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# 1. General

## **Q1-1. What is the System of Assurance of Net Metering Eligibility?**

A1-1. The System of Assurance of Net Metering Eligibility was created by the Massachusetts Department of Public Utilities (DPU): (1) to track the aggregate capacity of net metering facilities; and (2) to provide host customers and other stakeholders with an assurance, before beginning construction, that a facility will receive net metering services.

## **Q1-2. What is the Administrator's role?**

A1-2. The Administrator was selected by the Massachusetts utilities to implement and oversee the System of Assurance of Net Metering Eligibility. The Administrator has designed and implemented a web-based application for the System of Assurance, which is now located at [www.MassACA.org](http://www.MassACA.org).

## **Q1-3. Why is the System of Assurance necessary?**

A1-3. The System of Assurance will facilitate renewable energy development in the Commonwealth by reducing uncertainties about the availability of net metering services. Members of the public may visit [www.MassACA.org](http://www.MassACA.org) to review the aggregate capacity of net metering facilities in each Distribution Company's service territory. Further, users of the System of Assurance (e.g., town manager, municipal energy committee members, renewable energy developers) will use [www.MassACA.org](http://www.MassACA.org) to complete and submit Applications for Cap Allocation (ACA). Facilities that meet eligibility requirements and submit complete ACAs will receive a cap allocation from the Administrator. A cap allocation guarantees, *for a limited time*, that a Facility is eligible to receive Net Metering Services, as long as the rules of the System of Assurance are followed.

## **Q1-4. When is participation mandatory?**

A1-4. Participation in the System of Assurance is mandatory unless the Facility qualifies as a Cap Exempt Facility. A Facility is Cap Exempt if it is:

- a. A Nameplate Cap Exempt Facility: A Class I Net Metering Facility that is an eligible Renewable Energy Generating Facility pursuant to M.G.L. c. 164, § 138 and has a nameplate capacity rating equal to or less than 25 kilowatts.
- b. A Cap Exempt Facility Serving On-site Load: A Class I Net Metering Facility with a nameplate capacity greater than 25 kilowatts, Class II Net Metering Facility, or Class III Net Metering Facility with an executed interconnection service agreement with a Distribution Company dated on or after January 1, 2021, provided that it is an eligible Renewable Energy Generating Facility pursuant to M.G.L. c. 164, § 138 and serves On-site Load, and provided further that it is not a Net Metering Facility of a Municipality or Other Governmental Entity.

## **Q1-5. Is there a penalty for not following the System of Assurance requirements?**

A1-5. Unless a system is an exempt facility, if an applicant does not follow the System of Assurance rules and requirements, that facility will not qualify to receive Net Metering Services or a Cap Allocation.

**Q1-6. Will host customers or representatives still apply to the utility directly in addition to this process?**

A1-5. For interconnection matters, yes. The System of Assurance does not change the interconnection process with the electric distribution company. Applicants will need an executed Interconnection Service Agreement (ISA) to apply for an ACA, so the interconnection application process should be complete before applying to the System of Assurance. Plus, applicants will still need to submit Schedule Z to the Distribution Company to allocate net metering credits to any other accounts.

**Q1-7. Are the utilities keeping their "queue" intact for getting to a finalized ISA?**

A1-6. The System of Assurance does not impact the procedure for applications for interconnection with an electric distribution company. Applicants will need, among other details, an executed ISA, countersigned by the Distribution Company, to apply for and receive a Cap Allocation.

**Q1-8. Does the System of Assurance process come before or after the Distribution Company's engineering review?**

A1-7. After. To use the System of Assurance, Applicants must have an executed ISA from the Distribution Company.

**Q1-9. Is an ACA required for projects looking to net meter to municipal electric utilities?**

A1-8. No.

**Q1-10. Where can I see real-time information about remaining net metering capacity?**

A1-9. [www.MassACA.org](http://www.MassACA.org) contains publicly available information about the net metering caps. The tables show unofficial quantities of capacity, which are updated regularly, and – for each utility company – they show: (1) estimated remaining cap space; (2) the amount held in reserve for pending ACAs; and (3) facilities that are currently receiving Net Metering Services.

**Q1-11. Where do I apply for a Cap Allocation?**

A1-10. [www.MassACA.org](http://www.MassACA.org)

**Q1-12. Who are the various Users of MassACA.org?**

A1-11. Definitions for various Users of MassACA.org:

<b>Host Customer Entity (a.k.a. HCE)</b>	<p>This is the Distribution Company's customer of record (i.e. the name of the entity on an electric bill) for the Facility.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>(1) For a solar project planned for a public school in Watertown, MA, the Host Customer Entity is the Town of Watertown.</li> <li>(2) For a residential solar project, the name of the entity on the electric bill is the Host Customer Entity, e.g. John Doe.</li> </ul>
<b>Host Customer Administrator</b>	<p>Host Customer Administrators are individuals in a lead role for the HCE. Host Customer Administrators are authorized to start and revise ACA, add Users, and submit ACAs.</p>

	<p>For example: The Watertown Town Administrator is an example of a potential Host Customer Administrator.</p>
<b>HC Assistant</b>	<p>HC Assistants are individuals acting on behalf of an HCE in supportive role. HC Assistants are able to review and revise ACAs. They <i>cannot</i> add Users, submit ACAs, or view confidential documents (except those that they uploaded).</p> <p>For example: A Watertown department of public works staff member is an example of a potential HC Assistant.</p>
<b>Representatives</b>	<p>Representatives are individuals not associated with any HCE or project when they register with the System of Assurance. They can be invited to help complete existing ACAs by Host Customer Administrators. Representatives cannot add Users to an ACA, submit ACAs, or view confidential documents (except those which they uploaded). Representatives can be associated with multiple ACAs simultaneously.</p> <p>For example: A renewable energy project developer is an example of a potential Representative.</p>
<b>Administrator</b>	<p>The Administrator of the System of Assurance of Net Metering Eligibility reviews ACAs, collects reported information from Distribution Companies and Host Customer Entities, and monitors remaining capacity under the Public and Private Net Metering Caps.</p>
<b>Reviewers</b>	<p>Administrator staff members who review User registrations and submitted ACAs.</p>



**Q1-13. How long will the Administrator keep a Host Customer Entity's documents on file?**

A1-12. Three years.

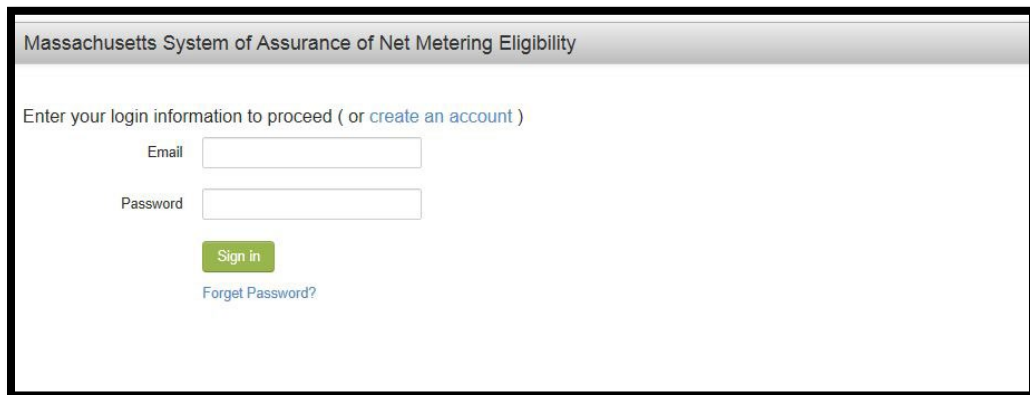
**Q1-14. How does the Administrator keep projects that do not move to execution from taking up room under the Cap(s)?**

A1-13. The bar is high for proposed net metering facilities to enter the System of Assurance. To receive an assurance of net metering eligibility, a Facility must have, at minimum an executed ISA, sufficient evidence of site control, and all necessary governmental permits and approvals (with the exception of ministerial permits, such as a building permit). The timelines built into the System of Assurance will help keep facilities that are not able to become operational from taking up room under the Cap(s).

## 2. User Registration

**Q2-1. How do I register?**

A2-1. From the "Enroll/Sign In" page, click "Create an Account." Users will be prompted to register one of two account types –Host Customer or Representative. Once an accounts type is selected, Users enter their information to the appropriate fields.



The screenshot shows a web interface for the "Massachusetts System of Assurance of Net Metering Eligibility". The page has a header with the title and a sub-header that says "Enter your login information to proceed ( or create an account )". Below this, there are two input fields: "Email" and "Password". A green "Sign in" button is positioned below the password field, and a blue link "Forgot Password?" is located below the "Sign in" button.

Host Customer Administrators need a unique e-mail address to be affiliated with more than one Host Customer Entity. Representatives do not.

Once a User registers with the System of Assurance, the account will be reviewed by the Administrator to ensure that each Host Customer Entity only appears in the System of Assurance once.

**Q2-2. What if I lose/forget the password to my account?**

A2-2. On the User Login page click "Forgot Password." The User will then be prompted to enter the e-mail address associated with the applicable account. Once the User has entered a valid e-mail address, a new temporary password will be sent to the e-mail address.

## Password Recovery

Please enter your email address below and we will send you instructions on how to reset your password.

Email

**Q2-3. I have registered as a Host Customer Administrator. What am I able to do?**

A2-3. Host Customer Administrators can (1) Start new ACAs; (2) Add Users to a Host Customer Entity and/or a specific ACA; (3) Upload and view all confidential documents for the Host Customer Entity's ACA(s); and (4) Submit complete ACA(s) to the Administrator.

**Q2-4. Is there a requirement to be an officer to be a Host Customer Administrator? Where is the cut-off, or is it solely determined by who registers first in an organization?**

A2-4. A Host Customer Administrator should be someone who has the legal authority to submit ACAs on behalf of the Host Customer Entity.

**Q2-5. Does the law automatically grant Town Administrators/Managers the legal authority, or do they need special permission from Board of Selectmen?**

A2-5. We are not experts on local laws. We assume that the town knows who is legally authorized to submit an application on its behalf. The System of Assurance requires someone from the Host Customer Entity to submit an ACA as the Host Customer Administrator to minimize the potential for fraud.

**Q2-6. How do I add new Users if I am a Host Customer Administrator?**

A2-6. From the Account Management page, a Host Customer Administrator can view a table of all Users associated with the Host Customer Entity. Click the "Add New Users" button under the table, and a "New User" window will appear with two fields to be populated. First, select the account type to add (Host Customer Administrator or HC Assistant), and then enter the e-mail address of the User that would like to added.

If the e-mail address of the user has already been registered in the System of Assurance, the fields will automatically populate. If no account is found, a message will be sent to the entered e-mail address, prompting the User to logon to MassACA.org to register.

**Q2-7. Can there be more than one Host Customer Administrator per Host Customer Entity?**

A2-7. Yes.

**Q2-8. Can there be more than one HC Assistant per Host Customer Entity?**

A2-8. Yes.

**Q2-9. If I have been added as an HC Assistant, what can I do?**

A2-9. HC Assistants can revise and review ACAs. HC Assistants cannot start new ACAs, see confidential documents submitted (except those that they uploaded), or submit ACAs to the Administrator.

**Q2-10. Can there be two or more ACAs submitted under a single Host Customer Entity?**

A2-10. Yes. A new ACA is required for each proposed Net Metering Facility.

**Q2-11. Can there be two Host Customer Entities for an ACA?**

A2-11. No.

**Q2-12. Can a Host Customer Administrator represent multiple Host Customer Entities?**

A2-12. Yes, but they need a unique e-mail address to do so.

**Q2-13. Can I register a Host Customer Entity that has already been registered by another User?**

A2-13. No. Each Host Customer Entity can only be registered in the System of Assurance once.

**Q2-14. If a User has already registered the Host Customer Entity that I am trying to register, how can I proceed with applying for a cap allocation?**

A2-14. In such a scenario, Users will have to contact a Host Customer Administrator registered to the Host Customer Entity that the User is trying to register with and request to be added as a Host Customer Administrator. Once added as a Host Customer Administrator, that User will be able to start a new ACA. For assistance, please contact [help@massaca.org](mailto:help@massaca.org) or the MassACA Helpline at 877-357-9030.

**Q2-15. Can multiple host customers assign me as an additional administrative user for their accounts if I only have one email address?**

A2-15. If your e-mail account is registered in the System of Assurance and you want to be affiliated with more than one Host Customer Entity, you should probably register as a Representative. A Representative can make changes to various clients' ACAs without becoming permanently tied to a single Host Customer Entity.

**Q2-16. If the customer of the meter of record and the recipient of net metering credits are different entities, which is the Host Customer?**

A2-16. The customer of record for the proposed net metering facility is the Host Customer.

**Q2-17. If the host customer asks the developer to fill the role of Host Customer Administrator, and the developer creates a unique e-mail address, will the Administrator reject the application?**

A2-17. Yes. We would reject this at the User Registration level.

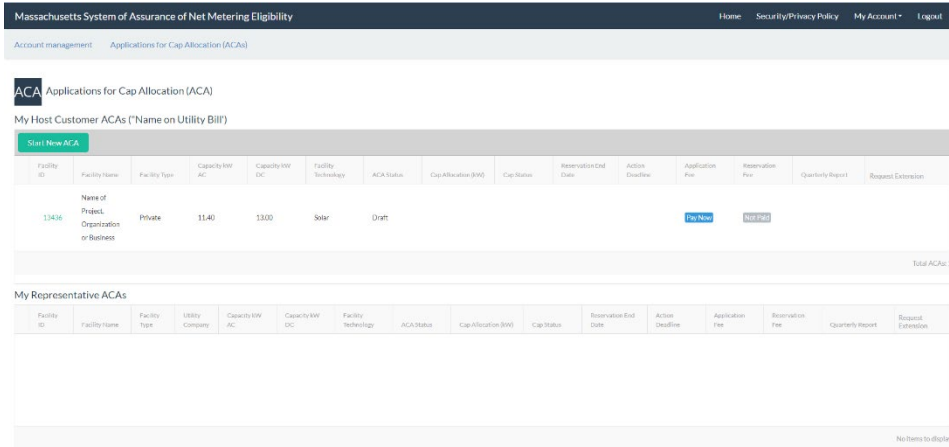
**Q2-18. What if my contact info changes after I have made an account?**

A2-18. Users can update their contact information in the System of Assurance. It is important that contact information provided to [www.MassACA.org](http://www.MassACA.org) is current and accurate.

### **3. Application for Cap Allocation (ACA) Process**

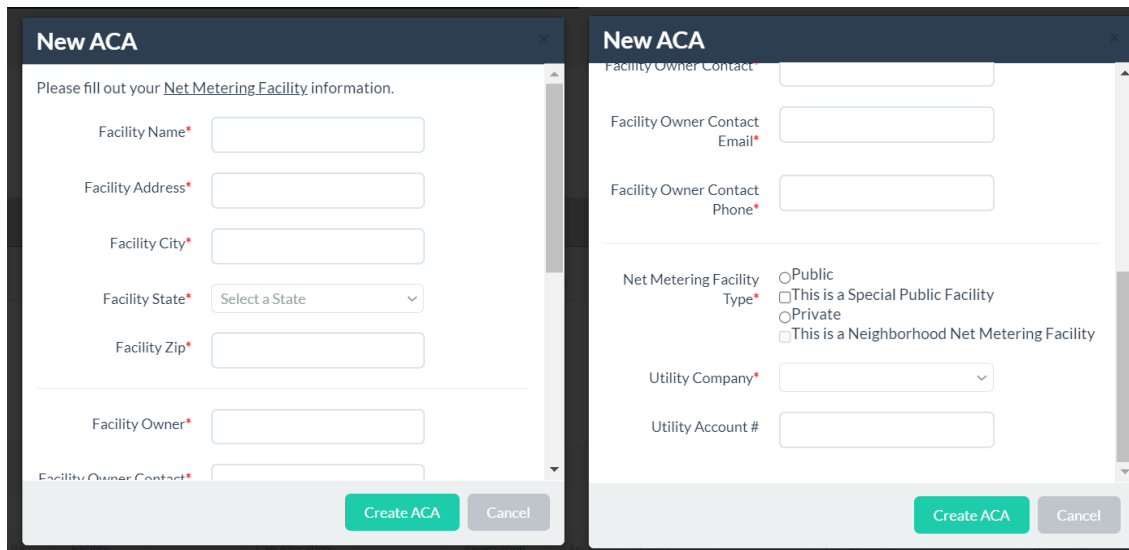
**Q3-1. Where can I start a new project as a Host Customer Administrator?**

- A3-1. Upon logging into the System of Assurance, Users will view a list of ACA(s) in progress and submitted. Host Customer Administrators can begin a new ACA by clicking “Start New ACA.”



**Q3-2. What do I need to start an ACA?**

- A3-2. Required fields to create an ACA are as follows: Facility Name, Facility Address, Facility Owner, Facility Owner Contact Name, Facility Owner Contact Telephone Number, Facility Owner Contact E-mail, Facility Type (e.g., Public Facility), Utility Company. While this information is needed to start an ACA, additional documents are needed to complete an ACA before it can be submitted.



**Q3-3. What is required to *complete* an ACA?**

A3-3. A complete ACA must include, among other details, Certification and supporting documentation to establish that the Host Customer has, with respect to the Facility: (1) an executed ISA; (2) site control; (3) all necessary governmental permits and approvals to construct the Facility with the exception of ministerial permits, such as a building permit; and (4) an application fee of \$100.

**Q3-4. What is expected turnaround time for DPU Public Entity ID applications?**

A3-4. Typically, a couple of days.

**Q3-5. What qualifies as an executed Interconnection Service Agreement?**

A3-5. An executed ISA is one that is countersigned by the Distribution Company in whose territory the proposed Net Metering Facility will be located.

**Q3-6. If you do not have an ISA, but have paid an invoice for the interconnection and have the invoice, can the Facility qualify for the System of Assurance?**

A3-6. No. A complete ACA requires the executed ISA.

**Q3-7. Which elements on the ACA need to match information on the ISA?**

A3-7. The following information from the ACA should match information in the ISA:

- Host Customer is a signatory
- *Note:* If the signatory on the ISA is NOT the Host Customer on the ACA (e.g., a third party agreement), the Administrator may request an Exhibit G signed by the Host Customer Entity of the ACA and the countersigning Distribution Company.
- Capacity kW (AC)
- *For Solar Only:* Capacity kW (DC)
- Technology
- Site Address

**Q3-8. Isn't it correct that the host customer's name is not necessarily on the ISA (it is the name of the owner of the system, not the owner of the meter)? What additional information should be submitted in this case?**

A3-8. That may be true – the names may not match. The information provided in the ACA should match the capacity of the Facility (both AC and DC), the ISA number, the technology, and the location in the ISA. Including Exhibit G would also indicate that there is an agreement between the host customer and the utility.

**Q3-9. New generation for new service is taking a while after the ISA is signed to get an account number assigned to the meter. Is the Utility Acc t# required?**

A3-9. No, a utility account number is requested on the ACA and it can be helpful, but it is not a required field to submit an ACA.

Q3-10. What constitutes On-site Load?

A3-10. On-site Load was defined in 220 CMR 18 as “Any new or existing electric load located at the site of a Net Metering facility, other than parasitic load that may result from the installation and operation of the Net Metering facility, and that is wired to be served by a portion of the electrical energy output from the Net Metering facility before the balance of such output passes through the Net Metering facility’s metered interconnection onto the electric grid.” An energy storage system does not constitute On-site Load.

**Q3-11. How do you define Authorization to Interconnect?**

A3-11. We are working with the utilities to standardize the practice of notification of authorization to interconnect. In the past, we know people have received a variety of notifications (i.e., phone calls, e-mails, letters), and we are working to develop a common and more formal process.

**Q3-12. What is evidence of adequate site control?**

A3-12. Evidence of adequate site control is demonstration of a sufficient interest in the real estate or other contractual right to build the Facility at the location specified in the ISA. An example of this could be a lease or option agreement. In these instances a copy of the lease or option agreement must be uploaded to the ACA. Where the host customer owns the property where the Facility will be located, no further documentation is required at the time of application.

**Q3-13. What is a ministerial permit?**

A3-13. A ministerial permit is a permit that is granted based upon a determination that the request complies with established standards. Such determinations are arrived at objectively, involve little or no discretionary judgment, and are usually issued by a single official or his/her designee. Non-ministerial permits are permits in which one or more officials consider(s) various factors and exercise(s) some discretion in deciding whether to issue (typically with conditions) or deny permits.

Examples of ministerial permits include, but are not limited to building permits and electrical permits.

Examples of non-ministerial permits include, but are not limited to wetlands Order of Conditions, Special Permit, Zoning Variance, Endangered Species, and MEPA Certificate.

**Q3-14. For permitting evidence, is Special Permit sufficient or do you need to file Site Plan?**

A3-14. The onus is on the Host Customer to: (1) determine all of the documents/permits/approvals that are necessary for an ACA; and (2) to attach these applicable documents/permits/approvals to an ACA.

**Q3-15. What is the difference between the Public Net Metering Cap and Private Net Metering Cap?**

A3-15. The Public Cap is the limit on Net Metering Capacity reserved for Public Facilities which qualify as Class I, Class II or Class III Net Metering facilities pursuant to G.L. c. 164 § 139(f). The Private Cap is the limit on Net Metering capacity of Facilities not covered by the Public Cap, pursuant to G.L. c. 164 § 139(f).

**Q3-16. How is a Public Facility defined?**



A3-16. A Public Facility means a Class I, II, or III Net Metering Facility (1) that is owned or operated by a municipality or other governmental entity; or (2) of which the municipality or other governmental entity (a) is assigned 100 percent of the output; (b) is the Host Customer; and (c) if allocating Net Metering credits, allocates only to municipalities and other governmental entities.

**Q3-17. What is a Special Public Facility?**

A3-17. A Special Public Facility means a Public Facility for which: (1) the municipality or other governmental entity owns and operates the Facility; and (2) the Facility is located on property that is owned or leased by the municipality or governmental entity.

A Special Public Facility does not need to have all required governmental permits and approvals before submitting an ACA. However, a Special Public Facility must submit all governmental permits and approvals within nine (9) months of being granted a Cap Allocation.

**Q3-18. Is there a limit to the amount of Net Metering capacity per Host Customer?**

A3-18. Yes. Municipalities or other governmental entities are limited to 10 megawatts (AC) of aggregate Net Metering capacity.

**Q3-19. Since public entities are limited to an overall net metering capacity, are public entities required to disclose a list of their previously interconnected systems?**

A3-19. Massachusetts DPU expects to provide guidance on this in the future.

**Q3-20. The Public Entity page referred to whether or not the Unit exceeds 2,000 kW (AC). Please discuss why this is being asked and how this impacts the ACA.**

A3-20. Public Facilities are not limited to 2,000 kW (AC); however, each individual Unit of a Public Facility cannot exceed 2,000 kW (AC).

A Unit is a part or component of a Net Metering Facility. For a Wind Net Metering Facility, a unit is a wind turbine. For agricultural facilities, a unit is a single piece of generating equipment (e.g., an engine or a turbine). For solar facilities, a unit is an inverter, provided that a solar project proponent may self-designate whether a project is a Class II or Class III Net Metering Facility when the project includes the minimum number of inverters required to qualify.

Questions regarding net metering rules, including the definitions of Unit and Facility, may be directed to the Massachusetts DPU via [dpu.netmetering@mass.gov](mailto:dpu.netmetering@mass.gov) or [Submit a renewable energy complaint or question to the DPU's Distributed Generation Group | Mass.gov](#).

**Q3-21. Can I assume that the ACA data must exactly match the information on the related ISA?**

A3-21. Information provided in the ACA needs to link back to the information in the executed ISA. The Administrators understand that there may be slight differences in some information, such as the address, and Reviewers may contact Users asking for clarifying information.

**Q3-22. The ACA asks for a utility account number. Consider the scenario: A Host Customer is developing a 5 MW system with three meters (two 2 MW and one 1 MW) and they received three account numbers. Do they need to submit three ACAs for this project because they have three utility accounts?**

A3-22. It is not required, but the ACA provides a field where account numbers can be recorded. This helps the Administrator align utility information and System of Assurance information.

We also understand that a utility account number will not be available for some ACAs. In such a scenario, an account number does not need to be provided right away.

**Q3-23. Are Users able to save ACAs that are in-progress?**

A3-23. Yes.

**Q3-24. How are documents uploaded?**

A3-24. Documents should be uploaded in PDF format. Uploaded files cannot exceed 10 MB. Confidential documents should be flagged as such in the Upload Document window.

**Q3-25. Is there a limit on the size of files I can upload?**

A3-25. Yes, files must be smaller than 10 MB to be uploaded to an ACA. For assistance, please contact [help@massaca.org](mailto:help@massaca.org) or the MassACA Helpline at 877-357-9030.

**Q3-26. Who can view confidential documents?**

A3-26. Confidential documents may be seen by the following Users: (1) the User who uploaded the confidential document (e.g., HC Assistant, Representative); (2) all Host Customer Administrators associated with the Host Customer Entity; and (3) the Administrator.

**Q3-27. Can documents that have been uploaded be updated or deleted?**

A3-27. Yes. If a User posts a document needs to update or delete it, the User may navigate to the “Project Documents” page, delete the existing document, and upload a new document.

**Q3-28. I have two built projects that have just been approved the utility (countersigned interconnection agreement). Do I need to register these projects?**

A3-28. Building a project before receiving an executed ISA is very uncommon. It is possible that these projects do not need a Cap Allocation. Project-specific questions can be directed to [help@MassACA.org](mailto:help@MassACA.org), the MassACA Helpline at (877) 357-9030, or Laura Bickel or Nathan Phelps at the Massachusetts DPU.

## 4. Representatives

### Q4-1. Can a renewable energy developer, installer, or other party not affiliated with the Host Customer Entity assist with an ACA?

A4-1. Yes. Host Customer Administrators can invite unaffiliated Users to join an existing ACA as Representatives. (Representatives may include, for example, renewable energy developers, installers, or consultants.) These Users may also register with the System of Assurance independently of any Host Customer Entity but they may not join an existing ACA until they are invited by a registered Host Customer Administrator.

The screenshot shows a web application interface for the Massachusetts System of Assurance of Net Metering Eligibility. The page title is "ACA - Stephenson Middle School" and the section is "Project Representatives". The interface includes a navigation menu on the left with options like "Facility Information", "Public Requirements", "Representatives", "Technology", "ISA", "Permitting", "Project Documents", and "Fees". The main content area displays the "Designated Representatives" section, which includes a table with columns for Name, Organization, Email, and Phone. The table lists two representatives: "GM HC GM" with email "gm@gm.com" and phone "8609220071", and "Thomas Tim" with email "malto7@gmail.com". The page also features a pagination control showing "10 items per page" and "1 - 2 of 2 items".

Name	Organization	Email	Phone
GM HC GM		gm@gm.com	8609220071
Thomas Tim		malto7@gmail.com	

## Q4-2. How do I add a Representative to an ACA?

A4-2. To add a Representative to an existing ACA, a Host Customer Administrator can navigate to the “Representatives” page, where there is an “Add New Representative” button. A window will pop up seeking an e-mail address for the new Representative. Once the e-mail address has been entered, if an account is found within the System of Assurance, the fields will populate. A message will be sent to the e-mail address inviting the Representative to join an ACA. If these fields do not populate, the Representative is not yet registered within the System of Assurance. Enter their e-mail address to send them a provisional account.

The screenshot displays the 'Massachusetts System of Assurance of Net Metering Eligibility' web application. A modal window titled 'New Project Representative' is open, featuring the following elements:

- Email\*** input field containing 'BPitt@WarnerBros.com'.
- Check if account exists** button.
- Feedback text: 'User does not exist.'
- First Name** and **Last Name** input fields.
- Save** and **Cancel** buttons at the bottom.

The background interface includes a navigation menu on the left with items like 'Facility Information', 'Public Requirements', 'Representatives', 'Technology', 'ISA', 'Permitting', 'Project Documents', and 'Fees'. A table on the right shows a list of representatives with columns for 'Email' and 'Phone', containing entries like 'gm@gm.com' and 'malto7@gmail.com'.

**Q4-3. What abilities does a Representative have?**

A4-3. Representatives may revise and review existing ACAs. They may not start ACAs, review confidential documents associated with an ACA (unless they uploaded those documents), or submit an ACA.

**Q4-4. How can a consultant obtain the legal authority to submit ACAs on a Host Customer's behalf?**

A4-4. If a consultant does not have the legal authority for a Host Customer, the consultant should register as a Representative and ask to be invited to join the Host Customer's existing ACA. A Host Customer Administrator for the Host Customer will need to submit the ACA.

**Q4-5. Must every ACA have a Representative?**

A4-5. No. While this feature allows Host Customer Administrators and HC Assistants to obtain support with their ACAs within the System of Assurance, it is not required.

**Q4-6. Can a Representative join more than one ACA?**

A4-6. Yes.

**Q4-7. Can Representatives be associated with multiple Host Customer Entities?**

A4-7. Yes. A Representative may be associated with the ACAs of many different Host Customer Entities.

**Q4-8. Can a developer have multiple User IDs? And if so, will they be able to see all the projects or only the projects associated with a person's individual User ID?**

A4-8. A Representative does not need to create multiple IDs to see multiple, independent projects that he or she is associated with. A Representative should be able to view all of the ACAs that they are affiliated with, even for different Host Customer Entities, on his or her homepage. If a developer, for example, registers multiple User IDs in the System of Assurance by using multiple e-mail addresses, the System of Assurance will not recognize these User IDs as being related on a single "Applications for Cap Allocations" page. (To compare, a single e-mail program like Yahoo! or Gmail typically cannot show you mailboxes for multiple usernames at the same time, and the System of Assurance does not consolidate projects for multiple user IDs on a single screen.)

**Q4-9. So even if I am registered as a project developer (representative in your system) that is not tied to any one customer, I would still need each individual host customer to register in the MassACA system and sponsor my account as an approved representative?**

A4-9. Yes, a Project Representative must be invited by the Host Customer Entity (via a Host Customer Administrator) to work on any individual ACA. To clarify, a Host Customer Entity must give a Representative access to each of ACA, one at a time. Inviting a Representative to participate on one ACA does not automatically give the Representative access to all ACAs associated with that Host Customer Entity. The Host Customer Entity could have projects with different Representatives.

**Q4-10. Is there some sort of "Master Account" for a developer to have insight to all of its projects and statuses?**

A4-10. Anyone who is registered as a Representative will have a “Projects” homepage where they will be able to view all of the projects they are affiliated with (under a specific, registered e-mail address) and the status of all of those projects. From there the Representative can view the progress and assist with any ACAs that are working on.

## 5. Submitting an Application for Cap Allocation (ACA)

**Q5-1. Are there fees associated with participation in the System of Assurance?**

A5-1. Yes. A \$100 Application Fee must be submitted and received before a host customer can submit an ACA and receive a Submitted Date. Once an ACA is deemed complete and is notified that there is sufficient capacity remaining under the applicable Cap, an applicant must submit a Reservation Fee of \$3.15 per kilowatt for the amount of capacity (AC) that is requested. The Reservation Fee must be paid within 15 Business Days of receiving a Cap Allocation. Failure to do so will result in the loss of a Cap Allocation.

**Q5-2. How do I pay fees associated with my ACA?**

A5-2. Electronic payments can be made on the Fees page. Note: The Application Fee must be submitted and received before an application will receive a Submitted Date. For assistance with or questions about electronic payments, please contact: [help@massaca.org](mailto:help@massaca.org) or the MassACA Helpline at 877-357-9030.

**Q5-3. When does a User pay the Application Fee?**

A5-3. Users are able to pay the Application Fee at any time while filling out the ACA. Users cannot submit an ACA until the Application Fee has been submitted and received.

**Q5-4. What is the lead time between submitting an ACA and receiving a Cap Allocation?**

A5-4. The Administrator has 15 Business Days to make a determination on an ACA. Once the Administrator has made a determination (of complete), the Host Customer then has 15 Business Days to submit their Reservation Fee.

**Q5-5. How are ACAs prioritized in the Net Metering Queue?**

A5-5. ACAs are prioritized based on the Submission Timestamp (i.e., the date and time a Host Customer Administrator clicks Submit). ***The Submitted Date does not depend upon the duration of the Administrator's review.***

For example, assume that on a given day, an ACA is submitted for Facility A at 1 PM, and an ACA is submitted for Facility B at 2 PM. If Reviewers take 10 days to review the ACA for Facility A, but only five days to review the ACA for Facility B, Facility A is nonetheless prioritized over Facility B ***as long as*** the Reservation Fee for Facility A is submitted within 15 business days of the Reviewers' determination that the ACA for Facility A is complete.

**Q5-6. Once my ACA is submitted, when will I be notified whether it is *complete* or *incomplete*?**

A5-6. The Administrator will review the ACA and make a decision within 15 Business Days of an ACA's date of submission. Users associated with the ACA will be notified of the decision via e-mail, and a status update will appear on their "Projects" homepage.

**Q5-7. If my ACA was deemed complete, am I done?**

A5-7. Once an ACA is deemed complete by the Administrator, the Host Customer Entity has 15 Business Days to submit a Reservation Fee of \$3.15 per kW. Once the Administrator decides that an ACA is complete, Users will be notified via e-mail and directed to submit the Reservation Fee.



**Q5-8. If an ACA comes is deemed incomplete, can the Host Customer Administrator just resubmit the necessary documents or do they have to repay and restart?**

A5-8. When the ACA is deemed incomplete, the status of the ACA is changed to “Incomplete,” and the ACA is saved as a read-only file. The applicant may copy the information from the incomplete ACA into a new ACA; however, documents will need to be uploaded again to the new ACA. Users can fix deficiencies and submit the new ACA. This process will require a new Application Fee and receive a new Submitted Date.

**Q5-9. What is the binding legal authority of the "cap allocation" once received (i.e., Investor Confidence)?**

A5-9. Massachusetts law requires the electric Distribution Companies to provide Net Metering Services up to a defined cap and it also requires the development of this System of Assurance of Net Metering Eligibility. Background information on the terms for the System of Assurance and net metering generally can be found in various Orders issued by the Massachusetts DPU. There are no pending court appeals.

**Q5-10. Is the Reservation Fee based off DC or AC capacity of the system?**

A5-10. AC

**Q5-11. Are wire transfers allowed for payment?**

A5-11. There is software set up to accept wire payments. Instructions have been sent via email to applicants. For additional assistance with or questions about electronic payment, please contact the Administrator at [help@massaca.org](mailto:help@massaca.org) or the MassACA Helpline at 877-357-9030.

**Q5-12. What is the Initial Reservation Period? How long is it?**

A5-12. The Initial Reservation Period is the period for which a Host Customer is entitled to an assurance of Net Metering Services (if the rules of the System of Assurance are followed) prior to a Facility’s receipt of notice of authorization to interconnect. The Initial Reservation Period begins when the Administrator notifies the Host Customer Administrator of a Cap Allocation that, together with any prior Cap Allocation, is equal to the requested capacity. The Initial Reservation Period is 18 Months for Wind and Agricultural Net Metering Facilities, and nine Months for Solar Net Metering Facilities and all other Net Metering Facilities.

**Q5-13. Will utilities be notified when a host customer receives approval for an ACA within their territory?**

A5-13. Yes, the utilities will be notified.

**Q5-14. I have uploaded an ISA, but when I try to submit my ACA I receive a validation error indicating that I do not have an ISA uploaded. What is the problem?**

A5-14. It is likely that the question “Has an executed Interconnection Service Agreement been received for this Facility?” either has answered “No” to this question, or has not been answered at all. Answering “Yes” to this question is part of the validation process for the System of Assurance and an ACA cannot be submitted unless this question is answered in the affirmative.

## 6. The Waiting List (Queue)

### Q6-1. What happens to my ACA if either Cap is reached?

A6-1. If a User submits their ACA after the applicable Cap has been reached, the ACA will be moved to the Waiting List. Priority on the Waiting List is established based on the Submitted Date of the ACA.

For example, assume that, on a given day, an ACA for Facility A is submitted at 1 PM and an ACA for Facility B is submitted at 3 PM. Both projects are Private Facilities, and the Private Cap has just been reached. Facility A is prioritized over Facility B on the Waiting List because of the earlier Submitted Date, **regardless of the duration of the Administrator's review**. When capacity under the Cap becomes available, Facility A will be offered the available capacity first.

### Q6-2. How does the Waiting List work?

A6-2. As new space under the Cap becomes available, it will be offered to Host Customer Entities on the applicable Waiting List based on their Submitted Dates. If the amount available is equal to or more than the amount requested by the Host Customer Entity with the highest-ranked position (e.g., the first position) on the Waiting List, the Host Customer Entity may accept the offer. The Host Customer Entity must then submit any applicable fees within the appropriate timeframe.

If the amount of Net Metering capacity offered to the Host Customer Entity is less than the amount requested, the Host Customer Entity may: (1) accept the offer of the reduced Cap Allocation and submit any fees required; (2) accept the offer, submit any fee required, hold the Cap Allocation, and remain on the Waiting List for additional capacity to become available; or (3) decline the offer and remain on the Waiting List, while the Net Metering capacity is offered to the next-highest-ranked Host Customer Entity on the Waiting List. Reservation Periods do not begin until a HC has accepted a partial Cap Allocation and left the Waiting List, or received 100 percent of the Cap Allocation requested.

## 7. Extensions for ACAs

**Q7-1. If I have a Cap Allocation or position on the Waiting List, is it possible for me to lose it?**

A7-1. If a Host Customer Entity fails to meet any deadlines associated with the ACA (i.e., failing to submit the Reservation Fee) it will result in the loss of a Cap Allocation or position on the Waiting List. In addition, if the Administrator or the DPU determines that a Host Customer Entity has made any false assertions in fulfilling the requirements of the System of Assurance, the Administrator or DPU may revoke the Host Customer Entity's Cap Allocation or position on the Waiting List.

**Q7-2. Is there a general extension of the Initial Reservation Period?**

A7-2. Yes. No later than 30 days before the end of the Initial Reservation Period, a Host Customer Entity may request an extension of the Reservation Period for an additional fee of \$3.15 per kW. The Extended Reservation Period will be an additional six months, beginning on the day the initial Reservation Period expires. This fee will be held in escrow by the Administrator and will be refunded to the Host Customer Entity provided that the Facility receives authorization to interconnect within the six month extension period. The Administrator will respond to requests for extensions within 15 Business Days.

**Q7-3. Does a Host Customer lose its place in the queue and get moved to the back if they file for an extension or do they keep your place in the queue?**

A7-3. An ACA keeps its Submitted Timestamp. Please consult Massachusetts DPU Order 11-11-A, Appendix A (October 25, 2012) for more information on extensions.

**Q7-4. If the utility delays their construction of their interconnection beyond the 9 months allocation, do I need to do an extension for the cap allocation or is that an automatic extension once it is delayed on the utility side?**

A7-4. There is a relevant extension outlined in Order D.P.U. 11-11-A, Appendix A (October 25, 2012).

## **8. Quarterly Reporting and Making Changes to an ACA**

**Q8-1. Can changes be made to an ACA once it is submitted?**

A8-1. There are Permissible Changes that can be made to an ACA. These changes will not invalidate an ACA, or lead to the loss of a Cap Allocation or position on the Waiting List, as long as they do not affect a Facility's status or position within the Public or Private Cap and they do not require a new ISA. These Permissible Changes include:

- (i) A change of Host Customer and related contact information. Both the Host Customer Entity with the Cap Allocation and the new Host Customer (i.e. the future Host Customer Entity) must notify the Administrator of such a change and revise the ACA.
- (ii) A change to the Facility ownership and related contact info. The Host Customer Entity must notify the Administrator of such a change and revise the ACA
- (iii) A change in a Host Customer Entity's equipment (e.g. manufacturer, brand, etc.) that does not require a new ISA, as determined by the utility.

- (iv) A reduction in the amount of Net Metering Capacity requested. Based on notice of a reduced request, the Administrator will revise the amount of aggregate capacity available to other applicants.
- (v) An increase in the amount of capacity included in an ACA or Cap Allocation as long as there is available capacity under the applicable cap and no other Host Customer Entity is on the Waiting List. A Host Customer Entity requests for an increased Cap Allocation must submit the same Certification required for the original ACA with respect to the additional capacity.

**Q8-2. Are there changes that are prohibited?**

A8-2. The following changes will invalidate an ACA, and lead to a loss of a Cap Allocation or place on the Waiting List:

A8-3. Changes to a Facility that require a Cap Allocation under a different cap (i.e., Public to Private or vice-versa).

A8-4. Changes to the type of technology (e.g., Solar to Wind)

A8-5. Relocation of the Facility to non-contiguous property.

**Q8-3. How do I make changes to a submitted ACA?**

A8-6. Only permissible changes can be made to an ACA after it has been submitted. A detailed description of the change may be submitted via e-mail to: [administrator@massaca.org](mailto:administrator@massaca.org). For assistance, contact the Administrator at [help@massaca.org](mailto:help@massaca.org) or the MassaACA Helpline at 877-357-9030.

## 9. Dispute Resolution

**Q9-1. If a Host Customer Administrator disagrees with the ruling of the Administrator, what is the appropriate course of action?**

A9-1. An applicant who is aggrieved by the Administrator's decision on its ACA may submit a request to the Administrator within 15 Business Days of the determination to resolve the dispute. The Administrator will respond to the request within 15 Business Days. The Administrator and Host Customer Entity will make a good faith attempt to resolve the dispute informally.

If the dispute is not resolved within 30 Business Days of a request to resolve the dispute, a Host Customer Entity may initiate arbitration. The Administrator will retain a neutral and independent arbitrator. A Host Customer Entity will initiate Arbitration by submitting a written request to the arbitrator, with a summary of the dispute. Unless otherwise agreed, the arbitrator will make a decision within 60 days of the initiation of arbitration.

**Q9-2. Who bears the costs of Arbitration?**

A9-2. The Host Customer Entity

**Q9-3. How do I notify the Administrator of changes to a project that has received a Cap Allocation?**

A9-3. Host Customer Entities must report all project changes to the Administrator and the Utility in a timely manner. A detailed description of the change may be submitted via e-mail to: [administrator@massaca.org](mailto:administrator@massaca.org).

## Transitional Period

**Q9-4. If an ACA is submitted but comes on line during the Transition Period, what happens?**

A10-1. Applicants may submit either an Application for Cap Allocation (ACA) or an application to obtain a cap allocation under the System of Assurance Transitional Period provision. The Administrator will accept Transitional Period applications from January 24, 2013 at 12:00 PM until February 7, 2013 at 12:00 PM. Applications to obtain a cap allocation under the Transition Period provision are available at [www.MassACA.org](http://www.MassACA.org). Simultaneous filings are not permitted. That is, it is up to the applicant to decide whether they want to apply for a cap allocation under the Transitional Period provision or through the ACA process.

The Administrator will set aside sufficient space under the Cap(s) to accommodate for all facilities for which the Administrator has received applications under the Transition Period provision. If a Host Customer has submitted an ACA during the Transitional Period, and it is deemed complete, and there is space under the Cap, then the Cap Allocation will be granted (following the ACA process).

**Q9-5. What happens if a Host Customer submits an application under the Transitional Period provision and expects the Facility to interconnect within 90 days of the Effective Date, but the Facility does not get interconnection authorization by then?**

A10-2. Host Customers can withdraw their application under the Transitional Period provision, and resubmit following the ACA process.

**Q9-6. If a Transitional Period application was submitted, what would happen in the instance where all you are waiting for is the Distribution Company to finish their upgrades and you miss the April 24, 2013, deadline (i.e., exceed 90 days from the Effective Date)?**

A10-3. There are no extensions for the Transitional Period deadline. The Facility would not be granted a cap allocation under the Transitional Period provision. The Host Customer would then have to submit an application through the standard ACA process.

**Q9-7. What is the benefit of filing under the Transitional Period provision if the Host Customer is then subjected to the 90 day window?**

A10-4. The advantage is that a project does not have to pay the fees associated with the ACA process (i.e., Application Fee and Reservation Fee).

**Q9-8. A Host Customer has a project that will not be ready to interconnect by April 24, 2013 (i.e., 90 days from the Effective Date). Do they have to wait until after the end of the application phase of the Transitional Period (February 7, 2013 at 12:00 PM) to submit their ACA?**

A10-5. No, ACAs can be submitted on January 24, 2013 at 12:00 PM, as soon as the System of Assurance goes live. No determinations (i.e., complete, incomplete) will be announced on submitted ACAs until February 7, 2013 after 12:00 PM, when the application phase of the Transitional Period provision has closed. Prioritization of ACAs determined to be complete will be based on their Submitted Date (i.e., time and date of ACA submission).

**Q9-9. Does the "extended Reservation Period Pending Authorization to interconnect" apply to Transition Period projects?**

A10-6. No.