



STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

CONNECTICUT DISTRIBUTED GENERATION POLICY WORKING GROUP

MEETING AGENDA

Wednesday, December 20, 2022

9:00 AM – 11:00 AM

Location: Microsoft Teams

Introduction

- The meeting began with Zak discussing the tasks delegated to the Working Group in Dockets 22-08-02 and 22-08-05

Cancellation Period

- Zak described the request from PURA for the WG to examine the establishment of a cancellation period for projects that are not progressing
- Carl stated he was opposed to a 15-day automatic cancellation period, particularly in light of ongoing supply chain issues, but is open to a 15-day notice with opportunity to cure after a long period of inactivity
- For Eversource territory, stalled projects are typically not missing documentation, except for municipal inspections; projects will stay in status of contingent approval
- Stalled projects are generally not disruptive until there is a duplicate project
 - The number of duplicate projects has been increasing
 - Duplicate projects pose a challenge because payments are linked to customer account number and a payment could be credited to the wrong project
 - Duplicate projects require the EDCs to reach out to the customer to determine which project they intend to pursue
- Zak solicited feedback from residential developers on the cancellation period and duplicate applications but none were on the call
- In Massachusetts Eversource does not allow duplicate applications, once one is entered it must be withdrawn before a subsequent application can be submitted
- Joe Marranca stated that UI has a similar process regarding duplicate applications; prior to adopting PowerClerk, UI would assume that the second application (signed at later date) was the active one
- Zak brought up an email he had received from Neil McCarthy describing the Green Bank's auto-cancel policy for applications that are not progressing
- Joe M. stated that he was in favor of some element of auto-cancellation
 - First step could be an auto-notification with a request to respond
 - Also need to consider the affect of dormant projects on projects behind them – could cause other projects to fail screens
- Ed discussed how during RSIP, the Green Bank had a policy to check in on projects, and later developed an auto-cancellation policy but it was hard to have blanket rules when circumstances are unique

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- Ed asked what makes a project “not progressed?” He stated that the most difficult projects are those that are installed but it can’t get permitted, often because of delays in inspections or unpermitted prior work at the premises.
- The Green Bank had different constraints and priorities than the EDCs may have because of upfront payments in the RSIP program
- Ed stated that reminders and the threat of cancellation were typically enough to move along stale applications. Originally gave 270 for an approved project to come online and allowed an extension request through PowerClerk. The timeline then could be extended to one year or 15 months
- Projects that hadn’t met the timeframes were usually installed but not online after receiving a cancellation warning. Often awaiting a permit or HES audit
- The original 9 month period began once a project was approved
- Keith Radonis stated that in Maine, a project with three consecutive months of no communication between the installer and owner, would lead to the EDC canceling the project. Applicant would have a 10-day period to cure.
- Noel stated that the issue is tricky because developers don’t want to be held up by stale projects but can often be delayed by forces outside of their control, such as state program changes, agency approvals, etc.
- Keith expressed concern with allowing projects to extend by paying additional fees because it could favor developers with deeper pockets. The EDCs prefer having clear rules and timeframes
- Robert Fontana explained that the crux of the issue is that extensions are non-specific and not black-and-white. Ultimately, it’s a judgment call of the EDC. Those in the queue would benefit from having more information on other projects and when they are given extensions as the developers also need to make a judgment call. He understands that there are potential confidentiality issues.
- Keith stated that he would prefer to have some ultimate time bound limit on the process. Would prefer that PURA gives waivers for certain circumstances
- Joe Debs stated that we need to differentiate between study delays and interconnection delays. Studies need to be executed within 10 days of notice.
- David Ferrante agreed that the guidelines needed to be updated to fill in any gaps on the distinction between study phase and interconnection phase
- Joe M. stated that the guidelines need to leave EDC flexibility to push projects causing queue delays, requiring upgrades, or impacting others

22-08-05 Discussion

- David Ferrante stated that the working group is the best place to address concerns with the interconnection process
 - The EDCs will study DERs as they operate; if the developer wants to be able to discharge at any time, it will be studied that way.
 - It’s unclear to him what needs to change in the guidelines.
- Joe Marranta agreed with David, stating that the EDCs already request information on the intended operation of the battery, which will dictate the type of analysis that is done. Often times the initial application will change significantly as the actual use case is determined.

- Joe Debs mentioned that a larger generator could create flicker without controlled operation
- Carl stated that Eversource has changed the question in PowerClerk to be clear that they are looking for the applicant to identify how much energy is going to be exported by a battery storage system
- The Working Group then discussed the need for FtM storage developers to be active participants in these discussions. Members were going to reach out to other developers to try and get them to join.