For this reason, the group felt it was an appropriate time to begin discussing Proposal 22.

The discussion centered on defining the intended scope of Proposal 22, and identifying how to best comply with the proposal. Largely, this involved discussion focused around the "gap" that Proposal 22 intends to fulfill. The EDCs' Straw Proposal to address Proposals 2, 3, 14, and 25 generally encompasses projects under 500 kW, while Proposal 22 focuses on projects under 1 MW. For this reason, Eversource proposed that the working group interpret Proposal 22 as seeking to address commercial project between 500kW and 1 MW. Participants expressed several considerations related to this suggestion:

- There may not be many projects that fit under Proposal 22 that are not already covered by the straw proposal.
- There is not a big difference in the technical review process between 500kW and 1MW.
- Sometimes projects in the 500 kW to 1 MW range are best considered their own category because they may require local upgrades may be required.

Two options were presented: to change the straw proposal to address up to 1MW and send all the projects through the same process, or to create a second straw proposal to address 500kW and 1MW and Proposal 22. EDCs expressed that is difficult to envision and account for every type of project that might exist.

The EDCs expressed that the best approach to addressing Proposal 22—given significant overlap with the Straw Proposal, but some areas of difference—would be to develop a brief narrative addition to the Straw Proposal that intends to encompass Proposal 22, in addition to Proposals 2, 3, 14, and 25. No participants expressed opposition to this approach.

Other Items and Next Steps

- Next EDC-led Flex IX workgroup meeting scheduled for August 29, 2025. Please reach out to Joe Debs if you would to receive invitations to these meetings.
- Two developers brought up questions related to vehicle-to-grid interconnection applications and related PowerClerk functionality:
 - In PowerClerk, applicants are restricted to selecting from an approved list of equipment, as provided in the application. This does not include new vehicle-togrid equipment.

- EDCs encouraged developers to submit a data sheet for manual approval, or reach directly out to the single point of contact for their project.
- Next IX WG meeting scheduled for August 26, 2025. Topics to be discussed:
 - Reach agreement on EDCs' straw proposal for addressing Proposals 2, 3, 14, and 25
 - EDCs to review Proposal 22 in the interim, and develop language responsive to Proposal 22, which can be incorporated into the Straw Proposal.