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State of New Hampshire
Department of Energy
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October 31, 2023

Re: ReWild Renewables, LLC comments (Set 4) on IP 2022-01 - Investigative Proceeding Relative to Customer-Generator Interconnection

To whom it may concern,

ReWild Renewables, LLC (“ReWild”) is a commercial solar and energy storage developer based in Portsmouth, New Hampshire. We have been based in New Hampshire since we started developing projects about 10 years ago and we’re excited by the opportunity to work with New Hampshire’s utilities, the Department of Energy (the “Department”), distributed generation (“DG”) developers, and the many other energy stakeholders to review and collectively improve the state’s interconnection procedures. We have appreciated the opportunity to collaborate with the stakeholders and provide comments on IP 2022-01, an Investigative Proceeding Relative to Customer-Generator Interconnection (the “Investigative Proceeding”) and we welcome any questions on our comments.

Request for Comments — Set 4

5.c. Non-consensus and key issues to address

- i. *Which interconnection model(s) should be used as basis for NH rules (IREC, MA, CT, other States)*

Feedback to 5.c.i: We encourage the Department to also include New York and Illinois in the list of interconnection models that should be used as basis for NH rules. These two states, like MA and CT, have successfully studied and interconnected a fair amount of DG onto their distribution systems, and both states share similarities with NH in that they are largely rural (lower load) with pockets of urban (higher load) areas.

1. *A new IREC 2023 Model Interconnection Procedures was released in August.*
 - a. *DOE will be requesting participant feedback.*
2. *Non-utility participants generally favor adopting IREC. Utilities open to using IREC as a base and modifying for application in NH.*

Feedback to 5.c.i.2: IREC has encouraged states to use their 2023 model procedures as a starting point and set of general guiding principles but not necessarily a prescriptive model for every state. IREC's 2023 model procedures are an excellent improvement over NH's existing interconnection procedures. However, Rewild is comfortable with these IREC model procedures being adjusted for NH's specific distribution system, application volume, and other set of unique characteristics. There are many principles in the procedures that need to be included for the interconnection process in NH to improve, but that does not mean that the model procedures need to be adopted word for word and cannot be adjusted for NH's needs. The state desperately needs an improved set of interconnection procedures to effectively interconnect DG projects as the current set of procedures are ineffective and move at a much slower cadence than any other sets of rules in New England.

3. *Whether or not all NH utilities use an identical process, especially for larger systems, > 100 kVA.*
- ii. *Cost allocation methodologies*
 1. *Utilities prefer traditional principles that generally align with cost causation but are open to further discussion.*
 2. *Developers prefer more socialization of costs.*

Feedback to 5.c.ii: We would encourage the Department to go back to Unitil and Eversource's comments from June 29, 2023, in which the two utilities reference the Massachusetts CIP process which does include aspects of cost socialization.

5.d. Summary of Recommendations

- i. *Statutory Recommendations*
 1. *No statutory recommendations are recommended until the Working Groups have made their final recommendations.*
- ii. *Working Groups*
 1. *Creation of two DOE led Working Groups*

Feedback to 5.d.ii: We are supportive of the creation of the working groups, but we would urge the Department to include specific recommendations around when the working groups shall form (by what date), what stakeholders shall comprise the working groups, how stakeholders can participate in the working groups, and how actions can be implemented by the working groups. Without setting rules for engagement and process for making improvements, the working groups may not be effective. We also believe the working groups should be formed by the end 2023 so the working groups can get to work immediately on making progress in NH.

- iii. *Near-term recommendations prior to obtaining final recommendations from Working Groups*
 1. *Encourage participants to develop informal minimum interconnection queue criteria.*

2. *Encourage utilities to post/report basic interconnection queue information.*

Feedback to 5.d.iii.2: For the avoidance of doubt, the Department can add here what “basic” interconnection queue information includes. This can be found in IREC’s 2023 model interconnection procedures, from the interconnection queues in states like MA and NY, and we have copied our earlier comments on interconnection queue information.

- a. Queue number
- b. AC kW Size
- c. Fuel Type (Solar PV, Wind, etc.)
- d. BESS Size (if applicable)
- e. Substation
- f. Feeder
- g. City/Town
- h. Status (active, withdrawn, operational)
- i. Date application was deemed complete
- j. Date of supplemental review/study start
- k. Date of supplemental review/study finish
- l. ISA date
- m. Permission to Operate Date
- n. Cost paid for interconnection
- o. i.3.9 approval date (if applicable)

6. *Customer-Generator and Distributed Energy Resource (DER) Background*

Provide general high-level description of Customer-Generator history, benefits, issues, and concerns

- c. *Developer perspective*
 - i. *Need for clarity and consistency of rules, fees, and timelines.*
 - ii. *Interconnection queue.*
 - iii. *Up-to-date utility distribution system status.*
 - iv. *Fair, reasonable, and transparent cost-allocation.*

Feedback to 6.c.: Rewild has four comments on this section.

1. There is a need for increased efficiency, in addition to clarity and consistency which are mentioned. We do lack clarity and consistency in the interconnection process and the state does need improvements in the application of rules and timelines, but we also need increased efficiency related to these timelines. Right now, projects that are first in queue on their substation are not proceeding with system impact study and that is a major issue for the state of NH’s interconnection process, moving projects forward in a timely manner, and the success of a DG market in the state.
2. Regarding application fees, we support the assessment of individual application fees to provide resources for utilities to review interconnection requests. This is a common

- practice in every state and can reduce the volume of applications received by the utility as there is a greater barrier to entry limiting the number of prospective applications.
3. We will state again that the creation of public facing interconnection queues will create less work for the utilities and we hope this point is made in the Department's report. A public facing queue, published at least monthly, will create greater clarity for DG customers around individual substations and feeders, fewer pre-application requests to the utility (which are only reports from a point in time and not dynamic like a queue), and fewer and higher quality full application requests. If DG customers can understand how many other DG projects are on a substation or feeder, they may decide not to submit a full application. If there are a few other projects on the substation they are looking into, the DG customer may avoid that substation altogether knowing there will likely be no capacity for their project. That removes one application from the utility's queue to review, approve, scope and study and frees up the utility's resources to work on other projects.
 4. Fair, reasonable, and transparent cost-allocation is necessary and we appreciate that this is included. We want to highlight that transparency around cost is incredibly and increasingly important to DG customers who use the information received by the utility, including cost information, to make financial decisions on their DG projects. When creating an estimate for grid upgrades, the utility's system impact study results report needs to explain to the DG customer what the itemized cost estimates are for equipment, labor, design, permitting, easements, and project management. Furthermore, the actual costs should not change by more or less than 25% of the estimated costs to create certainty for DG developers and the utility. So if the estimated cost is \$100,000 then the final cost shall not be greater than \$125,000 or less than \$75,000.

Conclusion

Thank you for the opportunity to provide comments on this Investigative Proceeding. We would be happy to address any questions the Department of Energy or any stakeholders have in response to these comments.

Thank you,

A handwritten signature in black ink that reads "Matt" followed by a stylized, elongated "D" and a horizontal line extending to the right.

Matt Doubleday
Director of Interconnection
ReWild Renewables, LLC