

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

THE CITIZENS UTILITY BOARD and)	
THE ENVIRONMENTAL LAW AND)	
POLICY CENTER)	
)	
Petition to Initiate Rulemaking With Notice)	Docket No. 14-0135
and Comment for Approval of Certain)	
Amendments to Illinois Administrative)	
Code Part 466 and 467 Concerning)	
Interconnection Standards for Distributed)	
Generation)	

**SUPPLEMENTAL VERIFIED COMMENTS OF THE ENVIRONMENTAL LAW
& POLICY CENTER, THE CITIZENS UTILITY BOARD, AND THE INTERSTATE
RENEWABLE ENERGY COUNCIL, INC.**

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FOR: INTERSTATE RENEWABLE
ENERGY COUNCIL, INC

May 20, 2015

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The Environmental Law & Policy Center (“ELPC”), the Citizens Utility Board (“CUB”) and the Interstate Renewable Energy Council, Inc. (“IREC”) (collectively the “Joint Petitioners”) respectfully file these Supplemental Verified Comments in response to the ALJ’s ruling of April 9, 2015, which granted Staff’s Motion to set aside the briefing schedule on the ALJ’s initial First Notice Proposed Order and directed the parties to file one additional round of verified comments and replies prior to the ALJ issuing a second First Notice Proposed Order, which will address all the comments filed in this docket to date.

The record in this case is quite substantial and the parties have had numerous opportunities to introduce evidence into the record to support their respective positions. Thus, in the interests of administrative efficiency, the Joint Petitioners will tailor these supplemental comments narrowly to address only those issues identified as requiring further comment in the ALJ’s initial First Notice Order. However, the Commission should consider the weight of the entire record when making decisions in this docket, including all of the verified comments filed previously by the Joint Petitioners in this docket.

The ALJ's Proposed First Notice Order

On March 4, 2015 the ALJ issued a Proposed First Notice Order (ALJPO) that proposed several amendments to the Illinois interconnection standards at Parts 466 and 467 of the Commission's rules. The proposed amendments, as reflected in Appendix A of the ALJPO, tracked closely with the Joint Petitioners' recommendations in this docket, as modified by the parties' negotiations following the workshop sessions held in this docket. In particular, the ALJPO noted that the proposed amendments appear to be "consistent with the statutory goal of ensuring that barriers to the interconnection of distributed generation be minimized" as required by Section 16.107.5(h) of the Illinois Public Utilities Act.¹

In agreeing that the rules should be amended, the ALJPO also indicated that "the Commission is still left with unanswered questions."² Thus, the ALJPO requested further information from the parties in a few specific areas, including:

- An update should be provided on the various proceedings cited to be likely to cause an increase in distributed generation applications - for instance the EPA's Clean Power Plan and distributed generation issues at the IPA, etc.
- The utilities are asked to provide specifics regarding the number of distributed generation applications received each year since the adoption of the rules - how many at each level, are the number of applications increasing and at what pace.
- Any other information that will assist the Commission in making an informed decision should also be provided.

The ALJPO also requested detailed information from ComEd and Ameren to justify the continued need for an external disconnect switch ("EDS") requirement, including:

¹ ALJPO at 5.

² *Id.*

- How often has each utility required a distributed generation applicant to install an external disconnect switch - for systems under 25kW and for systems under 10kW?
- When an EDS has been required, why was the EDS required?
- What are the costs to install a switch for applicants for systems under 25kW and under 10KW?
- How often has an EDS been used or accessed by ComEd or Ameren?
- In what circumstances - for maintenance or in emergencies?

Finally, the ALJPO requested further information and comments regarding the proposed Supplemental Review procedures at Section 466.110(f), particularly with respect to the proposed “100% of minimum load screen”:

- Is the minimum load data readily available if smart meters are installed on a circuit?
- What exactly is required and how much work goes into determining minimum load on a circuit that has been “modernized”?
- What types of generation have been considered under Level 2, what percentage are solar, etc.?
- Are there circuits on either utility’s system that exceed the 15% of maximum load or 100% of minimum load with distributed generation?
- How many circuits are nearing these levels?
- What problems have utilities experienced on circuits with distributed generation?
- Provide an explanation of radial circuits, looped circuits and circuits from multiple feeds and how this relates to the issues in this rulemaking?

- Provide an explanation of whether there have been any experiences with distributed generation related islanding in Illinois; and what has been the experience with inverters shutting down or not shutting down when there is a grid failure?
- Finally, with respect to the existing process, how often has the “additional review” process been used by applicants to either utility? How long is the process for the “additional review” on average?

Despite these “unanswered questions,” the ALJPO determined that the record, as it stands, supports the rule changes proposed by the Joint Petitioners. With respect to the supplemental review procedures, for example, the ALJPO explained that the proposed language “conforms with the studies presented for the Commission’s review” and is consistent with the approach taken by FERC in Order 792, which the ALJ found to be “persuasive.” (ALJPO at 29). Although Illinois is not required to follow the FERC approach on all issues, the ALJPO determined that the record lacks a “technical justification” for why Illinois should not be adopting this process as well.

For purposes of the First Notice Order, the Commission adopts the proposal of the Petitioners. In its Order 792, FERC adopts 100% of minimum load screen for its Supplemental Review. The Commission, with the evidence presented, finds this persuasive. The utilities may present information - a technical justification - for why Illinois should not follow the path suggested by FERC. This appears to be the trend and the utilities should explain why Illinois is unique.³

The Joint Petitioners agree that the record, as it stands, supports the proposed rule changes and that the utilities have not explained why Illinois is unique and requires rules that depart from the approach adopted by FERC and increasingly under consideration in other states. As requested, the Joint Petitioners present the following additional information that may be useful to the Commission in reaching an informed decision on the proposed rule changes.

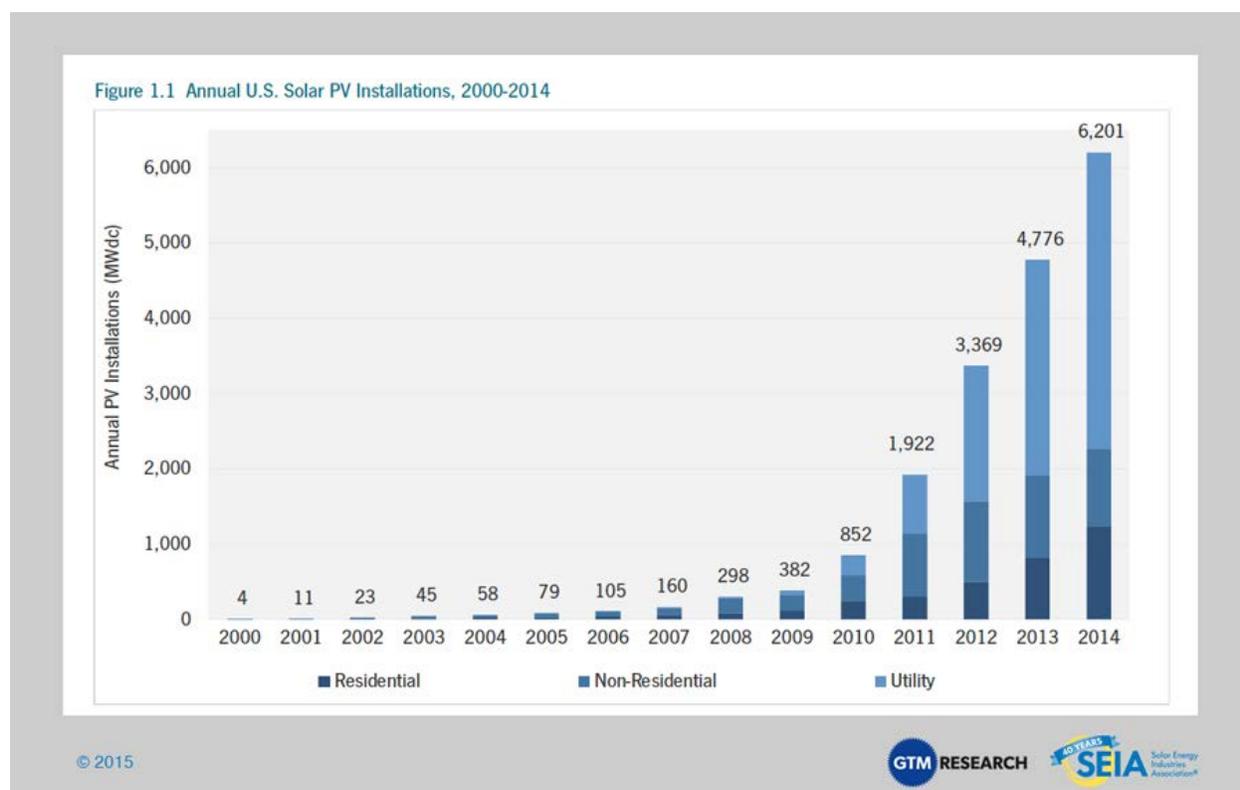
³ ALJPO at 29.

However, as mentioned above, the parties’ supplemental comments should be read and considered against the backdrop of the substantial record that has already been developed in this docket to support the proposed approach.⁴

Responses to ALJPO Questions

A. There is a clear need to prepare for increased numbers of distributed generation applications in Illinois in order to avoid “unnecessary costs to be passed on to consumers.”

The U.S solar market is booming, and costs continue to fall rapidly. In 2014, new solar installations totaled more than 6 GWdc—up 30 percent over 2013 and more than 12 times the amount installed five years earlier.



As reported by the Solar Energy Industries Association (“SEIA”), over 600,000 homes and businesses now have on-site solar, and *nearly 200,000 of these installations were completed in*

⁴ See Joint Pet. Ver. Init. Comments; Joint Pet. Ver. Rep. Comments.

2014.⁵ While most of these installations have been concentrated in select states, the primary driver for solar installations is cost, and these costs continue to fall rapidly. Thus, as SEIA reports, “[i]n many states solar is on the cusp of economic feasibility, so each incremental decline in prices opens up the market to new potential customers and makes solar more competitive with the alternative.”⁶

As described in the record, distributed generation market development typically follows a similar pattern in every state: decades of slow growth followed by a “tipping point” in which the pace and penetration of distributed generation expands very rapidly. (*e.g.*, Joint Pet. Ver. Init. Comments at 11-12). States that prepare for the inevitable expansion of solar will be much better off than states that simply wait for this boom to occur and then have to scramble to update their policies. As FERC explained in Order 792:

Without these reforms, the continued growth in Small Generating Facilities could cause inefficient interconnection queue backlogs and require some Small Generating Facilities to undergo the more costly Study Process when they could be interconnected under the Fast Track Process safely and reliably. Costs resulting from such inefficiencies in the interconnection process would ultimately be borne by consumers. The record in this proceeding does not refute the nature of the changes now occurring and expected to continue.⁷

Specifically, FERC determined that its old procedures—the same procedures that are embedded in the current Illinois rules—would “inhibit the continued growth in Small Generating Facilities *and cause unnecessary costs to be passed on to consumers.*”⁸ Thus, as the ALJPO recognized, it is reasonable for the Commission to act now, particularly in light of the PUA’s mandate to consider “best practices,”⁹ the ongoing push for smart grid infrastructure improvement in

⁵ GTM Research / SEIA, Solar Market Insight Report 2014 Q4 (available at <http://www.seia.org/research-resources/solar-market-insight-report-2014-q4>).

⁶ *Id.*

⁷ FERC Order 792 at 16 (available at <http://www.ferc.gov/whats-new/comm-meet/2013/112113/E-1.pdf>).

⁸ *Id.* at 20 (emphasis added).

⁹ 220 ILCS 5/16-107.5(h).

Illinois, and developments at the Illinois Power Agency that will support the development of distributed generation markets. It is not reasonable and prudent for the Commission to maintain rules that FERC and other states have determined are inappropriate for higher penetrations of distributed generation when it is clear that electricity markets are undergoing fundamental changes that will result, inevitably, in more distributed generation coming to Illinois.

The ALJPO requested an update on “the various proceedings cited to be likely to cause an increase in distributed generation applications - for instance the EPA’s Clean Power Plan and distributed generation issues at the IPA, etc.” (ALJPO at 5). Although it would be reasonable for Illinois to update its interconnection procedures based on the underlying DG market and economic dynamics alone, there have been several recent policy developments in Illinois that are likely to accelerate the inevitable expansion of distributed generation. The Illinois Power Agency is moving ahead with three distributed solar procurements over the next calendar year, with the first one occurring in June 2015.¹⁰ Importantly, the Commission’s final order in the IPA’s supplemental solar procurement case (ICC Docket 14-0651) upheld the IPA’s authority to allocate the entire \$30 million procurement to *new* distributed solar systems. This could result in the development of more than 40 MW of new distributed systems in Illinois over the next year. (By way of comparison, ComEd currently has less than 3 MW of *total* net metered solar capacity in its service territory.) The Commission is also moving ahead with updates to the state’s net metering rules, which should help streamline and lower barriers to new DG projects.¹¹ These proposed rules were published for First Notice in the Illinois Register on May 8, 2015. In the meantime, the Illinois legislature is considering bills that would fix the state’s flawed renewable

¹⁰ See Illinois Power Agency, Supplemental PV Procurement website, <http://ipa-energyrfp.com/supplemental-pv-procurement-section/>.

¹¹ See ICC Docket 15-0273.

energy standard and raise the standard to 35% by 2030.¹² These bills would require the IPA to significantly expand the development of distributed solar through a long-term renewable resource development plan that includes new low-income and community solar provisions, a “brownfield” solar carve-out, and a new DG declining block procurement program.

The purpose of this docket is to *prepare* for the inevitable expansion of distributed generation markets in Illinois. Although the “tipping point” has not yet arrived, there are many reasons to expect that it is closer at hand than some may expect. It is prudent for the Commission to act now so that Illinois is well prepared for this transition.

B. The utilities have not provided data or a technical justification for maintaining the external disconnect switch requirement for small, inverter-based DG systems.

An external disconnect switch (“EDS”) is a device that allows a utility line worker to disconnect a customer’s DG system from the exterior of a home or building. While these devices are typically required for larger DG systems, many states and utilities have determined that the devices are redundant and impose unnecessary costs for smaller inverter-based DG systems and therefore have eliminated the requirement for smaller inverter-based systems. The Joint Petitioners’ comments describe and discuss a substantial body of evidence, including two important and thorough technical reports, which conclude that an EDS on small inverter-based generators is not necessary and can be cost prohibitive to generators.¹³ The record also reflects that elimination of the EDS requirement for small inverter-based systems is consistent with the current practices of the nation’s utilities with the most experience integrating high volumes of

¹² See Illinois Clean Energy Jobs Act bills, SB1485/HB2607.

¹³ e.g. Joint Pet. Ver. Rep. Comments at 7; 8 *citing* M. Coddington, R.M. Margolis, and J. Aabakken, NREL, *Utility-Interconnected Photovoltaic Systems: Evaluating the Rationale for the Utility-Accessible External Disconnect Switch*, Technical Report: NREL/TP-581-42675 (Jan. 2008), available at www.nrel.gov/docs/fy08osti/42675.pdf [NREL EDS Report]; Michael T. Sheehan, P.E., IREC, *Utility External Disconnect Switch: Practical, Legal, and Technical Reasons to Eliminate the Requirement*, SolarABCs (Sept. 2008), available at www.solarabcs.org/about/publications/reports/ued/pdfs/ABCS-05_studyreport.pdf [Solar ABCs EDS Report].

distributed generation.¹⁴ In their responses, the utilities oppose removing the EDS requirement but fail to provide any evidence or response to the technical arguments presented in the reports.¹⁵

The ALJPO was “reluctant” to remove the option for utilities to require an EDS if those devices are truly “necessary for safety reasons.”¹⁶ However, the ALJPO also found that “there is no evidence regarding the use of external disconnect switches in Illinois.”¹⁷ Thus, the ALJPO requested information from the utilities regarding the actual use and need for EDS for small systems in Illinois, including how often EDS is required, why it is necessary, the cost of an EDS, how often utilities use an EDS and for what reason.¹⁸ Based on this information, the ALJPO indicated that a “middle ground” may be appropriate, including, for instance, a potential waiver of the requirement for systems under 10 kW.¹⁹

The Joint Petitioners believe that the overwhelming weight of the evidence in the record supports eliminating the EDS requirement for inverter-based systems under 25 kW²⁰ and the data produced by the utilities in response to the ALJPO will likely show that these devices are rarely, if ever, actually used. If the Commission is not inclined to entirely eliminate the EDS requirement for inverter-based systems under 25 kW, the Joint Petitioners would support the 10 kW “middle ground” suggested by the ALJPO. Alternatively, if the Commission wishes to continue to allow the utilities to require an EDS for all systems smaller than 25 kW, then it should require the utilities to pay the additional cost and file annual reports that respond to the questions left open by the utilities in this docket, as noted in the ALJPO (*e.g.* how often an EDS

¹⁴ See Joint Pet. Ver. Init. Comments at 36-37.

¹⁵ See, *e.g.*, ComEd Ver. Init. Comments at 15, Ameren Ver. Init. Comments at 3.

¹⁶ ALJPO at 15.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.* at 16.

²⁰ See Joint Pet. Ver. Init. Comments at 35-37; Joint Pet. Ver. Rep. Comments at 7-11; Joint Pet. Ver. Sur. Comments at 8.

is required, why it is necessary, how often the utilities actually use it, and for what reason). This will develop a record over time that will allow the Commission to revisit this policy decision in the future and ensure that Illinois customers are not being required to install, and pay for, unnecessary equipment.

C. The record contains no compelling technical justifications to depart from the supplemental review procedures adopted by FERC and other states.

Section 466.110(f) includes new “supplemental review” procedures to determine whether projects can be interconnected safely and reliably without having to go through unnecessary and expensive studies. FERC determined that the supplemental review process set forth in Order 792 (which is substantively identical to the process proposed here) “will enhance transparency and consistency ... and thus ensure that interconnection remains just and reasonable and not unduly discriminatory, particularly in regions with increasing penetrations of Small Generating Facilities.”²¹ FERC further concluded that the process “retains sufficient flexibility ... to meet the needs of regions that do not have significant penetrations of Small Generating Facilities.”²²

One important element of the supplemental review process adopted by FERC is the inclusion of a “100% of minimum load” screen to determine if there is a potential for unintentional islanding of DG equipment. FERC discusses the “minimum load” screen beginning at page 70 of Order 792, ultimately determining that the minimum load screen is “sufficiently conservative” and, when viewed together with the other two supplemental review screens “provide[s] the flexibility to identify circumstances when additional studies may be required while avoiding an unjust and unreasonable increase in expense and delay in interconnection.”²³

²¹ FERC Order 792 at 69.

²² *Id.* at 70.

²³ *Id.* at 81.

The ALJPO adopted a modified version of the proposed Supplemental Review, finding FERC’s adoption of similar procedures to be “persuasive.” While Ameren and ComEd raised various objections to supplemental review, the utilities fail to explain why the Illinois distribution system is somehow different than other states in ways that would require Illinois to adopt rules that diverge from the emerging trend established by FERC and other states. Supplemental review works for Ohio²⁴ and is under consideration in other Midwestern states, including Iowa.²⁵ In fact, in April 2015, Iowa’s investor-owned electric utilities filed joint comments with ELPC and other parties jointly recommending the very same supplemental review procedures that Ameren and ComEd oppose here.²⁶

The ALJPO raised some questions about how minimum load would be measured, and in particular whether it is appropriate to use an estimate if actual minimum load data is not available. (ALJPO at 29). As explained by FERC, the adopted reforms give electric utilities the flexibility to “to calculate, estimate or determine minimum load if data are not available.”²⁷ However, if data is available, as it should be in many cases given the proliferation of advanced metering in Illinois, then utilities should use that data. This mandate is in keeping with the Commission’s desire to see the utilization of the investment in smart grid technology. If data is not available, utilities may estimate it pursuant to well-established methods.²⁸ Finally, if a utility believes it cannot safely estimate the minimum load, it is permitted to have an applicant fail this

²⁴ See PUCO Docket 12-2051-EL-ORD (adopting amended interconnection rules in Chapter 4901:1-22 of the Ohio Revised Code) (December 4, 2013).

²⁵ *In re Distributed Generation*, IUB Docket NOI-2014-0001, Joint Comments on Proposed Interconnection Rule Changes (April 7, 2015).

²⁶ *See id.*

²⁷ FERC Order 792 at 83.

²⁸ See Joint Pet. Ver. Rep. Comments at 25 (*citing* NREL Technical Report 5500-54063, *Updating Interconnection Screens for PV System Integration* (Feb. 2012), at 7, *available at* <http://www.nrel.gov/docs/fy12osti/54063.pdf>, which states that “minimum load can be estimated based on standard load profiles for various customer classes that many utilities maintain and update on an annual basis.” and NREL, *Distributed Generation Interconnection Collaborative, Minimum Daytime Load Calculation and Screening*, *available at*: http://www.nrel.gov/tech_deployment/dgic.html which includes a specific technical session for utilities that helps identify methods for calculating minimum load.).

screen, so long as it provides the reason to the customer.²⁹ As the record shows, this approach, which gives utilities options based on the particular situation faced by each applicant, is being applied in many places now, and is appropriate in Illinois as well.³⁰ It protects system safety and allows for flexibility in identifying the appropriate method for determining minimum load as utilities gain experience and technological advances are deployed.

To the extent possible, the Commission should seek to harmonize the interconnection standards in Illinois with best practices at FERC and other states, so long as they are consistent with safe and reliable electric service.³¹ The supplemental review provisions proposed here have been well-vetted, are working well in other states, and represent an emerging national trend. The record in this case supports the use of supplemental review in Illinois, and no party has provided a persuasive technical justification for why the Commission should carve out a different set of requirements in Illinois, particularly when those requirements would add additional time and expense for DG projects.

Conclusion

The Joint Petitioners appreciate the ALJ's careful consideration of the important issues in this docket and the opportunity to present additional information that could assist the Commission in reaching an informed decision on the proposed rule changes. The full record overwhelmingly supports the rules as proposed by the Joint Petitioners, and reflects the

²⁹ FERC SGIP § 2.4.4.1 (“If minimum load data is not available, or cannot be calculated, estimated or determined, the Transmission Provider shall include the reason(s) that it is unable to calculate, estimate or determine minimum load in its supplemental review results notification under section 2.4.4.”); *see also* FERC Order 792 ¶ 144, at 83 (“The adopted reform gives the Transmission Provider the flexibility to calculate, estimate or determine minimum load if data are not available. Further, the language allows the Transmission Provider not to perform the Minimum Load Screen if data are unavailable or if it is unable to calculate, estimate or determine minimum load.”).

³⁰ *See* Joint Pet. Init. Comments at 27-34 (indicating that CA, MA and OH have adopted the same supplemental review process in place at FERC in this respect, which requires the use of available data, but allows for the estimation of minimum load or the rejection of an applicant if such estimation is not possible).

³¹ *See* 220 ILCS 5/16-107.5(h) (requiring the Commission to consider national standards and “best practices” when establishing interconnection standards in Illinois).

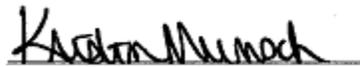
substantial amount of work that all parties and Commission Staff have put into this docket through workshops and several rounds of verified comments over the past 15 months. The Joint Petitioners respectfully request that the Commission move this docket forward expeditiously so that Illinois customers can take advantage of interconnection best practices that will help reduce costs while continuing to ensure the safety and reliability of electricity service in Illinois.

Dated: May 20, 2015

Respectfully submitted,



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AFFIDAVIT OF BRAD KLEIN

I, Brad Klein, affirm that I have personal knowledge of the contents of these *Supplemental Verified Comments of the Environmental Law & Policy Center, The Citizens Utility Board, and The Interstate Renewable Energy Council, Inc.*, which are to the best of my knowledge, true and accurate.



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Sworn or affirmed before me
this 20 day of May, 2015.



Notary Public

My commission expires: 2017



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AFFIDAVIT OF JEFF ZETHMAYR

I, Jeff Zethmayr, affirm that I have personal knowledge of the contents of these *Supplemental Verified Comments of the Environmental Law & Policy Center, The Citizens Utility Board, and The Interstate Renewable Energy Council, Inc.*, which are to the best of my knowledge, true and accurate.



Jeff Zethmayr
Senior Policy Analyst
Citizens Utility Board
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Sworn or affirmed before me
this 20th day of May, 2015.



Notary Public
My commission expires: 10/17/15



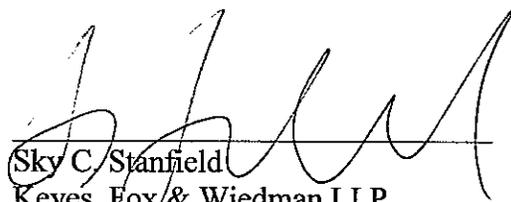
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AFFIDAVIT OF SKY C. STANFIELD

I, Sky C. Stanfield, affirm that I have personal knowledge of the contents of these *Supplemental Verified Comments of the Environmental Law & Policy Center, The Citizens Utility Board, and The Interstate Renewable Energy Council, Inc.*, which are to the best of my knowledge, true and accurate.



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FOR: INTERSTATE RENEWABLE
ENERGY COUNCIL, INC

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

~~Sworn or affirmed before me
this _____ day of _____, 2015.~~

~~Notary Public
My commission expires: _____~~

State of California SAN FRANCISCO
County of _____
Subscribed and sworn to (or affirmed) before me on this 20
day of MAY, 2015, by SKY C. STANFIELD
proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.
(Seal) Signature Kevin Tabb Woldhan

 KEVIN TABB WOLDHAN
Commission # 1959463
Notary Public - California
San Francisco County
My Comm. Expires Dec 3, 2015