

Agenda



Item	Schedule	Time
Welcome		
Process Update	9:00	15 min
Discussion of Near-Term issues in Decision Adoption Matrix	9:15	60 min
Break (time dependent)	10:15	10 min
IREC Presentation: Mid-Term issues	10:25	85 min
Next Steps	11:50	10 min
Adjourn	12:00	

Process Update



- Workshop discussing specific topic
- Staff to prepare meeting summary and circulate to Service List
 - Meeting summaries include questions in italics for stakeholder responses.
- Interested stakeholders collaborate on proposals/responses following workshop
- Responses/proposals circulated among Service List a week ten days prior to next workshop
 - Stakeholders should advise if there is need additional response time
- Next workshop discuss proposal and provide feedback
- End goal is to develop Final Report
 - Document consensus or competing positions on issues
 - Include supporting justification for consensus and/or competing proposals
 - Final Report should include sufficient record for Commission decision



Near-term Decisions Adoption Timeline

	-	
	1	

What to consider?	Decision Option (DO) Description	Utilize?
Consider equipment availability, the use of UL 1741 SA certification in the interim (if	DO 1a-1: Comply with IEEE 1547-2018 beginning [some	
needed), and whether naming a date certain is necessary before certified equipment is	date before April 1, 2023].	
widely available. Compliance requirements are usually based on the interconnection	DO 1a-2: Comply with IEEE 1547-2018 beginning ~April	\boxtimes
application submission date. Some projects have long interconnection review and lead	1st, 2023 or a later date.	
times and may not be installed long after the application date. A mechanism to require	DO 1a-3: Comply with IEEE 1547-2018 when the	
some of those projects with earlier application dates to be 1547-2018 compliant once	equipment is readily available (TBD by Commission	
installed could be beneficial for grid support. Installed MW with 1547-2018 compliance	action).	
could be increased if compliance is based on installation date, but this may be challenging	DO 1b-1: Base compliance date on application submission.	\boxtimes
for developers from a planning perspective, as they may have to specify equipment that is	DO 1b-2: Base compliance date on installation (may be	
not yet certified for 1547-2018. This issue may be mitigated if UL 1741 SA inverters are	useful for larger projects with long lead times).	
utilized, which can have similar features as those required by UL 1741 SB/1547-2018.	DO 1b-3: Differentiate compliance date mechanism	
Also consider how an interim adoption period will be implemented, allowing for 1547-	between smaller and larger projects.	
2018 compliance before the deadline. Widely available UL 1741 SB certified equipment	DO 1c-1: Allow interim compliance with IEEE 1547-2018	
is expected on the market by around April 1, 2023. More information is available on	beginning immediately.	
IREC's research on equipment availability. [MTGS II]	DO 1c-2: Define another interim compliance pathway.	×

Do parties agree with that these are the consensus choices? If not, please provide alternative selections, with the reasoning behind the choice. Do parties have a date in mind that would work in DO 1a-2? Staff would propose July 1, 2023 – should equipment not be available the Commission could order a new date for compliance. We can reassess closer to the end of 2022.

Near-term Decisions Operating performance categories



	What to consider?	Decision Option (DO) Description	Utilize?
	Consider input from transmission operators or regional reliability	DO 2-1: IEEE 1547-2018 Category III Ride-Through capabilities	\boxtimes
اور	coordinator when assigning ride-through categories, plus local	must be supported for inverter-based DER. Rotating DER must	
1	distribution utility protection practice. Since there can be conflict	meet Category I Ride-Through capabilities, at minimum.	
2	between distribution utility desires and bulk system reliability,	DO 2-2: IEEE 1547-2018 Category II Ride-Through capabilities	
₹	1547-2018 designates oversight of this selection to the Authority	must be supported by inverter-based DER, at minimum. Rotating	
	Governing Interconnection Requirements – often the Public	DER must meet Category I Ride-Through capabilities, at minimum.	
	Utilities Commission. [MTGS V.A]		

Staff would like to know if there are any parties who object to the use of Category III Ride-Through Capabilities going forward, and to the underlying rationale for the objection..

	What to consider?	Decision Option (DO) Description	Utilize?
a	The selection of A or B will impact the use of voltage regulation	DO 3-1: Inverter-based DER shall meet reactive power	\boxtimes
lε	controls. Some DER types cannot meet the full scale of reactive	requirements of 1547-2018 Category B. Rotating DER must meet	
ļ	power support. Consider specifying category assignment based on	Category A and may meet Category B.	
~	technology type. [MTGS V.A]	DO 3-2: All DER types (Inverter-based and rotating) shall meet	
		reactive power requirements with 1547-2018 Category A.	

Staff would like to verify stakeholders do not oppose the requirement of inverter-based DERs meeting the more stringent Category B requirements.



Near-term Decisions Operating performance categories



<u>.</u> ~	What to consider?	Decision Option (DO) Description	Utilize?
ltage trip ttings & ranges	Consider local distribution utility protection practices and make sure appropriate	DO 5-1: Align default settings with 1547.	×
Voltage tr settings ranges	trip settings are selected. As desired, select default settings or settings within the adjustable range. Trip settings should not hinder ride-through capability required at the transmission level.	DO 5-2: Select other default settings within 1547 ranges of adjustment.	
ngs es	Ensure that the under/over frequency trip settings are coordinated between the	DO 6-1: Align default settings with 1547.	×
Frequency trip settings & ranges	utility and transmission operator. As desired, select default settings or settings within the adjustable range. Trip settings should not hinder ride-through capability required at the transmission level.	DO 6-2: Select other default settings within 1547 ranges of adjustment.	
yor o	This capability is required for all DERs (with some limitations on Category I types) during the under/over frequency conditions. Consider using default settings or	DO 7-1: Align default settings with 1547.	×
Frequency droop Settings	adjust within ranges of allowable settings. Consider input from transmission operators or regional reliability coordinator. [MTGS V.A]	DO 7-2: Select other default settings within 1547 ranges of adjustment.	

Staff wanted to make sure stakeholders are in favor of using the default settings for the items above.



Near-term Decisions Voltage Regulation



Voltage regulation modes by reactive power

What to consider?	Decision Option (DO) Description	Utilize?
If desired, consider activating a non-unity power factor, volt-var,	DO 8a-1: Adjustable constant power factor is activated.	
watt-var, or constant var function. See PNNL research on	DO 8a-2: Utilize volt-var without autonomously adjusting Vref.	\boxtimes
autonomously adjusting V _{ref} . Also, consider statewide (or similar)	DO 8a-3: Utilize volt-var with autonomously adjusting Vref.	
default settings for such mode. [MTGS V.B, VI]	DO 8a-4: Watt-var is activated.	
	DO 8a-5: Constant var is activated.	
	DO 8b-1: Align default settings with 1547.	\boxtimes
	DO 8b-2: Select other default settings within 1547 ranges of	
	adjustment.	
	DO 8c-1: Specify process for selecting settings on site-by-site	
	basis.	
	DO 8c-2: Leave process for selecting settings on site-by-site	
	undefined.	

Staff would like to hear more fully from stakeholders on recommendations for this issue. A better understanding of which options would work best, and why. Along with that, which decisions are unworkable, and why. Do the recommendations change based on resource size, location, composition of loads on feeders, or other factors?



Near-term Decisions Voltage Regulation



Voltage regulation modes by active power

What to consider?	Decision Option (DO) Description	Utilize?
If desired, consider statewide (or similar) activation of volt-watt	DO 9-1: Volt-watt is activated with default 1547 settings.	\boxtimes
function (with default setting). Notably, the utilization of volt-watt	DO 9-2: Volt-watt is activated with non-default settings.	
will require changes to the interconnection applications forms	DO 9-3: Volt-watt is not activated.	
(online portals) to allow an applicant to specify how volt-watt is		
implemented. [MTGS V.B, VI]		

Staff would like to hear from parties as too their choice for this issue, and the rationale.



Near-term DecisionsInterconnection Rule



What to consider?	Decision Option (DO) Description	Utilize?
Update the interconnection rule to be inclusive of IEEE 1547-2018. To be clear which	DO 10a-1: Change 1547 date and title in	\boxtimes
version of a standard applies and when it takes effect, it is recommended that standards	standards references.	
be dated (and with edition number, if applicable), and that the implementation date is	DO 10a-2: Leave 1547 standard reference	
made clear either within the rule or by Commission order. In addition to implementing	undated.	
adoption of the standard within the rule, requirements or references to other standards	DO 10b-1: Define timeline for adoption of	\boxtimes
that are now addressed by IEEE 1547 should be updated to be inclusive of 1547's	new requirements in line with IEEE 1547-	
requirements. Note that this latter issue is reflected in DO 10c, and no alternatives are	2018 per DO 1.	
offered.	DO 10b-2: Leave timeline for adoption open	
Update the interconnection rule to be inclusive of IEEE 1547-2018. To be clear which	dependent on, e.g., Commission order (in line	
version of a standard applies and when it takes effect, it is recommended that standards	with DO 1a-3).	
be dated (and with edition number, if applicable), and that the implementation date is	DO 10c-1: Update applicable power quality or	\boxtimes
made clear either within the rule or by Commission order. In addition to implementing	other references (such as IEEE 519 or IEEE	
adoption of the standard within the rule, requirements or references to other standards	1453 in SGIP's Supplemental Review Voltage	
that are now addressed by IEEE 1547 should be updated to be inclusive of 1547's	and Power Quality Screen) to IEEE 1547-	
requirements. Note that this latter issue is reflected in DO 10c, and no alternatives are	2018.	
offered.		

Issue will be considered more fully in the Screens workstream



Presentation

- IREC Midhat Mafazy and Brian Lydic
 - Decision Adoption Matrix Mid-Term issues

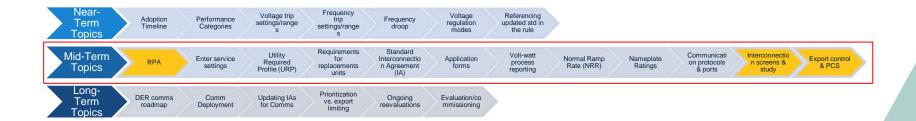




Background/supporting slides for the Mid-Term Topics (9/28/22 – 10/25/22)



Agenda



Focus of today is on Mid-Term Topics.

Feel free to use the Matrix to follow along.

This slide deck is designed to complement the Matrix by providing background/visuals as needed.

Highlighted are items that can overlap with the other working group (process and screens)



Reference Point of Applicability (RPA)

Why RPA matters

• IEEE 1547-2018 defines RPA so that it is clear at what physical location the requirement of the std needs to be met for testing, evaluation, and commissioning

What are the possible RPA locations

• PCC, PoC, A point between PCC and PoC, or Multiple RPAs for different DER units

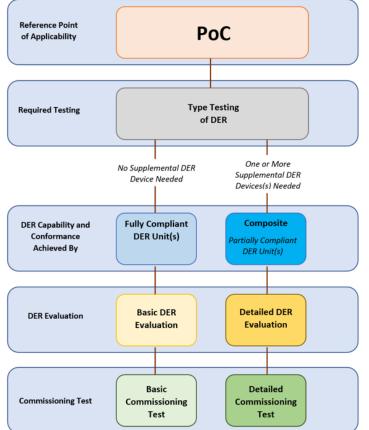
More on why this matters, some examples

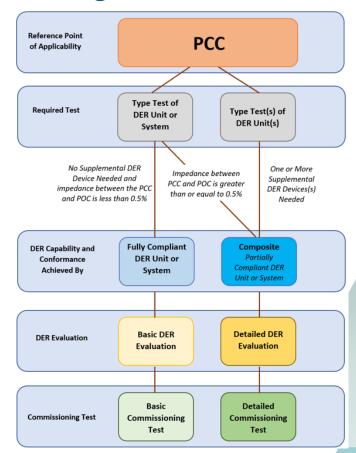
- Where the PoC is designated at the RPA location—utility can rely on equipment certification
- Where the PCC is the RPA—a more detailed system assessment may be needed for commissioning

This designation is likely to affect DER units under 500kVA (or those with export controls limiting export to 500kVA). It is important for utility and applicant to agree on RPA location upfront



RPA – Evaluation and Commissioning







Figures 3 and 4 of MN TIIR (Test and Verification Required Steps)

RPA – Evaluation and Commissioning

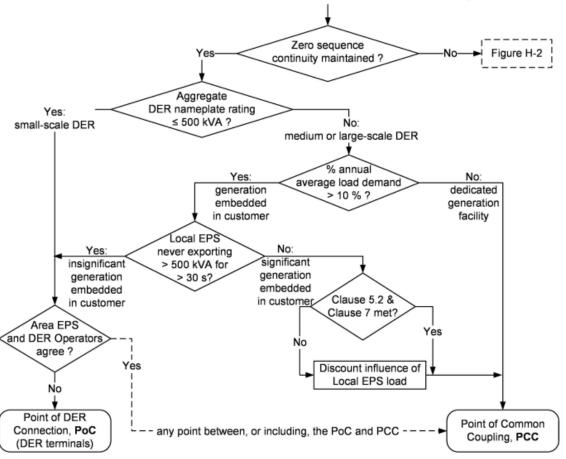




Figure H.1 of IEEE 1547-2018 (Decision tree for local EPS where zero sequence continuity maintained)

RPA – Evaluation and Commissioning

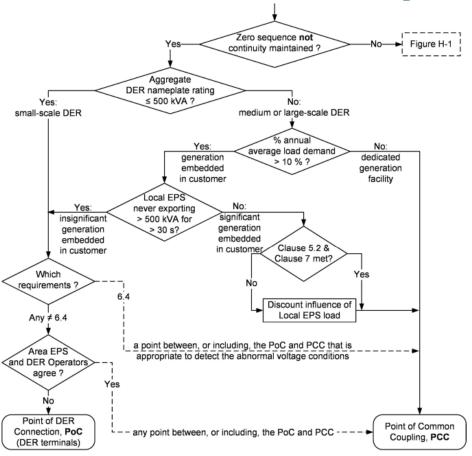




Figure H.1 of IEEE 1547-2018 (Decision tree for local EPS where zero sequence continuity is not maintained)

RPA Process – What Should Be Considered?

Process related improvements that allows for RPA designation by applicant

RPA designation in Application Forms

Process related improvement that allows for RPA review/verification by utility

- Fast Track (initial reviews) Intended to coincide with review timelines
- Impact Study (scoping meeting) Involves discussion between parties



RPA Process – Application Form

RPA designation in Application forms by Applicant

Where is the desired RPA location? [Check one]	
☐ PoC	
☐ PCC	
Another point between PoC and PCC (must be denoted in the one-	
line diagram)	
Different RPAs for different DER units (must be denoted in the one-	
line diagram)	
Is the RPA location the same as above for detection of abnormal voltage, faults	
and open-phase conditions?	
☐ Yes	
No (detection location must be denoted in the one-line diagram)	
Why does this DER fit the chosen RPA? [Check all that apply]	
Zero-sequence continuity between PCC and PoC is maintained	
The DER aggregate Nameplate Rating is less than 500 kVA	
Annual average load demand is greater than 10% of the aggregate	
DER Nameplate Rating, and it is not capable of, or is prevented	
from, exporting more than 500 kVA for longer than 30 seconds.	



RPA process – What should be considered?

RPA review/verification by utility

2.2 Reference Point of Applicability Review

The following process will occur concurrently with the Initial Review process in section 2.3. Within five Business Days after the Distribution Provider⁹¹ notifies the Interconnection Customer that the Interconnection Request is complete, the Distribution Provider shall review the Reference Point of Applicability denoted by the Interconnection Customer and determine if it is appropriate.

2.2.1 If it is determined that the Reference Point of Applicability is appropriate the Distribution Provider will notify the Interconnection Customer when it provides Initial Review results and proceed according to sections 2.3.2 to 2.3.4 below.

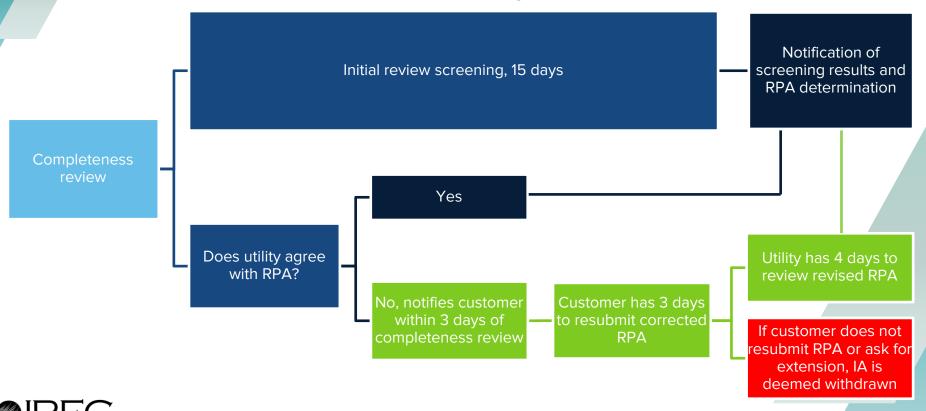
2.2.2 If the Distribution Provider determines the Reference Point of Applicability is inappropriate, the Distribution Provider will notify the Interconnection Customer in writing, including an explanation as to why it requires correction. The Interconnection Customer shall resubmit the Interconnection Request with the corrected Reference Point of Applicability within five Business Days. During this time the Distribution Provider will proceed with Initial Review in 2.3. The Distribution Provider shall review the revised Interconnection Request within five Business Days to determine if the revised Reference Point of Applicability has been appropriately denoted. If correct, the Distribution Provider will proceed according to sections 2.3.2 to 2.3.4. If the Interconnection Customer does not provide the appropriate Reference Point of Applicability or a request for an extension of time within the deadline, the Interconnection Request will be deemed withdrawn.

[Note: Initial Review is renumbered to 2.3]

The purpose of the scoping meeting is to discuss the Interconnection Request, the Reference Point of Applicability, and review existing studies relevant to the Interconnection Request.

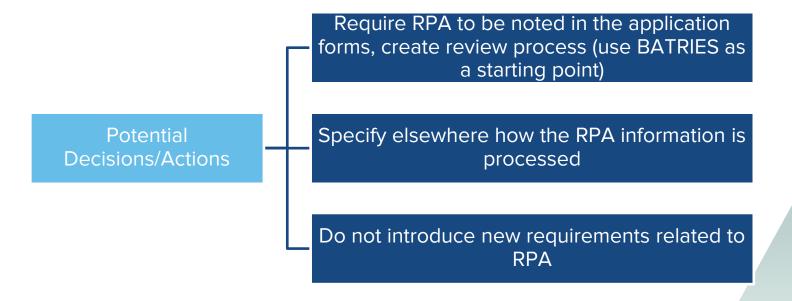


RPA Process – Proposed Utility Review in OR





RPA Process – What Should Be Considered?

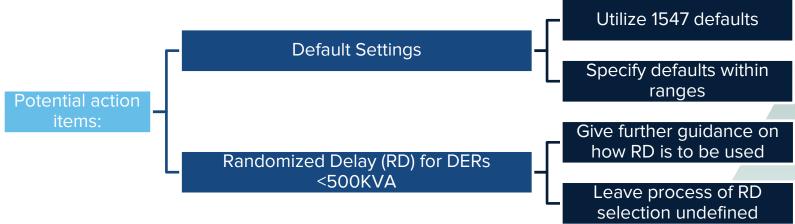




Enter Service Settings

What is allowed in the standard

- Ramp rate can be adjusted over 1-1000 sec with default at 300 sec
- However, DERs <500kVA, individual DER units may use randomized time delay as an alternative to ramping

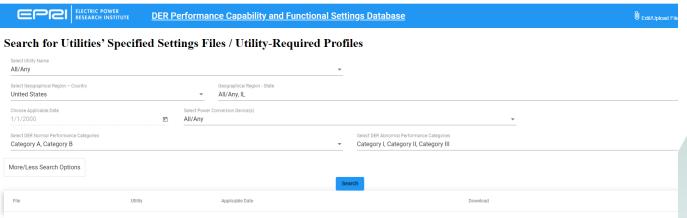




Utility Required Profile (URP)

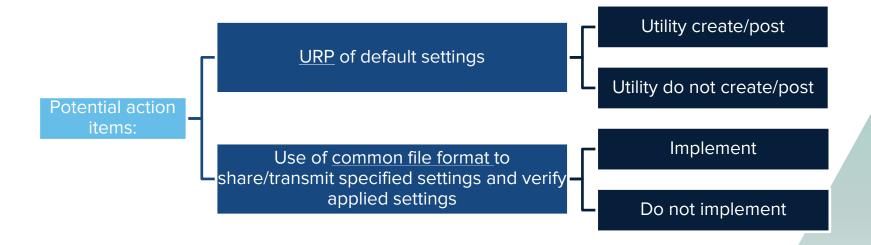
Communicating DER default settings:

- Finalize URP with all default settings and consider making that publicly available (post in the EPRI URP database)
- Implement the use of EPRI's Common File Format for DER settings Exchange and Storage





Utility Required Profile (URP)



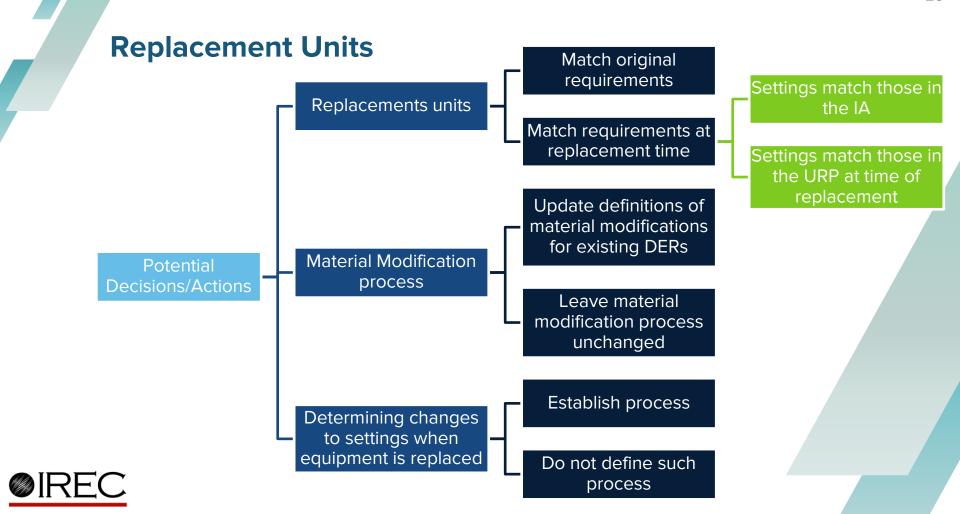


Replacement Units

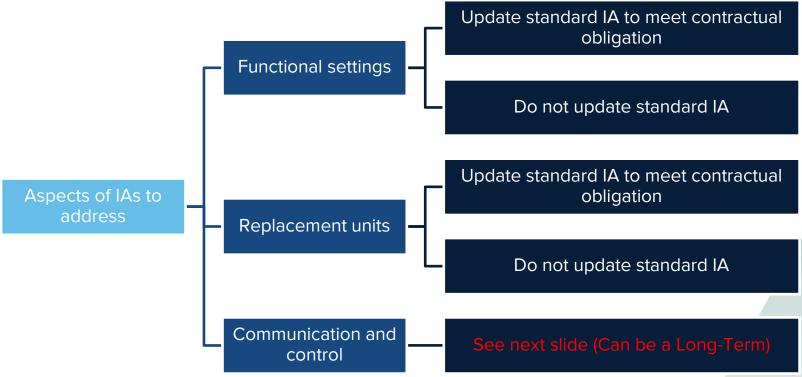
For end-of-life, define whether the most recent technical requirements, certifications and settings must be followed. However, make exceptions on like-for-like:

- If through warranty replacement, or
- If customer has spare parts on hand for future use



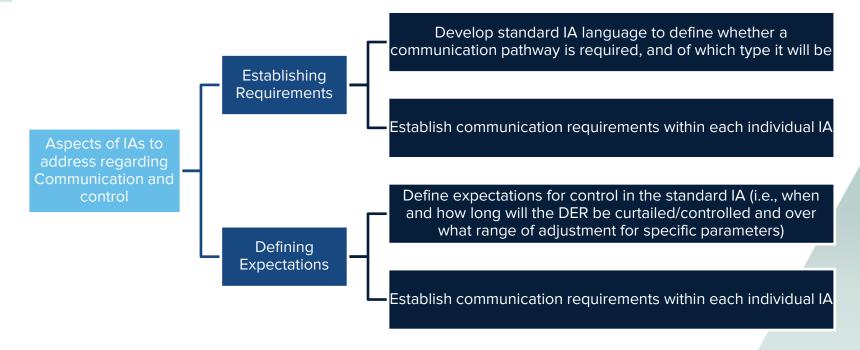


Interconnection Agreements (IA)





Interconnection Agreements (IA) – Can be Long-Term





Forms (online portals) offer means to streamline applicant designation and utility review of information. The following items need updating:

- RPA selection
- Enter service randomized delay
- Volt-watt implementation
- Limit active maximum power function implementation
- Frequency droop implementation
- Intentional islanding
- Emergency backup systems
- DER communication capabilities
- Export/import limiting
- Power Control Systems (PCS)
- Inverter fault current

n implementation

BATRIES addressed some of these, and provides

BATRIES addressed language

Recommended language



Potential action items:

Do not update forms (use recommended language from BATRIES as a starting point)

Do not update application forms

See sample recommended language from BATRIES in next slides



VIII. <u>UL 1741 and PCS related:</u> The project team recommends the application forms ask whether or not a PCS is included in the DER system design. Note the blank <u>section</u> is a fill in response from the applicant.
Does the DER include a Power Control System? [yes / no] (If yes, indicate the Power Control System equipment and connections on the one-line diagram)
What is the PCS maximum open loop response time? What is the PCS average open loop response time?
When grid-connected, will the PCS employ any of the following? [Select all that apply] Unrestricted mode Export only mode Import only mode No exchange mode Export limiting from all sources Export limiting from ESS Import limiting to ESS



IX.	<u>IEEE 1547-2018 related:</u> The project team recommends application forms use the language below to streamline the review of IEEE 1547-2018 capabilities (such as RPA designation, execution of mode of parameter changes, prioritization of DER response).
Whei	re is the desired RPA location? [Check one] PoC PCC
	Another point between PoC and PCC (must be denoted in the one-line diagram)
	☐ Different RPAs for different DER units (must be denoted in the one-line diagram)
	PRPA location the same as above for detection of abnormal voltage, faults
and (open-phase conditions? ———————————————————————————————————
Why	No (detection location must be denoted in the one-line diagram) does this DER fit the chosen RPA? [Check all that apply]
•	Zero-sequence continuity between PCC and PoC is maintained
	The DER aggregate Nameplate Rating is less than 500 kVA
	Annual average load demand is greater than 10% of the aggregate
	DER Nameplate Rating, and it is not capable of, or is prevented from, exporting more than 500 kVA for longer than 30 seconds.



Does the DER utilize export limiting for the Limit Maximum Active Power function (Yes/No) Which equipment(s) achieves this functionality? Is the equipment certified for export limiting (PCS, or "plant controller" via 1547.1 test 5.13)?
In addition to grid-connected mode, will the DER operate as an intentional local EPS island (also known as "microgrid" or "standby mode")?
When grid-connected, does the DER employ any of the following? [Select all that apply] Scheduled Operation Export limiting or control Does the export limiting method limit on the basis of kVA or kW? Import limiting or control Does the import limiting method limit on the basis of kVA or kW? Active or reactive power functions not specified in IEEE 1547 (such as the Set Active Power function)



Is the DER, or part of the DER, designated as emergency, legally required, or critical facility backup power? [yes / no] (If yes, denote the emergency generators and applicable portions of the DER in the submitted one-line diagram) How is the voltage-active power function implemented? [Check one] All DER units follow the same functional settings (same per-unit curve regardless of individual unit Nameplate Rating) Different DER units follow different functional settings (different perunit curves for individual unit Nameplate Ratings) ☐ Denote in one-line diagram the voltage-active power settings of each DFR unit A plant controller or other supplemental DER device manages output of the entire system (one per-unit curve based on total system Nameplate Rating) ☐ If selected, is the managing device certified for the voltageactive power function? [yes / no] Export limit is utilized (power control system manages export based on total system Nameplate Rating) ☐ If selected, is the managing device certified for the voltageactive power function? [yes / no]

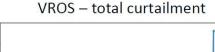


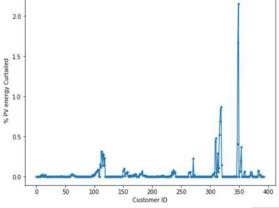
Volt-Watt Curtailment

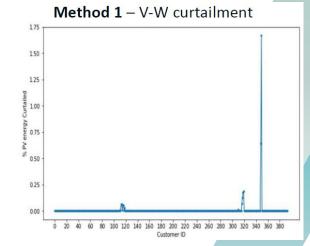
Ensure complaint process handles DER complaints appropriately

Consider reporting on how many voltage-based curtailment issues arise

Consider metric based on voltage data to determine potential for curtailment











Volt-Watt Curtailment Reports

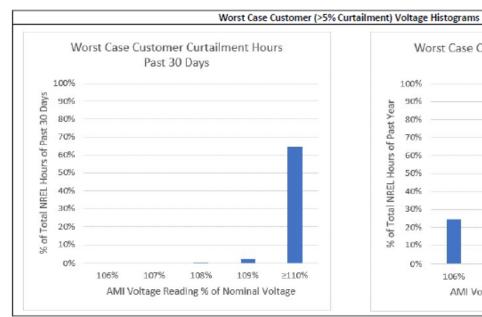
California Experience

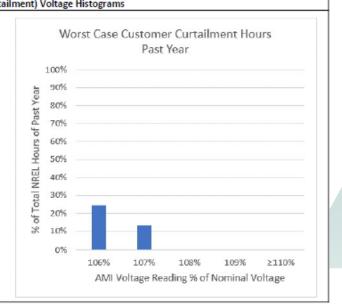
- California IOUs have been reporting on the power quality complaint process since February 2021
- For PV customers with volt-watt curtailment complaints, AMI data is used to note volt-watt triggering events
- Output potential is assumed to be 100% between 9am 3pm
- Overview as well as amounts/corrective action categories per issue are included; worst-case customer voltages



Summary Results for Utility (or Pending) Mitigations				
NREL Method 1 Estimation of # of Customers with 1 # of Customers with 1 Curtailment % # of Customers with 1 month Curtailment %				
≤ 2%	15	10		
> 2% ≤ 4%	0	1		
>4%	4	8		
Total	19			

Summary Results for Customer Issues			
NREL Method 1 Estimation of # of Customers with 1 # of Customers with 1			
Curtailment %	year Curtailment %	month Curtailment %	
≤ 2%	16	15	
> 2% ≤ 4%	2	0	
>4%	0	3	
Total	18	18	







Per Customer Curtailment Calculations and Mitigations			
Customer ID	1 Year Curtailment %	1 Month Curtailment %	
	0.2%		CUSTOMER ISSUE
	3.8%		CUSTOMER ISSUE
	1.2%		CUSTOMER ISSUE
	0.0%		CUSTOMER ISSUE
	0.1%		CUSTOMER ISSUE
	0.8%		CUSTOMER ISSUE
			CUSTOMER ISSUE
	0.8%		CUSTOMER ISSUE
			CUSTOMER ISSUE
10	0.0%		CUSTOMER ISSUE
1:			CUSTOMER ISSUE
1	0.4%	0.1%	CUSTOMER ISSUE
1	0.2%	0.0%	CUSTOMER ISSUE
14	0.1%	0.2%	CUSTOMER ISSUE
1	0.2%	0.4%	CUSTOMER ISSUE
10	2.1%	11.6%	CUSTOMER ISSUE
1	7 0.1%	0.0%	CUSTOMER ISSUE
1:	0.0%	0.1%	CUSTOMER ISSUE
19	0.3%	1.0%	DIST - CHANGE SETTINGS
20	0.1%	0.0%	DIST - REPAIR EQUIPMENT
2:	1.4%	8.6%	DIST - REPAIR EQUIPMENT
2:	0.1%	1.4%	DIST - REPAIR EQUIPMENT
2:	0.3%	0.0%	DIST - REPAIR EQUIPMENT
24	0.2%		DIST - TREE TRIMMING
2:	1.8%	2.2%	PENDING
2			PENDING
2			PENDING
2			SEC/SVC - REPAIR
2			SEC/SVC - REPAIR
3(SEC/SVC - REPAIR
3:			SEC/SVC - REPAIR
3:			SEC/SVC - REPLACE
3			SEC/SVC - REPLACE
34			SEC/SVC - REPLACE
3:			SUB/TRANS - CHANGE SETTINGS
3.			TX - REPLACE
3			TX - REPLACE



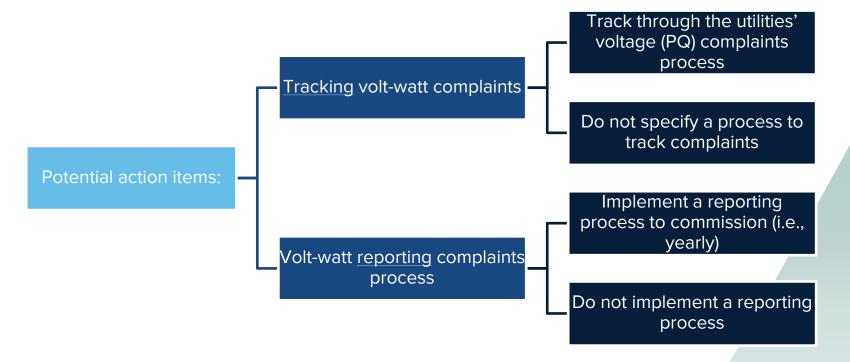
Volt-Watt Curtailment Reports

California Experience

- PG&E (largest IOU) reported only 9 customers with potential yearly curtailment >4%
- Worst yearly potential loss reported was 38.7% (failing distribution transformer)
- Next highest was 7.3%
- It appears true that volt-watt is unlikely to cause widespread curtailment, but individual customers can be highly impacted



Volt-Watt Curtailment

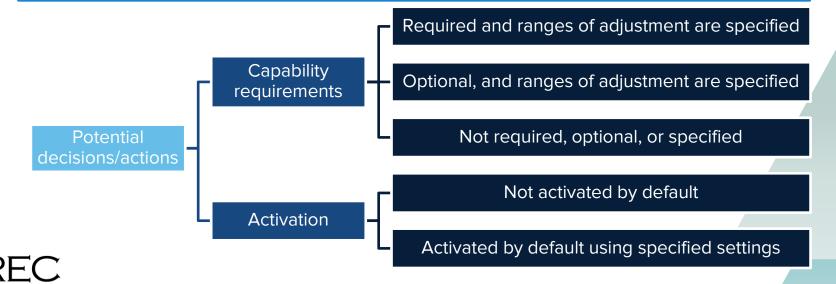




Normal Ramp Rate (NRR)

NRR is used when transitioning between output levels:

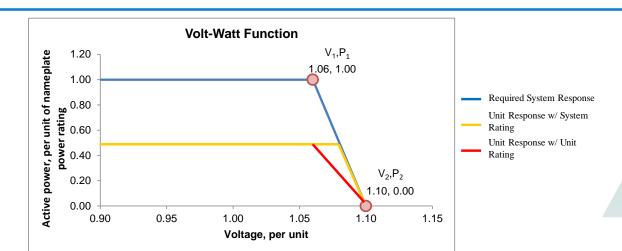
 Based on UL 1741 SA certification. Presently, testing only supports verification of ramp up (not ramp down)



Nameplate Ratings

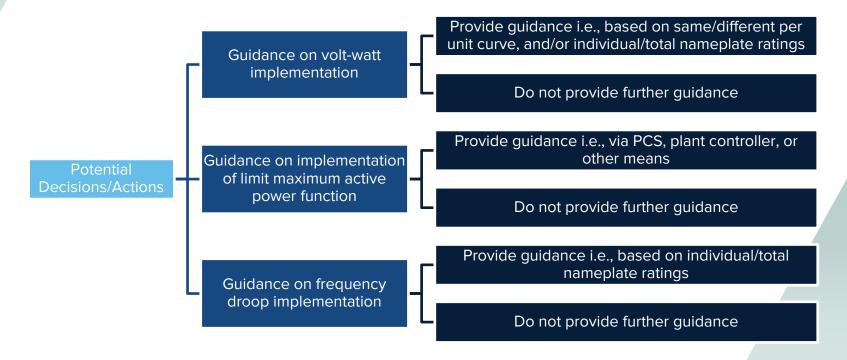
What to consider

- Consider addressing nameplate ratings issues related to volt-watt, limit maximum active power, and frequency droop
- Interconnection application forms may need to allow applicants to describe how the functions are achieved





Nameplate Ratings





Communications – Protocols, Ports & Telemetry

Specify protocol(s) Protocols & Ports to be used at the DER interface (or aggregator) Specify protocols and/or ports Implement Requirement Today (During Systems which require "Telemetry" What systems must comply with communication equipment requirement Systems of all sizes This means certified equipment may not have the utility's desired communication capability at time of Implement Requirement commissioning. Should there be a need to retrofit in the future equipment in the future (to achieve interoperability), it will be important to consider who bears the cost.





Secondary Transformer Screen

The existing Shared secondary Tx Screen says

"If the proposed DER is to be interconnected on a single-phase shared secondary, the aggregate Export Capacity on the shared secondary, including the proposed DER, shall not exceed"

- ➤ Some states use "20 kW"
- Some states use "65 % of the transformer nameplate power rating"

The existing screen may not reflect voltage regulation (i.e., volt-var settings) activated by the DER. Assuming voltage regulation settings is activated by default settings:

- What is the likelihood of overvoltage occurring?
- Should the screen stay conservative as is?
- Should there be alternate methods for screening with voltage regulation?



Line Configuration Screen (LCS)

The existing LCS may not recognize the difference between inverters vs. rotating machines.

Follow IEEE C62.92.6 guidelines and screen inverters and rotating machines distinctly.

Consider using the revised table from BATRIES (next slide)

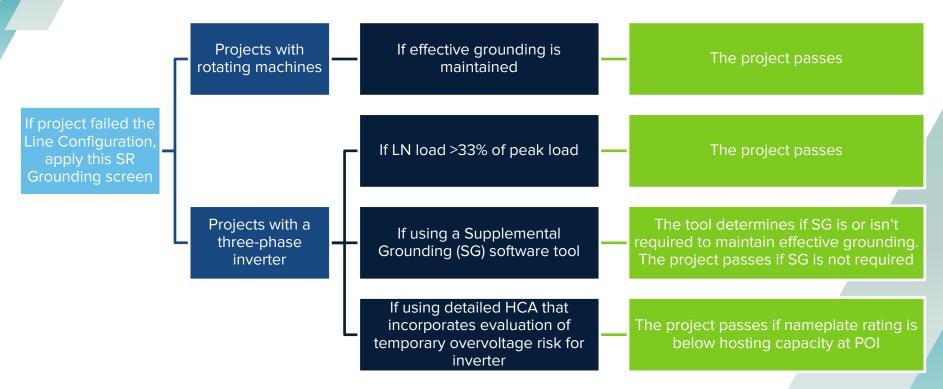


Line Configuration Screen (LCS)

Primary Distribution Line Type	Type of Interconnection to Primary Distribution Line	Result/Criteria
Three-phase, three-wire	3 phase or single phase, phase to phase If ungrounded on primary or any type on secondary	Pass screen
Three-phase, four- wire	Effectively-grounded 3 phase or Single-phase, line- to-neutral-Single-phase line-to-neutral	Pass screen
Three-phase, four-wire (for any line that has sections or mixed three-wire and four-wire)	<u>All others</u>	Pass screen for inverter-based generation if aggregate generation rating is ≤ 100% feeder* minimum load, or ≤ 30% feeder* peak load (if minimum load data isn't available) Pass screen for rotating generation if aggregate generation rating ≤ 33% of feeder* minimum load, or ≤ 10% of feeder* peak load (if minimum load data isn't available) (*or line section)



Grounding Review Within Supplemental Review (SR)





Export Control & PCS - Certification for export controls in IX process

Export controls and PCS may be used for Some aspects of IEEE 1547 implementation: (RPA selection, volt-watt etc.), and may also be used for Tariff compliance

Export controls can be considered part of the interconnection system

Certification or compliance could be considered necessary in certain "fast track" or "simplified" processes

Interconnection Rules may need to include specific technical and certification requirements for export controls and PCS

More on this topic (including recommended language) is discussed in the other WG





DER Communications/controls roadmap

Identify strategy and goals for deploying comms over time – What to consider?

- Timeline for utilization of monitoring data, changes to autonomous function settings, scheduled function changes, and continuous direct control.
- Deployment for larger systems versus numerous small systems
- Utility communications infrastructure versus DER aggregator model.



DER Communications/controls roadmap

Establish a formal roadmap development process to take into account Commission's, stakeholders', and utilities' DER management goals Allow individual utilities to determine needed communications Potential decisions/actions investments based on internal DER management goals without external direction) Avoid directive management of communications deployment



DER Communications Deployment

We are still in the early stages of communication deployment – What to consider?

- Is there a need to change the interconnection rule's "telemetry," "SCADA," or "monitoring" DER size threshold?
- What requirements apply to the DER site/equipment?
- What actions need to be taken to adopt a DER aggregator model?



DER Communications Deployment

If not done previously, specify protocols and ports to be used at the DER interface or aggregator

Define equipment requirements for DER or aggregator, and whether or not those apply to systems below the "telemetry" size threshold

Create or reference a guide for utilization of communications protocol(s) (e.g., California Common Smart Inverter Profile)

Update "telemetry" requirements to change size threshold

Update "telemetry" and/or other communication requirements to reference IEEE 1547 communications requirements

Include certification/validation requirements for communications equipment (e.g., California Common Smart Inverter Profile)

Define standard aggregator requirements and agreements



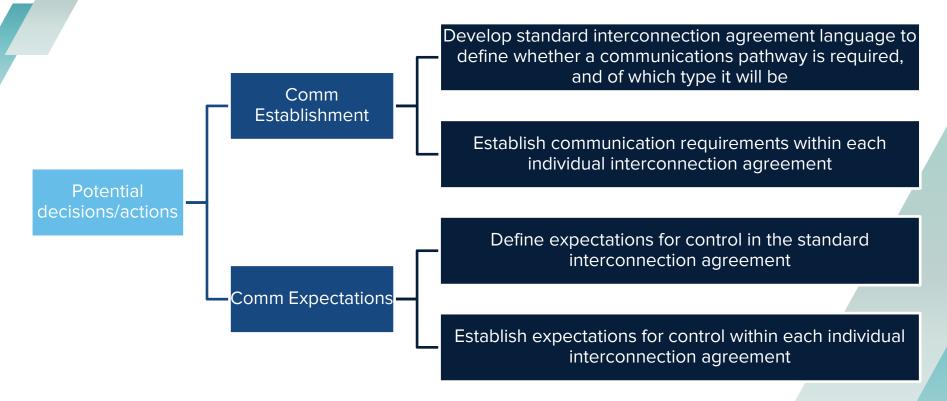
Interconnection Agreement (IA) for comms/control

IAs may need updating to reflect contractual obligations

- Control of the reactive power, volt-watt, limit maximum active power, permit service, and other functions can affect energy production/delivery and have financial repercussions on the affected DER
- These aspects should be memorialized in the IA
- A standardized IA can be developed to help establish expectations and limits while streamlining the interconnection process.



Interconnection Agreement (IA) for comms/control





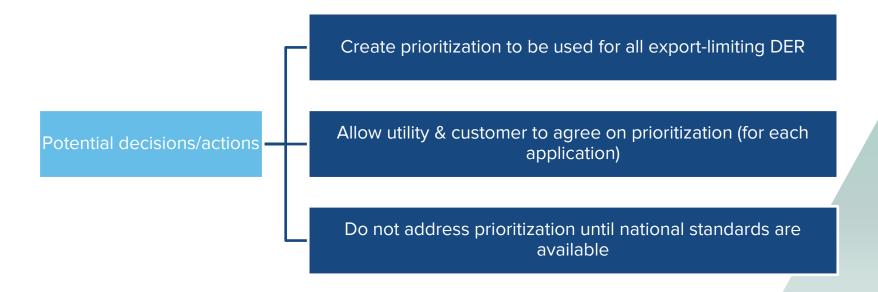
Prioritization vs. Export Limiting

Export limits can potentially interfere with DER systems providing full grid support capability:

- Prioritization of DER responses with export limiting is not addressed in subclause 4.7 of IEEE 1547-2018
- Seek input from RTO when assigning priority of functions (IEEE P1547.2)

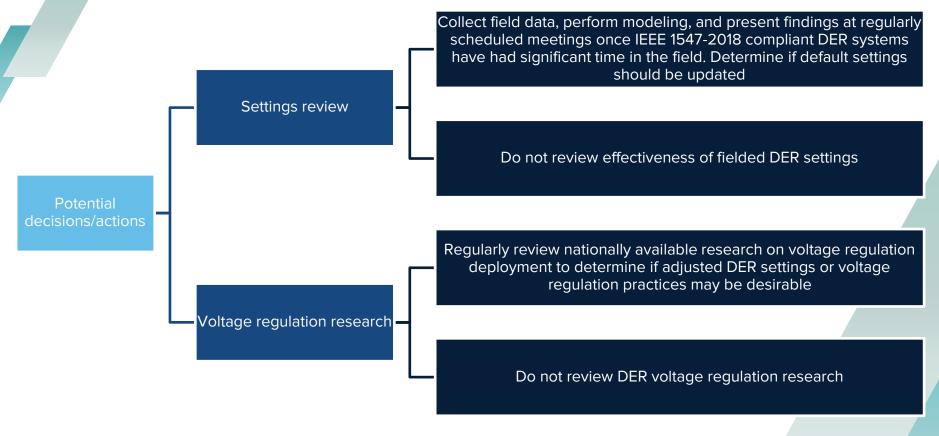


Prioritization vs. Export Limiting





Ongoing Reevaluation of Default Settings





Evaluation/Commissioning

IEEE 1547-2018 and 1547.1-2020 contain expanded guidance on how evaluation of DER systems should be performed

The different type tests, DER evaluations and commissioning tests are dependent on: RPA, fully vs. partial certification, and other factors

Rules often do not explicitly require specific commissioning guidance (Rule vs. Utility handbooks)

Consider updating rule and/or utility handbooks to address evaluation and commissioning





If you have any questions, contact:

Brian Lydic

Chief Regulatory Engineer | IREC brian@irecusa.org

Midhat Mafazy

Regulatory Engineer | IREC midhatm@irecusa.org



Next Steps



- Staff to provide meeting notes with questions for stakeholders
- Circulate responses to <u>service list</u> by November 11
- Next workshop in this workstream on November 22 9am-noon
 - Discussion of any responses/proposal(s) received
 - Discussion of long-term issues
- End goal report to submit to the Commission.



Save the Date(s)



Workshop 4: Screens, Study Methods, and Modern Configurations

Date: December 7*

Time: 9:00 AM – 12:00 PM

Location: Zoom

Link to Meeting

Dial-In: 1-551 285 1373Meeting ID: 161 631 5107

o Passcode: 6623001161

Workshop 4: Incorporating Updated Standards

Date: November 22

Time: 9:00 AM – 12:00 PM

Location: Zoom

o Link to Meeting

Dial-In: 1-551 285 1373Meeting ID: 161 631 5107

o Passcode: 6623001161



^{*}The November 8 workshop has been canceled – the next one in this workstream will be in December.

Appendix – IREC Decision Matrix

The following slides include the Decision Options Matrix for IEEE 1547-2018 Adoption as published October 12. An online version may be found here on IREC's website.

Decision Options Matrix for IEEE 1547-2018 Adoption

IREC's Decision Options Matrix is intended to be a resource for Public Utilities Commissions, utility personnel, and other distributed energy resource (DER) stakeholders interested in adopting and implementing IEEE 1547TM-2018 in their jurisdictions. The matrix includes a list of Decision Options (DOs) that stakeholders should consider before implementing the updated standard. The DOs provide step-by-step guidance on incorporating the updated standard into interconnection rules and procedures. The matrix translates technical content within the standard, as well as related issues, into easily digestible decisions that impact DER interconnection reviews and operations (e.g., timeline, voltage regulation, interoperability). The matrix includes over fifty distinct decisions, organized into three IEEE 1547-2018 adoption categories, namely:

- A. Near-term items (actions needed as first steps in the adoption process),
- B. Mid-term items (actions that should, for the most part, be taken before the implementation date), and
- C. Long-term items (actions that may be taken after the implementation date, may require a formal roadmap, or may require ongoing reevaluations).

It may take more than six months for a working group to select the near-term DOs, including education, discussion, and formalization of consensus. Further time will then be needed for the Commission to take related actions. This matrix can be used to help guide the schedule of working groups and select a feasible implementation date. Its use should help streamline the adoption of IEEE 1547-2018 and provide a means to transparently communicate key decision points. Users can download the matrix and use the DO items to communicate and keep track of key decisions. Users may also tailor the matrix and its DOs to their respective jurisdiction and preferences (e.g., color code individual DOs based on whether such decision falls within interconnection rules and procedures versus a utility interconnection handbook/manual). IREC's publication <u>Making the Grid Smarter: Primer on Adopting the New IEEE 1547TM-2018 Standard for Distributed Energy Resources ("MTGS")¹ dives deeper on many of these topics; references to relevant sections of the paper are given in brackets. Other references are mentioned as needed. Notably, <u>The Toolkit and Guidance for the Interconnection of Energy Storage and Solar-Plus-Storage</u> ("BATRIES Toolkit")² offers potential solutions for several DOs.</u>

¹ https://irecusa.org/resources/making-the-grid-smarter-primer-on-adopting-the-new-ieee-standard-1547-2018/

² https://energystorageinterconnection.org/



If there is only a single decision to be made for a particular topic, then one of the numbered options should be selected. When there are multiple decisions, these are indicated by letters (i.e., 1a, 1b, 1c) and one numbered option should be selected for each letter. The Matrix may be updated from time to time as more states adopt the standard and experience is gained.

Торіс	What to Consider	Decision Option (DO) Description	Utilize ?
	A. Near 1	Term Term	
Adoption timeline	Equipment listing to UL 1741 SB certifies conformance with 1547-2018 for inverter-based resources and some other interconnection equipment. Consider certified equipment availability, the use of UL 1741 SA certification in the interim (if needed), and whether naming a certain date is necessary before certified equipment is widely available. Compliance requirements are usually based on the interconnection application submission date. Some projects have long interconnection review and lead times and may not be installed until long after the application date. A mechanism to require some of those projects with earlier application dates to be 1547-2018 compliant once installed could be beneficial for grid support. Installed MW with 1547-2018 compliance could be increased if compliance is based on installation date. However, this may be challenging for developers from a planning perspective, as they may have to specify equipment that is not yet certified for 1547-2018. This issue may be mitigated if UL 1741 SA compliant inverters are utilized, which can have similar features as those required by UL 1741 SB/1547-2018. Also consider how an interim adoption period will be implemented, allowing for 1547-2018 compliance before the deadline. Widely available UL 1741 SB certified equipment is expected on the	DO 1a-1: Comply with IEEE 1547-2018 beginning [some date before April 1, 2023]. DO 1a-2: Comply with IEEE 1547-2018 beginning ~April 1, 2023 or a later date. DO 1a-3: Comply with IEEE 1547-2018 when the equipment is readily available (TBD by Commission action). DO 1b-1: Base compliance date on application submission date. DO 1b-2: Base compliance date on installation date (may be useful for larger projects with long lead times). DO 1b-3: Differentiate compliance date mechanism between smaller and larger projects. DO 1c-1: Allow interim compliance with IEEE 1547-2018 beginning immediately. DO 1c-2: Define another interim compliance pathway.	

 $^{^3} https://irecusa.org/blog/regulatory-engagement/new-research-sheds-light-on-when-key-smart-inverters-will-be-available/light-on-when-key-smart-inverter-will-be-available/light-on-when-key-smart-inverter-will-be-available/l$



Abnormal operating performance category	Consider input from transmission operators or regional reliability coordinator when assigning ride-through categories, plus local distribution utility protection practice. Since there can be conflict between distribution utility desires and bulk system reliability, 1547-2018 designates oversight of this selection to	DO 2-1: IEEE 1547-2018 Category III Ride-Through capabilities must be supported for inverter-based DERs. Rotating DERs must meet Category I Ride-Through capabilities, at minimum. DO 2-2: IEEE 1547-2018 Category II Ride-Through capabilities	
	the Authority Governing Interconnection Requirements—often the Public Utilities Commission. [MTGS V.A]	must be supported by inverter-based DERs, at minimum. Rotating DERs must meet Category I Ride-Through capabilities, at minimum.	
Normal operating performance category	The selection of A or B will impact the use of voltage regulation controls. Some DER types cannot meet the full scale of reactive power support. Consider specifying category assignment based	DO 3-1: Inverter-based DERs must meet reactive power requirements of 1547-2018 Category B. Rotating DERs must meet Category A, and may meet Category B.	
	on technology type. [MTGS V.A]	DO 3-2: All DER types (inverter-based and rotating) shall meet reactive power requirements of 1547-2018 Category A, and may meet Category B.	
Alternative performance category	If a technology that cannot meet the specified Abnormal or Normal Operating Performance Category, a defined process may be useful for determining if the technology can safely	DO 4-1: Define process for how exceptions to these category assignments are handled (e.g., for an inverter-based technology that cannot meet Category III capabilities).	
	interconnect without unduly impacting grid support requirements.	DO 4-2: Leave process undefined for how exceptions to these category assignments are handled.	
Voltage trip	Consider local distribution utility protection practices and make	DO 5-1: Align default settings with 1547.	
settings and ranges	sure appropriate trip settings are selected. As desired, select default settings or settings within the adjustable range. Trip settings should not hinder ride-through capability required at the transmission level.	DO 5-2: Select other default settings within 1547 ranges of adjustment.	
Frequency trip	Ensure that the under/overfrequency trip settings are	DO 6-1: Align default settings with 1547.	
settings and ranges	coordinated between the utility and transmission operator. As desired, select default settings or settings within the adjustable range. Trip settings should not hinder ride-through capability required at the transmission level.	DO 6-2: Select other default settings within 1547 ranges of adjustment.	
Frequency droop ⁴	This capability is required for all DERs (with some limitations on	DO 7-1: Align default settings with 1547.	
settings	Category I types) during the under/overfrequency conditions. Consider using default settings or adjust within ranges of allowable settings. Consider input from transmission operators or regional reliability coordinator. [MTGS V.A]	DO 7-2: Select other default settings within 1547 ranges of adjustment.	
		DO 8a-1: Adjustable constant power factor is activated.	

 $^{^{\}rm 4}$ Per IEEE 1547-2018, this function cannot be disabled.



Voltage regulation	If desired, consider activating a non-unity power factor, volt-	DO 8a-2: Utilize volt-var without autonomously adjusting V _{ref} .	
modes by reactive	var, watt-var, or constant var function. See PNNL research on	DO 8a-3: Utilize volt-var with autonomously adjusting V _{ref} .	
power ⁵	autonomously adjusting V _{ref} . ⁶ Also, consider statewide (or	DO 8a-4: Watt-var is activated.	
similar	similar) default settings for such mode. [MTGS V.B, VI]	DO 8a-5: Constant var ⁷ is activated.	
		DO 8b-1: Align default settings with 1547.	
		DO 8b-2: Select other default settings within 1547 ranges of	
		adjustment.	
		DO 8c-1: Specify process for selecting settings on site-by-site	
		basis (e.g., as determined through system impact study).	
		DO 8c-2: Leave process for selecting settings on site-by-site	
		basis undefined.	
Voltage regulation	If desired, consider statewide (or similar) activation of volt-watt	DO 9-1: Volt-watt ⁹ is activated with default 1547 settings.	
modes by active	function (with default setting). Notably, the utilization of volt-	DO 9-2: Volt-watt is activated with non-default settings.	
power ⁸	watt will require changes to the interconnection applications	DO 9-3: Volt-watt is not activated.	
	forms (online portals) to allow an applicant to specify how volt-		
7.1	watt is implemented. [MTGS V.B, VI]	DO 40 4 Cl 4547 Lt 1211 1 1 1 1	
Interconnection	Update the interconnection rule to be inclusive of IEEE 1547-	DO 10a-1: Change 1547 date and title in standards	
rule	2018. To be clear which version of a standard applies and	references.	
	when it takes effect, it is recommended that standards be	DO 10a-2: Leave 1547 standard reference undated.	
	dated (with edition number, if applicable), and that the implementation date is made clear either within the rule or by	DO 10b-1: Define timeline for adoption of new requirements	
	Commission order. In addition to implementing adoption of the	in line with IEEE 1547-2018 per DO 1.	
	standard within the rule, requirements or references to other	DO 10b-2: Leave timeline for adoption open dependent on,	
	standards that are now addressed by IEEE 1547 should be	e.g., Commission order (in line with DO 1a-3).	
	updated to be inclusive of 1547's requirements. Note that this	DO 10c-1: Update applicable power quality or other references (such as IEEE 519 or IEEE 1453 in SGIP's	
	latter issue is reflected in DO 10c, and only one decision option	Supplemental Review Voltage and Power Quality Screen) to	
	is offered.	IEEE 1547-2018.	
		ILLL 13 17 2010.	

⁵ The voltage support functions by reactive power (constant power factor, volt-var, watt-var, constant var) are mutually exclusive. By default, these functions are deactivated—meaning certified equipment will come "out of the box" to operate at unity power factor.

⁶ McDermott T.E., and S.R. Abate, Adaptive Voltage Regulation for Solar Power Inverters on Distribution Systems, In IEEE 46th Photovoltaic Specialists Conference (PVSC 2019), June 16-21, 2019, Chicago, IL, 0716-0723, IEEE, doi:10.1109/PVSC40753.2019.8981277

⁷ Note: Constant var mode is only required for normal performance Category B.

⁸ The voltage support by active power (volt-watt) is deactivated by default—if desired, consider statewide (or similar) default setting for volt-watt.

⁹ Note: Volt-watt mode is only required for normal performance Category B.



Торіс	What to Consider	Decision Option (DO) Description	Utilize ?
	B. Mid	Term	
Reference point of applicability (RPA)	Consider process related improvement that allows RPA designation by applicant and for utility to review. This may involve changes to application forms (such as online	DO 11-1: Require RPA to be noted in the application forms and use RPA recommended language from Appendix E and F of BATRIES Toolkit as a starting point.	
	application portals), initial review processes, and provisions to allow RPA review/discussion during the scoping meeting.	DO 11-2: Specify elsewhere how the RPA information is processed.	
	[MTGS IV]	DO 11-3: Do not introduce new requirements related to the RPA.	
Enter service settings	It is important to consider whether non-default enter service settings are preferred for voltage and frequency ranges, delay	DO 12a-1 : Utilize 1547 default settings for voltage range, frequency range, reconnect delay, and ramp duration.	
	time, and ramp rate. The standard allows for the duration of enter service period (ramp rate) to be adjustable over 1-1000	DO 12a-2: Specify default settings within the ranges allowed by 1547.	
	seconds with a default time of 300 seconds. For DERs less than 500kVA, individual DER units may use a randomized time delay with a default maximum interval at 300 seconds as an alternative to ramping. It is likely even the smallest inverter-based DERs can utilize the enter service ramp. Enter service ramp rate is also known as connect/reconnect or soft start ramp rate. Given that DERs would ramp up upon reconnection with a default period of 300 seconds, consider whether the default delay of 300 seconds can be shortened.	DO 12b-1: Give further guidance on how randomized delay times are to be used for DERs smaller than 500 kVA (consider application form addition).	
		DO 12b-2: Leave process for randomized delay selection undefined for DERs smaller than 500 kVA.	
Utility-required	Finalize URP with all default settings and consider posting that	DO 13a-1 : Utility to create and post URP of default settings.	
profile (URP)	in the EPRI URP database ¹⁰ (publicly available). Implement use	DO 13a-2: Do not create and post URP of default settings.	
	of EPRI's Common File Format for DER Settings Exchange and Storage. ¹¹ [MTGS IV, VI]	DO 13b-1: Utility to implement use of common file format to transmit specified settings to customer and verify applied settings.	
		DO 13b-2: Do not implement common file format.	
Requirements for replacement units	For end-of-life or other equipment replacements, define whether or not the most recent technical requirements,	DO 14a-1: Allow replacement equipment to match the certification and technical requirements of originally evaluated	

https://dersettings.epri.com/
11 Common File Format for Distributed Energy Resources Settings Exchange and Storage, EPRI (December 2020), https://www.epri.com/research/products/000000003002020201



	cortifications, and cottings must be followed. It sould be	and installed equipment. Dequire settings to match these	
	certifications, and settings must be followed. It could be	and installed equipment. Require settings to match those	
	beneficial to ensure that "legacy" interconnection equipment	specified in the Interconnection/Operating Agreement.	
	(such as an inverter) is upgraded to the most recent standards	DO 14a-2: Require replacement equipment to conform to	
	over time. However, warranty replacements are usually like-	certification and technical requirements of rule in effect at time	
	for-like and should be accommodated. Additionally, DER	of replacement. Make exception for warranty work (and	
	owners may keep spare parts on hand for future use to limit	potentially for previously acquired equipment). Require settings	
	downtime during repair. Contractual obligations for notifying	to match those specified in the Interconnection/Operating	
	the utility of equipment changes and the requirements for	Agreement.	
	updated equipment should be clear at the time of	DO 14a-3: Require replacement equipment to conform to	
	interconnection. Note that "material modification" guidelines	certification and technical requirements of rule in effect at time	
	could be developed to ensure an easy transition to new	of replacement. Make exception for warranty work (and	
	equipment and note under which circumstances further	potentially for previously acquired equipment). Require settings	
	evaluation must be conducted by the utility. [MTGS VI]	to match those specified by the utility or default URP at the time	
		of replacement.	
		DO 14b-1: Update definitions of material modification for	
		already interconnected DERs. Establish when notification or	
		further evaluation (and related fees) must occur, dependent on	
		replacement type and power specifications.	
		DO 14b-2: Leave material modification process unchanged or	
		undefined.	
		DO 14c-1: Establish process for determining changes to settings	
		when replacement equipment is updated.	
		DO 14c-2: Do not define process for determining changes to	
		settings when replacement equipment is update.	
Standard	As required, include provisions for adhering to required	DO 15a-1: Update standard interconnection agreement to meet	
interconnection	functional settings and updating settings or equipment over	contractual obligations (operating requirements) regarding	
agreements	time.	functional settings.	
		DO 15a-2 : Do not update standard interconnection agreement	
		to meet contractual obligations regarding functional settings.	
		DO 15b-1: Update standard interconnection agreement to meet	
		contractual obligations (operating requirements) regarding future	
		replacement equipment (see DO 14a).	
		DO 15b-2 : Do not update standard interconnection agreement	
		to meet contractual obligations regarding replacement	
		equipment.	



Application forms	Update application forms (including online portals) for the following items: • RPA selection	DO 16-1 : Update application forms (use recommended language from Appendix F of BATRIES Toolkit as a starting point).	
	 Enter service randomized delay Volt-watt implementation Limit active maximum power function implementation Frequency droop implementation Intentional islanding Emergency backup systems DER communication capabilities Export/import limiting Power control systems (PCS) Inverter fault current 	DO 16-2: Do not update application forms.	
Volt-watt process/reporting	Volt-watt can have an impact on the DER customer's energy production. Curtailment is based on utility voltage that the	DO 17a-1: Ensure volt-watt curtailment complaints are tracked through the utilities' voltage/power quality complaint process.	
	customer has no control over. Consider a reporting process to understand if volt-watt curtailment becomes an issue for	DO 17a-2: Do not specify a process to track volt-watt curtailment complaints.	
	customers now or in the future. [MTGS V.B]	DO 17b-1: Implement a reporting process to Commission to review volt-watt complaints on a regular basis (e.g., yearly).	
		DO 17b-2 : Do not implement a reporting process.	
Normal ramp rate	The normal ramp rate is used when transitioning between power output levels over the normal course of operation. This	DO 18a-1 : Normal ramp rate certification is required, and ranges of adjustment are specified.	
	capability is based on UL 1741 SA certification (not UL 1741 SB). Consider whether the capability may be utilized (if	DO 18a-2: Normal ramp rate capability/certification is optional, and ranges of adjustment are specified.	
	available). Though not required by IEEE 1547-2018, this	DO 18a-3 : Normal ramp rate is not required or specified.	
	feature may be useful to avoid rapid voltage changes,	DO 18b-1: Normal ramp rate is not activated by default.	
	especially for energy storage technologies. Per CA Rule 21, the default value is 100% of maximum current output per second (with an adjustable range of between 1% to 100%). At the moment, testing only supports verification of upward ramping (for increases in power), which PV systems can support. Storage systems could also support downward ramping (for decreases in power), but verification tests in UL 1741 SA do not yet evaluate this direction. This ramp rate could interfere with frequency support or matching load via a power control system, so prioritization or exceptions may be needed for implementation.	DO 18b-2: Normal ramp rate is activated by default using specified settings.	



Nameplate ratings	Consider addressing nameplate rating issues related to volt- watt, limit maximum active power, and frequency droop. The interconnection application forms may need to allow applicants to describe how the functions are achieved.	DO 19a-1: Provide guidance on volt-watt implementation, i.e., whether the DER unit(s) implement volt-watt based on the same or different per-unit curves, and individual or total nameplate ratings (see <u>BATRIES Toolkit Chapter VIII</u> ¹² and IEEE 1547.2).	
		DO 19a-2 : Do not provide further guidance on volt-watt nameplate ratings designation.	
		DO 19b-1: Provide guidance on how limit maximum active power function is implemented i.e., via PCS, via plant controller, or other means (see BATRIES Toolkit Chapter VIII and IEEE 1547.2).	
		DO 19b-2 : Do not provide further guidance on how limit maximum active power is implemented.	
		DO 19c-1: Provide guidance on frequency droop implementation, i.e., whether the DER unit(s) implement frequency droop based on individual or total nameplate ratings (see IEEE 1547.2).	
		DO 19c-2 : Do not provide further guidance on how frequency droop is implemented.	
Communication protocols and ports	Consider specifying protocols and ports if known and of interest to utilities at this time. Requirements for having the	DO 20a-1 : Specify protocol(s) to be used at the DER interface or aggregator.	
	necessary communications equipment (e.g., gateway with a specific port) could cause DERs to include "stranded"	DO 20a-2: Specify protocols and/or ports to be used at the DER interface or aggregator.	
	equipment that is never used if it is never connected to a communications system. On the other hand, having the	DO 20a-3: Do not specify protocols or ports at the DER interface or aggregator.	
	equipment installed ensures that it is available to connect at a future date, if desired. See communications/control roadmap	DO 20b-1: Specify that systems which require "telemetry" must comply with communication equipment requirements.	
	in the Long-Term topic. [MTGS V.C]	DO 20b-2: Specify that systems of all sizes must comply with communication equipment requirements.	
		DO 20b-3: Implement equipment requirements in the future when ready to implement 1547-standardized communications.	
Interconnection screens and study		DO 21a-1: Update "shared secondary transformer screen" based on likelihood of overvoltage occurring with default voltage regulation settings.	

 $^{^{12}\} https://energy storage interconnection.org/viii-incorporating-updated-interconnection-standards-into-interconnection-procedures/$



The Fast Track,¹³ Supplemental Review (SR), and detailed study interconnection review processes should be updated to reflect IEEE 1547-2018. The existing Fast Track includes:

- The "shared secondary transformer screen," which may not reflect voltage regulation (e.g., volt-var settings) activated by the DER
- The "line configuration screen," which may not recognize the difference between inverters vs. rotating machines [MTGS V.D]

For projects that fail the existing "line configuration screen," SR may lack new or alternate ways to evaluate effective grounding or provide means to properly evaluate the need for supplemental grounding [MTGS V.D].

Similarly, screening for "inverter fault current" needs updating to reflect 1547.1 certification testing. Inverter manufacturers may have additional information supplied by 1547.1 certification testing that indicate fault values (fault current test data). Where fault current values are made available through test certification, it should be understood and agreed if review practices (for screens and detailed study) can utilize such data.

In addition, best practices for rapid voltage change (RVC) and flicker evaluation should be developed. While DO 10c-1would update the power quality references in the Supplemental Review Voltage and Power Quality Screen, the actual practices used to evaluate these issues have previously been left undefined. It is likely that utilities across the U.S. utilize varying practices, some of which may be unnecessary or overly conservative. For instance, EPRI has found that it is largely unnecessary to perform flicker screening for PV

DO 21a-2: Do not update screen. Keep screen conservative as is.	
DO 21a-3: Determine alternative methods for screening overvoltage risk with voltage regulation.	
DO 21b-1: Update line configuration screen to treat inverters and rotating machines distinctly (see BATRIES Toolkit Chapter VIII).	
DO 21b-2: Use existing or alternative line configuration screens.	
DO 21c-1: Revise Supplemental Review to include new grounding review for three-phase inverters based on line-to-neutral connected load (see BATRIES Toolkit Chapter VIII).	
DO 21c-2: Revise Supplemental Review to utilize a tool to determine supplemental grounding needs for inverters (see BATRIES Toolkit Chapter VIII).	
DO 21c-3: Use existing or alternative grounding review practices.	
DO 21d-1: Review practices for provision of inverter fault current test data (see BATRIES Toolkit Chapter VIII).	
DO 21d-2: Rely on existing or undefined practices for determining inverter fault current values.	
DO 21e-1: Review flicker, RVC, and other power quality screening practices to ensure they are in alignment with the standards, as well as best practice.	
DO 21e-2: Leave power quality screening practices undefined and open to interpretation.	

¹³ Note: Fast Track is the terminology used in SGIP and some states to categorize the second tier of interconnection reviews. Other states refer to such second-tier process as "Level 2."



	systems. ¹⁴ It is advised that Public Utilities Commissions review these practices to ensure current learnings and the requirements of IEEE 1547-2018 are taken into account appropriately. [MTGS V.D]		
Export control and power control systems (may be optional or long-term)	While not strictly required for IEEE 1547 adoption, export controls and power control systems (PCS) may be used for some aspects of IEEE 1547 implementation, including RPA selection, volt-watt implementation (see DO 18a-1), and limit maximum active power implementation (see DO 18b-1), in addition to other interconnection or tariff-related reasons. These export controls can be considered part of the interconnection system, and certification or compliance with certain requirements could be considered necessary in certain "fast track" or "simplified" interconnection processes. [MTGS V.H, BATRIES Toolkit]	DO 22a-1: Include specific technical and certification requirements for export controls and PCS in the interconnection rule (see BATRIES Toolkit Chapter III .	
		DO 22a-2: Leave technical and certification requirements for export controls undefined.	
		DO 22b-1 : Add information on PCS and export limiting equipment to application forms (see BATRIES Chapter VIII).	
		DO 22b-2: Do not update application forms with export controls information.	
		DO 22c-1: Implement other elements of BATRIES Toolkit export control recommendations (e.g., Chapters \underline{II} , ¹⁶ \underline{IV} , ¹⁷ \underline{VI} , ¹⁸ \underline{VII} , ¹⁹ \underline{IX}^{20}).	
		DO 22c-2: Do not implement other BATRIES Toolkit elements at this time.	

Topic	What to Consider	Decision Option (DO) Description	Utilize ?	
C. Long Term				
DER communications/ control roadmap	Identify goals and strategies for deploying IEEE 1547 standardized communications/control of DERs over time. Consider timeline for utilization of monitoring data, changes to	DO 23-1: Establish a formal roadmap development process to take into account Commission's, stakeholders', and utilities' DER management goals.		

¹⁴ Xiaojie Shi et al., Can Photovoltaic Plants Cause Voltage Flicker? – Field Measurement and Screening, IEEE (June 2019) ("We found that PV ramping is too slow to cause light flicker in cases measured. Even the relatively large PV installations do not contribute in a noticeable way because of relatively slow power output changes."), https://ieeexplore.ieee.org/document/8980601.

¹⁵ https://energystorageinterconnection.org/iii-requirements-for-limited-and-non-export-controls/

¹⁶ https://energystorageinterconnection.org/ii-updating-interconnection-procedures-to-be-inclusive-of-storage/

¹⁷ https://energystorageinterconnection.org/iv-evaluation-of-non-export-and-limited-export-systems-during-the-screening-and-study-process/

¹⁸ https://energystorageinterconnection.org/vi-improving-grid-transparency-through-hosting-capacity-analyses-and-other-tools/

¹⁹ https://energystorageinterconnection.org/vii-pathways-to-allow-for-system-design-changes-during-the-interconnection-review-process-to-mitigate-the-need-for-upgrades/

²⁰ https://energystorageinterconnection.org/ix-defining-rules-and-processes-for-the-evaluation-of-fixed-schedule-der-operation/



	autonomous function settings, scheduled function changes, and continuous direct control. Consider deployment for larger systems versus numerous small systems, and utility communications infrastructure versus DER aggregator model. Will communications infrastructure, DER equipment requirements, and protocols be harmonized to any degree among utilities? How can investments in ADMS, DERMS, or AMI ²¹ be optimized to meet various goals? Consider the linkage to grid modernization discussions. [MTGS V.C]	DO 23-2 : Allow individual utilities to determine needed communications investments based on internal DER management goals without external direction.	
		DO 23-3: Avoid directive management of communications deployment.	
Communications deployment	DER communications deployment is still nascent and best practices for interconnection rules and technical requirements	DO 24a: If not done previously, specify protocols and ports to be used at the DER interface or aggregator.	
	are still in development. The decision option list at right is a list of potential actions to consider, but is not intended to be exhaustive. Consider the need to change the interconnection rule's "telemetry," "SCADA ²² ," or "monitoring" DER size threshold. What requirements apply to the DER site/equipment? What actions need to be taken to adopt a DER aggregator model? [MTGS V.C]	DO 24b : Define equipment requirements for DER or aggregator, and whether or not those apply to systems below the "telemetry" size threshold.	
		DO 24c: Create or reference a guide for utilization of communications protocol(s) (e.g., California Common Smart Inverter Profile).	
		DO 24d: Update "telemetry" requirements to change size threshold.	
		DO 24e: Update "telemetry" and/or other communication requirements to reference IEEE 1547 communications requirements.	
		DO 24f: Include certification/validation requirements for communications equipment (e.g., California Common Smart Inverter Profile).	
		DO 24g: Define standard aggregator requirements and agreements.	
Interconnection agreement updates for communications/	As DER communications become deployed more widely, standard interconnection agreements should reflect such utilization. Control of the reactive power, volt-watt, limit maximum active power, permit service, and other functions	DO 25a-1: Develop standard interconnection agreement language to define whether a communications pathway is required and of which type it will be (e.g., utility direct to inverter, utility direct to gateway, or aggregator participation).	
control	can affect energy production/delivery and have financial repercussions on the affected DER. It should be understood	DO 25a-2: Establish communication requirements within each individual interconnection agreement.	
	and agreed as to how these functions will be used. These aspects should be memorialized in the interconnection	DO 25b-1: Define expectations for control in the standard interconnection agreement (e.g., when and how long will the	

Advanced distribution management system (ADMS), distributed energy resources management system (DERMS), advanced metering infrastructure (AMI) Supervisory control and data acquisition (SCADA)



	agreement. A standardized agreement can be developed to	DER be curtailed or controlled and over what range of	
	help establish expectations and limits while streamlining the	adjustment for specific parameters).	
	interconnection process.	DO 25b-2: Establish expectations for control within each	
		individual interconnection agreement.	
Prioritization vs.	Export limits can potentially interfere with DER systems	DO 26-1: Create prioritization to be used for all export-limiting	
export limiting	providing full grid support capability. For example, a non-	DERs.	
	exporting storage system may not be able to fully increase	DO 26-2 : Allow utility and customer to agree on prioritizations	
	power output in line with frequency droop requirements for	for each individual interconnection application as needed.	_
	underfrequency events if output would exceed local load. IEEE	DO 26-3: Do not address prioritization for export-limited DERs	
	1547-2018 does not address situations related to export	until national standards are established.	
	limiting in its prioritization of DER responses in subclause 4.7.	and national standards are established.	
	Since this can affect bulk grid reliability, seek input from		
	transmission operators or regional reliability coordinator when		
	assigning priority of functions. See discussion in IEEE 1547.2.		
Ongoing	Investigate whether fielded functional settings (voltage	DO 27a-1: Collect field data, perform modeling, and present	
reevaluation of	regulation and voltage/frequency settings) are optimized.	findings at regularly scheduled meetings once IEEE 1547-2018	
default settings	Address the following:	compliant DER systems have had significant time in the field.	
derault settings	Are voltage regulation settings and trip settings	Determine if default settings should be updated.	
	working well or should they be revised?	DO 27a-2: Do not review effectiveness of fielded DER settings.	
	Are volt-watt issues present that need to be		
	addressed?	DO 27b-1: Regularly review nationally available research on	
		voltage regulation deployment to determine if adjusted DER	
	Are new insights available that can be leveraged to improve grid integration?	settings or voltage regulation practices may be desirable.	
	improve grid integration?	DO 27b-2: Do not review DER voltage regulation research.	
Evaluation/	IEEE 1547-2018 and 1547.1-2020 contain expanded guidance	DO 28-1: Update interconnection rule to address different	
commissioning	on how evaluation of DER systems should be performed and	evaluation and commissioning concepts introduced by the	
	what commissioning tests are to be completed. The different	standards.	
	options for type tests, DER evaluations, and commissioning	DO 28-2 : Update utility handbooks to address evaluation and	
	tests are dependent on the RPA of the DER system, whether	commissioning.	
	or not it is fully certified, and other factors. Interconnection	DO 28-3 : Do not address evaluation or commissioning updates.	
	rules often do not explicitly require specific commissioning		
	tests or give direct guidance on how evaluations should be		
	performed by the utility. Utility handbooks may address		
	commissioning in more detail. [MTGS IV]		