

**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 Parts 466 and 467 Concerning	)	
Interconnection Standards for	)	
Distributed Generation.	)	

**REPLY SUPPLEMENTAL VERIFIED COMMENTS OF  
COMMONWEALTH EDISON COMPANY**

**I. Introduction.**

Commonwealth Edison Company (“ComEd”), by its counsel, hereby submits its reply supplemental verified comments pursuant to the ruling of April 9, 2015, of the Administrative Law Judge. This proceeding concerns a proposal submitted by the Environmental Law and Policy Center, the Citizens Utility Board and the Interstate Renewable Energy Council, Inc. (“ELPC/CUB/IREC” or “Proponents”) on August 8, for revisions to Parts 466 and 467 of this Commission’s rules that govern the interconnection of distributed generation facilities (“the Proposed Rules”). Pursuant to the April 9, 2015 ruling Ameren, ComEd, the Proponents, and Staff of the Illinois Commerce Commission (“Staff”) each submitted verified supplemental comments. In order to facilitate analysis of these comments within the context of the Proposed Order, ComEd will present its reply supplemental comments using the same outline as the Proposed Order.

## **II. Comments.**

### **A. The Need for the Amendments.**

Even without the revisions addressed in this proceeding, the Part 466 and 467 rules are working. ComEd Initial Comments at 2. As noted in ComEd's Supplemental Verified Comments, since the adoption of the Commission's Part 466 rules in 2008, ComEd has received a total of 1,132 applications of which only four (4) or 0.4% were denied by ComEd. ComEd Supplemental Verified Comments at 2. Each of the denied applications were originally submitted under Levels 1, 2 or 3 and subsequently approved under Level 4. *Id.* The Proponents' Supplemental Comments indicate that there is "a clear need to prepare for increased numbers of distributed generation applications" and present data showing rapidly expanding solar installations nationally. Proponents Supplemental Comments at 5. ComEd notes that while distributed generation applications have been increasing, a significant portion of the increases nationally are due to utility scale installations.

According to the source cited by the Proponents, utility scale PV installations present the "bedrock of demand within the U.S. solar market" accounting for "63% of all PV capacity brought on-line in 2014."<sup>1</sup> These utility scale projects are carefully planned out to function in conjunction with distribution system infrastructure and typically fall outside the context of the topics being discussed in this proceeding for Part 466 applications. Currently Part 466 applications involve non-utility scale systems with capacities that are significantly smaller. The data presented by ComEd in its Supplemental Comments presents the most accurate and relevant data regarding past distributed generation application trends in the ComEd service territory.

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<sup>1</sup> GTM Research / SEIA, Solar Market Insight Report 2014 Q4. Available at: <http://www.seia.org/research-resources/solar-market-insight-report-2014-q4>.

**B. Part 466.90(b) Refining Level 2 Size Limit by Incorporating a Table.**

ComEd recommends setting the cut-off level for the 5kV to 15kV voltage band at <2MW rather than the <3MW proposed by the Proponents. Setting the threshold to 3MW would likely allow some larger scale inverter projects to be eligible for Level 2 review when a more detailed engineering analysis and review would be prudent and necessary to determine the project's impact on the distribution system. ComEd Supplemental Comments at 6. For devices that fall between 2MW and 3MW, it is highly unlikely that all the Level 2 screens can be successfully met without additional analysis and/or upgrades. *Id.* at 7. A device that falls within the 2MW and 3MW range is a larger scale installation requiring significant engineering design and analysis. Based on data from a National Renewable Energy Laboratory (NREL) report, a solar installation of this magnitude would require an average of 11 to 16.5 acres of land for solar panels.<sup>2</sup> Based on ComEd's experience it is more prudent for both applicants and ComEd to have applicants that have projects that fall between 2MW and 3MW apply under Level 4. *Id.* In ComEd's experience, a process that is not reasonably correlated with the likelihood of meeting all the Level 2 screens leads to confusion and dissatisfied customers who may feel they were misled and delayed into undergoing Level 2 review. ComEd Initial Comments at 11.

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<sup>2</sup> Ong, S., Campbell, C., Denholm, P., Margolis, R., and Heath, G., NREL Technical Report (June 2013), NREL/TP-6A20-56290, Land-Use Requirements for Solar Power Plants in the United States. Available at: <http://www.nrel.gov/docs/fy13osti/56290.pdf>

**C. Section 466.110(f) Supplemental Review.**

As noted by Staff, an additional review process is already presented in the Commission's current Part 466 rules. Staff Supplemental Comments at 6. Over the past two years, ComEd has successfully approved at least 2 distributed generation applications using the flexibility of the Level 2 additional review provision to avoid having the interconnection customer reapply under Level 4. The Petitioner's proposal for supplemental review is wholly unnecessary and ineffectively detailed. *Id.* The Proponents' proposal to set "100% of minimum line load" as the basic screening criteria for evaluation of the potential impact on system performance, reliability, and safety of a proposed distributed generation interconnection request should be rejected because utilities have limited or no operational experience using the screening criteria. ComEd Supplemental Comments at 8. Additionally, the Voltage and Power Quality and Safety and Reliability Screen are designed only to determine impacts on the distribution system during normal operating conditions. ComEd Supplemental Comments at 17.

As noted by Staff, the inclusion of the phrase "and other factors" within subsection (f)(4)(C) makes the detailed listing of items unnecessary and not meaningful. Staff Supplemental Comments at 6-7. The current additional review process based on existing industry standards is working. ComEd agrees with Staff's recommendation that the best course of action is to leave the language unmodified.

**III. Conclusion.**

ComEd urges the Commission to adopt revised Part 466 and Part 467 rules in accordance with its comments presented in this proceeding.

Dated: June 3, 2015

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

/s/ Michael R. Lee \_\_\_\_\_

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**VERIFICATION**

William J. Gannon, being first duly sworn, states that he is Director, Transmission & Substation Engineering for Commonwealth Edison Company, that he has read the foregoing and he is knowledgeable of the facts stated therein and that the facts stated therein are true and correct to the best of his information and belief.

William J. Gannon  
William J. Gannon

SUBSCRIBED AND SWORN to  
Before me this 3<sup>rd</sup> day of  
June, 2015.

Gudelia Justiniano  
Notary Public

