Connecticut Distributed Generated Interconnection Working Group Meeting Summary

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

July 29, 2025

Introduction

During the July 29, 2025 IX WG meeting, the IX WG continued discussing strategies to address Proposals 2, 3, 14, and 25 from the 100-Day Sprint Working Group Report, which were approved in PURA's March 2025 Interim Decision. PURA directed the EDCs to coordinate implementation of Proposals 14 and 25 due to their significant overlap.

At the June 24th IX WG meeting, participants discussed a straw proposal by the EDCs which would address Proposals 14 and 25 in combination. Participants were directionally supportive of the straw proposal but felt that it warranted some modifications. Participants also expressed that they felt there was a way to address Proposals 2, 3, 14, and 25 through a revised straw proposal.

Between the previous IX WG meeting and this IX WG meeting, the EDCs and CONNSSA members worked to revise the straw proposal, which the EDCs shared in this meeting. In prior discussions, work group members felt that there were ways in which the straw proposal—with revisions—could address all four of these proposals in a manner consistent with the intent of participants during the Sprint process.

GPI provided an overview of all four proposals (as included in Table 1 of PURA's March 2025 Interim Decision) at the beginning of the meeting. Proposal language is provided below for reference.

- 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.

Per the Interim Decision, all four proposals must be implemented by October 1, 2025.

Straw Proposal Discussion

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. Two significant differences between the straw proposal that the EDCs had previous presented and the revised straw proposal include:

- The revised straw proposal would follow an "opt-in" option, rather than "opt-out" option. In other words, developers would follow the more streamlined option by default, unless the projects had specific circumstances necessitating a more detailed review, or if developers wanted a more detailed review for a specific reason.
- Rather than all developers paying a universal flat fee with their application to cover this
 aspect of the interconnection process, the fee would vary based on the intensity and
 cost considerations related to additional activities, if the developer elects to opt into the
 more detailed study. This could range from no cost, to costs higher than the previously
 discussed \$500, all depending on project- and study-specific needs.

Both of the above modifications are intended to enable improved clarity and a more streamlined process, with options for additional study based on developer-identified needs. The revised straw proposal intends to provide a mechanism to better facilitate field visits or other more specific studies when such a need is known in advance. This should help the EDCs better understand certain site-specific conditions that are more difficult to fully evaluate from a desktop review alone.

The revised straw proposal establishes a standardized process, with the optionality for developers to opt into more involved analysis if they want to know more about potential costs that could arise due to project-specific conditions or circumstances. The application would enable the EDCs to request further analysis related to any of the following in PowerClerk:

- Point-of-interconnection at project behind load
- Point-of-interconnection for standalone project
- Further review upfront of potential upgrades along the circuit
- Potential substation upgrades

If the applicant selects one of these options, the EDCs would conduct a supplemental technical review focused on the identified area(s) of interest, with a fee assessed at the end via a true-up. This optionality for further analysis would enable the EDCs to better understand applicants' needs, which would enable more timely response.

Some additional features of the EDCs' revised straw proposal:

- EDCs would continue conducting desktop reviews without additional charge
- Developers are allowed to request supplemental review throughout the process if something changes, or if they want something else evaluated; this does not need to happen upfront with the application, but provides a pathway through which that can be done if developers are already aware of the potential need for further analysis upfront.
- Would give EDC engineers the opportunity to invoke supplemental review if they feel something is specifically necessary. This would likely have a charge based on the extent of additional review needed.

Participant Discussion and Q&A Regarding Revised Straw Proposal

IX WG participants discussed the revised straw proposal. A summary of participant questions and EDC responses is provided below.

- Question: If a developer is confident in the design, but still wants pertinent individuals at the EDC to review the design to confirm that it will be approved if implemented as designed, will a site visit still be mandatory?
- Answer: Not necessarily—applicants can opt-in and still have it go through just the desktop review, so long as a site visit is not specifically needed. The goal is to ensure that there is always the option for a site visit.
- **Question**: Do the EDCs have a specific list of items that would trigger a supplemental review?
- Answer: Most of these would be triggered by the applicant—they would indicate in their
 application that they want additional analysis on one or more of the four identified areas.
 However, if additional study is triggered by the EDCs, it would typically be because the
 developer indicated that there's no realistic way to move forward with the project without
 deviating from a specific standard. The goal of this new approach is to provide an option
 for developers who want more certainty upfront.
- **Question**: Is there an option for a "light study" to just provide a general understanding of if the project is realistic.
- Answer: Encourage developers to utilize Hosting Capacity Map during project planning
 phase. That would be an easy way to identify whether a project would exceed the
 Hosting Capacity Value, or a transformer. The Hosting Capacity Maps are updated every
 two weeks, so that information is very up-to-date. If a potential project would exceed a
 specific value, they might want to consider minimizing export.
- Question: Could the EDCs provide a written version of the revised straw proposal for developers to review?
- Answer: Yes, EDCs are happy to do this.

Update on Flexibile Interconnection (Flex IX) Proposal

Next, the EDCs provided an update on their progress complying with Proposal X, which directs them to develop a Flex IX program by March 15, 2026. The EDCs have started meeting with a small group of developers and industry representatives to develop the proposal and have another subgroup meeting following this call. The subgroup is beginning to discuss what other states are doing with respect to Flex IX (NY, MA, and others)—group wants to understand other states' requirements and, more broadly, industry needs.

Any interested party can reach out to Joe Debs for an invitation to upcoming Flex IX subgroup meetings.

Other Items and Next Steps

- Other items:
 - Noel Lafeyette (SHR Energy) informed the group that a motion has been filed requesting that PURA remove current caps on rooftop solar. Important to get as much solar under construction and operational ASAP, given broader federal uncertainty. Anticipating a significant increase in the amount of rooftop solar deployments, and encourages the EDCs to consider strategies, processes, etc. to be ready for that influx, without creating bottlenecks.
 - EDCs agree that this is important and will consider strategies internally.
- Next IX WG meeting scheduled for August 12, 2025. Topics to be discussed:
 - Reach agreement on EDCs' straw proposal for addressing Proposals 2, 3, 14, and 25
 - Introduce and begin discussion of Proposal 22 (also due October 1st)
- EDCs to prepare written version of straw proposal discussed at today's meeting to distribute to IX WG members for review