



Connecticut Distributed Generated Interconnection Working Group Meeting Summary

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

June 11, 2024

Overview of Meeting Topics:

1. Update on EDCs' MSA filing in Docket No. 24-08-02
 - Eversource's filing: [link](#)
 - UI's filing: [link](#)
 - Response from ConnectDER and Tesla: [link](#)
 - PURA requests comments on EDCs' MSA filing by June 24, 2024 (deadline extended from June 10th): [link](#)
2. New straw proposal for DER IX Cost allocation (NRES) filed in Docket No. 22-06-29RE01 ([link](#))
3. Update from recent hosting capacity map call
 - Eversource filing due June 1, 2024
4. Level-setting discussion on energy storage issues in CT
 - EDCs must submit summary of energy storage findings by August 1, 2025 (see Order No. 28 [here](#))

Topic 1: Update on EDCs' MSA Filing

1. Tesla and ConnectDER submitted comments yesterday in response to the EDCs' filings. Identify big-picture and more specific issues in their comments. Today will focus on big-picture issues, but refer to their comments for more detailed discussion.
 - a. PURA expressed interested in approving MSAs, directed EDCs to work w/ Tesla and ConnectDER, replicate best practices from elsewhere.
 - i. EDCs held multiple meetings with Tesla and ConnectDER, but have not indicated intent to move proactively towards MSA implementation
 - b. EDCs spoke with just two of the 40+ utilities that currently allow customer-owned MSAs
 - c. Approved in many states:
 - i. NJ utilities required to assess/approve devices within 90 days.
 - ii. CO requires review/approval within 60 days.

- iii. MD requires review/approval within 180 days.
 - iv. Arizona takes a “you meet these criteria, you’re approved” approach
 - d. Encourage PURA to take more direct action if they do wish to approve MSAs
 - e. Tesla and ConnectDER are happy to continue working with EDCs towards an implementation strategy
 - f. Welcome comments by other participants in response to the EDCs’ filings or their own filing
- 2. EOE: EOE’s understanding of the order indicates that PURA is seeking solutions that make MSAs implementable, but the EDC filings are primarily problem identification
 - a. Additionally, some of the potential strategies that the EDCs shared in the IX WG meeting on this topic did not end up in the final compliance filing, which is disappointing.
 - b. EOE still appreciates the efforts the EDCs have demonstrated to collaborate and seek out solutions and looks forward to seeing those efforts moving forward.

Topic 2: DER IX Cost Allocation Straw Proposal

- 1. Eversource: The technical and administrative portions of revised straw proposal are good, but rate recovery remains an issue.
 - a. Eversource would not make the described investments until they know they will have guaranteed recovery what from the proposal would be used and useful.
 - b. In MA, EDCs’ investments are approved by regulator through the Capital Investment Plan (CIP) before pursuing those investments, rather than through a rate case one those investments have been made.
 - c. Given that the described investments could cost hundreds of millions of dollars, timely recovery is essential.
- 2. IX WG members are encouraged to submit comments by 6/21 if interested in providing feedback.

Topic 3: Update from hosting capacity map call

- 1. EDCs’ hosting capacity map updates discussed in detail during dedicated subgroup call on May 20th
- 2. Eversource submitted filing detailing the updates on 5/31, as required by Order 28 in Docket No. 23-08-03
- 3. UI issued RFI in the past couple of weeks and is on track for November filing
 - a. Currently has five vendors engaged, expect responses by early/mid july

Topic 4: Energy storage interconnection practices

- 1. EDCs’ must file energy storage interconnection jurisdictional assessment and proposed strategy in accordance with Order 28 by August 1, 2024
 - a. EDCs have to share what energy storage interconnection practices they’ve found in other jurisdictions and their proposal for energy storage interconnection.
 - b. EDCs will present in July, but this is an opportunity to touch base early on energy storage challenges and issues.

- c. Aware that despite programs and market options, the amount of storage being deployed is not in-pace with targets in the New England region.
- 2. *MK, New Leaf Energy*: What size AC storage applications have been made in CT?
 - a. *Joe Debs, Eversource*: Eversource has seen 5–20MW projects in their service territory. A small generating facility with large storage capacity makes the situation much more complex.
- 3. *Joe Debs, Eversource*: Some storage projects seeking to interconnect are larger than the actual load. Why?
 - a. *Kyle Perry, Verogy*: Have looked at storage for commercial behind-the-meter—large upfront payment for capacity to install (where the majority of revenue comes from). This is likely why there are oversized storage systems at commercial facilities, which is an issue in CT and MA. Smallest MA project is 750kW AC-output storage.
 - b. *Ed Kranich, CTGB*: Is this due to a lack of interest, lack of equipment availability, or something else?
 - c. *Kyle Perry, Verogy*: Developers will explore different capacities, sizes, etc. Have seen little interest in the 250-500kW range recently. This is not just a developer decision; it also pertains to equipment availability. Meets with a storage manufacture at least monthly, and many customers are interested in pursuing it, but quickly becomes not an option due to availability constraints.
- 4. *MK, New Leaf Energy*: Could EDCs provide a forecast and load profile (NY has an 8760 load profile), and ConEd provides forecasted peak load.
 - a. *Joe Debs, Eversource*: Yes, Eversource plans to put them into hosting capacity maps, will put them in next year (assuming PURA approval).