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August 1, 2023

**IP 2022-01 – Investigative Proceeding Relative to Customer-Generator
Interconnection**

Request for Comments

On December 5, 2023, the Department of Energy (“Department”) issued an Order of Notice initiating a proceeding to investigate the potential modification of the rules of the Public Utilities Commission in PUC 903.01(e) to ensure cost-effective, predictable, and timely interconnection procedures for customer generators to the state’s electric distribution system. A two-hour virtual technical session was held on May 15, 2023.

A second two-hour virtual technical session was held on July 18, 2023. As follow-up from that technical session, attached are suggestions for participant feedback. Any comments on the attached, as well as any other feedback regarding the investigation, should be submitted to the Department as Set 3 Comments. Set 3 Comments must be filed with the Department by August 18, 2023, by emailing them to Proceedings@energy.nh.gov.

Participants wishing to be on the service list for this proceeding should provide an email address to Proceedings@energy.nh.gov. Please include the above referenced docket number in the subject line of any email.

New Hampshire Department of Energy

IP 2022-01

Investigative Proceeding Relative to Customer Generator Interconnection

Highlights and Follow-up from Tech Session 2 held July 18, 2023

Request for Set 3 Comments due August 18, 2023

Please Address the Following Issues

1. Interconnection Queue(s)

Several participants expressed a need/desire for accurate, up-to-date interconnection queues from each utility.

- a. Please define the anticipated benefits an Interconnection Queue would provide for your organization.
- b. During Technical Session 2, participants voiced a preference for keeping the queue as simple as possible. Please identify the minimum information your organization feels is necessary for an Interconnection Queue.

The following link provides examples from several utilities under “SIR Inventory Information”, “Utility Interconnection Queue Data (May 2023)”. <https://dps.ny.gov/distributed-generation-information>. Please note, these examples include a significant amount of information that may not be necessary.

- c. What is your organization’s preference for frequency of queue updates? (i.e. weekly, monthly, quarterly, or some other frequency)
- d. What is your organization’s format preference(s) for updates? (Excel, etc.)

2. Interconnection Standard Reference/Preferences

There continues to be a strong consensus on the benefits of adopting consistent interconnection standards in New Hampshire, as well as a desire to have them aligned with other states in the region.

- a. Have your organization’s thoughts regarding the use of the Interstate Renewable Energy Council (IREC) model changed since the initial Set 1 comments? If so, please describe.
- b. Please identify which of the following, if any, is your organization’s preference to use as a model or base to create a NH Interconnection Standard. If there is more than one you feel is appropriate, please rank priority:

○ Connecticut

□

- IREC
- Maine
- Massachusetts
- New York
- Other _____

3. Cost Allocation for Distribution System Upgrades necessary for DER interconnection

Please identify your organization’s preferred methodology and/or other state model(s) for cost allocation. Further, identify key concerns with various approaches. Some general issues and example methodologies are below, but other suggestions are welcome:

- a. Cost Causation: The interconnecting customer(s) pays for the required upgrades.
- b. Utility customers initially fund improvements and are reimbursed over time through a reconciliation method.
- c. Utility Prorated Cost Sharing: Projects pay for their share of the upgrades.
- d. Post-Upgrade Allocation: Customer that requires the upgrade pays but can get some reimbursement as other customers connect.
- e. Defined contributions toward upgrades based on kW of the DER. For example, a residential solar PV customer pays for a pole transformer upgrade.
- f. Other:

4. Interconnection Facilitator or Ombudsman

Some participants suggested an interconnection facilitator could be beneficial in addressing scheduling, delays, technical issues, etc.

- a. Does your organization feel there are benefits of an Interconnection Facilitator or Ombudsman?

If yes, please describe the anticipated benefits. Please also provide suggestions for the scope, role(s), funding, and other recommendations regarding a Facilitator/Ombudsman.

If no, please indicate reasons why this may not be beneficial or other areas of concern.

5. **Interconnection Working Group(s)**

The Technical Session 2 discussion included a strong consensus on the importance of working groups. Further, participants generally agreed there should be at least two working groups, one for Policy/Procedures, and one for Technical/Engineering issues.

There was also general agreement that establishing formal working groups will take time to properly scope, structure, and identify resources for staff and studies. Further, there was consensus for establishing both near-term informal working groups and long-term formal working groups.

Some participants also suggested working groups could be expanded beyond immediate interconnection issues to other issues, such as net metering, grid modernization, etc. Please note, pending legislation may establish formal working groups whose scope expands beyond interconnection issues into areas such as net metering and grid modernization.

Near-Term Informal Working Groups:

To assist with exploring these informal working groups, at minimum, please address the following:

- a. Do you agree with two initial working groups, one for Procedural/Process and one for Technical/Engineering?
- b. Identify which DER technologies would be within the scope of the informal working groups:
 - Solar PV
 - Wind
 - Energy Storage, including type
 - Wind
 - Fuel Cells
 - Fossil fuel (natural gas, oil, propane, etc.) generation
 - Biogas
 - Landfill gas
 - Other – Provide details
- c. Group composition. Please provide suggestions for industry, utility, and other participants.
- d. Group lead(s). The technical session participants and SB 262 suggest that DOE lead a working group. Given the limited resources among the participants, please provide suggestions on how best to organize these informal working groups.
- e. Provide suggestions for near-term (3-12 months) areas of focus, objectives, and anticipated outcomes. Some examples include, but are not limited to:

- Interconnection Queue
 - Consistency of application format, threshold levels, review periods.
 - Recommendations for reducing the time for processing applications, studies, and approvals.
 - Recommended timelines for various functions including application review, pre-screening, study duration ranges, etc.
 - Transparency of costs for studies and utility system upgrades.
- f. Decision processes. Please suggest preferred structure for decisions and recommendations. Consensus, quorum, formal voting, etc.

Long-Term Formal Working Groups:

In addition to addressing the issues a. through f. above, please address the following in relation to long-term formal working groups:

- g. Should the group(s) also address net metering, grid modernization, etc.?
- h. Should formal working group charters and procedures be required?
- i. Should there be formal adherence to agenda items vs. informal discussions?
- j. Should legal representation be required to attend working group meetings?
- k. Should there be identification of topics that should be avoided at working group meetings?
- l. Should there be a formal third-party facilitator? Reference item no. 4.
- m. Suggestions for how best to address funding for participation, studies, investigations, etc.
- n. Communications format: Should meeting minutes, reports, etc. be posted on the DOE website, and/or other locations?

6. New Hampshire Grade from the “Freeing the Grid” report

- a. Please refer to the Freeing the Grid website: <https://freeingthegrid.org/>
- b. Please provide feedback on the report (NH received a “D” score) and recommendations and if your organization agrees with those recommendations.
- c. Identify issues and concerns with the recommendations.

7. SB 166 (2023)

SB 166 has been passed by both the House and Senate and is currently awaiting the Governor's signature. SB 166 addresses Grid Modernization and directs the Department of Energy to establish and support a Grid Modernization Advisory Group (GMAG).

- a. Please identify issues, if any, related to SB 166 that you feel should be addressed/discussed in this (IP 2022-01) investigation.
- b. Should the requirements and activities associated with SB 166 be included with any Working Groups (near-term informal or long-term formal) that develop from the IP 2022-01 investigation? If not, should there be separate working group(s) for SB 166?

8. Other topics

Provide thoughts on any other issues that should be addressed, concerns, etc.