

VEPP Inc.

4.100 Purchasing Agent
4.300 Speed Facilitator

TO: Vermont Utility Engineers; Solar Installers

FROM: VEPP Inc., SPEED Facilitator

DATE: October 13, 2011

RE: Interconnection Requirements SPEED Standard Offer Projects 150 kW or Less

On June 4, 2010, Public Act 159 (Act 159) was enacted, which requires simplified interconnection procedures for small renewable energy projects with a plant capacity of 150 kW or less. Act 159 reads as follows:

§ 8007. SMALL RENEWABLE ENERGY PLANTS; SIMPLIFIED PROCEDURES

(a) The same application form, rules, and procedures that the board applies to net metering systems of 150 kilowatts (kW) or less under sections 219a and 248 of this title shall apply to the review under section 248 of this title of any renewable energy plant with a plant capacity of 150 kW or less and to the interconnection of such a plant with the system of a Vermont retail electricity provider. This requirement includes any waivers of criteria under section 248 of this title made pursuant to section 219a of this title.¹

Section 7 of Act 159 mandates that “**As of the effective date of this act**, 30 V.S.A. § 8007(a) shall supersede any contrary provisions of the rules of the public service board” [emphasis added].

On June 7, 2010, we filed a letter with the Vermont Public Service Board (Board) requesting clarification on how Act 159 impacts the interconnection milestone requirement for SPEED Standard Offer Projects of 150 kW or less.

On July 30, 2010, the Board responded by issuing Order Re Milestone Requirements for Plants with a Capacity of 150 kW or Less. In that Order, the Board explained that SPEED Standard Offer Projects of 150 kW or less can fulfill their interconnection milestone requirement by submitting a completed *Application for a Certificate of Public Good for SPEED Standard Offer Projects with a Plant Capacity of 150 kW or Less* to the Board and the parties identified in the application.

As a result of Act 159 and the Board’s Order, SPEED Standard Offer Projects of 150 kW or less must submit a completed *Application for a Certificate of Public Good for SPEED Standard Offer Projects with a Plant Capacity of 150 kW or Less* in order to satisfy their interconnection requirements. The interconnecting utility then has 10 days to comment

¹ Public Act No. 45 (2009 Vt., Bien. Sess.).

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on roof mounted photovoltaic systems and 30 days to comment on all other systems. We hereby request of the utilities that if comments are made, the SPEED Facilitator be copied on those comments.

The Board has determined that SPEED Standard Offer Projects of 150 kW or less are not required to have an interconnection agreement and are not subject to Rule 5.500.

According to 30 V.S.A. § 8007(a), rules for net metering (Rule 5.100) are to apply to SPEED Standard Offer Projects of 150 kW or less, except for the Certificate of Public Good (CPG) and interconnection application processes that have been modified in the Board's July 30, 2010 Order. Attached is an example of a question raised by one of the utilities which demonstrates the applicability of the net metering rules for SPEED Standard Offer Projects of 150 kW or less.

Additionally, a utility has indicated that, generally, for small solar projects there are two pieces of information missing on the *Application for a Certificate of Public Good for SPEED Standard Offer Projects with a Plant Capacity of 150 kW or Less*: (1) inverter technical specifications and (2) 1-line interconnection drawings. If you wish to expedite the interconnecting utility's review of your Application for this type of project, please append these two pieces of information to the Application.

Very truly yours,
VEPP Inc.

John R. Spencer

John R. Spencer, P.E.
SPEED Facilitator

cc: Ed McNamara, Esq.
Tom Knauer

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Example of a question regarding interconnection of a SPEED Standard Offer Project with a plant capacity of 150 kW or less:

For example, in the case of a relatively small solar project, a utility asked who had to own the transformers (the project already had normal service transformers which were okay for the project) and who had to bear the cost of these transformers?

A general requirement of the SPEED Standard Offer Program is that the project developer pays for all costs associated with the interconnection (an exception, which is at the discretion of the utility, is the cost of the actual meter). As a result, the developer should pay for transformers. However, Rule 5.100, Appendix A, Table 1 states that an existing transformer “may be used if its use will not seriously degrade power quality....” Since the project can use the existing service transformers, there is no associated cost for transformers.

In this case, the metering will be on the low side of the existing transformers. Unlike net metered projects, SPEED Standard Offer Projects are to be designed only to inject power into the grid. The projects are only paid for power supplied to the grid. Therefore, a meter on the low side of the transformers must have “meter compensation” in order to account for losses through the transformer.