Connecticut Distributed Generated Interconnection Working Group Meeting Summary

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

August 26, 2025

Introduction

During the August 26, 2025 Interconnection Working Group meeting, the IX WG continued discussing the EDCs' straw proposal to address Proposals 2, 3, 14, 25, and 22 from the 100-Day Sprint Working Group Report, which were approved in PURA's March 2025 Interim Decision. Additionally, GPI provided an overview of PURA's Decision posted August 20, 2025, GPI focusing on items from the Decision with IX WG directives and/or near-term (October 1, 2025) deadlines. Additionally, Patrick Fam (Eversource) presented a draft document outlining the EDCs' proposed- approach to line-side taps and meter relocations for Buy-Alls.

The group first discussed Proposal 22 at the prior IX WG meeting and determined that it made sense to incorporate additional language into the straw proposal intended to address Proposals 2, 3, 14, and 25, to ensure that it also covered Proposal 22. The EDCs developed language intended to cover Proposal 22 in advance of the August 26, 2025 IX WG meeting and presented it to the group.

GPI provided an overview of all five 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.
- **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 EDCs had presented several iterations of the straw proposal to the IX WG in prior meetings, and the IX WG was generally supportive of the proposal as presented in the prior meeting, with consideration for some minor revisions. Revisions that the EDCs incorporated into the straw proposal are summarized below:

- Projects <500kW AC to be automatically assigned to Level 2 process
- EDCs to provide Supplemental Study Agreement (with description of scope of review, costs, and timeline for completing the requested supplemental review) within two weeks
- For projects 500kW–1MW: Stand-alone projects not co-located with load will require Impact Studies and will not be eligible for Supplemental Studies. All other projects may request a Supplemental Review, which will include evaluation for additional protection and controls equipment that may not apply to projects < 500kWAC.
    - This aspect of the revised straw proposal aims to address Proposal 22.

IX WG discussion regarding the revised proposal is summarized below. Participant questions are designated with "Q." EDC responses are designated with "A."

- Q: Would the Supplemental Review include the site visit?
    - A: It could and most likely could, and a site visit could be done at low/no cost, depending on the circumstances. However, more intensive work would likely be done after the Supplemental Study Agreement has been issued.
- Q: What departments would be included in the site visit?
    - A: It would depend on the project-specific circumstances and conditions. If a Supplemental Review is requested or determined to be needed, this approach enables more thought/advanced consideration regarding who should be there. This may mean that the site visit cannot be established in one day's notice, but it will be more planned out under the Agreement.
- Q: If we just do the desktop review for Buy-Alls, will we need to reach out to the new service to get a cost letter? What is the timeline on the cost letter?
    - A: The Customer Care team should generate a work order, and a field agent assigned—the field agent will generate the cost letter. Rather than waiting for the developer to ask for a work order, that will be incorporated into the process. The cost letter should take up to two weeks, though iterations on the cost letter can

take longer. Overall timelines will be stipulated in the Supplemental Study Agreement.

- Q: What will the supplemental review cost?
  - A: The Supplemental Review is high-level and limited in scope, and is a review of existing information. In most cases it would likely be <$10,000, and could even be less than $1,000. Costs would be trued up at the end, and the Agreement would provide the estimated costs.
- Q: How detailed would the good faith cost estimate be?
  - A: As detailed as possible with the available information.
- Q: Does this replace an Impact Study?
  - A: No, it doesn't replace the Impact Study. The Impact Study provides different information. This is an opportunity to enable a more tailored approach and to get engineers involved in the project in earlier stages.
- Q: Will these details be reflected in the redlined interconnection guidelines that the EDCs will be filing with PURA?
  - A: First we need to update PowerClerk, as developers' selections in PowerClerk will trigger certain downstream actions based on what is submitted in the application. This is similar to the approach currently in the guidelines, though they may need to be somewhat refined to capture these details.
- Q: What is the approximate cost range for each project's study?
  - A: Range between $1,000–$10,000, depending on project specifics, though this is not intended to be a formal maximum. Some projects will also require an Impact Study, but that is difficult to predict. Typically do not prefer to do a full study for projects <500kW, so would look for alternative solutions in those instances.
- Q: Will flexible interconnection fall under one of these proposals?
  - A: Flexible interconnection is being discussed in a separate subgroup, with some overlap with the broader IX WG. A proposed flexible interconnection program is due in March 2026.

The IX WG broadly agreed on the goals and methods of the straw proposal. GPI asked IX WG participants if they felt that the revised straw proposal sufficiently addresses the items required under Proposals 2, 3, 14, 25, and 22. No IX WG participants expressed concern that it did not adequately address these proposals.

Discussion: August 20th PURA Final Decision

GPI provided an overview of items from PURA's August 20, 2025 Decision. This included an overview of consensus proposals that PURA adopted (with or without modification) in its 8/20 Decision after deferring their adoption in the March Interim Decision, and an overview of non-consensus proposals that PURA adopted (with or without modification), that it did not explore in the March Interim Decision. GPI also identified which of these proposals have IX WG directives and/or near-term (October 1, 2025) deadlines.

GPI invited IX WG participants to identify which near-term decision items require or would benefit from the IX WG discussion, either during the meeting or via email following the meeting. No IX WG participants specifically identified any of the items from the 8/20 Decision during the meeting.

Other items: Line-Side Taps and Meter Relocation

Next, the IX WG had an opportunity to bring up other interconnection-related items to discuss. Eversource shared its planned approaches regarding line-side taps and meter relocation, provided below. **These approaches are reflective of the material presented to and discussed at the August 26, 2025 IX WG meeting, but are not intended to be considered as formally submitted plans or requirements related to these items. They are included here for contextual IX WG meeting documentation purposes only.**

Line-Side Taps

Eversource shared that line-side taps are no longer allowed for Buy-Alls, except in instances in which all of the following situations are met (all variance requests must be reviewed on a case-by-case basis by FED and NRES program manager).

- Existing transformer is physically full but has the electrical capacity for connections
- Transformer is >300' from a building
- Transformer is separated by >200' of asphalt/concrete
- Inter-city transformers that have public roads/sidewalks needing to be crossed for attachment
- Trenching to the transformer would cause damage to other utilities
- Does not void UL listing and is approved by the manufacturer

Eversource indicated that the distances provided are not up for further discussion, as these parameters are intended to mitigate against significant safety risk from arc flashes.

Meter relocation

For Buy-Alls, instrument transformer (IT)-rated meters will be relocated with solar installations. Self-contained meters can stay inside so long as the following conditions are met:

- The existing meter is in good condition and not a safety issue (meter socket condition would be evaluated during site visit with FED and Program Manager ahead of approval)
- Metering team has 24/7 access to the meter (can be solved by adding a lock box and key if access is an issue)
- Meter has no issues with being read on a regular basis (meters that cannot be read on a regular basis or that are estimated will be required to move outside)
- 400A IT services must be upgraded to CL 320.

Discussion

- Q: Are the distances provided in the line-side tap approach up for further discussion? How did Eversource arrive at these distances?
    - A: The distances provided are not up for further discussion. They are based on Eversource's experience with other reviews, and are intended to serve as a guideline for expectations. All would need to be considered on a case-by-case basis.
- Q: When will these guidelines be posted publicly and when would they become effective?

    - A: Eversource needs to discuss this internally to determine when this can be posted.
- Q: For the line-side tap rule regarding trenching having the potential to cause damage to other utilities, would that include projects for which the trenching would be less than the stated distances?
    - A: Yes, those projects would be eligible for exemption.
- Q: For existing meters staying inside as long as they meet these criteria, if there were a new service and new construction where a meter was put inside would that meter need to be relocated outside?
    - A: If the meter was approved to be inside, it was probably for a specific reason, and would be evaluated on a case-by-case basis.
- Q: For the line-side tap rule that states “does not void UL listing and is approved by the manufacturer,” does that mean that if we don’t void the UL we don’t have to go to the tap?
    - A: We are not approving anything that would void the UL listing. All listed criteria must apply for the project to be exempt from the line-side tap prohibition.
- Q: This prohibits line-side taps in a vast majority of cases, even though this is beyond the utility’s jurisdiction. The utilities say that this is a safety issue—would like the utility to define what about it is a safety issue.
    - A: EDCs can provide a write-up on that.
- Comment from participant: Historically line-side taps were not a problem. EDCs claim that this is a safety issue but other agencies do not consider it to be one. The restrictions listed seem arbitrary. Would like the EDCs to justify why line-side taps should be restricted.
    - A: EDCs are concerned about the safety of their personnel.

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.
- Next Full IX WG Meeting: September 9, 2025
- IX WG members to identify which near-term (Oct 1 deadline) Decision items require or would benefit from IX WG discussion
    - Email Aileen Cole (acole@gpisd.net) and Val Stori (vstori@gpisd.net) with considerations
- EDCs to discuss Proposal 30 items at August 29, 2025 Flex IX workgroup meeting (Definitions of “export capacity” and “power control systems”)
    - EDCs already have working definitions of these terms. Will discuss and refine (as needed) with the Flex IX workgroup, and will present the definitions to the full IX WG in September following those discussions