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March 23, 2007

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2d Floor
Boston, MA 02110

**RE: DTE 02-38-D: Investigation by the Department into Distributed Generation
Comments on Compliance Filings**

Dear Secretary Cottrell:

Upon review of recent compliance filings by various Distribution Companies in the above proceeding, the Massachusetts Division of Energy Resources ("DOER") has identified a number of typographical errors and inconsistencies which should be noted on the record. DOER is filing this letter with the Department to provide details of those typographical errors along with inconsistencies between the NStar filing and the Model Tariff. Inconsistencies by other Distribution Companies have already been corrected by subsequent filings.

Model Interconnection Tariff Errors

DOER discovered some typographical errors in the revised Model Interconnection Tariff filed by the DG Collaborative as part of the *Massachusetts DG Collaborative 2006 Report* filed on June 30, 2006. Because the Distribution Companies were using this document as a basis for their individual compliance filings, some minor errors have inadvertently lead to inconsistent treatment in the filed compliance tariffs.

The following errors are in the Model Interconnection Tariff:

- 1) Table 1 – Time Frames, second row of the first column, the phrase reads “Listed Small Inverter” when it should read “Listed Small Inverter \leq 10kW.”
- 2) Table 1 – Time Frames, the symbol “ \leq ” is missing from the second row of the last column.
- 3) Table 2 – Fee Schedules, in the second row of the last column, under Simplified Spot network, the cell reads “10 kW” when it should read “Listed Inverter \leq 15 kW.”
- 4) The model tariff does not have the “ \leq ” symbols in it under Exhibit A, but the language throughout the model tariff speaks to limits of “__ kW or less.”

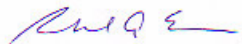
Corresponding Issues in Distribution Company Compliance Filings

The following inconsistencies were found in the NStar Compliance Filings:

- 1) Table 1 – Time Frames (MDTE No. 162A, at page 21)
Second row, first column
 - reads “Listed Small Inverter < 10 kW”
 - should read “Listed Small Inverter \leq 10 kW”
- 2) Section 11.1(b) (MDTE No. 162A, at page 47)
 - reads “less than or equal to ten (10) kW.”
 - should read “eligible for net metering”¹
- 3) Exhibit F, Section 11.1(b) (MDTE No. 162A, Exhibit F, at page 7)
 - reads “less than or equal to ten (10) kW.”
 - should read “eligible for net metering”

DOER appreciates the opportunity to offer these comments. Please contact the undersigned or Gerry Bingham at DOER with any questions.

Sincerely,



Rachel Graham Evans

cc: Service List

¹ Note that current net metering regulations apply to projects up to 60 kW and provide an exemption from insurance requirements.