



Connecticut Distributed Generated Interconnection Working Group Meeting Summary

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

Tuesday, January 30, 2024, 10:00–11:00AM EST

IX WG Subgroup Meeting Topic: Implementing the \$25 cost adder in accordance PURA’s December 20, 2023 Decision in Docket No. 22-06-29, *PURA investigation into distributed energy resource interconnection cost allocation*

Meeting Context

On December 20, 2023, PURA issued a Decision in Docket No. 22-06-09 directing the EDCs to implement a \$25 cost adder to qualifying residential distributed energy resource (DER) projects by no later than April 1, 2024.

EOE Staff provided an overview of PURA’s Decision during the IX WG meeting held on January 9, 2024.¹ During the January 9, 2024 meeting, Eversource expressed an interest in implementing the cost adder well in advance of the April 1, 2024 deadline. United Illuminating (UI) also felt that early compliance was a possibility worth exploring. Both EDCs requested a dedicated IX WG sub-group meeting focused on the cost adder so they could discuss and work through potential barriers to implementing the cost adder on or before April 1, 2024.

This summary provides an overview of the discussion from that dedicated sub-group meeting.

Meeting Summary

Aileen Cole (GPI) began the meeting with another high-level overview of PURA’s December 20, 2023 Decision for level-setting purposes. She then presented the following questions for both Eversource and UI to guide a discussion related to each EDCs’ current status for implementing the cost adder.

¹ EOE Staff’s presentation during the January 9, 2024 IX WG meeting was based solely on their reading of the Decision and was clearly presented as such. EOE Staff emphasized that PURA’s interpretation of the Decision could be different and, accordingly, suggested that participants direct any questions related to details of the Decision to PURA decisional staff.

- *Where are you in then cost adder implementation process?*
 - *Revised application status?*
 - *Other internal steps?*
- *What barriers have you encountered? Have you identified any solutions to those barriers?*
- *What questions do you have for the other EDC regarding the implementation process? Questions for other parties?*

Status Update: Eversource

1. Brian Rice (Eversource): Eversource is currently working with their accounting staff to identify the next steps towards implementation. Not encountering specific accounting-related barriers, just need to rethink how to receive the payments, charge time/materials to the appropriate work order, etc.
2. Still aiming to implement the cost adder before April 1st
3. Environmental Justice criteria:
 - a. Eversource will rely on the same criteria that inform the distressed municipality/low income cost adders—any project that qualifies for those adders should qualify for the updated adder.
4. Proposed approach to fee collection:
 - a. Eversource will use its existing PowerClerk system to collect fees
 - b. Would like to assess the fee in the same way as the meter fee
 - i. Instead of paying the fee upfront with the application, applicant would be allowed to pay upon the final meter swap (capital cost)—the fee will only be necessary if the project moves forward
 - ii. Becca Adams (EOE): Based on our reading, nothing in the Decision seems to preclude collecting payments via the meter fee; Eversource should just ensure that this is clear to the customer.
 - c. For applications being submitted in 2024, the customer will still be responsible for transmission system upgrade costs
5. Jamie Spannhake (EOE): How would these changes affect the application, and when does Eversource plan to have the application ready to submit to PURA for review?
 - a. Brian Rice (Eversource): We plan to submit PowerClerk screenshots to PURA to display the changes to the application, but the changes likely won't involve asking for any new information. The only anticipated change will be that at the end of the application, the customer will be prompted to pay a different fee.

Status Update: United Illuminating

1. Cornelius Stevenson (UI): UI is generally in the same position as Eversource—Working to address back-end billing/accounting components and does plan to use PowerClerk to receive the payment. However, because UI is newer to PowerClerk than Eversource is, UI is also working through a few software issues.

- a. UI has not considered tying this cost adder to the meter fee—initially intended to add a specific application for the cost adder component and charge the fee when necessary. UI will connect with Eversource to discuss the meter fee approach.
- b. Will likely be 4–5 weeks until UI can make the required changes to PowerClerk (dependent on the software production environment).
 - i. Adding some fields and mapping, addressing some other bugs, conducting testing.
 - ii. Currently working with PowerClerk vendor
 - iii. Still planning to meet April 1st deadline
- c. Like Eversource, UI plans to provide PURA with PowerClerk screenshots.

General Discussion and Q&A

1. Joe Marranca (UI): Seeking clarity on what is considered within the cost of transformer upgrades vs. “other upgrades” in the Decision. The Decision states that, “*The cost of transformer upgrades is defined narrowly as the cost of the transformer itself, the labor to install the transformer, and costs **directly related to the installation of the new transformer such as a new pole.***”
 - d. “New pole” example language is vague—e.g., if you need to upgrade one pole, does subsequent necessary upsizing of other poles also count?
 - e. What constitutes a cost being “directly related”?
 - f. Eligible distribution transformer system upgrade costs should be consistent between Eversource and UI, but as written the language lacks clarity.
 - g. EOE: If EDCs feel that more clarification on this language is needed, recommend filing this request in the docket. EDCs could elect to present PURA with a suggested list of costs that might be “directly related.”
2. John Mosher (Solect Energy): Does this cost adder apply to non-export systems?
 - h. Joe Marranca (UI): From UI’s perspective, limited or non-export projects are generally pursued with the intent of avoiding transformer upgrades, so this policy probably would not apply.
 - i. John Mosher (Solect Energy): I understand that this process will result in changes to the portal and application fee—is there accommodation or exception for non-exported or limited-export projects within the portal?
 - j. Carl Nowiszewski (Eversource): All non-EJ residential interconnection applicants will pay the fee—the technical criteria for deciding if an upgrade is needed will not change; the only change will be how that upgrade is paid for.

Next Steps

1. Upcoming sub-group meeting: Optimizing interconnection model/application submittals for FERC 2023 compliance (February 6, 2023)
 - a. John Mosher (Solect Energy): Would like clarity regarding the scale of projects will be affected (i.e., delayed) by the upcoming ISO NE transmission cluster study? Or will that be happening independent of the EDCs’ cluster studies?

- b. Compton Donohue (East Point Energy): Questions and ambiguity remain regarding whether it is possible to start or complete the ASO study before the cluster study—still seeking more clarity in the communication between EDCs and developers on this topic. The ISO process is well defined, but the distribution-side interconnection process is confusing
- 2. Upcoming recurring IX WG meeting: EDC progress updates on trough-type connection plans & EDC presentations on MSA proposals (originally scheduled for February 13, 2023—rescheduled to later in February due to severe winter storm event)
- 3. Upcoming PURA deadlines:
 - a. 3/15/24: EDCs to file trough-type connection plans with PURA for review & approval
 - b. 4/1/24: Deadline to implement \$25 cost adder
 - c. 4/10/24: EDCs' MSA compliance filings due