

ReWild Renewables, LLC
47 Bow St
Portsmouth, NH 03801



State of New Hampshire
Department of Energy
21 S. Fruit St, Suite 10,
Concord, NH 03301-2429
Proceedings@energy.nh.gov

August 18, 2023

Re: ReWild Renewables, LLC comments (Set 3) 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 3

Interconnection Queue(s)

- a) *Anticipated benefits:* An up-to-date interconnection queue with accurate and robust data will have several benefits. It will reduce the number of “speculative” interconnection requests utilities will receive. If a potential applicant is aware of information like the number of projects at a substation or feeder, their size, their status within the queue (i.e. pre-study, in-study, post-study, etc.), the town or city where the project is located, transmission study status, and ISA execution status then the applicant can use the information to make an informed decision as to whether they will submit an application for their own project. Not only whether they will submit the application, but the queue information can inform the size of the applicant’s project. The reduction of speculative interconnection requests reduces work for the utility which is a benefit for the utility and for all other stakeholders as well. Additionally, it allows the public to see how quickly projects are moving through the interconnection queue. This will let the public know that the utility and the applicant for a specific project are meeting reasonable timelines within

the interconnection queue. The utilities have a duty to move through the queue and complete the study of projects in a reasonable manner, and interconnection applicants similarly have a responsibility to not take up space in the queue which would delay other projects and end up creating more work for the utility. The interconnection queue can thus act to ensure applicants are not holding queue positions for months or years and preventing other projects from proceeding through the interconnection queue.

b) *Minimum information:* Rewild provided a similar list in its comments from June 29, 2023 and we believe that this is the minimum information that is necessary for an interconnection queue. We are also aware that IREC's Model Interconnection Procedures provides comprehensive guidance related to public queue reporting and we recommend DOE review this list as well.

- 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)

c) *Frequency of updates:* It is our preference that the interconnection queue be updated at least monthly. This is common in other states (Massachusetts, Maine, New York) and strikes a fair middle ground between providing up-to-date data to the public and allowing the utility enough time to compile and publish the data.

d) *Format preference:* Excel is sufficient.

Interconnection Standard Reference/Preferences

- a) *IREC Model:* Rewild's opinion of the IREC model has not changed since the first comment set. We believe the IREC model is an effective set of interconnection standards that would significantly improve the interconnection process in New Hampshire.
- b) *State based preferences:* While many state based interconnection standards have effective aspects of their models, it is our opinion that New Hampshire adopt the IREC model

update for 2023. This set of standards would be a significant improvement over New Hampshire's current interconnection standards, and it is our strong opinion that **NH Department of Energy recommend that the NH Public Utilities Commission open a formal proceeding to adopt this set of standards as soon as practicable.**

Cost Allocation for Distribution System Upgrades necessary for DER interconnection

a) Feedback on Cost Allocation Methodologies:

I. Cost Causation: The interconnecting customer(s) pays for the required upgrades.

Feedback: Cost Causation is an outdated and inequitable form of cost allocation. It requires a single project to pay for distribution infrastructure that will serve multiple beneficiaries. Some form of cost sharing among the beneficiaries of the infrastructure upgrade must be implemented in New Hampshire if the state is to reach its clean energy goals. Without a departure from Cost Causation, individual distributed generation projects will continue to face hurdles with proportionally high cost of interconnection due to the Cost Causation principle. Simply put, Cost Causation often causes clean energy projects to terminate due directly to high interconnection costs.

II. Utility customers initially fund improvements and are reimbursed over time through a reconciliation method.

Feedback: This model is preferable to Cost Causation. Assuming the utility customers also benefit from the grid improvements, then it can be a model with multiple beneficiaries: The utility customers through improved reliability from grid improvements, the interconnecting customers (DG projects) through timeline improvements and known upgrade costs, and the State of New Hampshire through a more streamlined process for reaching renewable energy goals. As the costs are initially paid for by utility customers, the model would require a cost and benefit analysis by the State of New Hampshire to ensure that customers will absolutely benefit from their investment in the grid improvements. Massachusetts has recently adopted a similar model and we recommend the DOE review the Massachusetts model along with the analysis they conducted in MA DPU docket number 22-47 (the Eversource Marion-Fairhaven CIP).

III. Utility Prorated Cost Sharing: Projects pay for their share of the upgrades.

Feedback: This model is preferable to Cost Causation. It is a fair model as projects are allocated their fair share of upgrade cost based on kW size. A larger project has a greater share of the upgrade cost because their project is using more of the capacity of the upgrade. If a 2 MW and a 1 MW projects are sharing a \$3 million transformer upgrade, then the 2 MW project pays for \$2 million and the 1 MW project pays for \$1 million. Projects under this model would not pay

above their fair share at first and then be reimbursed later (which occurs under Post-Upgrade Allocation).

- IV. Post-Upgrade Allocation: Customer that requires the upgrade pays but can get some reimbursement as other customers connect.

Feedback: This model is preferable to Cost Causation but is not as preferable as Utility Prorated Cost Sharing. This is because Utility Prorated Cost Sharing does not require reimbursement as other customers connect. Post-Upgrade Allocation requires that one project still pays all the upgrade cost up front, and it could then be years before they are reimbursed. Reimbursement can often be challenging and complicated if the ownership of the project has changed.

- V. Defined contributions toward upgrades based on kW of the DER. For example, a residential solar PV customer pays for a pole transformer upgrade.

Feedback: This model is preferable to Cost Causation. It provides more predictability around cost for interconnection and fairly allocates cost based on kW of the DER so that the project is paying for what they use of the upgrade, rather than paying for all the upgrade as it would under Cost Causation.

Interconnection Facilitator or Ombudsperson

- a) *Benefits of an Interconnection Facilitator or Ombudsperson:* Currently, New Hampshire does not have a process for dispute resolution in the interconnection regulations and this means that interconnecting customers have no recourse if the utility is not meeting their obligations around DER interconnection. An Interconnection Facilitator or Ombudsperson can benefit the state's interconnection process by being an independent third party to mediate disagreements around interconnection disputes. An Interconnection Facilitator or Ombudsperson would be effective for New Hampshire as each of the utility and customer would be incentivized to meet their obligations under the interconnection standards with the knowledge that not meeting such obligations could result in a dispute resolution process with the Ombudsperson and potentially damages to that party. We strongly recommend that New Hampshire create an Ombudsperson role and a dispute resolution process so that customers and utilities have an opportunity for working through disputes related to the interconnection process with an independent third party. We recommend New Hampshire review and discuss this process with the Massachusetts PUC

staff and Ombudsperson as their process is well established and may be a useful model for New Hampshire.

New Hampshire Grade from the “Freeing the Grid” report

- a) *Feedback on NH’s score and recommendations:* We agree entirely with New Hampshire’s score of a “D” from the “Freeing the Grid” report and we agree with the recommendations made by the report. Below are some of the key items we would like to highlight from the report that New Hampshire must improve upon to create and implement an effective set of interconnection standards.
- a. Transparency through monthly public queue reporting is necessary and can be accomplished in the short term (i.e., in the next 2-3 months).
 - b. A fee for interconnection applications must be adopted in New Hampshire so that utilities are being compensated for reviewing applications and can invest that money in application and study process improvements.
 - c. Standardized timelines are needed for several items including review of applications, conducting system impact studies, and customers paying for upgrades after an ISA has been signed. This includes that system impact studies must be completed in a set number of business days by the utility, as is done in other state jurisdiction where interconnection is done effectively.
 - d. An interconnection specific process for resolving disputes is paramount to the interconnection process.
 - e. Energy storage will continue to be included in new interconnection applications and a process for reviewing and studying energy storage process must be created in New Hampshire.

Other items

The study and queuing process in New Hampshire must be improved in the short term to clear up the interconnection queue backlog. It is our understanding that currently utilities are not studying one project at each substation, which means that even if a project is in the first queue position on a substation the project may not be studied right away. Rewild brought this up during the most recent Technical Session on July 18, 2023. This current process slows down the development process for interconnecting DER customers to an unreasonable degree. Utilities in all other jurisdictions are at least studying projects quickly enough to perform one System Impact Study per substation. Since studies are often outsourced to external engineers, it is possible for the utilities to change and accelerate this process in such a way that the utility is performing a System Impact Study at each substation where there is a queued DER project. This is also possible to achieve in the short term (i.e., in the next 2-3 months) New Hampshire cannot reach

its clean energy goals if the interconnection process moves with as slow a cadence as it currently does and making this change to the study and queuing process can improve the interconnection process in such a way that more projects are being studied and approved for interconnection to the distribution system.

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,

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

Matt Doubleday
Director of Interconnection
ReWild Renewables, LLC