

CT PURA Interconnection Working Group

MSA Subgroup Meeting Summary

February 6, 2025 | 11:00am-12:00pm EST

MSA Directive

PURA's October 16, 2025 Decision in Docket 24-08-02 contains several Orders pertaining to the use of meter socket adapters (MSAs). Order 26 in that Decision includes specific IX WG directives that the EDCs must meet as they work to authorize and enable the use of MSAs in their service territories.

Order 26 from PURA's October 16, 2024 Decision is provided below for reference.

- 26. No later than March 31, 2025, the EDCs shall file the following for the Authority's review and approval in this proceeding and as a compliance filing in Docket No. 24-08-05:
 - (1) a liability waiver for solar customers using MSAs;
 - (2) a finalized list of restrictions on MSA use, with clear justification for any additional restrictions not previously outlined in the EDCs' Order No. 32 filings;
 - (3) clean and redlined Program documents, including updated RRES wiring diagrams, as needed:
 - (4) clean and redlined versions of the EDCs' Interconnection Guidelines, as needed;
 - (5) an MSA allowance application, to be submitted by an MSA OEM to the EDCs for their review and approval;
 - (6) any comments from the State Building Inspector on the EDCs' filing;
 - (7) a list of the conditions required for a third-party other than the EDC to install, maintain, and service an MSA; and
 - (8) a proposed date for an MSA training webinar, to be held in conjunction with Tesla, ConnectDER, municipal inspectors, and other relevant stakeholders.

The EDCs shall consult with Tesla, ConnectDER and the Interconnection Working Group in developing the liability waiver and list of MSA use-case restrictions before submitting their filing for the Authority's approval.

During the MSA subgroup's January 14, 2025 meeting, the group discussed areas of agreement and disagreement on several items, as informed by previous filings. The group also identified a list of several "data gaps" that, once resolved, could help inform the compliance filing. ConnectDER, Tesla, and the EDCs provided one another with responses to these data/information need in advance of the February 6, 2025 meeting. A list of those data/information needs and responses is included in the summary below.

Order 26 Context

Aileen Cole (GPI) began the meeting by providing an overview of Order 26, including (but not limited to) the two components of Order 26 that have direct IX WG engagement and consultation requirements: Item (1) liability waiver, and item (2) list of use case restrictions with justification. Aileen Cole (GPI) reminded the group that under Order 26, the EDCs are required to, "consult with Tesla, ConnectDER and the Interconnection Working Group in developing the liability waiver and list of MSA use-case restrictions before submitting their filing for the Authority's approval," (PURA's October 16, 2024 Decision in Docket No. 24-08-02, Order 26).

Aileen Cole (GPI) then provided a brief overview of past IX WG-related MSA discussions, including 2023 Order 32 in PURA's November 1, 2023, Decision in Docket No. 23-08-02 and the EDCs' May 2024 filings in response. Though PURA found that the EDCs' May 2024 filings were not fully responsive to Order 32, these filings did touch on several items relevant to Order 26 requirements, including the liability waiver and some use-case restrictions.

Summary of Data Needs and Responses

During the January 14, 2025, meeting, stakeholders identified the following data needs. The data need, the party responsible for providing a response, and the responses received in advance of the February 6, 2024, meeting are summarized below. Aileen Cole (GPI) provided a high-level overview of the data needs and responses and provided opportunities for the responsible party to share additional information on their responses, and for anyone to ask questions about the data needs and/or responses.

Data Need (identified 1/14)	Responsible Party	Response
Examples of liability waivers from other jurisdictions	ConnectDER/Tesla	Provided example liability waivers from Tucson Electric Power and Xcel Energy (Colorado). Not aware of this requirement in any other jurisdictions except for Appalachian Power Company, which is in-progress.
Examples of state inspector responsibilities in other jurisdictions	ConnectDER/Tesla	Noted that it is uncommon for a state agency to provide local guidance regarding MSAs, but provided example from NJ Department of Community Affairs, in which the Director of the Division of Codes and Services issued a letter directing electrical subcode officials to approve MSA products, subject to specific criteria.
List of meter inspection approaches, including ways to assess meter socket condition	ConnectDER/Tesla	Provided information about three different onsite meter accuracy testing devices (would enable onsite testing), rather than requiring meters to be brought back to the utility testing facility.
		Suggested that EDCs make their existing meter socket evaluation procedures (which the EDCs use when installing a net meter) available to installer technicians, which is common practice in other jurisdictions.
		Provided additional information regarding inspection approaches in New Jersey (electricians notify the utility that an MSA will be installed via the interconnection application, then conduct socket inspection and meter installation), and

		in Exelon utilities (MD, DE, DC), electrician signs a terms and conditions sheet indicating that they understand how to safety remove and reinstall a meter.
Expected lifespan of MSA device	ConnectDER/Tesla	ConnectDER device: Minimum 15 yearsTesla device: 20+ years
Example lists of use case restrictions from other jurisdictions	ConnectDER/Tesla	Provided documents containing example use case restrictions from ten utilities across six states (NJ, CO, AZ, PA, UT, WV)
Estimate of approximately how many ring-type (i.e., older) sockets remain in their service territories	EDCs	EDCs do not have a database of socket type or socket age and were thus unable to provide ballpark estimate of all remaining ring-type sockets in service territories

Discussion

After reviewing the information provided in response to these data needs, parties had an opportunity to ask clarifying questions about any of the information provided and to identify any further information needs.

- 1. Eversource is still reviewing the materials that ConnectDER provided
- 2. Aileen Cole (GPI) asked Eversource if there was another way that they could help the group understand approximately how many older ring-type sockets remain in their service territory (e.g., "utility field technicians encountered X ring-type sockets in the field in 2024.")
 - a. Eversource stated that they are unable to provide this information because they don't track socket type
- 3. Patrick Fam (Eversource): What happens if the house with an installed MSA is sold? Who manages the change of system ownership? Noticed that this is not covered on the example liability waivers.
 - a. Jon Knauer (ConnectDER): In general, this would likely vary depending on whether the homebuyer purchased the solar PV system outright with the home, or whether it's under a PPA arrangement. Either approach would involve a distinct assignment of responsibility and a liability between the existing and new homeowner. This is several steps removed from the MSA installation aspect but can look to see if there's additional information available on this from installers.
- 4. Carl Nowiszewski (Eversource): In addition to the MSA device lifespan, can ConnectDER or Tesla provide any field maintenance data (e.g., if anything goes wrong with the device)?
 - a. ConnectDER's maintenance needs are within industry norms.
 - b. Jordan Graham (Tesla): Awaiting additional internal information on this, but Tesla is notified through an automated system if something fails during operation. Customer would only lose power if a failure occurred when the devices contactor is in its "open" phase (typically the device is in "closed" phase; only in "open" phase during a grid outage).

- Failure presents no risk to the grid more broadly because a failure to the Backup Switch communications systems would automatically prevent the Powerwall from dispatching power.
- ii. If such a failure were to occur, Tesla would immediately be notified of any failures and would issue a rush service to the customer's home to replace the device.
- iii. These issues and approaches to potential device failure are common nationwide among home storage installations with whole-home backup because systems that provide whole-home backup power include a service disconnect point that is upstream of the customer's main panel. These service disconnect points are already common in whole-home backup residential storage installations across CT. This device provides the same functionality in a different location and form factor.
- c. Patrick Fam (Eversource): Is the customer made aware that if something goes wrong, they should contact Tesla, not their utility?
 - i. Jordan Graham (Tesla): Will reach out internally for answer.
- Aileen Cole (GPI) asked ConnectDER if there was anything else that they think should be considered in a liability waiver, or if the two examples they provided are reflective of what they think a liability waiver should look like.
 - a. ConnectDER are neutral on the liability waiver. They provided these examples because they are the only ones that they are aware of.
- 6. Neither Eversource nor UI will be providing updated RRES wiring diagrams (item 3 in Order 26)—have determined that they are not necessary.
 - a. There was broad agreement among attendees that updated RRES wiring diagrams are not necessary.
- 7. Patrick Fam (Eversource): Regarding incorporating storage—had understood that Order 26 pertained to solar PV only, but the description in the new installation document indicates that storage would be allowed under specific conditions. Could ConnectDER provide more information on that?
 - a. Jon Knauer (ConnectDER): This would only be done under very limited circumstances, but it needed to be documented in the manual. Would be so uncommon that it is acceptable to not include special considerations related to storage.
- 8. Aileen Cole (GPI) reminded the EDCs that Order 26 also includes the requirement to include "any comments from the State Building Inspector" in their filing due March 31, 2025, which would require the EDCs to provide a draft to the State Building Inspector sufficiently in advance of that deadline to enable them to review and provide comments, and to for the EDCs to document those comments as part of their filing. Asked what the EDCs' internal deadline is to ensure sufficient time to meet this requirement.
 - a. Patrick Fam (Eversource): Have been working on reaching out to the State Building Inspector but have had trouble getting in contact. Has anyone else been able to contact them to notify them of this requirement?
 - b. EOE can work on outreach, but encourages EDCs to continue trying to do so.

- 9. Aileen Cole (GPI) and Jamie Spannhake (EOE) asked the EDCs to reach out to their legal departments to identify when a draft will be ready and to confirm when legal will have a version of their filing that they can share with ConnectDER and Tesla. Alternatively, the EDCs' legal departments could coordinate with the ConnectDER and Tesla's legal departments.
 - a. EDCs will reach out internally to their legal teams.

Next Steps

MSA subgroup meeting currently scheduled for February 11th will be cancelled and will be rescheduled for later in February to enable parties more time to conduct internal outreach.