

Proposed Rule Rule 5.500

April 27, 2016

DPS Petitions PSB To Open Rulemaking Process

- March 18, 2016 Petition filed
- Reflects views of Working Group but not a consensus document
- Requests Board to commence rulemaking within 30 days

Summary of Proposed Revisions

- **Policy Issues-** does not address policy question of relative responsibilities of generators and utilities (i.e., optimization of circuits etc. to accommodate DG)
- **Applicability** – covers all interconnections previously covered under 4.100, 5.100
- **Electric Energy Storage-** definition of “Generation Resource” modified to include energy storage
- **Integration of Net Metered-** streamlined interconnection process for net metered generators that are subject to the registration and application form processes established by the Board in current and proposed draft versions of Rule 5.100 (as well as other small generators under 30 V.S.A. §8007(a)). Utilities may raise interconnection issues during comment period and shift consideration of generator into queue, screening, review, and study processes that would apply to other (generally larger) generators

Summary of Proposed Revisions cont.

- **FERC SGIP**-follows Nov 2013 FERC Small Generator Interconnection Process including Pre-Application Process and Supplemental Review Process. DPS encourages utilities to make pre-app info available online (e.g., map-based systems), but rule does not require.
- **Fast Track Criteria**- draws on experience of utilities and generators but still tied closely to FERC SGIP. Provides flexibility to interconnect without studies in appropriate circumstances when projects fail screens but maintains certain screens that some thought were duplicative (2 and 11)

Summary of Proposed Revisions cont.

- **Electronic Application**- rule assumes an electronic application process hosted by PSB (part of electronic CPG app) that time stamps applications and routes to relevant utilities. \$20,000 grant from DOE secured to pay for interconnection portion of electronic system.
- **Interconnection Queue**-recognizes increase in projects makes queue management critical -explicit provision allows interconnecting utility to place the study of projects further down the queue on hold until analysis of earlier applications is complete; queue position based on date and time of receipt of complete application to prevent gaming

Summary of Proposed Revisions cont.

- **Study Assumptions**-study formalizes study process used by Vermont utilities - assumes all generation running
- **Codes and Standards**-updates references to most recent codes and standards including flicker –ride through and other performance standards will be incorporated as they are adopted
- **Miscellaneous**
 - Utilities may hire experts to do any and all studies (not just SIS as in present rule)
 - Standard fee allowed for supp review if utility gets PSB approval
 - Standardization of “business days” in rule

PSB Rulemaking

- <http://psb.vermont.gov/5550StatutesRulesAndGuidelines>
- Board order 4/25/16 – commences rulemaking process by soliciting initial comments on Proposed Rule
- Comments due 5/13/16
- Board particularly interested in comments regarding process for rulemaking (e.g., how many rounds of comments, workshops etc.)