

CONNECTICUT DISTRIBUTED GENERATION WORKING GROUP – NONRESIDENTIAL INTERCONNECTION GUIDELINES SUBCOMMITTEE

MEETING AGENDA

Wednesday, December 14, 2022

9:00 AM – 10:00 AM

Location: Microsoft Teams

**Introduction**

* The meeting began with Zak discussing the goal of the subcommittee, which included modernizing and streamlining the guidelines while also reviewing the guidelines for any potential changes for FTM storage as required by Order 10 of Docket 22-08-05.

**Technical Updates to Guidelines**

* Joe Debs stated that the guidelines need to be updated to reflect changes in the rules surrounding FERC jurisdictional circuits
* Joe stated that the current guidelines are based on the FERC process and were first created in 2003 and updated in 2010
* Shirin stated that she would like to see included in the guidelines information on study phase timelines, estimates and deposits
	+ Joe responded that the guidelines do contain timelines but are subject to change for any given project
	+ Transmission studies have to be approved by ISO and may require a previous study to be completed
* Eversource gives developers the option to wait for the ongoing transmission study to complete before starting the facilities study
* UI and Eversource both try to run the studies in parallel but can also do the distribution study first if desired
* The subcommittee will update the guidelines to specifically show this flexibility
* Joe Debs described that a study is needed whenever there is more than 20MW of generation on a substation but the challenge is when ISO decides to aggregate substations – ISO does not have a defined group and the aggregated stations change over time
* If a substation has crossed the 20MW threshold, any project over 1MW will trigger the need for a study and the EDCs are aware of this. If, however, the substation hasn’t, the EDC cannot know if a study will be required without checking with ISO
* Jon Demay asked when PSCAD is required for distribution analysis, what triggers the requirement and how detailed it needs to be.
	+ The EDCs responded that they would need to bring in their engineering team to answer that question
* Mike Trahan asked whether the current guidelines are based on IREC best practices
	+ Joe Debs responded that they are based FERC best practices\
* Joe Marranca stated that he is open to exploring any other interconnection study best practices and is also looking at adding a “faster track” for mid-size projects (those below 250-300kW)
* Joe Debs stated that the screens could be updated by using information from the Hosting Capacity Maps
* Jon Demay asked how the utilities define the 15% rule, whether it was at the automatic section device, fuse, or lateral level
	+ Joe Debs stated that they look at the recloser end and that between utilities it can matter whether the utility uses radial or loop schemes
	+ Eversource and UI confirmed they both use loop schemes and therefore look at reclosers
	+ Joe Marranca stated that if a review fails the 15% screen, UI will perform a supplemental review, which may not automatically trigger a study
* Jon Demay asked whether there were thoughts about updating settings to allow customers on spot networks to export power. Jon mentioned that this is happening in ConEd territory
	+ Joe Debs stated that they were asked to examine the issue in 2007 and retained a consultant who advised against allowing export. Joe also said that the spot networks in ConEd territory tend to be much larger (on the order of MWs) than CT, which usually has one or two customers per spot network
	+ Both Eversource and UI stated that they would be open to revisiting the issue if there is any new information available

**Group Studies**

* Jon mentioned that he didn’t want to emulate the Massachusetts Group Study process largely because they lumped together behind-the-meter (BtM) and front-of-the-meter (FtM) projects resulting in BtM projects sharing costs with bi-directional battery projects
* Jon stated that in CT project turnaround time can be 60 business days whereas in MA, it can be 12 months to get through the study process because they are dependent on other developers
* Jon recognized, however, that much of the industry is moving towards group/cluster studies. He believes they work for transmission but not for distribution level studies.
* Zak asked whether it made sense to distinguish between FtM and BtM projects
	+ Joe Marranca stated that from an EDC perspective, the potential impacts are vastly different and stated he was open to considering creating a separate bucket/subset for those projects
	+ Joe Debs stated that the guidelines are based on nameplate capacity but they could potentially look at max power export
	+ Jon expressed interest in that option since most of his projects are sized for base load
* Shirin stated that group studies can be beneficial for some developers and slower for others
	+ Joe Debs asked whether group studies should be limited to where significant substation upgrades are needed
	+ Shirin agreed that would be a good first step. She also stated that in New York, a developer can avoid studies through the use of flexible interconnection, which examines load profiles and specific curtailment to avoid substation upgrades
* Joe Marranca stated that he would like to review the guidelines and technical document in concert.