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State of New Hampshire
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Re: ReWild Renewables, LLC comments (Set 2) 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 nearly 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 appreciate the opportunity to 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 2

1. **Hosting Capacity Maps: Feedback on maps and available information, frequency updates, level of detail, etc., and feedback on concept of posting longer term capital projects on Hosting Map layer or via link.**

Response: The current hosting capacity maps provide some great information and as a developer we appreciate that certain data points are included, like the existence of 3V0 at the substation, DER in queue and on-line at the substation and circuit, operating voltage, and the hosting capacity in MWs at the specific location. All New Hampshire utilities should incorporate this information into their hosting capacity maps and we believe the maps should be updated on a weekly basis. This frequency of updates will create less work for the utility as a Hosting Capacity Map with accurate and robust data that is frequently updated will result in fewer questions to utility staff and fewer speculative interconnection requests. We do believe that posting longer term capital projects on the maps is reasonable and provides an incredibly useful data point for interconnecting customers that can be used to effectively interconnect one or more

projects in an area of the grid which will be able to support the project in the future. This makes for efficient projects that benefit several stakeholders.

2. **Priorities for various efforts/tasks/issues associated with this investigation:**
    - Working Group(s)

Response: Rewild believes working groups have an important function in improving state level interconnection. To be effective, they must have willing and active participants and a process for implementing proposed changes and working group recommendations. Our experience has also been that the working group must have a well-defined scope to be effective. ReWild's recommendation would be to first determine the items that this investigation wants to address in the Near-term, Mid-term, and Long-term and then determine if and how working groups should be established to address specific topics.

- Application Processes
    i. Application fees
    ii. Pre-screening
    iii. Portals
    iv. Ensuring application and fees are not double counted/recovered
    v. Interconnection request process

Response: ReWild is supportive of the utilities collecting application fees. We do want to stress that the funds from the fees must be invested in additional interconnection staff to handle the growing number of requests and technology that can assist the utility staff in processing applications in a timely manner. Technology would include an interconnection portal like PowerClerk, used by many utilities including Eversource in Massachusetts. ReWild supports each utilities' investment into an interconnection portal as it will, if used correctly, benefit the utility and applicant with communication and timeline compliance and should improve the interconnection process. Again, the portal must be structured and used correctly for this to occur and there must be sufficient staff to maintain the portal and the growing number of interconnection requests.

- Consistency among utilities for Interconnection Agreements
    i. Identify by kVA threshold

Response: We do believe there should be consistency between utilities in using an identical Interconnection Agreement form and believe the agreement should identify the project's operating capacity in kW. If the project's inverter nameplate is de-rated then the operating capacity should be the de-rated value as this is the project's operating capacity. Inverter de-rating is commonly done in other jurisdictions.

3. **Cost Allocation for Distribution System Upgrades:**
    - Preference(s) for Other State Models

Response: ReWild believes that the cost causer pays model is unfair, outdated and needs to be updated so that specific interconnection upgrade costs are shared among those projects and stakeholders that benefit from the upgrade. New York and Massachusetts have both adopted cost sharing models recently and we believe that New Hampshire should learn from those states' models and implement a similar one in New Hampshire that shares costs with the applicants and stakeholders that benefit rather than the single applicant that causes an upgrade. ReWild is supportive of the Massachusetts Capital Investment Plan (CIP) model which allocates cost to those projects utilizing the upgrade as well as to the ratepayers that will benefit from the additional electrification and reliability the upgrade provides. Massachusetts DPU docket 22-47 is currently the only approved CIP and we recommend this be looked at and studied by the state of New Hampshire. There are several other CIPs that are under consideration by the Massachusetts DPU.

4. **Suggestions on what can be discussed/determined**
    - **Near-term without statutory changes**

Response: ReWild supports the comments of Clean Energy New Hampshire (CENH) around a monthly queue report by each utility tracking the active, operational, and withdrawn interconnection requests in each utility area. This information is incredibly vital to applicants and regulators in determining the projects that are requesting to interconnect, where they are doing so, and what their current status is so that there is assurance that the utility and the applicant are both moving the project along so as not to clog up the queue with speculative applications. We support this being updated monthly, being excel based and that the queue report should at least include the following information:

- AC kW Size
- BESS Size (if applicable)
- Substation
- Feeder
- Town
- Date of application
- Date application was deemed complete
- Date of study start
- Date of study finish
- ISA date
- Commercial Operation Date
- If the application has been withdrawn

- i.3.9 approval date (if applicable)

    - **Mid-term**

Response: ReWild again supports CENH's comments and wants to highlight the following topics in particular:

- Standardized study fees and timelines
    - Many states have standardized study fees and timelines. We believe study timelines absolutely need to be standardized to a set number of business days. Standardizing the fees *can* be done but it can also be a challenge because some applications require more time and therefore money for the utility to study. One solution is to require a study deposit of $1,500 - $3,000 paid by the applicant before the study starts, and then the utility sends a final invoice and accounting for the actual cost incurred less the deposit at the end of the study. This ensures the utility is paid for the cost incurred to study a specific project.
- Updating the interconnection tariff regulations and timeline enforcement
    - There are many ways we believe the interconnection tariff should be updated to create more efficiency in the process, and many resources the State of New Hampshire can use to adequately update and improve the tariff regulations. The Interstate Renewable Energy Council (IREC) has many resources for updating and improving interconnection tariff regulations. One area that the state can work on with its interconnection stakeholders is timeline enforcement. ReWild strongly believes that timelines need to be enforced for both the utility and the applicant. Below are several areas in the interconnection process where the utility and the customer ought to have timelines enforced and examples of timelines for each milestone.
        - Utility
            - Acknowledge receipt of application (ex: 5 business days from application submittal)
            - Determine if application is deemed complete by utility (ex: 10 business days from bullet above)
            - Perform initial Screens (ex: 20 business days from bullet above)
            - Send System Impact Study Agreement (ex: 5 business days from bullet above)
            - Perform System Impact Study (ex: 40-55 business days from bullet above)
            - Hold Results meeting following System Impact Study (ex: 5 business days from bullet above)
            - Send ISA to Customer (ex: 20 business days from customer decision to sign ISA

- Developer
    - Correct any incomplete aspects of application (ex: 15 business days)
    - Sign System Impact Study Agreement and Pay deposit (ex: 15 business days from receipt of SIS agreement)
    - Make a one-time modification to the project (ex: 15 business days from results meeting after SIS)
        - May trigger a short restudy but a modification period following SIS is necessary.
    - Request ISA following System Impact Study (ex: 15 business days from results meeting after SIS, assuming no modification)
    - Sign ISA (ex: 15 business days from receipt of ISA)
    - Pay Initial Deposit of ISA 25% (ex: 60 business days from ISA execution date)
    - Pay Balance of ISA 75% (ex: 120 business days from 25% payment)
    - If developer misses a milestone: 30 business day grace period to cure
    - Allow for a negotiated payment schedule for any upgrade above $250,000

- <u>Dispute resolution</u>
    - Interconnection in Massachusetts includes a dispute resolution process between applicant and utility, and an Ombudsperson who acts as an independent mediator for the dispute. We recommend that New Hampshire adopt a similar model as disputes will occur, hopefully infrequently, and a process to address disputes in an organized and fair manner is necessary for a well-functioning interconnection process. CENH has listed some great resources in their comments submitted under this investigation.

- <u>Cost allocation</u>
    - Again, ReWild supports a move away from the cost-causation principle and that New Hampshire undertake a process to share costs for upgrades among those projects and stakeholders that benefit from the upgrades. We think this is a topic should fall in the mid-term bucket as it is potentially too complicated to be a short-term task but it does need attention and cannot be a long-term task for this investigation or the state based on the number of new applications that are submitting requests to the utilities.

- <u>Technology and software</u>

- Our only comment here is that the state should begin investigating the utilization of technologies, like smart inverters and battery storage, to offset the need for interconnection upgrades. Many current inverters have functionality that can mitigate grid impacts and lower interconnection costs. For example, direct transfer trip (DTT) is an upgrade that is used to prevent islanding of a distributed energy resource (DER) but it is costly and many smart inverters can function in such a way that they can prevent the DER from islanding and therefore serve the same function as the direct DTT. It's a lower cost solution to achieve the same outcome. There are other examples of this, and we recommend the state study the opportunities to utilize inverter functions, battery storage and other technologies to offset the need for more expensive and cumbersome interconnection upgrades.

Conclusion

Thank you for the opportunity to provide comments on this Investigative Proceeding. We look forward to discussing this matter further with the Department and the many interconnection stakeholders in New Hampshire.

Thank you,

Matt Doubleday
Director of Interconnection
ReWild Renewables, LLC