

## **Borrego Solar Systems, Inc.**

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*Section 3.4 of the M.D.P.U. 1320 outlines the Standard Process for interconnection applications. The first step in the Standard Process is that the Utility conducts an Initial Review of the project and then provides additional circuit information to the Developer. This document contains Borrego Solar's opinions on the Initial Review, whether the information provided to the Developer is adequate, and what can be done to improve the process as a whole.*

### **Information Provided to Developers:**

Below are the informational requirements outlined in the tariff that the Utility must provide to the Customer at the end of the Initial Review. In blue are the comments by Borrego Solar.

- “The available fault current at the proposed location”
  - Currently, we are not given this information in all situations. We are proposing that where it is not possible to provide specific fault current data, the utility provides the fault current at the substation bus, distance from the substation, and conductor type so that the developers may estimate the value themselves.
- “The existing peak loading on the lines in the general vicinity of the Facility”
  - Historically, this data has not been provided in the Initial Review Report. For those utilities who have satisfied this requirement in the past, only the load data for the closest circuit has been provided. According to the tariff, this information should be provided for all circuits within the “...vicinity of the Facility” which was determined to be within a ¼ mile radius of the POI according to Section 3.2 of the Tariff.
- “The configuration of the distribution lines”
  - Currently, we do not receive any information on the Initial Review Report for this required deliverable. We believe this should include the following data which would decrease the volume of projects that move past this stage:
    - Thermal limitations of the feeder (or conductor size at the POI)
    - Presence of distribution step-down transformers on the feeder
    - Whether the circuits found within the vicinity are Sub Transmission or Distribution feeders. Historically Sub Transmission lines are a non-starter for interconnection and therefore significant upgrades may be required if that is the only infrastructure nearby. It is our understanding that this data is readily available via utility GIS mapping tools.
- “If the application is subject to the Pre-Application Report requirement in Section 3.2, the Pre-application Report may, as necessary, be discussed at the initial review”
  - Currently we are not receiving this Tariff required deliverable on the Initial Review Report. It is vital to understand whether the information received during the Pre-App stage is still valid in order to make that time invested worth while.
- “...Initial Review, which may include if requested, a scoping meeting/discussion with the Interconnecting Customer to review the application”
  - This implies that the scoping meeting is supplementary to a written Initial Review Report, not a replacement for said document.

### **Improvements to the Initial Review:**

Borrego believes that the Initial Review report could be improved greatly by providing a minimal increase in report information to the Developers. This increase in transparency would reduce the number of projects which fail to interconnect post-impact study due to unexpected high interconnection cost.

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- **Transformer/Substation Information:**
  - **Nameplate KVA Rating** – This data will provide much needed insight into substation capacity limits in high penetration areas. Feeder specific data is no longer sufficient as substation transformers creep closer and closer to saturation.
  - **Minimum and Peak Load** – This data will provide much needed insight into substation capacity limits in high penetration areas. This will also help Borrego estimate the threshold in which certain bi-directional controls (such as 3V0) will be needed at a given substation.
  
- **Bi-Directional Controls Information: Can be accomplished by either...**
  - **Bi-Directional Control Status in the Initial Review Report** – Yes or no question on Initial Review Reports which would allow developers to select projects for a given location that can absorb bi-directional relaying costs.

### **OR**

- **Providing a Calculated Bi-Directional Threshold** – Provide the calculated N-1 contingency capacity threshold before which bi-directional controls (such as 3V0) are needed. Developers will know that if this number is below the aggregate DG interconnected, then 3V0 is already installed. Number can be easily calculated using substation and circuit loading information.

### **Conclusion:**

Borrego recognizes that there is an exorbitant amount of time spent on managing the interconnection queue by the Utilities, however, there are certain portions of the tariff relating to the Initial Review which have not been followed by several members. Now that the Utilities realize to what extent they have not been following the guidelines, we hope that that this document, along with attached Initial Review Report templates, will make it easier to follow the tariff guidelines. We also hope that the Utilities take time to reflect on how much labor they have spent on the Impact Studies for failed projects and decide whether the inclusion of the suggested additional pieces of information mentioned in this document will reduce total time spent managing the queue.