STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On its Own Motion	))	
	)	Docket No. 06-0525
Consideration of the Federal Standard on Interconnection in Section 1254 of the Energy Policy Act of 2005.	)))))	

JOINT REPLY COMMENTS OF THE ENVIRONMENTAL LAW & POLICY CENTER AND THE PEOPLE OF THE STATE OF ILLINOIS

The Environmental Law & Policy Center ("ELPC") and the People of the State of Illinois ("the People") hereby submit the following Joint Reply Comments to the comments filed on April 25, 2008 regarding the proposed new Illinois Interconnection Rules at Part 466 of the Commission's Administrative Rules, as published at 32 Ill. Reg. 6173 (April 18, 2008).

Summary of the Comments

The Joint Comments submitted by ELPC and the the People ("Joint Comments") generally support the ICC Staff Draft Rules but suggested the following changes to eliminate remaining market barriers to distributed generation ("DG") and to align the Illinois Interconnection rules with best practices:

- The isolation device requirement should be clarified or eliminated for Level 1 generators;
- The Level 4 study process and related procedures should be extended to cover all state-jurisdictional DG;

- The 15% screen should be modified or eliminated for Level 3 non-exporting generators;
- Application fees should be clarified;
- The rules for interconnecting to area networks should be improved;
- The 50% minimum load screen should be justified or eliminated;
- Timelines should be modified to be no longer than those outlined in the FERC's rules for small generator interconnections;
- Information sharing requirements should be clarified; and
- Billing and payment terms should be consistent with standard business practices.

ComEd's comments generally support the Draft Rules as a "reasonable accommodation" between the needs of electric utilities and their customers, but suggest that the details of these rules should be implemented voluntarily by Illinois utilities rather than spelled out in Commission rules. (ComEd Comments 1). The Ameren utilities similarly state that they generally "do not disagree" with the currently effective Emergency Rule, but argue that the scope of the Permanent Rule should be reduced to cover only customers that are eligible for net metering. (Ameren Comments 5). Each utility, including MidAmerican, also advances some other technical arguments including positions on indemnification, insurance requirements, queuing procedures, cost tracking, and standard agreements, among others.

The Interstate Renewable Energy Council ("IREC") and the City of Chicago both filed comments in support of the Proposed Rule with some suggested revisions, particularly with respect to the isolation device requirement for Level 1 generators.

Reply to the Comments

ELPC's and the People's Joint Reply Comments follow:

1) **The Commission should implement the interconnection procedures through a rule, rather than through tariffs or voluntary utility practices.**

As discussed throughout the workshop process, and as recognized by Staff, a uniform statewide rule will provide the transparency and certainty needed to effectively grow the DG market in Illinois. (See, e.g., Staff 9). ComEd argues that "uniformity among utility practices means nothing to the customers." (ComEd 9). But this is not so. The discontinuities between various utility tariffs or procedures can be significant barriers in and of themselves. According to the National Renewable Energy Lab, utility-specific differences "deter commercial scale marketing."[1] The Congressional Budget Office explains that uniform requirements "lower costs" by "fostering a market" for certified DG equipment rather than requiring equipment packages to be "custom designed and built for each application on the basis of case-by-case requirements from the utility."[2] By adopting a statewide rule, the Commission will enhance predictability and diminish the financial risk that currently hinders DG investments.

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[1] National Renewable Energy Laboratory, *Making Connections: Case Studies of Interconnection Barriers and their Impact on Distributed Power Projects* (May 2000), p. 36 (available at http://www.nrel.gov/docs/fy00osti/28053.pdf) ("NREL Report").

[2] Congressional Budget Office, *Prospects for Distributed Energy Generation* (2003), p. 30 (available at http://www.cbo.gov/ftpdoc.cfm?index=4552&type=1) ("CBO Report").

ComEd further argues that the Commission is not "required" to adopt detailed procedures in rules. (ComEd 3). Even if that were so, both the U.S. Congress and the Illinois General Assembly directed the Commission to consider adopting interconnection rules based on "best practices," 16 U.S.C. 2621(d)(15) and 220 ILCS 5/16-107.5(h), and uniform statewide rules are assuredly among the "current best practices of interconnection for distributed generation." 16 U.S.C. 2621(d)(15). In any event, the appropriate question is not whether the Commission is "required" to adopt procedures, but whether adopting uniform procedures would be good policy.

ComEd is also concerned about situations in which "the exigencies of business justify deviation" from the rules. (ComEd 6). However, there is no cause for concern because the rules provide flexibility for unforeseen circumstances (e.g., Appendix C, Art. 6.4) and parties are always free to seek a waiver from the rules in appropriate circumstances. The rule-based approach strikes the appropriate balance between certainty and flexibility and should be preserved by the Commission.

2) The Commission should not "create a void" in the standards by failing to cover all state-jurisdictional interconnections.

Ameren's argument for piecemeal interconnection rules covering only small net metering customers misinterprets the nature of this docket and would result in bad policy. (Ameren 11-12). Ameren implies that the Net Metering Act is the "enabling statute" for this docket. (Ameren 12). But this docket was initiated on July 26, 2006, many months before the Net Metering Act's passage. Although the

Net Metering Act covers related ground, the true "enabling statutes" for this docket are the Public Utilities Regulatory Policies Act (PURPA), as amended by the Energy Policy Act of 2005 (EPAct), and the Illinois Public Utilities Act. None of these statutes suggest any limitation in coverage. Indeed, the PURPA standard requires utilities to make interconnection services based on best practices available to "*any electric customer that the electric utility serves.*" 16 U.S.C. 2621(d)(15) (emphasis added).

In addition to rejecting Ameren's attempts to further reduce the scope of Rules, the Commission should eliminate the arbitrary 10 MW cutoff in Section 466.10(a). Staff selected this 10 MW threshold because the IEEE 1547 technical standard was designed for such generators. (Staff 13). But there is no reason why the *technical* standard should be allowed to dictate the scope of the *procedural* requirements. For example, FERC's Small Generator Interconnection Procedures also rely on IEEE 1547 but extend their coverage to 20 MW. (See FERC Order 2006, para. 75).

Staff acknowledges that its 10 MW limit "creates a void" in the rules, but declined to extend the rule because there was no other number that was "obviously correct." (Staff 12-13). But Staff's failure to come up with a "correct" number does not support its decision to draw the line at 10 MW. FERC's jurisdictional test does not turn on nameplate capacity. (ELPC/People 6-7). As a practical matter, most generators larger than 10 MW will apply for interconnection under federal/RTO rules. But any attempt to draw an arbitrary MW threshold will inevitably leave

some generators in a regulatory black hole. This would conflict with the federal standard's directive to cover "any electric consumer that the electric utility serves." 16 U.S.C. 2621(d)(15).

ELPC's and the People's Joint Comments offer a compromise position that would apply the rule's procedural protections to all state-jurisdictional DG customers, but would allow for flexibility in the application of the technical standard. (ELPC/People 8). This recommended approach would comply with the federal standard and avoid future disputes such as the recent GSG controversy[3] by providing a clear procedural pathway and Commission oversight for *all* state jurisdictional interconnections.

3) Fees, timelines and technical screens should be consistent with best practices and in no case should Illinois take a step backward from the positions adopted in the FERC small generator interconnection procedures.

The FERC stakeholder process resulting in Order 2006 and FERC's Small Generator Interconnection Procedures (SGIP) involved broad representation across the utility, DG and government sectors. Although some states have now improved on the FERC provisions, the FERC SGIP represents the bare minimum that can be still be considered "best practices." In fact, the FERC provisions are commonly

[3] *See 116 FERC ¶ 61,102* (July 31, 2006) (in which FERC disclaimed jurisdiction over the interconnection of two wind generating plants (53 MW and 30 MW) to be located in Lee County, Illinois to ComEd 34 kV distribution lines).

regarded as benchmarks for organizations that evaluate and "grade" state interconnection procedures.[4]

Sections (f) and (g) of the ELPC / People's Joint Comments highlight certain instances where the Draft Rules fall short of FERC standards and should be revised. The utilities propose various modifications that would further depart from FERC standards. For example, the FERC SGIP requires customers to provide utilities with at least 5 business days notice of a planned commissioning test. (FERC SGIP Sec. 4.4). ComEd, on the other hand, requests the authority to require up to 30 business days notice – a full six weeks! (ComEd 11). There is no technical or legal reason why it should take utilities in Illinois six times longer to prepare for a witness test than it does for those in Maryland, for example, which adopted FERC's five business day rule.

Accordingly, the Commission should revise the Draft Rules where they fall short of FERC standards and should reject any proposals to further weaken the Rules.

4) The Commission should clarify that Level 1 generators are not required to install redundant disconnect equipment.

Staff's Comments indicate that the Draft Rules themselves do not explicitly require redundant external disconnect equipment for Level 1 generators and that in some circumstances, "requiring the customer to bear the cost of an additional isolation device would serve no purpose." (Staff 15). Unfortunately, the Draft Rule is

[4] For example, a report from the Network for New Energy Choices assigns a lower grade to state procedures that are less "DG-friendly" than the FERC rules. NNEC, "Freeing the Grid" (2007) (available at http://www.newenergychoices.org/uploads/FreeingTheGrid2007_report.pdf).

vague as to the circumstances in which a utility can require external disconnect switches. Staff suggests that this could be resolved through the dispute resolution process set forth under Section 466.130. (Staff 15). ELPC and the People disagree. Instead of using Commission resources to resolve costly and time-consuming disputes that could easily be avoided, the Commission should revise Section 466.60(h) to more clearly exclude Level 1 generators from external disconnect switch requirements, as suggested in the ELPC / People's Joint Comments. (ELPC/People 4-6.)

As pointed out by NREL, there are several layers of redundant protections built into small inverter-based generators that render an additional disconnect switch unnecessary.[5] Ameren argues that this is a safety issue, but provides no evidence why a "ganged, manually-operating isolating switch" is necessary in light of all the other redundant safety protections identified in the NREL report. (Ameren 17). Ameren also disputes that the incremental cost of a disconnect switch could be an "overwhelming cost barrier" to the installation of small generators. (Ameren 17). But incremental costs have a disproportionate impact on smaller generators, and external disconnect switch requirements have been consistently identified as one more additional expense that, when added to other barriers, can make the difference between a project going forward or not.

While external disconnect switch requirements appear in several state interconnection rules, the recent trend is to eliminate such requirements for small

[5] *Utility Interconnected Photovoltaic Systems: Evaluating the Rationale for the Utility-Accessible External Disconnect Switch*, NREL Technical Report NREL/TP-581-42675, p. 23 (Jan. 2008).

inverter-based generators. Given PURPA's mandate to identify "*current* best practices of interconnection," 16 U.S.C. 2621(d)(15), the Commission should be careful not to include an outdated, unnecessary and burdensome requirement in the Illinois rules.

5) The Commission should not add burdensome queuing provisions in the Level 4 interconnection process.

The Draft Rules outline a "queuing process" for Level 4 generators so that utilities can allocate cost responsibility for distribution system upgrades where they are necessary to accommodate grid interconnections. (Sec. 466.120(c)). Ameren points out that an earlier draft included language that would have prevented utilities from initiating interconnection studies until it had "completed its review of all other interconnection requests that have a higher queue position." (Ameren 7). Contrary to Ameren's suggestion, however, the elimination of this flawed provision was not "unintentional," but was necessary to avoid injecting significant unnecessary delays and uncertainty into the Illinois process.

As discussed at length during the workshop process, a sequential study process for Level 4 generators makes no sense. (See, e.g., IREC Comments to Staff, 2/15/08). Each application has generous time allotments for scoping meetings and studies and provisions for further time if the EDC has further questions for the applicant. A sequential queuing process that trumps these timelines and allows utilities to ignore lower-queued applications until each and every higher-queued study is complete could create a backlog of years and would make it very difficult for Level 4 facilities to be financed.

Furthermore, instead of "discouraging speculative developers from stalling the process" as Ameren suggests (Ameren 8), the addition of a queuing process would actually *encourage* speculation. A queue would create an incentive for project developers to "get in line" even if their plans for a project were not fully formulated. One need only look at the backlog in transmission interconnection queues at the RTO level to understand the potential problem here. For example, MISO currently has 80,000 MW of generation, including 64,000 MW of wind sitting in its queue -- some projects dating back to 2004. According to a recent article, the backlog exists because of the placement of value on the queue position rather than on interconnection details. Thus, "stakeholders are encouraged to enter the queue early and often."[6]

Illinois should avoid duplicating the problems plaguing interconnection at the RTO level. Accordingly, the Commission should reject Ameren's suggestion to tie the initiation of the Level 4 study process to queue position.

6) The Commission should retain the reasonable indemnity and insurance requirements in the Draft rules.

Article 6 of the standard interconnection agreement (Appendix C) includes a bilateral indemnification provision which ensures that each party will take responsibility for their own negligence, willful misconduct or breach of contract in the case of a third-party claim. (Apx. C, Art. 6.3). Ameren and ComEd's suggestion that this standard business term would somehow create a "subsidy" by "shifting liability from individual interconnection customers to ratepayers" is puzzling.

[6] *RTOs report huge backlog of transmission interconnection requests*, Washington (Platts) (April 24, 2008) (available at http://www.platts.com/Electric%20Power/News/7937513.xml?src=Electric%20Powerrssheadlines1).

(Ameren 15; ComEd 8). Indemnification provisions do not "shift" liability. They ensure that liability remains where it belongs – on the responsible party. In effect, ComEd and Ameren are suggesting that interconnection customers should assume the liability of electric utilities in third party damage suits even in cases where the claims are "*based upon the EDC's (a) negligence or willful misconduct or (b) breach of this Agreement*." (Apx. C, Art. 6.3.3). This is absurd and unfair. Ameren's suggestion that bilateral indemnification is only required in "a few states" is also puzzling given Staff's thorough investigation of other state DG rules suggesting that bilateral indemnification is the norm and not the exception. (Ameren 16; Staff 23).

The Draft Rules require DG facilities with a nameplate capacity of 1 MW or above to carry a minimum of $2 million in comprehensive liability insurance coverage. (Apx. C, Art. 7). Ameren and MidAmerican apparently seek authority to impose additional insurance requirements on all DG customers. (Ameren 16; MidAmerican 4). But unjustified insurance requirements have been identified as a substantial barrier to interconnection. For example, a paper that was circulated during the workshop process concluded that there is "no technical or historical evidence to justify imposing additional insurance requirements" on small DG systems and "utility-imposed insurance requirements beyond typical homeowner's liability policies create unnecessary costs that discourage customers from investing in grid-connected PV systems."[7]

[7] T. Starrs and R. Harmon, *Allocating Risks: An Analysis of Insurance Requirements for Small-Scale PV Systems* (2000) (available at http://www.puc.state.pa.us/electric/pdf/NMIC_SunEdison_Comments_Att3.pdf)

The utilities' arguments regarding insurance and indemnification seem to be rooted in unrealistic and unsupported characterizations of the magnitude of risk posed by DG installations. For example, ComEd argues (without support) that DG customers create risks that are "substantially in excess" of ordinary load customers. (ComEd 8). Ameren darkly suggests that "[t]he potential risk associated with the operation of distributed generation in unquestionably serious – injury, property damage, or death …." (Ameren 16). Notably absent is evidence of even one single insurance claim (much less any "injury, property damage, or death") arising from the operation of a DG facility in the United States.

The Commission should accordingly decline the utilities' invitation to revisit the reasonable compromises embodied in the Draft Rules, especially as the current requirements are "within the general range of the insurance requirements" in other states. (Staff 24).

7) The Commission should maintain oversight authority over all standard forms and contracts.

The Draft Rules include not only detailed procedures, but standardized forms and contracts for each interconnection review level. The utilities argue in their Initial Comments (ComEd 3, Ameren14, and MidAmerican 2) that the Commission should not include the standard forms and contracts in its Final Rules. They primarily raise practical concerns, *i.e.,* different customers might require different technical standards.

However, as ComEd concedes (ComEd 6), waivers are available for instances where the utility and interconnection customer need a customized arrangement.

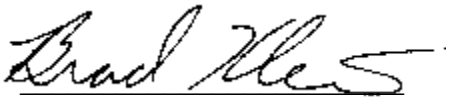
Given the interconnection timeframes included in the Draft Rules –which already exceed the best practices of other states – there is ample opportunity during the review schedules for the utilities to request waivers which would provide adequate protection against the risk of noncompliance with the terms in the standard forms and contracts.. The ICC should, therefore, approve the standardized forms and contracts included in the Draft Rules.

Conclusion

These comments are the culmination of a discussion that has been ongoing at the Commission in various forms since at least 1999. (See ELPC & People's Joint Initial Comments pp. 2-3). It is now time to complete this process and lay the foundation for economic growth and a cleaner Illinois environment by adopting rules based on "current best practices of interconnection for distributed generation." (See 7/26/06 Initiating Order at 1, citing Section 1254 of the Energy Policy Act of 2005). The Commission can achieve this goal by adopting the Draft Rules as published, with the revisions suggested in the Comments of ELPC, the People, the City of Chicago and the Interstate Renewable Energy Council.

Dated this 9th day of May, 2008.

Respectfully submitted,



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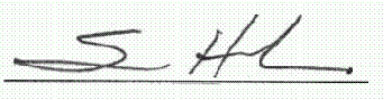

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the Energy Policy Act of 2005	)	

VERIFICATION

Bradley D. Klein, being first duly sworn upon oath, deposes and states that he has read the foregoing Joint Reply Comments in ICC Docket No. 06-0525, that he knows the contents thereof, and that to the best of his knowledge, information and belief, based upon reasonable inquiry, that said contents are true and correct.

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Notary Public

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OFFICIAL SEAL
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My Commission Expires
September 18, 2010

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NOTICE OF FILING

PLEASE TAKE NOTICE that on this date, May 9, 2008, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission via e-docket the enclosed Joint Reply of the Environmental Law & Policy Center and People of the State of Illinois.

Bradley D. Klein
One of the Attorneys for the
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CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on this date, May 9, 2008, I hereby certify that I did electronically file with the Illinois Commerce Commission the foregoing Joint Reply of the Environmental Law & Policy Center and People of the State of Illinois and electronically served the same upon the persons identified on the attached Service List.

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