

# Interconnection Procedures Under Development in Illinois

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# IREC Background

- The Interstate Renewable Energy Council (IREC) is funded by the U.S. DOE to participate in state rulemakings on net metering and interconnection
- In 2007-2008, IREC helped (and continues to help) develop interconnection procedures in Florida, New Mexico, North Carolina, Maryland, Illinois, Utah and South Dakota
- Under DOE contract, IREC is writing a paper comparing the leading interconnection standards: FERC's SGIP/SGIA, California's Rule 21, the MADRI Model, and the IREC Model
- IREC has been very active in Illinois Docket No. 06-0525 for the past year developing interconnection procedures, which is the topic of this presentation

# Illinois Docket, July, 2006 – July, 2007 (whether to have a rule at all)

- Docket No. 06-0525 opened in July, 2006 in response to Energy Policy Act of 2005 requirement to consider implementing interconnection procedures incorporating “best practices”
- Active parties initially: ComEd, Ameren, MidAmerican, the Environmental Law and Policy Center, and Illinois Commerce Commission Staff
- Comments and reply comments filed in November, 2006 and again in January/February, 2007
- Order in March, 2007 resolves that any procedures developed will incorporate IEEE 1547, but doesn't even decide that there will be a rule
- Monthly workshops start in early 2007 using draft of the Maryland procedures (which are based on the MADRI Model), with City of Chicago and Recycled Energy as active participants along with parties; nearly every point debated at length
- Little resolve to actually create a rule as of July, 2007 – after a full year of meetings and filings (IREC begins involvement at this point)

# Illinois Docket, August, 2007 – March, 2008 (deciding to have a rule)

- Net Metering law passes in August, 2007 requiring interconnection procedures by April, 2008 for facilities eligible for net metering (renewables < 2 MW)
- Parties submit comments and reply comments in September, 2007 on whether interconnection procedures are really required now or if utilities have broad discretion to establish their own procedures – no conclusion
- In December, 2007, workshops come to a close and ICC Staff says it will propose a rule based on the draft Maryland procedures discussed for the past year, covering all interconnections < 10 MW; utilities voice displeasure with decision
- Staff produces draft procedures in February, 2008 and requests informal comments
- Ameren files motion in February, 2008 for Leave to File Comments Instantly – arguing that it needs more time to review these new rules; parties file comments regarding the motion; motion withdrawn and rulemaking continues
- In March, 2008, ICC approves plan to establish comprehensive emergency rule by April, 2008 and permanent rule within 150 days (September, 2008)

# Illinois Docket, April, 2008 – August, 2008 (establishing the rule)

- Rulemaking for permanent procedures begins in April, 2008 based on emergency rule
- New intervenors since Oct, 2007: Office of General Counsel, City of Chicago, IREC
- Parties file comments and reply comments in April/May
- Public meeting held in May, 2008
- Judge issues proposed order in late May, parties file briefs on exceptions
- Judge issues second notice order on June 10, 2008; adopts comprehensive rule and agreements and establishes that there will be a new docket to develop interconnection rules for systems over 10 MW
- Second notice period begins in June with rule submittal to the Joint Committee of Administrative Rules
- Order with permanent procedures by late August, 2008
- Permanent procedures by mid-September, 2008 (2+ years after docket opens)

# High Points of the Procedures

- Comprehensive – rules, application forms, study agreements, interconnection agreements
- Familiar – follows FERC model, including fast track for  $\leq 2$  MW facilities (low fixed cost) and study process for larger (customer pays for studies)
- Non-exporter rule – fast track procedures for  $\leq 10$  MW facilities possible (GREAT FOR CHP)
- Insurance only required for facilities  $> 1$  MW
- New rulemaking docket for facilities  $> 10$  MW

# Unhelpful Provisions in the Procedures

- Lengthy rule – lots of optional clauses
- Timelines generally longer than FERC for utility review processes
- Self-certification of systems not allowed (have to comply with IEEE 1547 / UL 1741) (BAD FOR CHP)
- Aggregate interconnections to a spot or area network limited to  $\leq 50$  kW (limits development on campuses and in urban cores) (BAD FOR CHP)
- Dispute Resolution procedures rely on ICC complaint process
- External disconnect switch required

# Notes on the Process

- Comprehensive rule seemed unlikely before net metering law requirement
- Two year process was painful for parties
- Industry participants were very influential for workshops and public meetings; Staff starved for non-utility input
- Critical to have local non-utility participants; IREC's role is to add national perspective
- Commission Staff have determined direction; Commissioners vote on orders but have not interacted with parties
- Generally – utilities need an interconnection incentive

# Three great links

- [www.irecusa.org](http://www.irecusa.org) and click on “Connecting to the Grid” for model rules and more
  - [www.dsireusa.org](http://www.dsireusa.org) for federal and state rules plus overviews
  - [www.newenergychoices.com](http://www.newenergychoices.com) for grading of state rules in “Freeing the Grid”
- (and for questions: [jkeyes@keyesandfox.com](mailto:jkeyes@keyesandfox.com))