

# Review of Small Generator Interconnection Agreements and Procedures

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# SunEdison Talking Points

- ❑ SunEdison believes that there is a need to update FERC Order No. 2006 SGIP procedures/requirements due to changed circumstances for solar electric generation interconnections.
  - ❑ *SunEdison strongly supports SEIA petition to update the SGIP rules as they have failed to keep pace with the rapid evolution of the solar industry and become barriers to entrance of wholesale market*
  - ❑ *Current SGIP rules are impediment to renewable projects since they impose unnecessary cost, prolonged delays and uncertainty in solar PV development cycle*
  - ❑ *The “fifteen percent rule” is overly stringent and triggers significant project delays*
  - ❑ *On March 16, 2012, fourteen parties to the Distribution System Interconnection Settlement Process filed a settlement in CPUC Rulemaking as part of recent reform of Rule 21 procedures in California*
  - ❑ *The centerpiece of this Settlement is a significantly reformed CPUC-jurisdictional Rule 21 interconnection tariff that can act as source of ideas for updating SGIP technical standards nationally*
  - ❑ *A national best practice for distributed generation penetration levels is introduced, under which aggregate interconnected generating capacity can be equal to 100% of minimum load on a distribution line section.*
  - ❑ *As part of the Settlement, Supplemental Review screens have also been formalized and clarified regarding the issues being addressed by the Distribution Provider. This is a more robust look at site specific impacts of power flow than the initial 15% Review Screen.*

# SunEdison Talking Points (cont'd)

- ❑ The ability to determine minimum circuit load is integral to a more effective screening protocol
  - ❑ *Although it is not the universal practice of utilities currently to monitor minimum load and the time of occurrence across the majority of their radial circuits, this should not be a barrier to implementation of the solar-specific minimum load screen.*
  - ❑ *SunEdison believes that utilities should be required to collect and provide peak and minimum load data on all circuits where existing plus planned distributed generation additions would represent 15% or more of the circuit peak load to generation developers*
  - ❑ *As an alternative, SunEdison recommends that where actual minimum load data is not available, powerflow software algorithms be extensively used by utilities (and their consultants) so that load data can be estimated with reasonable accuracy based on yearly historical load flow patterns and standard load profiles for various customer classes that many utilities maintain and update on an annual basis in their database*
  
- ❑ Greater transparency to load data should be encouraged
  - ❑ *More widespread access to load data and known system limitations to accommodating additional distributed generation will greatly facilitate the developer's site selection, avoid wasteful investment, streamline interconnection review, and enable "fast track" eligibility.*

# SunEdison Recommendations

- ❑ A swift SGIP rulemaking action by FERC would be highly beneficial.
- ❑ SEIA's proposed supplemental minimum daytime load screen for solar PV should be adopted.
- ❑ Utilities should be required to collect minimum load data, or rely on well established engineering techniques to estimate minimum load, on circuits with significant planned penetration of PV.
- ❑ SunEdison recommends utilities share useful load data with developers by execution of Non-Disclosure Agreements (NDA) to alleviate concerns (associated with providing such data to generation developers) and posting such data in secured websites that developers can easily access upon execution of NDAs with utilities or Regional Reliability Organizations.
- ❑ SunEdison recommends that post-rulemaking, various Working Groups be formed among distribution system stakeholders to promote a collaborative working environment and implement transparent rules that provide a clear, predictable path to interconnection for distributed generation.