

13. Based on proposed Point of Interconnection, existing or known constraints such as, but not limited to, electrical dependencies at that location, short circuit interrupting capacity issues, power quality or stability issues on the circuit, capacity constraints, or secondary networks.

The Pre-Application Report need only include pre-existing data. A Pre-Application Report request does not obligate the Utility to conduct a study or other analysis of the proposed project in the event that data is not available. If the Utility cannot complete all or some of a Pre-Application Report due to lack of available data, the Utility will provide the potential Applicant with a Pre-Application Report that includes the information that is available and identify the information that is unavailable.

Notwithstanding any of the provisions of this Section, the Utility shall, in good faith, provide Pre-Application Report data that represents the best available information at the time of reporting.

III. INTERCONNECTION REVIEW

A. Level 1 Screening Criteria and Process for Inverter-Based Generating Facilities Not Greater than 25 kW

1. Application: An Applicant must submit a Level 1 Application using the standard form provided in [Attachment 2](#) to these Interconnection Procedures, which may be sent electronically to a recipient designated by the Utility. Within three (3) Business Days of receipt, the Utility shall acknowledge receipt of the Application and notify Applicant whether or not the Application is complete. If the Application is incomplete, the Utility shall provide a written list detailing all information that must be provided to complete the Application. The Applicant shall have ten (10) Business Days after receipt of the list of incomplete material to submit the listed information, or to request an extension of time to provide such information. Otherwise, the Application will be deemed withdrawn. The Utility shall notify the Applicant within three (3) Business Days of receipt of a revised Application whether the Application is complete or incomplete. The Utility may deem the Application withdrawn if it remains incomplete. An Applicant executes the standard Interconnection Agreement for Level 1 by submitting a Level 1 Application.
2. Applicable Screens:
 - a. Facility Size: The Generating Facility has a Generating Capacity not greater than 25 kW.
 - b. For interconnection of a Generating Facility to a radial distribution circuit, the Generating Facility aggregated with all other generation

capable of exporting energy on a Line Section will not exceed 15 percent of the Line Section's annual peak load as most recently measured at the substation or calculated for the Line Section.⁷ A Line Section is that portion of the radial distribution circuit to which the Applicant seeks to interconnect and is bounded by automatic sectionalizing devices or the end of a distribution line.⁸

- c. If the Generating Facility is to be interconnected on single-phase shared secondary, then the aggregate generation capacity on the shared secondary, including the Generating Facility, will not exceed 20 kilovolt-amperes (kVA).
- d. If the Generating Facility is single-phase and is to be interconnected on a transformer center tap neutral of a 240-volt service, its addition will not create an imbalance between the two sides of the 240-volt service of more than 20 percent of nameplate rating of the service transformer.
- e. For interconnection of a Generating Facility within a Spot Network or Area Network, the aggregate generating capacity including the Generating Facility may not exceed 50 percent of the Network's anticipated minimum load.⁹ If solar energy Generating Facilities are used exclusively, only the anticipated daytime minimum load shall be considered. The Utility may select any of the following methods to determine anticipated minimum load:
 - i. the Network's measured minimum load in the previous year, if available;
 - ii. five percent of the Network's maximum load in the

⁷ The intent of this screen is to assure that generation on a Line Section will not exceed load at any time, but utilities typically track peak loads and not minimum loads. Fifteen percent of peak load was established in the FERC procedures as a conservative estimate of minimum load. Inexplicably, the FERC procedures call for aggregate generation on the *circuit* to not exceed 15 percent of *Line Section* peak load, when the relevant comparison is Line Section generation versus Line Section load (the correction has been made here).

⁸ Typically, a radial distribution circuit does not have automatic sectionalizing devices, so the whole circuit is one Line Section. A fuse must be manually replaced and is therefore not considered an automatic sectionalizing device.

⁹ Area Networks and Spot Networks use a network protector on each feeder serving the network and these protectors normally remain closed. It is important that generation not exceed load on the network to avoid the possibility of operating one or more network protectors.

- previous year;
- iii. the Applicant’s good faith estimate, if provided; or
 - iv. the Utility’s good faith estimate if provided in writing to the Applicant along with the reasons why the Utility considered the other methods to estimate minimum load inadequate.
3. Time to process screens: Within seven (7) Business Days after the Utility notifies the Applicant that the Application is complete, the Utility shall notify the Applicant whether the Generating Facility meets all of the applicable Level 1 screens.
 4. Screens failure: Despite the failure of one or more screens, the Utility, at its sole option, may approve the interconnection provided such approval is consistent with safety and reliability. If the Utility cannot determine that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards, the Utility shall provide the Applicant with detailed information on the reason(s) for failure in writing. In addition, the Utility shall either:
 - a. Notify Applicant in writing that the Utility is continuing to evaluate the Generating Facility under Supplemental Review if the Utility concludes that the Supplemental Review might determine that the Generating Facility could continue to qualify for interconnection pursuant to Level 2; or
 - b. Offer to continue evaluating the Interconnection Request under Level 4.¹⁰
 5. Approval: If the proposed interconnection meets all of the applicable Level 1 screens, the Interconnection Request shall be approved and the Utility will provide the Applicant an executable Interconnection Agreement within the following timeframes.

¹⁰ In some cases, an Applicant’s facility may require upgrades whose costs are so significant that they are prohibitive. In these cases, a Utility sometimes refers to the particular circuit where the Applicant is trying to interconnect as “full” or “closed,” meaning that no more projects may interconnect to that circuit without prohibitively costly upgrades. These Interconnection Procedures leave the decision about whether or not to pay for necessary upgrades to the Applicant, who will ultimately bear the burden of these high upgrade costs, rather than attempting to define what constitutes a full or closed circuit. Moreover, in order to avoid this situation, a Utility could direct Applicants and potential Applicants toward more optimal locations on the Utility’s Electric Distribution System, for example through the Pre-Application process described in [Section II](#) or through publicly available mapping tools.

- a. If the proposed interconnection requires no construction of facilities by the Utility on its own system,¹¹ the interconnection agreement shall be provided within three (3) Business Days, the Utility shall send the Applicant a copy of the Application form, signed by the Utility, forming the Level 1 Interconnection Agreement. If a Utility does not notify an Applicant in writing or by email within twenty (20) Business Days whether an Application is approved or denied, the Interconnection Agreement signed by the Applicant as part of the Level 1 Application shall be deemed effective.¹²
- b. If the proposed interconnection requires only Interconnection Facilities or Minor System Modifications, the Interconnection Agreement, along with a non-binding good faith cost estimate and construction schedule for such upgrades, shall be provided within fifteen (15) Business Days after notification of the Level 1 review results.
- c. If the proposed interconnection requires more than Interconnection Facilities and Minor System Modifications, the Utility may elect to either provide an Interconnection Agreement along with a non-binding good faith cost estimate and construction schedule for such upgrades within thirty (30) Business Days after notification of the Level 1 review results, or the Utility may notify the Applicant that the Utility will need to complete a Facilities Study under [Section III.F](#) to determine the necessary upgrades.¹³

6. Unless extended by mutual agreement of the Parties, within six (6) months

¹¹ This sub-provision (a) permits the installation of any metering or other commercial devices. If such devices are required, the three-day timeline for provision of the interconnection agreement still applies.

¹² In most cases approval by the local municipal electrical inspector will still be required to commence operation.

¹³ Many states' interconnection procedures contain some version of a "no construction screen," which prohibits Generating Facilities that pass other technical screens for expedited interconnection review from obtaining an Interconnection Agreement if they require construction of any facilities by the Utility on its system. This "no construction screen" results in unnecessary studies and can be particularly problematic for Generating Systems wishing to interconnect in locations without onsite load. In contrast, the approach taken here gives utilities additional time to provide a cost estimate along with an Interconnection Agreement if it determines that upgrades are necessary, with timeframes dependent on whether these are Minor System Modifications or something more. Alternatively, the Utility may opt to proceed directly to a Facilities Study, bypassing the Impact Study.

of formation of an Interconnection Agreement or six (6) months from the completion of any upgrades, whichever is later, the Applicant shall provide the Utility with at least ten (10) Business Days notice of the anticipated start date of the Generating Facility.

7. A Utility may conduct an inspection within ten (10) Business Days of receiving the notice of the anticipated start date at a time mutually agreeable to the Parties. If a Generating Facility initially fails a Utility inspection the Utility shall offer to redo the inspection at the Applicant's expense at a time mutually agreeable to the Parties. If the Utility determines that the Generating Facility fails the inspection it must provide a written explanation detailing the reasons and any standards violated.
8. An Applicant may begin interconnected operation of a Generating Facility provided that there is an Interconnection Agreement in effect, the Utility has received proof of the electrical code official's approval, and the Generating Facility has passed any inspection required by the Utility.¹⁴ Evidence of approval by an electric code official includes a signed Certificate of Completion in the form of [Attachment 5](#) or other inspector-provided documentation.
9. A Utility may elect to charge a standard Application fee of up to \$100 for Level 1 review.¹⁵

B. Level 2 Screening Criteria and Process for Generating Facilities Meeting Specified Size Criteria Up to 5 MW, Depending on Line Capacity and Distance from Substation

1. Application: An Applicant must submit a Level 2 Application using the standard form provided in [Attachment 3](#) to these Interconnection Procedures, which may be sent electronically to a recipient designated by the Utility. Within three (3) Business Days of receipt, the Utility shall acknowledge receipt of the Application and notify the Applicant whether or not the Application is complete. If the Application is incomplete, the Utility shall provide a written list detailing all information that must be provided to complete the Application. The Applicant will have ten (10) Business Days after receipt of the list to submit the listed information, or to request an extension of time to provide such information. Otherwise, the Application will be deemed withdrawn. The Utility shall notify the Applicant within three (3) Business Days of receipt of a revised

¹⁴ Upon interconnected operation, the Applicant becomes an Interconnection Customer.

¹⁵ States have set Level 1 Application fees in a range from \$0 to \$800. California and other states with extensive renewable energy installations have chosen \$0 for net-metered facilities.