



March 12, 2024

Kerri Phillips
Hearing Officer
Massachusetts Department of Public Utilities
1 South Station, 3rd Floor
Boston, Massachusetts 02110

Re: Public Comments from the Solar Energy Business Association of New England regarding
Massachusetts Department of Public Utilities Dockets 24-10, 24-11, and 24-12

The Solar Energy Business Association of New England (SEBANE) is pleased to submit the following public comments to the Massachusetts Department of Public Utilities (DPU) regarding open dockets 24-10, 24-11, and 24-12 which concern review of Electric Sector Modernization Plans from our state's three investor-owned transmission and distribution utilities.

SEBANE's mission is to protect and promote the New England solar industry through informed policy intervention, coalition building, and stakeholder education. SEBANE's membership is comprised of companies from across the solar industry, including residential, commercial and community solar companies, along with many of the service providers essential to the success of the solar industry.

We applaud the Healey administration's ambitious climate goals to reduce emissions across the Commonwealth and embrace the governor's stated goal of deploying and interconnecting 10 GW of solar energy by 2030. Such a target is a critical component of the state's overarching decarbonization goals and can serve as a catalyst for the reduction of greenhouse gas emissions. However, the deployment of such distributed energy resources is entirely dependent on cost-effective, predictable, and timely interconnection procedures.

To that end, SEBANE asks the Department to clearly address three critical issues in dockets 24-10, 24-11, and 24-12:

- The establishment of a long-term planning process;
- The need for a cost allocation methodology; and
- The importance of continued distributed generation interconnection while long-term strategies are ultimately implemented.

The establishment of a long-term planning process is essential to proactively upgrade the current distribution system to enable hosting capacity for distributed generation, like solar, to ultimately serve the state's decarbonization goals. The 2022 legislative mandate from An Act Driving Clean Energy and Offshore Wind required the development of Electric Sector Modernization Plans to "proactively upgrade the distribution, and where applicable, transmission systems." However, recently submitted plans did not include a proposed uniform long-term system planning analysis process for the interconnection of distributed energy resources moving forward. SEBANE believes the establishment of such a process is essential to enable such upgrades to occur in an effective manner, and that such inclusion is required by law. SEBANE asks the DPU to review and direct such action in all three dockets.

Additionally, a long-term planning process must include the evaluation and development of a methodology to establish interconnection cost allocation, which can ensure equitable allocation of infrastructure upgrade costs amongst both distributed generation customers as well as traditional distribution customers. Such upgrades deliver value to all customers—not just those seeking to interconnect, and the DPU must enable a process to develop a framework with substantive criteria to allocate such costs and benefits equitably. Such a process must include stakeholder engagement with distributed energy resource stakeholders.

Finally, while a long-term planning process and a long-term cost allocation methodology are developed, our members must have a clear path to interconnection in the short-term. For that reason, we recommend expanding, extending, and streamlining the Provisional System Planning Program to ensure continued distributed generation interconnection across the Commonwealth while such long-term planning processes and a cost allocation methodology is finalized and implemented. Such work will not only provide regulatory certainty for SEBANE member companies, but—more important—it will enable the Massachusetts solar industry to better assist the Commonwealth in meeting its codified climate goals.

In closing, SEBANE respectfully asks the DPU to consider the perspective of the Massachusetts solar industry and to take action to advance short-term and long-term interconnection policies within dockets 24-10, 24-11, and 24-12. SEBANE thanks the DPU for its review of such critical issues to ensure the state can meet its codified climate goals and solar energy targets. Please do not hesitate to contact SEBANE with any questions; thank you.

Sincerely,

/s/ Nick d'Arbeloff

Nick d'Arbeloff
President, SEBANE

/s/ Lindsay Bourgoine

Lindsay Bourgoine
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