

Chair James: As requested, below are the notes I used in presenting the PUC position on the single plant definition before the committee earlier today.

We are open to address the single-plant definition, but would like an opportunity to propose a definition next session.

- The current definition is flagging several process concerns. It appears that this language asks us to receive two simultaneously filed 5MW facility applications in the same location but treat them as entirely separate, rather than assess their cumulative impacts. The definition of single plant must be harmonized with the Commission's other statutory review obligations.
- There is a rationale for 5 MW as the Tier 2 limit. Anything over 5 MW must participate in the ISO-NE wholesale markets; anything below that acts a reduction in the utility's load and therefore likely has greater value for ratepayers.
- How are municipalities impacted? For example, would a town have to intervene and participate in multiple proceedings?

There is good policy for collocating and avoiding duplicate infrastructure in certain contexts. The Commission would like the opportunity to consider these various policy implications and consult with stakeholders, such as other state agencies and municipalities, before a new definition is moved forward.

Cheers,

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