

COMMONWEALTH OF PENNSYLVANIA



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April 26, 2006

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INDEPENDENT REGULATORY  
REFERENCE COMMISSION

James J. McNulty  
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Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
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RE: Proposed Rulemaking Re Interconnection  
Standards for Customer-generation pursuant  
to Section 5 of the Alternative Energy  
Portfolio Standards Act, 73 P.S. § 1648.5  
Docket No. L-00050175  
  
Implementation of the Alternative Energy  
Portfolio Standards Act of 2004: Net  
Metering  
Docket No. M-00051865

Dear Secretary McNulty:

Enclosed are an original and fifteen (15) copies of the Office of Consumer Advocate's Comments on Interconnection Regulations, in the above-referenced proceeding.

Copies have been served on the parties of record as indicated on the enclosed Certificate of Service.

Sincerely,  
*Christy M. Appleby*  
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Assistant Consumer Advocate

Enclosures

cc: H. Kirk House, Office of Special Assistants  
Greg Shawley, Bureau of Conservation, Economics and Energy Planning  
Carrie Sheriff, Bureau of Conservation, Economics and Energy Planning  
00088201.DOC

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Proposed Rulemaking Re Interconnection	:	
Standards for Customer-generators pursuant to	:	
Section 5 of the Alternative Energy Portfolio	:	Docket Nos. L-00050175
Standards Act, 73 P.S. § 1648.5	:	
	:	
Implementation of Alternative Energy Portfolio	:	
Standards Act of 2004: Interconnection Standards	:	M-00051865

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Office of Consumer Advocate's  
Comments on Interconnection Regulations

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**I. Introduction**

On November 10, 2005, the Pennsylvania Public Utility Commission (PUC or Commission) issued its proposed rulemaking regarding interconnection standards for customer-generators pursuant to the requirements of Act 213 of 2004 (the Act). The OCA previously provided comments in September 2005 regarding the Commission's proposed draft interconnection regulations. On February 25, 2006, the Commission's proposed rulemaking Order was published in the Pennsylvania Bulletin. The proposed rulemaking addresses issues including: definitions; review procedures; general procedures for interconnection requests; and Levels 1-4 review processes.

The OCA supports the Commission's efforts to develop rules for interconnection standards. The OCA has only a few comments on these proposed regulations. The OCA's comments will address issues regarding the definition of affected system; incremental capacity interconnection requests; lockbox devices; and insurance and indemnification requirements.

## **II. Discussion**

### **A. Definitions: Section 75.22**

The Energy Association of Pennsylvania (EAP) proposed in its September 19, 2005, Comments to the draft interconnection regulations, a definition regarding “affected system.” EAP Comments at 2 and Appendix I at 1. The Commission requested comments in its Order regarding this issue. Proposed Rulemaking Order at 7-8. The OCA submits that the proposed definition is unnecessary.

EAP’s definition proposes:

Affected System—shall mean an Electric Distribution System owned or operated by another EDC that may be affected by the proposed interconnection.

The OCA is not aware of substantial interconnections below the sub-transmission level, i.e., at a level where the impacts identified by the EAP can reasonably be expected to occur. It is important to note that these interconnection rules are for small generators of less than 2 MW. Larger units will be required to interconnect directly under the PJM small generation interconnection rules. As such, regional impacts will be analyzed and generators will be required to comply with PJM rules so that reliability is preserved. Thus, it is not clear that the definition proposed by the EAP is necessary.

### **B. Interconnection Request For an Increase in Capacity**

Section 75.36(2) raises the issue of whether a review of an increase in capacity should be limited to the incremental addition or involve the total rated capacity of the generation equipment for which interconnection is sought.

The Commission’s proposed language in section 75.36(2) states:

When an interconnection request is for an increase in capacity for an existing small generator facility, the

interconnection request shall be evaluated on the basis of the new total electric nameplate capacity of the small generator facility.

Section 75.36(2).

The OCA urges the Commission to follow model outlined in PJM Manual 14A and 14B. PJM Manual 14B provides that the addition of capacity should be reviewed under the standard project review process. Manual 14B states:

Owners of existing generation plants that plan increases in a plant's output capability by more than 1 MW above that specified in the generating plant's ISA [Interconnection Service Agreement] must follow the same procedure as new generation...These projects...will be evaluated under the same study procedure as new generation.<sup>1</sup>

To clarify the intent of the review process for generation additions, PJM states in Manual 14A:

If a generation owner plans to increase the output capability of an existing plan by more than 1 MW above that already specified in a generating plant's ISA, then the additional capability is treated as new generation subject to the procedures discussed in Manual 14B.<sup>2</sup>

The PJM model requires that the *addition* to an existing project be reviewed under the same standards used for new projects not the entire total project as is proposed in the Commission regulations.

Only the new, incremental capability of existing customer generation should be

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<sup>1</sup> PJM Manual 14B, Generation and Transmission Interconnection Planning, Revision 08, Effective Date 01/16/06 at 23. See, <http://www.pjm.com/contributions/pjm-manuals/pdf/m14bv08.pdf>

<sup>2</sup> PJM Manual 14A, Introduction to the Generation and Transmission Interconnection Process, Revision 04, Effective Date 10/01/05 at 13. See, <http://www.pjm.com/contributions/pjm-manuals/pdf/m14av04.pdf>

subject to review.<sup>3</sup> Each interconnected customer-generator's existing facilities will have been reviewed to ensure that the interconnection is safe and does not undermine reliability. As is recognized in PJM's requirements, there is no need to reanalyze the entire project due to proposed, additional capabilities.

A complete review of the entire project as proposed in the Commission's regulations has two potential cost implications. First, the scale of such a review may impose substantial costs. In effect, the generation owner will pay twice for the same review of the base project. Second, where a utility finds that the proposed, incremental capability does have impacts that must be mitigated; the on-going operation of the existing project will be called into question only due to the effects of the proposed addition.

The OCA proposes the following changes to the language of Section 75.36(2):

When an interconnection request is for an increase in capacity for an existing small generator facility, the interconnection request shall be evaluated on the basis of that incremental addition to the existing ~~the new total electric nameplate~~ capacity of the small generator facility.

Section 75.36(2).

The OCA submits that PJM's Manuals 14A and 14B address the Commission's issues. The OCA proposes that the Commission adopt PJM's model and the above language, reflecting PJM's model.

**C. Lockbox Device: Section 75.36(10)**

In the Proposed Rulemaking Order, the Commission requests comments on the lockbox approach. Proposed Rulemaking Order at 11. The OCA strongly supports the

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<sup>3</sup> The OCA submits that modifications to existing projects should be exempted from review where generating capability increases are below some small level or where the changes behind the interconnection point do not change capability of the generator or generators.

lockbox approach taken by the Commission in Section 75.36(10). This section discusses the requirement for an external disconnect switch/lockbox option and states:

An interconnection customer may elect to provide the EDC access to an isolation device that is contained in a building or area that may be unoccupied and locked or not otherwise readily accessible to the EDC, by providing a key in a lockbox installed by the EDC that shall provide ready access to the isolation device. The interconnection customer shall permit the EDC to install the lockbox in a location that is readily accessible by the EDC and the interconnection customer shall permit the EDC to affix a placard in a location of its choosing that provides clear instructions to EDC operating personnel on access to the isolation device.

Section 75.36(10). The cost of complying with a rigid requirement for an external disconnect switch can impose thousands of dollars of additional costs on small, inverter-based projects. The OCA strongly supports a requirement that ensures that consumers, utility employees and others are not endangered by unanticipated power flows into the distribution network. The use of the lockbox option appears to satisfy the need for ready access while offering the customer-generators an option that may save substantial amounts of money.

#### **D. Insurance Requirements for Customer-Generators**

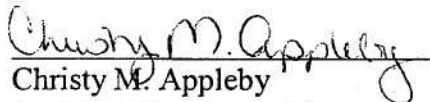
In response to the Commission's request for comments, the OCA states its strong support for excluding insurance and indemnification requirements from the proposed regulations. Proposed Rulemaking Order at 15 (Section E). The OCA submits that the Commission should not establish special insurance requirements that will become both an additional obstacle for the development of distributed generation and an unnecessary administrative burden and cost for utility companies. The OCA submits that the MADRI (Mid-Atlantic Demand Response Initiative) model with regard to insurance is more

reasonable. As the Commission notes, "MADRI's standard interconnection agreement does not require customer generators to provide general liability insurance, but does recommend that every customer generator protect itself with insurance due to the risk of incurring damages." Proposed Rulemaking Order at 15. The OCA would recommend adopting the proposed approach to follow the MADRI model taken in the Commission's Order of not requiring additional insurance and indemnification requirements but encouraging customer generators to have appropriate insurance.

### III. Conclusion

WHEREFORE, the Office of Consumer Advocate generally supports the Pennsylvania Public Utility Commission's proposed interconnection regulations, subject to the above comments.

Respectfully Submitted,



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to Section 5 of the Alternative Energy Portfolio :  
Standards Act, 73 P.S. § 1648.5 :  
:  
Implementation of the Alternative Energy :  
Portfolio Standards Act of 2004: Net Metering : M-00051865

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Comments on Interconnection Regulations, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 26<sup>th</sup> day of April 2006.

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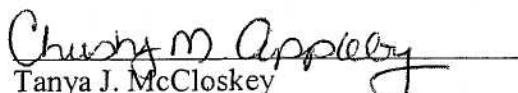
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