

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 19-0856-RULE

Proposed revisions to Vermont Public Utility Commission Rule 5.500	
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Order entered: 02/26/2024

ORDER ADOPTING STANDARD INTERCONNECTION APPLICATION FORMS

I. INTRODUCTION

In today's order, the Vermont Public Utility Commission's ("Commission") adopts standard application forms as part of the implementation of its revisions to Rule 5.500, the interconnection rule. There will be two standard interconnection application forms, one for distributed energy resources up to 150 kW and one for distributed energy resources greater than 150 kW.¹ The purpose of these forms is to standardize the information that utilities collect when evaluating interconnection requests. The Vermont distribution utilities may use these forms as adopted or may reformat these documents to suit the utility's particular needs, such as collecting the required information electronically. The utilities are directed to implement these forms as soon as reasonably practicable.

The Commission recognizes that interconnection standards will continue to evolve. These forms may be updated from time to time and the Commission expects that further refinements to these forms may be appropriate in the future.²

II. PROCEDURAL HISTORY

On October 14, 2022, Green Mountain Power Corporation ("GMP") filed draft standard application forms as part of this rulemaking.

¹ In addition to these forms, net-metering systems up to 15 kW may request to interconnect with the distribution utility by filing a registration for a certificate of public good ("CPG") with the Commission. The distribution utilities receive notice of these registration forms and must process them as interconnection requests using the timelines and procedures contained in Rule 5.500. The information collected on the CPG registration form is similar, though not identical, to the information collected on the forms adopted in this order. All CPGs deemed issued using the registration process are conditioned upon the CPG following all requirements of Rule 5.500 and the CPG holder is responsible for the cost of all reasonable system upgrades necessary to interconnect the net-metering system.

² Commission Rule 5.502(4).

On December 19, 2023, the Commission adopted revisions to Rule 5.500, to take effect on March 1, 2024.

On December 26, 2023, the Commission requested comments on GMP's draft forms. Comments were due January 19, 2024.

On January 19, 2024, Vermont Electric Power Company, Inc. ("VELCO"); Renewable Energy Vermont ("REV"); the Vermont Public Power Supply Authority ("VPPSA"); and the Vermont Department of Public Service ("Department") filed comments.

On February 2, 2024, REV filed supplemental comments.

On February 7, 2024, Commission staff held a workshop to review the initial comments.

On February 9, 2024, GMP filed reply comments.

No other filings related to the draft application forms were received.

III. SUMMARY OF COMMENTS

VELCO

VELCO recommends that the electronic forms be linked to a database that can store interconnection request information along with updated, post-application information. VELCO states that the forms and initial data included in the interconnection request should remain accessible to the interconnection requestor, allowing the requestor to submit and make the interconnecting utility aware of material modifications. VELCO envisions that the database storing this information should be designed to allow a Vermont distribution utility to integrate with other databases. VELCO states that the form should be designed so that any required modifications to the form can be made seamlessly at the request of the Vermont distribution utilities.

VELCO recommended that the forms should include fields for: (1) an auto-generated unique identifier/number; (2) an auto-generated registration/application submission time and date stamp; and (3) a certificate of public good number to be entered after Commission issuance.

VELCO asked whether the forms or any database aggregating the data collected by the forms should track certain information such as the current status of the CPG case, the interconnection time and date stamp; and the current status of a project's operation (e.g., active, inactive, decommissioned).

REV

REV requested clarification of or revisions to numerous fields in the draft form for distributed energy resources greater than 150 kW. Specifically, REV addressed the form's preamble and instructions and the following data fields: Project Specifications, Individual Generator Data, Photovoltaic (PV) Data, Individual Inverter Data, Batter Storage/Backup Information, Shared Inverter Information, Battery Intended Use and Operations, Limited Export/Non-Export/Limited-Import Data, Transformer and Protective Relay Specifications, Interconnection Protective Relays, and Discrete Components. With respect to the Photovoltaic Data field, REV states that it is common for project installers to change brands of panels between submission of an application and installation of a project due to supply chain uncertainty.

REV states that project use cases may change over time and asked what process would be required if the customer wished to change the mode of operation after installation. REV also asked for clarification about what information was being gathered on the form for distributed energy resources not greater than 150 kW and recommended minor revisions.

VPPSA

VPPSA states that the draft application forms collect more equipment data than is presently required. VPPSA requests that systems less than 150 kW be required to submit a site plan so that VPPSA's members can use that information to determine whether an application is for an amendment to an existing system.

The Department

The Department states that it generally supports GMP's draft application forms.

GMP

GMP provided responses to several of REV's requests for clarification. With respect to the Photovoltaic Data field, GMP states that the current interconnection application form requires panel manufacturer and model data and that GMP tracks this information.

IV. DISCUSSION AND CONCLUSION

The Commission has reviewed REV's recommendations and has implemented several of REV's requested revisions to the draft application forms that were not opposed by any participant. The adopted versions of the forms are attached to this order. The Commission also made minor adjustments to the Photovoltaic Data section of both forms regarding system orientation to match the way this data has been collected on the CPG registration form.

The Commission understands REV's position that the photovoltaic panel manufacturer and model data that is currently collected may not be accurate because project installers may change this information due to changes in equipment availability and price. The Commission recognizes this limitation with the current data collection process but looks forward to a time when the utilities' data collection and management processes may be able to address this issue. Therefore, the standard application forms will continue to collect this information. This decision should not be construed as a determination that any change in the manufacturer or model data is a "material modification." Provided that an interconnection requestor changes equipment for like equipment, the Commission does not believe that a change to the manufacturer or model data would require a new interconnection review. The Commission is interested in developing a process to ensure that such changes are communicated to the utility to ensure data quality, but developing such a process is beyond the scope of today's order.

The Commission also has not adopted REV's recommendation to change the heading reading "Shared Inverter Information (DC coupled inverters with multiple sources)" to "DC coupled BESS and PV." Though battery storage with photovoltaics is the most likely technology that would use this portion of the form, other technologies may share inverters and the Commission intends to keep the form technology neutral to the extent practicable.

Next, we turn to VPPSA's request that the form for distributed energy resources up to 150 kW require the inclusion of a site plan. The Commission cannot make this change to the form because it is inconsistent with Rule 5.506(B). The rule only requires facilities with a capacity of more than 150 kW to provide a site plan.

Finally, we turn to VELCO's comments. The Commission has added the fields VELCO recommended adding to the form. These fields are the responsibility of the interconnecting utility to complete because the data collected is either generated by the utility (e.g., the unique

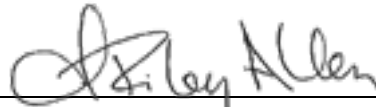
identifier and time stamp) or not known to the interconnection requester at the time of filing (e.g., the CPG case number).

VELCO's comments also raise important issues about the collection and maintenance of interconnection data. The Commission agrees in principle that the distribution utilities should be tracking and validating data about distributed energy resources and that this information could be shared to the extent appropriate for planning or other valid purposes. The Commission also recognizes that implementing a database that allows the sharing and updating of this data in real time would require additional resources and increased coordination between utilities and other parties.

Today's order is solely focused on establishing a baseline for what data is collected by distribution utilities when an interconnection application is filed. The Commission does not believe that it is the appropriate entity to design or host the database envisioned in VELCO's comments. However, stakeholders may request that the Commission exercise its convening authority to facilitate discussions about the development of an interconnection database if stakeholders believe that it would be helpful.

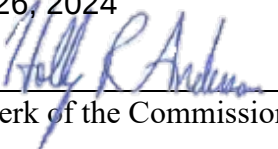
SO ORDERED.

Dated at Montpelier, Vermont, this 26th day of February, 2024.

	)	
Edward McNamara	)	PUBLIC UTILITY
	)	
	)	COMMISSION
	)	
	)	OF VERMONT
J. Riley Allen	)	

OFFICE OF THE CLERK

Filed: February 26, 2024

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

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