Michigan Public Service Commission Interconnection Update

December 7, 2018

MINNESOTA
PUBLIC UTILITIES COMMISSION

https://mn.gov/puc

Disclaimer

The ideas expressed are the views of the presenter, and not the Minnesota Public Utilities Commission.

Interconnection Update Takeaways

- Identify a well-balanced workgroup or informal group of individuals from utilities, DER industry, and consumer advocates.
- Establish a clear process (scope and timeframe) that grounds recommendations in guiding principles and facts.
- Encourage shared learning and include Commission.
- Keep in mind future proofing versus driving specific outcomes.
- Engage outside expertise in a transparent way.
- Delineate what is interconnection/technical versus other policy considerations

Commission Order

January 24, 2017

- The Commission hereby delegates authority to the Executive Secretary to issue Notice(s), set schedules, and designate comment periods for the scope outlined in paragraphs 2 – 3 below. The Executive Secretary will, in cooperation with the Department of Commerce, convene a work group of appropriate size and composition, and may select a facilitator, to **develop the record more fully.**
- **The Commission will transition the Minnesota Interconnection Process to one based on the FERC SGIP and SGIA**. The Executive Secretary will set schedules and take comments. It is anticipated that the Commission will consider the record and comments within 18 months of this order, to replace Attachments 1, 3, 4, and 5 to its 2004 Interconnection Standards in this Docket. The Executive Secretary will **use the Joint Movants' May 12, 2016 filing, generally, as the starting point for comments.**
- In the longer-term (nine to twenty-two months), the Executive Secretary will set schedules and take comments on updating the Minnesota interconnection technical standards. It is anticipated that the Commission will consider the record and comments within 24 months of this Order, to replace Attachment 2 to the Commission's 2004 Interconnection Standards. **This stage of work would incorporate newly revised national technical standards, and other issues identified as areas in need of updating.**
- The Commission hereby designates Commissioner Matthew Schuerger as lead commissioner pursuant to Minn. Stat. § 216A.03, Subd. 9, with authority to **help develop the record necessary for resolution of the issues, and to develop recommendations to the Commission in this docket.**

Minnesota Interconnection Update

Phase I

Interconnection Process, Applications, Agreements

→

Phase II

Technical Requirements consistent with newly revised IEEE 1547 (Published April 6, 2018)

→ ?

Phase III?

- Compensation?

- Rate Design?

- Incentive for the utility?

Phase I	Phase II
3 initial documents (FERC SGIP/SGIA, Joint Movants' Red-line of FERC; Dakota Electric Red-line of MN existing stds)	1 initial document (Regulated Utilities' Technical Interconnection and Interoperability Requirements Proposal)
15 organizations (engineers, regulatory staff, lawyers, advocates)	9 organizations (engineers, technical experts)
5 full day In Person meetings – 1 year	8 half day web meetings – 7 months; 3 full day In Person mtgs
Draft staff recommendations (4 rounds of comments)	Edits as we go (~2 rounds of comments)

Workgroup Topics & Timeline

2017	PHASE I In-Person Topics
June 2	Pre-app report; Application requirements; Queue type & process; Material Modification Definition; Fast Track; Site Control
July 28	Definitions; Transmission Provider's role; Engineering screens; Study process; process timelines/extensions; dispute resolution
Sept 15	Insurance; Disconnect Switch; metering; Commissioning/inspection, testing, authorization; Design, procure, install, construct facilities/upgrades; advanced inverters
Nov 3	Interconnection Agreement; process for updating; Transition issues; any outstanding issues
Dec 1	Webinar for feedback on some of the draft staff recommendations and descriptions of outstanding issues

2018	PHASE II Web Meeting Topics
March 23	Scope/Overview; Inventory of Definitions to Discuss
April 13	Performance Categories; Response in Normal and Abnormal Conditions; MISO Bulk Power System
May 18	Reactive Power and Voltage/Power Control Performance; Protection Requirements
June 8	Energy Storage; Non-export; Inadvertent export; Limited export
Aug 24	Interoperability (Monitor and Control Criteria); Metering; Cyber security
Sept 14	Test and Verification; Witness Test Protocol
Sept 21	Full Day In Person to Revisit and Reconcile Edits
Oct 3	References; Definitions; 1-line diagram requirements; Agreements

MINNESOTA
PUBLIC UTILITIES COMMISSION

Phase I Highlights

Some Interconnection Process Changes

Pre-Application Report	• Allows Interconnection Customer more detail about a specific location before submitting an application
Queue	• Assigns capacity and organizes interconnection application requests for transparency and efficiency
Simplified Process	• Streamlines interconnection process for smaller projects; incorporates Uniform Statewide Contract where appropriate.
Fast Track Process	• Expedited review option for projects under 500 kW and some projects under 5 MW
Updated Engineering Screens	• Initial review screens for Simplified and Fast Track based on FERC SGIP updated with input from DGWG, NREL, & EPRI

Interconnection Process Changes Cont'd

DER Modifications	• Clarifies what constitutes a major modification, identifies when new application is required (including for existing DER.)
Timelines	• Establishes timeframes for utility & customer. Option to withdraw an application for failure to meet deadline or request extension.
Electronic Submission	• Allows customer to submit applications & materials electronically. Enables electronic signatures and payment at utility discretion.
Application Agent	• Allows customer to identify someone to coordinate with the utility on details of the application/interconnection process.
Updates Fees & Study Deposits	• Establishes application fee caps based on DER capacity and type of review. Requires study deposits in advance.
Other improvements	• Recognize Distributed Energy Resources, including storage, which parallel with utility grid. Clarifies DER capacity is in AC not DC.

Examples of Possible Policy Considerations

- How to treat storage applications
  - Trade offs between hosting capacity and customer flexibility
  - Net metering integrity issues
  - Capacity definition
- Interconnection Requirements and how costs are recovered
  - Production metering
  - Utility accessible disconnect switch
- Insurance
- Grandfathering vs. Updating agreements

MINNESOTA
PUBLIC UTILITIES COMMISSION

Phase II Considerations

Technical Requirements Considered; Not Explicit in IEEE 1547

- Definition and application of limits to a DER's "capacity" versus nameplate rating.
- Non-export or Limited export; including inadvertent export.
- Metering requirements
- Distribution upgrades for remote control and monitoring
- 1-line diagrams

Phase II Preliminary Take Aways

1. Familiarize yourself with IEEE 1547.
2. Establish a technical subgroup with utility and DER expertise.
3. Work with your RTO/ISO and neighboring states.
4. Recognize the elephant in the room (may not be in scope) and frame your process appropriately.
5. Interim implementation requires consideration.

1. Familiarize yourself with IEEE 1547

- Authority Governing Interconnection Requirements:

  authority governing interconnection requirements (AGIR): A cognizant and responsible entity that defines, codifies, communicates, administers, and enforces the policies and procedures for allowing electrical interconnection of DER to the Area EPS. This may be a regulatory agency, public utility commission, municipality, cooperative board of directors, etc. The degree of AGIR involvement will vary in scope of application and level of enforcement across jurisdictional boundaries. This authority may be delegated by the cognizant and responsible entity to the Area EPS operator or *bulk power system* operator.

  NOTE—Decisions made by an authority governing interconnection requirements should consider various stakeholder interests, including but not limited to Load Customers, Area EPS Operators, DER Operators, and *bulk power system* Operator.

- Capabilities → Enabling Capabilities → Utilization → Reporting
- Annex B is an informational guide for setting performance categories
- Provide engineering support to your staff.
- IEEE 1547 available for purchase: https://standards.ieee.org/findstds/standard/1547-2018.html

2. Establish a Technical Subgroup w/ Utility & DER Expertise

- 6 utility representatives (IOU, cooperative, municipal) and 5 non-utility representatives (DER, customers, etc.)
- Green formed "Regulated Utilities" and submitted a draft MN Technical Interconnection and Interoperability Requirements proposal that serves as the working document for edits.
- 3 representatives participated in IEEE 1547 revision (including 2 from "Regulated Utilities").
- EPRI, NREL and RAP participated as technical assistance with goal of creating a road map for other utilities and states going through this update.

Jeff Schoenecker/Craig Turner, Dakota Electric Assn. (Rate-regulated cooperative)	Robert Jagusch, MN Municipal Utilities Assn	Patrick Dalton/John Harlander/Alan Urban, Xcel Energy
Lise Trudeau, Dept of Commerce	Kevin McLean/Jenna Warmuth, MN Power	Tam Kemabonta/Professor Mahmoud Kabalan, Academic/unaffiliated
Mike McCarty/Katie Bell, Energy Freedom Coalition of America	Kristi Robinson, MN Rural Electric Cooperative Assn.	John Dunlop/Chris Jarosch, MN Solar Energy Industry Assn.
Brian Lydic/Sky Stanfield/Laura Hannah – Interstate Renewable Energy Council, Fresh Energy, Environmental Law & Policy Center (Joint Movants)	Dean Pawlowski, Otter Tail Power	Commissioner Matt Schuerger; Staff: Michelle Rosier; Cezar Panait.

3. Work with your RTO/ISO, NERC Reliability Coordinators and neighboring states

- IEEE 1547 considers and seeks to address bulk power system issues.
- Establish contact early and identify the right people.
- Ask for an update on: 1) DER impact analysis efforts, and 2) Existing Bulk Power System voltage and frequency concerns and causes.
- If possible, work collaboratively with respect for each other's roles.
- MISO is coordinating an IEEE 1547 work project with distribution utilities and other stakeholders.

4. Capabilities vs. Utilization and State Requirements

- Utilization of IEEE 1547 required capabilities brings questions re: compensation; visibility; dispute resolution.
- How do you address the gap between setting a performance requirement (re: capability) and the Area EPS utilizing those capabilities?
  - FERC Order 842: Frequency Response
    - "While we are requiring newly interconnecting generating facilities to install equipment capable of providing frequency response and adhere to specified operating requirements, we are not mandating headroom, which is a necessary component for the provision of primary frequency response service."
  - Utilization can have impacts on DER owners (active power curtailment, reactive power exchange, head room) and distribution utilities (voltage or frequency ridethrough with extended trip settings)
  - Utilizing interoperability and communication enabled with IEEE 1547 at the DER local interface may require additional equipment and investment in areas outside IEEE 1547's scope by utility and/or DER customer/operator.
- What should the role of statewide technical requirements be?

5. Work w/ Technical Experts in Transparent Way

- National Renewable Energy Laboratory (NREL), Electric Power Research Institute (EPRI), Regulatory Assistance Project (RAP), and Dept of Energy Solar Energy Innovator Program have provided significant technical assistance to our process.
- Check IEEE 1547 list to see who participated in the revision.
  - MN PUC is fortunate to have a Lead Commissioner and engaged utility and DER representatives who participated in the IEEE 1547 revision. They help provide additional insights into what is meant by IEEE 1547 and suggestions on how to work through the state requirements.
- If possible, offer shared learning opportunities.
  - IEEE has hosted 3 full day trainings on IEEE 1547 in the US; including one MN PUC and Organization for MISO states jointly hosted. IEEE also has a webinar series.
  - EPRI has a number of white papers and webinar content.
  - NREL has the Distributed Generation Interconnection Collaborative (white papers, webinars) and lessons learned from other states.
  - Our local experts provided their insights during the drafting and helped identify areas of crossover with Phase I update.

Interim Implementation?

Step	Timeline
IEEE 1547 2nd Edition (2018) Published	April 6, 2018
MN Statewide Technical Requirements Approved	*1Q 2019*
UL 1741 Interim SRD for IEEE 1547 2nd Edition (2018)	*TBD. Expected to address about 85% of 1547 2nd Edition.*
IEEE 1547.1 Published	*Mid-to-late 2019*
UL 1741 Certified Products Available on Market	*18 months after IEEE 1547.1 Published (~2020)*

- Some areas (CA, HI, ISO-NE) are developing interim implementation using UL 1741SA (contains some, but not all of the functionality required in IEEE 1547-2018.) If this approach, TSG must discuss the Source Requirements Document (SRD):

Location	SRD
California	Rule 21
Hawaii	14H
ISO-NE	1547-2018

Resources

- FERC Small Generator Interconnection Process (SGIP) & Interconnection Agreement (SGIA):

https://www.ferc.gov/industries/electric/indus-act/gi/small-gen.asp

- NREL Distributed Generation Interconnection Collaborative:

https://www.nrel.gov/dgic/

- Database of State Incentives Renewable Energy (DSIRE) Interconnection Pages:

http://programs.dsireusa.org/system/program?type=14&

- NERC and IEEE Workshop on IEEE 1547-2018 – Sept 26, 2018 in Atlanta, GA

http://standards.ieee.org/events/interconnection-eps.html

- IEEE 1547 available for purchase:

https://standards.ieee.org/findstds/standard/1547-2018.html

MINNESOTA
PUBLIC UTILITIES COMMISSION

Thank You!

Michelle Rosier

michelle.rosier@state.mn.us

651-201-2212