



Review of Small Generator Interconnection Agreements and Procedures

AD12-17-000

July 17, 2012

Final Agenda

9:00 – 9:15 a.m. Welcome and Opening Remarks

Introduction

On February 16, 2012, the Solar Energy Industries Association (SEIA) filed a petition (Docket No. RM12-10-000) requesting that the Federal Energy Regulatory Commission (Commission) initiate a rulemaking to revise the *pro forma* Small Generator Interconnection Procedures (SGIP) and Small Generator Interconnection Agreement (SGIA) promulgated in Order No. 2006.¹ This technical conference is convened to discuss possible reforms to the SGIP and the SGIA in light of increased penetration of small generation resources in some areas.² Participants are encouraged to propose and discuss possible regulatory alternatives that address the issues raised by SEIA and are consistent with the Commission's statutory responsibilities.

¹ *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180, *order on reh'g*, Order No. 2006-A, FERC Stats. & Regs. ¶ 31,196 (2005), *order granting clarification*, Order No. 2006-B, FERC Stats. & Regs. ¶ 31,221 (2006).

² The scope of issues to be explored in this conference relate to small generation resources, not just small solar generation resources.

Panel 1**9:15 – 11:30 a.m. Fast Track Interconnection Process**

Under the current *pro forma* SGIP, a proposed generating facility that does not exceed 20 megawatts (MW) may be evaluated for interconnection under the Study Process (Section 3 of the SGIP), the Fast Track Process (Section 2 of the SGIP) or the 10kW Inverter Process (Attachment 5 to the SGIP). The Fast Track Process (for a generating facility no larger than 2 MW) and the 10kW Inverter Process (for an inverter-based generating facility no larger than 10 kW) use technical screens in an attempt to evaluate proposed interconnections more expeditiously. To qualify for the Fast Track Process or the 10 kW Inverter Process, a generating facility must meet 10 technical review screens, including the 15% Screen (Section 2.2.1.2 of the SGIP), which states that “aggregated generation, including the proposed Small Generating Facility, on the circuit shall not exceed 15% of the line section annual peak load...”³

Panelists are encouraged to address:

- Whether the 15% Screen in Section 2.2.1.2 of the *pro forma* SGIP should be revised.
 - For example, should the *pro forma* Fast Track Process be amended to allow interconnection customers proposing to interconnect a small generating facility the right to request the application of supplemental review screens if it fails the 15% Screen? This would allow a small generating facility meeting such supplemental review screens to bypass the Study Process in Section 3 of the *pro forma* SGIP.
 - To the extent the *pro forma* Fast Track Process is amended to include supplemental review screens, what should be included in those screens? For example, the settlement proposing revisions to California Electric Rule 21, the California distribution level interconnection rules and regulations, included supplemental review screens that create thresholds for distributed generation penetration based on minimum load and establish criteria for power quality, voltage, safety and reliability.⁴

³ A line section is defined as that portion of a Transmission Provider’s electric system connected to a customer bounded by automatic sectionalizing devices or the end of the distribution line.

⁴ See the Motion for Approval of Settlement Agreement Revising Distribution Level Interconnection Rules and Regulations filed on March 16, 2012, by parties to the California Public Utilities Commission Rulemaking 11-09-011: <http://docs.cpuc.ca.gov/EFILE/MOTION/162852.PDF>.

- Whether the 2 MW threshold for eligibility in the Fast Track Process should be changed or eliminated.

Panelists

- Virinder Singh, Director of Regulatory and Legislative Affairs, enXco (Solar Energy Industries Association)
- Carl Lenox, Principal Engineer, SunPower Corporation (Solar Energy Industries Association)
- Michael Coddington, Senior Electrical Engineer, National Renewable Energy Laboratory
- Tim Roughan, Director, Energy and Environmental Policy, National Grid (Edison Electric Institute)
- Steve Steffel, Manager, Distributed Energy Resources, Atlantic City Electric
- Jeffrey Triplett, Power System Engineering (National Rural Electric Cooperative Association)
- Jose Carranza, Electric Distribution Planning Manager, San Diego Gas & Electric
- Michael Sheehan, P.E., Keyes, Fox & Wiedman LLP (Interstate Renewable Energy Council)
- Rachel Peterson, Regulatory Analyst, California Public Utilities Commission

11:30a.m. – 1:00 p.m. BREAK

Panel 2

1:00 – 2:30 p.m. Load Data Collection

In its petition, SEIA proposes that transmission providers should be required to collect and provide peak and minimum load data to generation developers because such information would help developers site their projects in areas where they would be eligible for the Fast Track Process. Rather than requiring such data collection and provision on all line sections, the requirement could be triggered once aggregate existing and proposed distributed generation on a line section reaches a certain level. Where actual minimum load data is not available, SEIA proposes that it “can be estimated based on standard load profiles for various customer classes that many utilities maintain and update on an annual basis.”⁵ Panelists are encouraged to address:

⁵ “Updating Interconnection Screens for PV System Integration,” National Renewable Energy Laboratory report NREL/TP-5500-54063 (January 2012), 7-8.

- The extent to which actual line section minimum load data is currently available and the ease or difficulty (including technical and economic considerations) of collecting and providing such data if it is not currently available;
- Concerns associated with providing such data to generation developers and ways to alleviate these concerns;
- Methods of estimating minimum load data, concerns associated with such estimation, and ways to alleviate these concerns; and
- Alternative proposals to provide small generation developers with information to facilitate site selection that streamlines interconnection review.

Panelists

- Bhaskar Ray, Senior Director of Engineering and Design, SunEdison LLC (Solar Energy Industries Association)
- Dan Adamson, Vice President for Regulatory Affairs and Counsel, Solar Energy Industries Association
- Kristen Nicole, Senior Project Engineer, Electric Power Research Institute
- Roger Salas, Senior Engineer, Southern California Edison
- Steve Steffel, Manager, Distributed Energy Resources, Atlantic City Electric
- Tim Roughan, Director, Energy and Environmental Policy, National Grid (Edison Electric Institute)
- Kevin Fox, Attorney, Keyes, Fox & Wiedman LLP (Interstate Renewable Energy Council)

Panel 3

2:45 – 3:45 p.m. Review of Required Upgrades

In its petition, SEIA asserts that the *pro forma* SGIP Study Process could be improved with regard to the process for identifying upgrades required to support interconnection. SEIA proposes that interconnection customers have the opportunity to engage in an expedited independent third-party expert review of upgrade requirements that are perceived as excessive by the interconnection customer. Another possible approach to improving the process could be to revise the SGIP to include provisions similar to those in Section 8.3 of the Large Generator Interconnection Procedures (LGIP). In the LGIP, the interconnection customer is given the opportunity to provide written comments on the draft facilities study report, which includes the proposed upgrades required for interconnection. The transmission provider must include these comments in the final report. Panelists are encouraged to address:

- Would an independent third-party review of upgrade requirements allow small generation developers to have a meaningful opportunity to provide input on upgrade requirements? What are the pros and cons of such an approach?
- Would language similar to that in Section 8.3 of the Large Generator Interconnection Procedures (LGIP) in which interconnection customers may submit written comments on the draft facilities study report allow small generation developers to have a meaningful opportunity to provide input on upgrade requirements? What are the pros and cons of such an approach?
- Alternative ways that the interconnection customer may provide meaningful input on the upgrades required for interconnection.

Panelists

- Jim Torpey, Director, Market Development, SunPower Corporation (Solar Energy Industries Association)
- Rick Gilliam, Research Director, The Vote Solar Initiative
- Dan Adamson, Vice President for Regulatory Affairs and Counsel, Solar Energy Industries Association
- Roger Salas, Senior Engineer, Southern California Edison
- Steve Steffel, Manager, Distributed Energy Resources, Atlantic City Electric
- Steven Herling, Vice President, Planning, PJM

3:45 – 4:00 p.m. Wrap-Up