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## Easterling, Deborah

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**From:** Easterling, Deborah  
**Sent:** Wednesday, November 25, 2015 9:25 AM  
**To:** 'jjazynka@energyfreedomcoalition.com'  
**Subject:** FW: Protest letter in Docket No 2015-362-E

POSTED  
12/2/15  
tod

**From:** Easterling, Deborah  
**Sent:** Wednesday, November 25, 2015 9:20 AM  
**To:** 'Scott Thomasson' <scott@votesolar.org>  
**Cc:** 'kthornburg@seia.org' <kthornburg@seia.org>; 'jjazynkz@energyfreedomcoalition.com' <jjazynkz@energyfreedomcoalition.com>; 'tyson.grinstead@sunrun.com' <tyson.grinstead@sunrun.com>  
**Subject:** RE: Protest letter in Docket No 2015-362-E

Dear Mr. Thomasson,

This is to acknowledge receipt of your email to the Public Service Commission of South Carolina. I am forwarding your email to our Clerk's Office for processing. Your email will become a part of Docket No. 2015-362-E - Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard. Your email has been placed in the Protest File of this Docket and on the Commission's Website at [www.psc.sc.gov](http://www.psc.sc.gov). A Protestant is an individual objecting on the ground of private or public interest to the approval of an Application, Petition, Motion or other matters which the Commission may have under consideration. A Protestant may offer sworn testimony but cannot cross-examine witnesses offered by other parties.

According to the Commission's Rules of Practice and Procedure, filing a Protest does not make you a Party of Record. A Protestant desiring to become an Intervenor (i.e., a Party of Record) in a proceeding before the Commission may file a Petition for Intervention within the time prescribed by the Commission.

If we may be of further assistance to you, please do not hesitate to contact us.

Sincerely,

Deborah Easterling  
Administrative Coordinator  
803-896-5133

**From:** Scott Thomasson [<mailto:scott@votesolar.org>]  
**Sent:** Monday, November 23, 2015 5:13 PM  
**To:** PSC\_Contact <[Contact@psc.sc.gov](mailto:Contact@psc.sc.gov)>  
**Subject:** Re: Protest letter in Docket No 2015-362-E

The previous version of the protest letter I just submitted by email was sent in error. Please substitute this attached version as the protest letter to be submitted in Docket No. 2015-362-E

Please call me at [202.670.7601](tel:202.670.7601) if you have questions.

## **Easterling, Deborah**

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**From:** Easterling, Deborah  
**Sent:** Wednesday, November 25, 2015 9:20 AM  
**To:** 'Scott Thomasson'  
**Cc:** 'kthornburg@seia.org'; 'jjazyнкz@energyfreedomcoalition.com';  
'tyson.grinstead@sunrun.com'  
**Subject:** RE: Protest letter in Docket No 2015-362-E

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Please call me at [202.670.7601](tel:202.670.7601) if you have questions.

**Scott Thomasson**  
**Director, New Markets**  
**Vote Solar**  
[202.670.7601](tel:202.670.7601)  
[scott@votesolar.org](mailto:scott@votesolar.org)

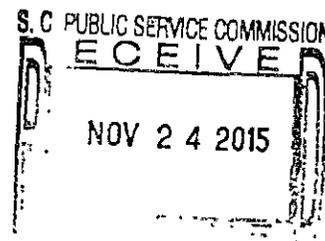
On Mon, Nov 23, 2015 at 5:04 PM, Scott Thomasson <[scott@votesolar.org](mailto:scott@votesolar.org)> wrote:

Attached please find the joint protest letter of Vote Solar, The Solar Energy Industries Association, The Alliance for Solar Choice, and Energy Freedom Coalition of America.

Please contact me with any questions.

**Scott Thomasson**  
**Director, New Markets**  
**Vote Solar**  
[202.670.7601](tel:202.670.7601)  
[scott@votesolar.org](mailto:scott@votesolar.org)

November 23, 2015



**VIA ELECTRONIC MAIL**

The Honorable Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

**Re: Letter of Protest in Docket No. 2015-362-E, Implementation of S.C. Code  
Ann. § 58-39-110 Resource Act, the South Carolina Distributed Energy**

Dear Ms. Boyd:

Vote Solar, The Solar Energy Industries Association (SEIA), The Alliance for Solar Choice (TASC), and The Energy Freedom Coalition of America (EFCA) hereby submit this Letter of Protest to respectfully urge the Commission to consider improvements to South Carolina's Interconnection Standard above and beyond those recommended by Duke Energy Carolinas, LLC; Duke Energy Progress, LLC; and South Carolina Electric & Gas Company (collectively, the "Utilities") in their October 9, 2015 Joint Application for Approval of Revised South Carolina Interconnection Standard ("Joint Application").

**I. PROTESTANTS INFORMATION**

Scott Thomasson  
Director, New Markets  
Vote Solar  
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Kristen Thornburg  
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Julia Jazynka  
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Tyson Grinstead  
The Alliance for Solar Choice  
336.213.3545  
[tyson.grinstead@sunrun.com](mailto:tyson.grinstead@sunrun.com)

## II. PROTESTANTS' INTEREST IN THE CASE

Vote Solar is a non-profit grassroots organization working on behalf of its members to bring solar energy into the mainstream. Since 2002, Vote Solar has engaged in state, local, and federal advocacy campaigns to remove regulatory barriers and implement key policies needed to bring solar to scale. Vote Solar has 131 active members in South Carolina and maintains full-time staff in California, Colorado, Massachusetts, and the District of Columbia.

Established in 1974, SEIA is the national trade association of the United States solar energy industry and is a broad-based voice of the solar industry in South Carolina. Through advocacy and education, SEIA and its 1,000 member companies are building a strong solar industry to power America. SEIA represents many of the nearly 50 companies in operation in South Carolina, working in all market segments – residential, commercial, and utility-scale – and employing 700 people.<sup>1</sup>

TASC leads advocacy across the country for the rooftop solar industry. TASC was founded by the largest rooftop solar companies in the United States and represents the rooftop solar industry nationwide. Its members include: Demeter Power; REPOWER by Solar Universe; Sunrun; and Verengo.

EFCA is a national advocacy group registered as a limited liability corporation in the State of Delaware. EFCA is an organization that seeks to promote public awareness of the benefits of solar and alternative energy through public advocacy, and the use of rooftop and other customer-owned and third-party owned distributed solar electrical generation for residential and commercial applications. EFCA's current members include Silevo, LLC, SolarCity Corporation, Zep Solar, LLC, and NRG Energy, Inc.

## III. STATEMENT OF PROTEST

South Carolina is embarking on a new era in the State's energy future with the implementation of Act 236. With this Act and the adoption of the underlying programs, the State has opened up a market for distributed generation that will bring savings to customers and sustainable job growth to the State. Section 6 of Act 236 wisely recognized that in order for the distributed generation programs adopted by the utilities to be successful, there need to be improvements to the State's interconnection procedures.

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<sup>1</sup> <http://www.seia.org/state-solar-policy/south-carolina>

We believe there are two key improvements that need to be made to the proposed procedures to enable efficient interconnection of distributed generation in South Carolina. First, the Supplemental Review process should include defined screens. Second, Fast Track eligibility requirements should not be overly restrictive. Finally, we also believe the Commission should require the Utilities to provide a more detailed, regularly updated public queue. We urge the Commission to make these essential changes to the Utilities' proposed interconnection procedures.

#### A. SUPPLEMENTAL REVIEW

Section 3.4 of the Utilities' proposed interconnection standard provides for Supplemental Review of a proposed project if it fails the Fast Track screens but could nonetheless be interconnected without undergoing a full study. The Supplemental Review process is important to avoiding unnecessarily time-consuming and costly studies for distributed generation projects and becomes particularly important as penetration of distributed generation grows in the state. However, the technical review that will be conducted in the Utilities' proposed Supplemental Review process is not defined, instead the proposed process is open ended, just stating that after the customer provides a deposit for the review the utility will "determine if the Generating Facility can be interconnected safely and reliably." We believe that it is better to define screens for a Supplemental Review process that provide structure to the review, clarity about the nature of the review and provide paying applicants a better sense of the anticipated outcome. The Federal Energy Regulatory Commission (FERC) recently adopted Supplemental Review screens in the Small Generator Interconnection Procedures (SGIP) and we recommend that the procedures in South Carolina follow these same screens.<sup>2</sup>

In particular, we believe it is critical that the Supplemental Review process include three basic screens. The first screen should be a 100% of minimum load screen.<sup>3</sup> For projects that cause the generation on the line section to exceed 100% of minimum load, it is appropriate to send the project to full study. For projects below 100% of minimum load it is not always necessary for a project to undergo full study and thus the utilities should apply two additional technical screens – a safety and reliability screen and a voltage and power quality screen. If the screens adopted by FERC are utilized, they provide the utility with complete flexibility to identify a full range of technical concerns that may arise, but they also require the utility to be specific in identifying what concerns warrant further study for projects below 100% of minimum load.

We agree with IREC's comment that an open-ended Supplemental Review, as proposed by the Utilities, will not ensure that a sufficient number of projects avoid unnecessary full studies, which are costly and time-consuming. SEIA, TASC, and EFCA's member companies have significant experience with interconnecting distributed generation projects across the country, and we have seen firsthand the limitations of the Fast Track process without a robust and well-defined Supplemental Review process. For example, in 2012, at SEIA's urging, the

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<sup>2</sup> FERC Order 792, 145 FERC ¶ 61,159 (adopting revised SGIP, see SGIP § 2.4 for the Supplemental Review screens).

<sup>3</sup> The minimum load should be measured during the daytime for solar PV systems.

FERC initiated a proceeding to review interconnection rules for small solar generators. The FERC held a technical conference on the issue in 2012, followed by a workshop in 2013. As a result of this review, the FERC initiated a rulemaking, and issued Order No. 792 in November 2013, adopting Supplemental Review screens.

We have also witnessed the effectiveness of including a robust Supplemental Review procedure that includes screens. Additionally, without any definition of what Supplemental Review would entail, the Utilities' proposed process lacks transparency. Including screens would ensure that the reviewing utility specifies a project's technical issues that require full study. It provides customers some certainty that they are paying for a meaningful process.

South Carolina has the opportunity to get it right the first time. FERC and other states have already tried an open-ended Supplemental Review process, like the one proposed by the Utilities here, and found it lacking and have generally been moving towards a more defined process in markets with large amounts of small generators. We encourage the Commission to follow FERC and other states in adopting a robust Supplemental Review process that includes screens, including a 100% of minimum load screen.

## **B. FAST TRACK SIZE LIMITS**

Next, we urge the Commission not to adopt unjustifiably restrictive eligibility limits on Fast Track. The limits proposed by the Utilities would substantially limit access to an efficient review process for distributed generation projects that have a strong probability of passing the technical review screens without causing safety and reliability issues. The Utilities' proposed eligibility table in section 3.1 restricts Fast Track review to 2 MWs for projects located close to the substation on lines between 5 kV and 25 kV, and ratchets the eligibility limits down to only 1 MW or 500 kW for projects on smaller lines or located farther from the substation. This is despite the fact that FERC recently recognized that much higher limits are appropriate for Fast Track when it updated SGIP in Order 792. FERC now allows projects of up to 4 MW on lines up to 30 kV to have the opportunity to undergo Fast Track review (see section 2.1 of SGIP). We believe the Utilities' proposed eligibility limits are too narrow and would exclude projects from Fast Track review that could pass the technical screens, resulting in unneeded, expensive full studies and their concomitant delays.

Not only is it inefficient to force projects through a full study unnecessarily, doing so could be a fatal blow for many distributed generation projects. It is important to recognize that the Fast Track screens will catch any projects that pose safety or reliability concerns and the eligibility limits are not a technical screen. On the other hand, a full study takes months (as opposed to the approximately one-month Fast Track review) and is substantially more expensive. Smaller distributed generation projects especially may not be able to afford a full study and may give up—or not even try—when they cannot meet the Utilities' overly restrictive proposed eligibility limits. The Commission should avoid setting limits that could have a chilling effect on development of distributed generation projects.

In order to meet Act 236's goal of promoting distributed generation, the Commission should adopt Fast Track eligibility limits that will allow as many projects that can feasibly connect via the expedited process to use Fast Track. We agree with IREC that the FERC SGIP

Fast Track Eligibility Table is sufficiently conservative and best achieves Act 236's goals. FERC's SGIP Fast Track Eligibility Table was developed collaboratively and has been vetted by diverse stakeholders, including all of the major national utility groups. We urge the Commission to likewise adopt these optimal Fast Track eligibility limitations.

### **C. REPORTING REQUIREMENTS**

Finally, the Commission should adopt more detailed reporting requirements than what the Utilities proposed. The information that the Utilities offered to disclose in the public queue and semi-annual reports simply is not sufficient provide adequate transparency and to ensure data is available to help with future improvements of the interconnection review process. Based on our experience across the United States, we believe that having a detailed public queue provides substantial value to developers, the State, and other stakeholders, while placing little extra burden on the Utilities.

It is important for project developers to have access detailed information in the queue. For example, information about the number and size of projects that would be ahead of a developer's project in the queue gives a developer an idea of whether its project may require a full study or a costly distribution upgrade. A detailed queue also ensures that anyone can find out how interconnection applications are progressing through the process and how long a project may take from application to approval. This helps developers stay up to date on what to reasonably expect in terms of the interconnection process for projects, which is critically important to maintaining good customer relationships.

Also, the information provided in a detailed queue fosters development of improved procedures over time. Such a queue will note when projects pass certain critical review milestones, allowing parties to easily identify and remedy problematic slowdowns in the process. Further, public disclosure of this information will make the Utilities and developers more accountable for ensuring that the interconnection process works efficiently and effectively and that timelines are met.

As IREC mentioned in its comments, the burden on the Utilities of maintaining detailed public queues is slight in relation to the benefit the queues will provide. Specifically, the Utilities will already have to track interconnection projects internally in order to comply with the timelines in their proposed procedures, so it will take little extra effort to provide this information publicly. And as we have explained, the value of this information to developers, stakeholders and the Commission is significant.

For these reasons, we request that the Commission require the Utilities to maintain a regularly updated public queue that contains at least all if the information outlined by IREC in its comment letter.

### **IV. HEARING APPEARANCE**

Vote Solar, SEIA, TASC, and EFCA currently do not plan to make appearances at any hearings the Commission may hold in this proceeding. Protestants will notify the Commission should any of their plans change in this regard.

Respectfully,

/s/ Scott Thomasson - ----  
Director, New Markets  
Vote Solar

/s/ Kristen Thornburg \_\_\_\_\_  
Southeast Regional Manager  
Solar Energy Industries Association

/s/ Tyson Grinstead \_\_\_\_\_  
The Alliance for Solar Choice

/s/ Julia Jazyńska \_\_\_\_\_  
Energy Freedom Coalition of America, LLC