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**Draft Comments of
The Pennsylvania Environmental Council
Before
The Pennsylvania Public Utility Commission**

**Regarding
Docket No. L-00050175**

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**Proposed Rulemaking Re Interconnection Standards
for Customer-generators pursuant to Section 5 of the
Alternative Energy Portfolio Standards Act**

73 P.S Section 1648.5

April 25, 2006

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The Pennsylvania Environmental Council (PEC) reviewed the Public Utility Commission (PUC) proposed rulemaking on Alternative Energy Portfolio Standards; Interconnection Standards for Customer-generators published in the February 25, 2006 issue of the Pennsylvania Bulletin. PEC applauds the effort and stakeholder process devoted to the development of the proposed rules and recognizes that they will remove many of the traditional barriers to interconnection but there are several ways to improve them further to encourage the development of clean renewable distributed electric generation across the Commonwealth as intended by Act 213.

PEC appreciates that interconnecting distributed generation presents many concerns including safety and reliability for existing utilities and that the rules should be designed to ensure a safe and reliable environment for all employees yet provide as much ease and simplicity for Customer-generators as possible in order to encourage the development of clean distributed generation.

Other states including Colorado, New Jersey, Nevada and California have adopted interconnection standards that provide lessons and examples for Pennsylvania. Naturally, the New Jersey standards should be considered as a model because of its common border with PA and its status as a member of the PJM grid with EDCs and EGCs that straddle that border. In addition, many of the New Jersey standards were designed, through ease and simplicity, to encourage distributed renewable generation rather than simply allow it. Obviously, it is to the benefit of those EDCs operating in both NJ and PA to adopt similar if not identical interconnection standards as New Jersey.

General Comments:

PEC recommends that EDC approvals for interconnection applications have timelines similar to those adopted in New Jersey. For example, a shorter timeline for a Level 1 review of a solar system interconnection application makes sense. Such a review can typically be completed in 1 hour or less. A one-week review period is reasonable and encouraging. A five-week review period to review and approve the application for interconnection is not.

PEC applauds the PUC for convening the Interconnection Working Group and recommends reconvening the Group to provide further input and recommendations to that will maximize ease and simplicity of the interconnection standards and attend to those circumstances that are unique to PA including those facing the agricultural sector.

As stated above, the PA interconnection standards should mirror the New Jersey standards as much as possible in order to streamline the process for all parties involved.

Specific Comments:

PEC provides several comments listed below that address specific issues that can clarify and simplify the proposed rules and further encourage the installation clean renewable capacity and help meet the goals of Act 213.

1. **Limiting Level 2 review to inverter based equipment:** PEC recommends Level 2 review of non-inverter based equipment under certain circumstances. Automatically requiring Level 3 review for non-inverter based systems can pose a significant barrier to entry for many systems including farm-based methane digesters, or low-impact hydro, technologies that Act 213 is specifically designed to support. Restricting Level 2 review to only inverter based systems is unnecessary and should be deleted from the proposed rule.
2. **Appropriate limit for exposure of distribution protective devices to fault currents.** PEC recommends that the PUC adopt a less restrictive limit than the proposed limit of 85%. PEC cites that the limits adopted under FERC 2006 (87.5%) and MADRI (90%) interconnection rules are less restrictive and more consistent with the intent of Act 213.

PEC expresses concern that the limit of 85% for fault currents established in the proposed rule, in combination with existing system infrastructure and operating practices does not create a de facto barrier, and result in a situation where a significant portion of distribution circuits are not eligible for new distributed generation.

3. **Certificate of Completion.** PEC recommends that applicants for interconnection simply submit signed copies of all required building and electrical code inspections as part of their final documentation package rather than requiring all applicants to submit a proposed certificate of completion. The proposed certificate creates another potential barrier and delay.
4. **Timelines for EDC reviews.** PEC recommends that PA adopt the Level 1, 2, and 3 timelines adopted by New Jersey. The New Jersey timelines will provide a more streamlined and rapid approval process than the PA proposed standards and those recommended by the MADRI process. It is also worth noting that the FERC 2006 timelines are more expedient than the PA proposed standards.

PEC supports the PUC for adopting the reporting requirements regarding interconnection requests and processing times. PEC concurs that emergency situations should allow for more flexible timelines, but it is understood these should be extraordinary and emergency situations.

5. **Screening of new capacity.** PEC recommends that the level of review applied to new interconnection applications be based on the proposed new incremental capacity. The aggregate result of existing distributed generation capacity (whether at the same customer site or others) on a circuit is addressed by each Level of the screening criteria.

6. **kW cap in addition to % limit for network applications.** PEC questions the need for a 50 kW cap in addition to the 5% maximum load limit should be applied to spot and area network applications. This requirement would result in a 50 kW cap being more restrictive in some cases and PEC therefore recommends a percentage only limit.
7. **Cost responsibility for a single point of interconnection.** In the event an EDC requests a single point of interconnection in order to reduce costs, then the costs associated with the single point of interconnection should be paid by the EDC. If the standard requires the Customer-generator to assume this cost, it would be a potential and unnecessary barrier to distributed generation.