

Order 792 Pre-application Report



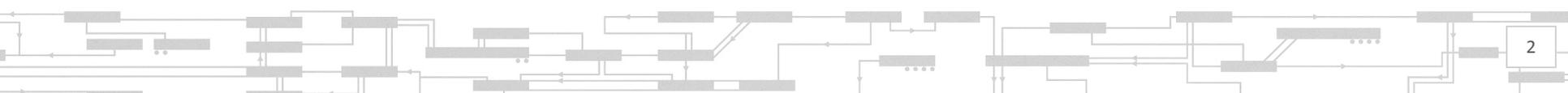
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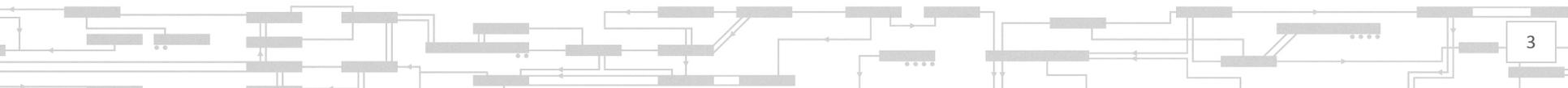
Goals of Today's Presentation

- Describe provisions of FERC Order 792 and Schedule 23 concerning pre-application activities.
- These slides are a subset of the slides presented to the Transmission Owners in February 2014.



Schedule 23 Applicability

- Schedule 23 of the ISO OATT applies to generator interconnection requests to the Administered Transmission System, which includes PTOs' PTF, Non-PTF and OATT-Distribution Facilities.
- PTOs are all the entities that are signatories to the Transmission Operating Agreement

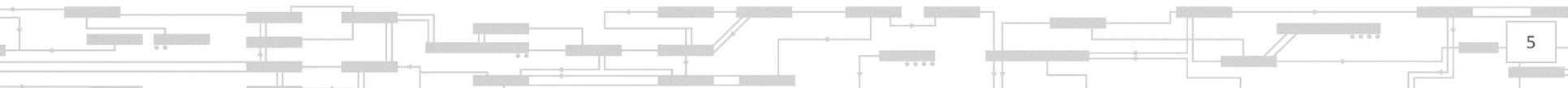


Schedule 23 Applicability

- ISO's Schedule 23 contains the following discussion concerning applicability:
 - 1.1.1 The Small Generator Interconnection Procedures (“SGIP”) and Small Generator Interconnection Agreement (“SGIA”) shall apply to Interconnection Requests, as defined in Attachment 1, pertaining to Small Generating Facilities, except that the SGIP and SGIA shall not apply to: (i) a retail customer interconnecting a new Generating Facility that will produce electric energy to be consumed only on the retail customer’s site; (ii) a request to interconnect a new Generating Facility to a distribution facility that is subject to the Tariff if the Generating Facility will not be used to make wholesale sales of electricity in interstate commerce; or (iii) a request to interconnect a Qualifying Facility (as defined by the Public Utility Regulatory Policies Act, as amended by the Energy Policy Act of 2005 and the regulations thereto), where the Qualifying Facility’s owner intent is to sell 100% of the Qualifying Facility’s output to its interconnected electric utility. In the event the SGIP and SGIA do not apply, the Interconnection Customer shall follow the applicable state tariff, rules or procedures regarding generator interconnections.

Schedule 23 Pre-application Requirements

- Schedule 23 has existing requirements to provide information prior to an interconnection request:
 - 1.2.1 The Transmission Provider shall designate an employee or office from which information on the application process and on an Affected System can be obtained through informal requests from the Interconnection Customer presenting a proposed project for a specific site. The name, telephone number, and e-mail address of such contact employee or office shall be made available on the Transmission Provider's Internet web site. Electric system information provided to the Interconnection Customer should include relevant system studies, interconnection studies, and other materials useful to an understanding of an interconnection at a particular point on the Transmission Provider's Transmission System, to the extent such provision does not violate confidentiality provisions of prior agreements or critical infrastructure requirements. The Transmission Provider shall comply with reasonable requests for such information.



Order 792 Pre-application Report

- Order 792 revised the *pro forma* SGIP/SGIA to incorporate new requirements to provide a pre-application report prior to an interconnection request:
 - In addition to the information described in section 1.2.1, which may be provided in response to an informal request, an Interconnection Customer may submit a formal written request form along with a non-refundable fee of \$500 for a pre-application report on a proposed project at a specific site. The Transmission Provider shall provide the pre-application data described in section 1.2.3 to the Interconnection Customer within 20 Business Days of receipt of the completed request form and payment of the \$500 fee. The pre-application report produced by the Transmission Provider is non-binding, does not confer any rights, and the Interconnection Customer must still successfully apply to interconnect to the Transmission Provider's system.

Order 792 Pre-application Report (Continued)

Order 792 identifies data requirements for a request for a pre-application report in *pro forma* SGIP, Sections 1.2.2.1-1.2.2.8:

- Project contact information, including name, address, phone number, and email address.
- Project location (street address with nearby cross streets and town).
- Meter number, pole number, or other equivalent information identifying proposed Point of Interconnection, if available.
- Generator Type (e.g., solar, wind, combined heat and power, etc.).
- Size (alternating current kW).
- Single or three phase generator configuration.
- Stand-alone generator (no onsite load, not including station service – Yes or No?).
- Is new service requested? Yes or No? If there is existing service, include the customer account number, site minimum and maximum current or proposed electric loads in kW (if available) and specify if the load is expected to change.

Order 792 Pre-application Report (Continued)

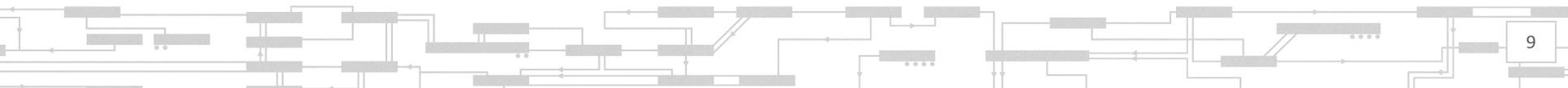
Order 792 identifies the limitations of a pre-application report in *pro forma* SGIP, Section 1.2.3.4:

- The pre-application report need only include existing data. A pre-application report request does not obligate the Transmission Provider to conduct a study or other analysis of the proposed generator in the event that data is not readily available. If the Transmission Provider cannot complete all or some of a pre-application report due to lack of available data, the Transmission Provider shall provide the Interconnection Customer with a pre-application report that includes the data that is available. The provision of information on “available capacity” pursuant to section 1.2.3.4 does not imply that an interconnection up to this level may be completed without impacts since there are many variables studied as part of the interconnection review process, and data provided in the pre-application report may become outdated at the time of the submission of the complete Interconnection Request. Notwithstanding any of the provisions of this section, the Transmission Provider shall, in good faith, include data in the pre-application report that represents the best available information at the time of reporting.

Order 792 Pre-application Report (Continued)

Order 792 identifies data thirteen items to be included in a pre-application report in *pro forma* SGIP, Sections 1.2.3.1-1.2.3.13:

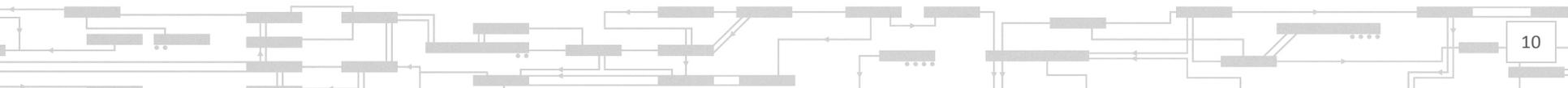
1. Total capacity (in MW) of substation/area bus, bank or circuit based on normal or operating ratings likely to serve the proposed Point of Interconnection.
2. Existing aggregate generation capacity (in MW) interconnected to a substation/area bus, bank or circuit (i.e., amount of generation online) likely to serve the proposed Point of Interconnection.
3. Aggregate queued generation capacity (in MW) for a substation/area bus, bank or circuit (i.e., amount of generation in the queue) likely to serve the proposed Point of Interconnection.



Order 792 Pre-application Report (Continued)

Order 792 identifies data thirteen items to be included in a pre-application report in *pro forma* SGIP, Sections 1.2.3.1-1.2.3.13(continued):

4. Available capacity (in MW) of substation/area bus or bank and circuit likely to serve the proposed Point of Interconnection (i.e., total capacity less the sum of existing aggregate generation capacity and aggregate queued generation capacity).
5. Substation nominal distribution voltage and/or transmission nominal voltage if applicable.
6. Nominal distribution circuit voltage at the proposed Point of Interconnection.
7. Approximate circuit distance between the proposed Point of Interconnection and the substation.



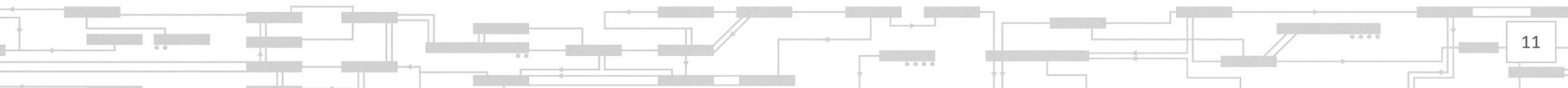
Order 792 Pre-application Report (Continued)

Order 792 identifies data thirteen items to be included in a pre-application report in *pro forma* SGIP, Sections 1.2.3.1-1.2.3.13 (continued):

8. line section(s) actual or estimated peak load and minimum load data, including daytime minimum load as described in section 2.4.4.1.1 below and absolute minimum load, when available.

9. Number and rating of protective devices and number and type (standard, bi-directional) of voltage regulating devices between the proposed Point of Interconnection and the substation/area. Identify whether the substation has a load tap changer.

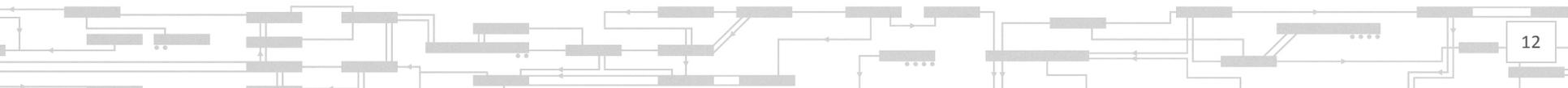
10. Number of phases available at the proposed Point of Interconnection. If a single phase, distance from the three-phase circuit.



Order 792 Pre-application Report (Continued)

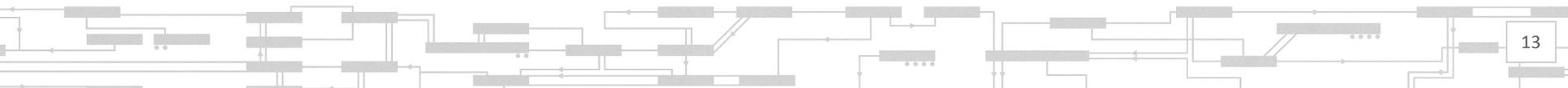
Order 792 identifies data thirteen items to be included in a pre-application report in *pro forma* SGIP, Sections 1.2.3.1-1.2.3.13 (continued):

11. Limiting conductor ratings from the proposed Point of Interconnection to the distribution substation.
12. Whether the Point of Interconnection is located on a spot network, grid network, or radial supply.
13. Based on the 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.



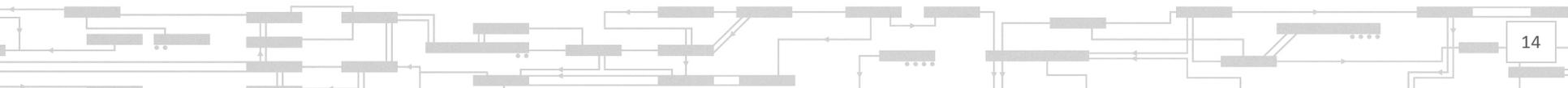
Pre-application Report Issues

- When ISO receives a request for a pre-application report, the ISO must determine if Schedule 23 is applicable?
 - ISO will require input from the utility serving the point of interconnection on the status of the facility to determine whether Schedule 23 applies.
 - Connections to any facilities classified as transmission (e.g. 46 kV or 34.5 kV in some companies) typically fall under Schedule 23.
 - Requests for pre-application reports related to facilities not subject to Schedule 23 will not be processed.



Pre-application Report Issues (Continued)

- Order 792 requires that the pre-application report include “Available capacity (in MW) of substation/area bus or bank and circuit likely to serve the proposed Point of Interconnection (i.e., total capacity less the sum of existing aggregate generation capacity and aggregate queued generation capacity). “
 - Aggregate queued generation will include generation in ISO queue. It also needs to account for generation in “State” queue where one exists. Where a “State” queue does not exist, PTOs will need to establish a queue for interconnection requests on their system that are not under FERC’s jurisdiction.



Questions

