

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**PJM Interconnection, LLC**

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**Docket No. ER12-1177-000**

**MOTION TO INTERVENE AND COMMENTS  
OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.212, 385.214 the Solar Energy Industries Association (“SEIA”) hereby files this motion to intervene and comment in the above-captioned docket regarding proposed revisions to the PJM Interconnection LLC (“PJM”) Tariff, in particular modifications to interconnection queue rules.

**I. COMMUNICATIONS**

The following persons should be included on the official service list in this proceeding and should be served with all communications concerning this motion and comments:

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## II. INTERESTS OF SEIA

SEIA is the national trade association of the United States solar industry, encompassing all solar technologies, including photovoltaic (“PV”), concentrating solar power, solar heating and cooling and other technologies. Through advocacy and education, SEIA and its 1,100 member companies work to make solar energy a mainstream and significant energy source by expanding markets, removing market barriers, strengthening the industry and educating the public on the benefits of solar energy.

The proposed changes to the PJM Open Access Transmission Tariff (“OATT”), in particular the queuing process and rules for solar projects 20 MW or less, will have a major impact on SEIA’s members, many of whom are active in the PJM market and are seeking to interconnect wholesale distributed solar generation to the PJM system. As of today the total amount of solar generation in PJM is over 900 MW.<sup>1</sup> Even under the most conservative assumptions the amount of solar generation in PJM will continue to increase rapidly.

The importance to SEIA and its members of improved interconnection rules and processes is further exemplified by SEIA’s recent “Petition for Rulemaking to Update Small Generator Interconnection Rules and Procedures For Solar Electric Generation” filed with the Commission on February 16, 2012 (Docket No. RM12-10-000).<sup>2</sup>

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<sup>1</sup> See Renewable Generators Registered in GATS, available at <https://gats.pjm-eis.com/myModule/rpt/myrpt.asp?r=228>.

<sup>2</sup> The Commission noticed the SEIA Petition on February 28, 2012, and comments, interventions and protests are due March 27, 2012.

Therefore, SEIA and its members have a vital interest in ensuring that any revisions or modifications to the PJM OATT are just and reasonable and not unduly discriminatory. SEIA thus has a direct and substantial interest in the outcome of this proceeding that cannot be adequately represented by any other party.

### **III. MOTION TO INTERVENE**

Intervention is appropriate where the movant has or represents an interest that may be directly affected by the outcome of the proceeding. *See* 18 C.F.R. § 385.214(b)(2)(ii). SEIA requests that its motion to intervene be granted pursuant to Rule 214 because, as discussed above, the outcome of this proceeding will directly and materially affect its members.

### **IV. COMMENTS**

SEIA commends PJM for its effort to “relieve bottlenecks in the interconnection queue and provide for greater certainty and transparency.”<sup>3</sup> Making the interconnection process as cost-effective and timely as possible is essential to the deployment of solar PV and other generation technologies.

#### Alternative Queue Issues

SEIA supports PJM’s proposal to create an “alternate queue” for projects 20 MW or less “that will not have an impact on the PJM monitored transmission system.”<sup>4</sup> Many solar projects should fall into this category. If properly implemented, this new approach should expedite the interconnection of many solar projects throughout the PJM market.

SEIA does have a significant concern regarding one aspect of the alternate queue proposal. The proposal requires the Transmission Provider to exercise “due diligence in

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<sup>3</sup> PJM filing at p. 1.

<sup>4</sup> *Id.* at p. 2.

meeting deadlines for completion of Interconnection Feasibility Studies.”<sup>5</sup> However, the deadlines are not binding because the Tariff states that if “the Transmission Provider is unable to complete an Interconnection Feasibility Study within such time period, it shall so notify the affected Interconnection Customer and the affected Transmission Owner(s) and provide an estimated completion along with an explanation of reasons why additional time is needed to complete the study.”<sup>6</sup>

SEIA acknowledges that there will be situations when, for good cause, a feasibility study deadline cannot be met. However, the proposed language is too open-ended. It provides little assurance that solar or other generation projects will not get stuck in limbo with no firm dates for the delivery of a cost estimate and feasibility report. SEIA strongly recommends that PJM require that the Transmission Provider make a showing of good cause for any delay upon request from the applicant.

#### Fast Track Interconnection

The PJM proposal makes no reference to the use of the “fast track” interconnection provisions in its OATT that govern interconnection in cases where there is no need for a study process.<sup>7</sup> Instead, PJM seeks to make improvements applicable to projects that are not eligible for fast track interconnection. By contrast, SEIA has proposed in its petition to FERC a series of improvements to the interconnection process that focus primarily on making the “fast track” process reasonable and effective. SEIA

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<sup>5</sup> Sec. 36.2 Tariff Redline

<sup>6</sup> *Id.*

<sup>7</sup> It is SEIA's understanding that no participant raised the fast track interconnection issues of concern to SEIA during the stakeholder process that the PJM proposal is a product of. SEIA regrets that it was unable to participate in this stakeholder process due to lack of resources. However, SEIA's regulatory capacity has increased and we intend to participate in future key PJM stakeholder processes to the extent our limited resources allow.

believes that there is great potential to make the fast track process more effective and this can serve as a complement to PJM's interconnection queue reform proposal in this proceeding. SEIA believes that its' proposal, if approved by FERC, will dramatically increase the amount of wholesale solar distributed generation eligible to be interconnected on a fast track basis while maintaining safety and reliability.<sup>8</sup>

Order No. 2006 provides that for a solar electric project to be eligible for fast track interconnection it must be 2 MW capacity or less and the aggregate distributed generation interconnected on a utility circuit "shall not exceed 15 percent of the line section annual peak load."<sup>9</sup> The primary purpose of the 15% rule is to ensure that distributed generation does not produce power in excess of minimum load on a circuit and result in reverse power flows to a substation, which can cause safety and reliability problems.<sup>10</sup>

SEIA is not suggesting that the 15% screen be eliminated. Rather, SEIA requests that the Commission provide a solar-only alternative to the SGIP 15% screen—100% of

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<sup>8</sup> Michael Coddington, Benjamin Kroposki, Barry Mather (National Renewable Energy Laboratory); Kevin Lynn, Alvin Razon (Department of Energy); Abraham Ellis, Roger Hill (Sandia National Laboratories); Tom Key, Kristen Nicole, Jeff Smith (Electric Power Research Institute), *Updating Interconnection Screens for PV System Integration* ("Interconnection Screens Report") (Jan. 2012) at p. 6 (stating " . . . it is possible to refine screening procedures to be more efficient and effective, substantially reducing interconnection process time and effort for PV deployment without compromising safety and reliability of the interconnected distribution system.")

<sup>9</sup> *Standardization of Small Generator Interconnection Agreements and Procedures*, Order No. 2006, FERC Stats. & Regs. ¶ 31,180, ("Order No. 2006") Appendix E "Small Generator Interconnection Procedures," at § 2.2.1.2.; *order on reh'g*, Order No. 2006-A, FERC Stats. & Regs. ¶ 31,196 (2005) ("Order No. 2006-A"); *order on reh'g*, Order No. 2006-B, FERC Stats. & Regs. ¶ 31,221 (2006) ("Order No. 2006-B").

<sup>10</sup> The 15% screen is also intended to prevent unintentional islanding. However, this issue has been rendered largely moot due to the use of anti-islanding algorithms long required for inverters by IEEE standards. The 15% screen also addresses voltage control issues. "However, it should be kept in mind that the 15% penetration threshold, by itself, is not a good indicator of when steady-state high voltages are likely to occur." Interconnection Screens Report at pp. 4-5.

minimum daytime load for the period between 10 a.m. and 2 p.m.<sup>11</sup> The alternative solar minimum load screen would only apply where aggregate existing and proposed distributed generation on a feeder exceeds 15% of peak circuit load.

SEIA also supports deleting the 2 MW threshold for fast track interconnection from Order No. 2006 because many proposed solar projects larger than 2 MW capacity can meet a 100% of minimum daytime load screen. SEIA also believes that improvements are needed in the study and upgrade process for solar projects 20 MW capacity or less that are unable to meet fast track screens. To that end, SEIA has proposed that the SGIP be modified to provide, at the request and cost of the applicant, an expedited, independent, third-party expert technical review of proposed upgrade requirements.

#### SEIA Request to PJM

Notwithstanding the high priority and urgency SEIA assigns to fast track interconnection and other reforms in its petition, SEIA is not suggesting that these issues be addressed by PJM and other parties in this proceeding at this time. We appreciate that taking on the broader issues raised by the SEIA petition would expand the scope of this proceeding in a way that would likely delay implementation of important reforms proposed by PJM, including a separate queue for projects 20 MW or less.

Instead, SEIA respectfully requests that, if it has not already decided to do so, PJM intervene as a party in the proceeding initiated by FERC in response to the SEIA petition seeking to update small generator interconnection rules. SEIA further requests

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<sup>11</sup> *Id.* at p. 6.

that PJM in its intervention encourage the Commission to take further action on the SEIA petition such as the issuance of a Notice of Proposed Rulemaking.

The positive and active engagement of PJM in such a proceeding would likely be very helpful for many reasons, including the major role PJM plays in the operation of the U.S. electricity system and its resources and expertise. SEIA looks forward to working with all stakeholders, including PJM, in a FERC small generator interconnection rulemaking proceeding.

## **V. CONCLUSION**

SEIA respectfully requests that the Commission address the PJM interconnection proposal consistent with the findings and recommendations herein.

Respectfully submitted this 16<sup>th</sup> day of March 2012,



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Dated: March 16, 2012

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. March 16, 2012.

/s/ Heather Whitpan