

Sent on behalf of Dominion Energy

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On behalf of Dominion Energy, I am submitting the following suggestion for consideration under the Interconnection Process Enhancements 2018 initiative.

(NOTE: Links to the Bulk Electric System definition and NERC definition of a dispersed power producing resource are included at the end of this document)

Issue Statement:

Many independent distributed energy resources (DER) are interconnecting to the Bulk Electric System (BES) throughout North America. Many of these DERs are small (between 3-30 MW) resources that are interconnecting via the distribution system and being aggregated to a common point, commonly a step-up transformer. These DERs could begin (if they have not already) to aggregate to a total capacity at the common point to 75 MVA (gross nameplate rating) or greater, triggering Inclusion I4 to the NERC BES definition. This could unknowingly bring these DERs (each individual resource) as well as point of aggregation (the system designed primarily for delivering capacity from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above) into the jurisdiction of NERC, potential requiring a small DER to now register as a Generator Owner and/or Generator Operator.

Recommendation:

Amend the Interconnection Process to include notification to DERs when they potentially meet the NERC BES Definition Inclusion 4 (I4) criteria. This could take the form of an attachment to the current interconnection agreement between the Transmission Owner (TO) and DER advising the DER that they may be aggregated or, in cases where they will be aggregated, that they may be subject to Inclusion I4. In addition, for existing DERs, explore notification option that could include a written notification from the TO to the DER when the DER, based on the TOs knowledge, has reached the threshold or will soon reach the threshold to potentially be subject to I4.

Suggested language for communicating with DERs:

The output from your generating facility aggregates with other generation facilities at a common point of connection at a voltage of 100 kV or greater and aggregates to capacity greater than 75 MVA. (Insert description of common point of aggregation). Dispersed power producing resources that aggregate to a total capacity greater than 75 MVA (gross nameplate rating), and that are connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage of 100 kV or above, are subject to the jurisdiction of the North American Reliability Corporation (NERC). Entities subject to NERC jurisdiction are required to register with NERC and are subject to mandatory reliability standards.

Applicable NERC documents include Appendix 5B of the NERC Registration Criteria, specifically Inclusion I4 of the criteria. This criteria state:

I4 - Dispersed power producing resources that aggregate to a total capacity greater than 75 MVA (gross nameplate rating), and that are connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage of 100 kV or above. Thus, the facilities designated as BES are:

- a) The individual resources, and

- b) The system designed primarily for delivering capacity from the point where those resources aggregate to greater than 75 MVA to a common point of connection at a voltage of 100 kV or above.^[1]

NERC goes on to define Dispersed power producing resources as a small-scale power generation technologies using a system designed primarily for aggregating capacity providing an alternative to, or an enhancement of, the traditional electric power system. Examples could include but are not limited to: solar, geothermal, energy storage, flywheels, wind, micro-turbines, and fuel cells.^[2]

^[1] [NERC Bulk Electric System definition:](http://www.nerc.com/pa/RAPA/BES%20DL/BES%20Definition%20Approved%20by%20FERC%203-20-14.pdf)

<http://www.nerc.com/pa/RAPA/BES%20DL/BES%20Definition%20Approved%20by%20FERC%203-20-14.pdf>

² [NERC dispersed power producing resources definition:](http://www.nerc.com/pa/RAPA/BES%20DL/bes_phase2_reference_document_20140325_final_clean.pdf)

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^[1] [NERC Bulk Electric System definition:](http://www.nerc.com/pa/RAPA/BES%20DL/BES%20Definition%20Approved%20by%20FERC%203-20-14.pdf)

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