



February 11, 2022

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05602

Re: Interconnection Rule 5.500 (Case No. 19-0856 RULE)

Dear Clerk Anderson,

Renewable Energy Vermont (“REV”) appreciates the opportunity to provide comments on the Commissions proposed change to Rule 5.500, governing the interconnection process.

REV supports many of the of the changes within the draft Rule. We agree that the readability and organization of the Rule are improved and are broadly supportive of the proposed standards to account for the export capacity and operating characteristics of proposed projects based on the IREC Model Interconnection Procedure,¹ as well as the recommend adoption of IEEE 1547 and UL1741. However, we have strong reservations about the impact of incorporating net-metered projects within the draft Rule 5.500. Given the magnitude of the changes within Rule 5.500 and the concurrent rulemaking process underway on net-metering (Case No. 19-0855-RULE) and storage (Case No. 21-3883-RULE) we would urge the Commission to consider an additional round of workshops to ensure that changes are harmonized across these rulemaking efforts.

While REV recognizes the motivation for addressing the interconnection of net-metering systems within Rule 5.500, we reiterate our prior comments from July 30th 2021 that the existing 5.100 procedures for interconnecting net-metered project have been generally effective and that we do not recommend changing this process. To the extent that the Commission is committed to incorporating the interconnection of net-metered projects within Rule 5.500, we urge that this change be implemented in such as fashion as to minimize the additional cost and time burden imposed on these projects. To the end REV recommends the following:

- That the interconnection of projects of 15 kW and below continue to be handle through a registration process as is currently the case under Rule 5.100 with no additional fee or study. As stated by Green Mountain Power (GMP) during it April 9th, 2021 presentation, projects of this size do not currently require review and neither GMP nor other utilities

¹ We note that IREC has provide update language on this and other issues in their comments on this case and encourage the commission to strongly consider adopting this updated language.



have raised concerns about the impact of project of this size to the best of our knowledge.²

- That the Commission adopt a “Simplified Process” for projects up to 25 kW as described by IREC in its comments on this case and analogous to the Level 1 process in IREC’s Model Interconnection Procedures. REV would further recommend that Commission consider the “Simplified Process” for projects up to 50 kW, parallel to the 5.106 interconnection capacity threshold.

With regards to the Fast Track process, REV members have raised concerns that the current language for the first screening criterion regarding interconnection at transmission voltage fails to recognize the existence of 34.5 kV distribution circuits in the state and would result in even the smallest projects failing the Fast Track screen if the proposed interconnection point was on one of these distribution circuits. We encourage the Commission to revise this criterion to address this issue. Additionally, to further enhance the value of the Fast Track process, REV requests that when projects are evaluated in the Fast Track process, the Interconnecting Utility complete the evaluation of all of the criteria, rather than terminating the evaluation when a single screen is failed. The evaluation of all criteria provides the Requester with ability to make a more informed decision about whether or not to seek a higher level of review. Finally, we commend the Commission for eliminating the criterion limiting the aggregate generation on radial feeders to 15% of annual peak load (the third screen in the current Fast Track process) as this criterion did not effectively identify projects that would cause interconnection issues and failed the vast majority of Fast Track applications.

With regards to the Commissions request for feedback on the current \$300 application fee, REV notes that IREC’s Model Interconnection Process indicates that most states have a fee in the \$100 to \$200 range for a Level 1 evaluation (equivalent to the “Simplified Process”) and that a number of states have chosen to waive the fee for net-metered facilities.³ This is consistent with REV’s belief that fees for smaller projects, which require lower levels of study should be significantly lower than \$300 and should be waived altogether for smallest projects.

In addition, REV strongly endorses several procedural and timeline recommendations advanced by IREC in their comments submitted on this case. REV sees the following recommendations to be of particular importance to the effectiveness of the interconnection process:

- At their request, Interconnection Requestors should have the ability to enter the interconnection review process at any level of evaluation for which their project is eligible. This would allow, for example, a project that meet the eligibility requirements for a Fast Track Screening Process to jump immediately to a Feasibility Study if the Requestors was already aware that project would fail the Fast Track process. This option would save time and effort for both the Requestor and Interconnecting Utility.

² 2 GMP workshop presentation filed 04-09-2021 at slide 9; Tr. 04-19-2021 at 55-56 (Kim Jones)

³ Interstate Renewable Energy Council, Inc., Model Interconnection Procedures (2019), Page 7. available at <https://irecusa.org/publications/irec-model-interconnection-procedures-2019>.



- Interconnecting Utilities should produce a biannual, public report documenting the number of the number of pre-application reports and interconnection application that they received, the processing time for the reports and applications and the failure rate for interconnection applications by review process. This information promote compliance with the timelines mandated in the Rule and will help inform future changes to the Interconnection process.
- REV is cautious about the utility and practicality of group studies. Groups studies offer potential for mutual benefits but the process risks being to cumbersome to be utilized effectively. If group studies are considered, the processes for these studies should include clear language about how group are formed and maintained, how to manage attrition during the study process and a timeline to allow projects to proceed with individual study if a group cannot be formed.
- REV also supports IREC's recommendation to bring processing timelines throughout the rule into line with national best practices.

Thank you for the opportunity to comment.

Dated this 11th day of February, 2022.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Dowds".

Jonathan Dowds

Deputy Director

Renewable Energy Vermont