



# UM 2111

**Incorporating updated standards:  
IEEE 1547-2018  
10-25-2022**



# 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



What to consider?	Decision Option (DO) Description	Utilize?
<p>Consider equipment availability, the use of UL 1741 SA certification in the interim (if needed), and whether naming a date certain 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 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, but 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 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 market by around April 1, 2023. More information is available on <a href="#">IREC's research on equipment availability</a>. [MTGS II]</p>	<b>DO 1a-1:</b> Comply with IEEE 1547-2018 beginning [some date before April 1, 2023].	<input type="checkbox"/>
	<b>DO 1a-2:</b> Comply with IEEE 1547-2018 beginning ~April 1 <sup>st</sup> , 2023 or a later date.	<input checked="" type="checkbox"/>
	<b>DO 1a-3:</b> Comply with IEEE 1547-2018 when the equipment is readily available (TBD by Commission action).	<input type="checkbox"/>
	<b>DO 1b-1:</b> Base compliance date on application submission.	<input checked="" type="checkbox"/>
	<b>DO 1b-2:</b> Base compliance date on installation (may be useful for larger projects with long lead times).	<input type="checkbox"/>
	<b>DO 1b-3:</b> Differentiate compliance date mechanism between smaller and larger projects.	<input type="checkbox"/>
	<b>DO 1c-1:</b> Allow interim compliance with IEEE 1547-2018 beginning immediately.	<input type="checkbox"/>
	<b>DO 1c-2:</b> Define another interim compliance pathway.	<input checked="" type="checkbox"/>

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?
Abnormal	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 the Authority Governing Interconnection Requirements – often the Public Utilities Commission. [MTGS V.A]	<b>DO 2-1:</b> IEEE 1547-2018 Category III Ride-Through capabilities must be supported for inverter-based DER. Rotating DER must meet Category I Ride-Through capabilities, at minimum.	<input checked="" type="checkbox"/>
		<b>DO 2-2:</b> IEEE 1547-2018 Category II Ride-Through capabilities must be supported by inverter-based DER, at minimum. Rotating DER must meet Category I Ride-Through capabilities, at minimum.	<input type="checkbox"/>

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?
Normal	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 on technology type. [MTGS V.A]	<b>DO 3-1:</b> Inverter-based DER shall meet reactive power requirements of 1547-2018 Category B. Rotating DER must meet Category A and may meet Category B.	<input checked="" type="checkbox"/>
		<b>DO 3-2:</b> All DER types (Inverter-based and rotating) shall meet reactive power requirements with 1547-2018 Category A.	<input type="checkbox"/>

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



	What to consider?	Decision Option (DO) Description	Utilize?
Voltage trip settings & ranges	Consider local distribution utility protection practices and make 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.	<b>DO 5-1:</b> Align default settings with 1547.	<input checked="" type="checkbox"/>
		<b>DO 5-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
Frequency trip settings & ranges	Ensure that the under/over frequency trip settings are 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.	<b>DO 6-1:</b> Align default settings with 1547.	<input checked="" type="checkbox"/>
		<b>DO 6-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
Frequency droop Settings	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 adjust within ranges of allowable settings. Consider input from transmission operators or regional reliability coordinator. [MTGS V.A]	<b>DO 7-1:</b> Align default settings with 1547.	<input checked="" type="checkbox"/>
		<b>DO 7-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>

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, watt-var, or constant var function. See PNNL research on autonomously adjusting $V_{ref}$ . Also, consider statewide (or similar) default settings for such mode. [MTGS V.B, VI]	DO 8a-1: Adjustable constant power factor is activated.	<input type="checkbox"/>
	DO 8a-2: Utilize volt-var without autonomously adjusting $V_{ref}$ .	<input checked="" type="checkbox"/>
	DO 8a-3: Utilize volt-var with autonomously adjusting $V_{ref}$ .	<input type="checkbox"/>
	DO 8a-4: Watt-var is activated.	<input type="checkbox"/>
	DO 8a-5: Constant var is activated.	<input type="checkbox"/>
	DO 8b-1: Align default settings with 1547.	<input checked="" type="checkbox"/>
	DO 8b-2: Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
	DO 8c-1: Specify process for selecting settings on site-by-site basis.	<input type="checkbox"/>
	DO 8c-2: Leave process for selecting settings on site-by-site undefined.	<input type="checkbox"/>

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 function (with default setting). Notably, the utilization of volt-watt will require changes to the interconnection applications forms (online portals) to allow an applicant to specify how volt-watt is implemented. [MTGS V.B, VI]	<b>DO 9-1:</b> Volt-watt is activated with default 1547 settings.	<input checked="" type="checkbox"/>
	<b>DO 9-2:</b> Volt-watt is activated with non-default settings.	<input type="checkbox"/>
	<b>DO 9-3:</b> Volt-watt is not activated.	<input type="checkbox"/>

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



# Near-term Decisions Interconnection Rule



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

Issue will be considered more fully in the Screens workstream

# Presentation



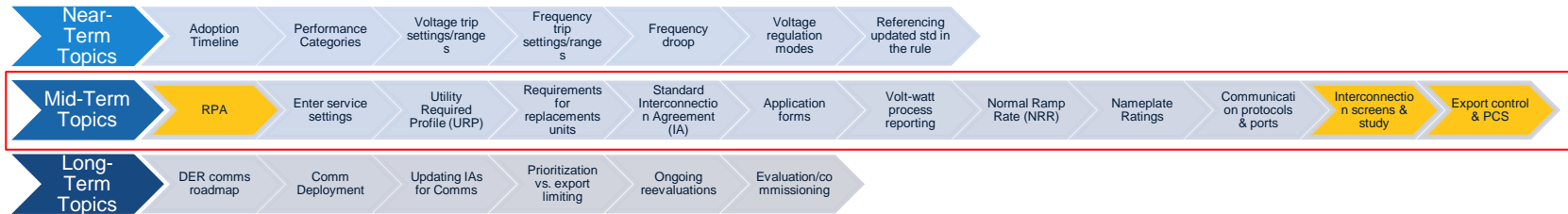
- IREC – Midhat Mafazy and Brian Lydic
  - Decision Adoption Matrix – Mid-Term issues

# UM 2111: Incorporating updated standards, IEEE 1547

*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

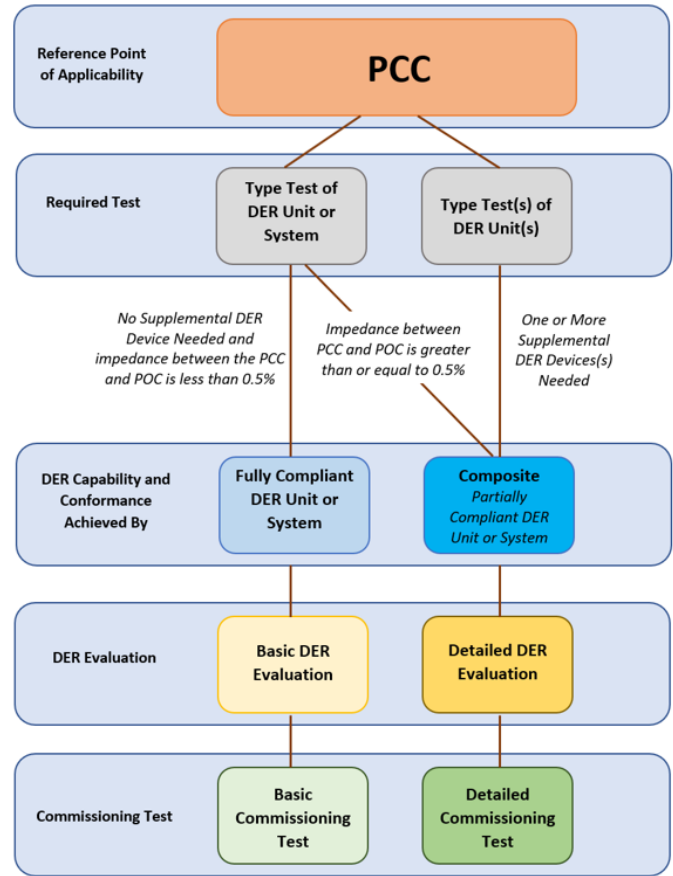
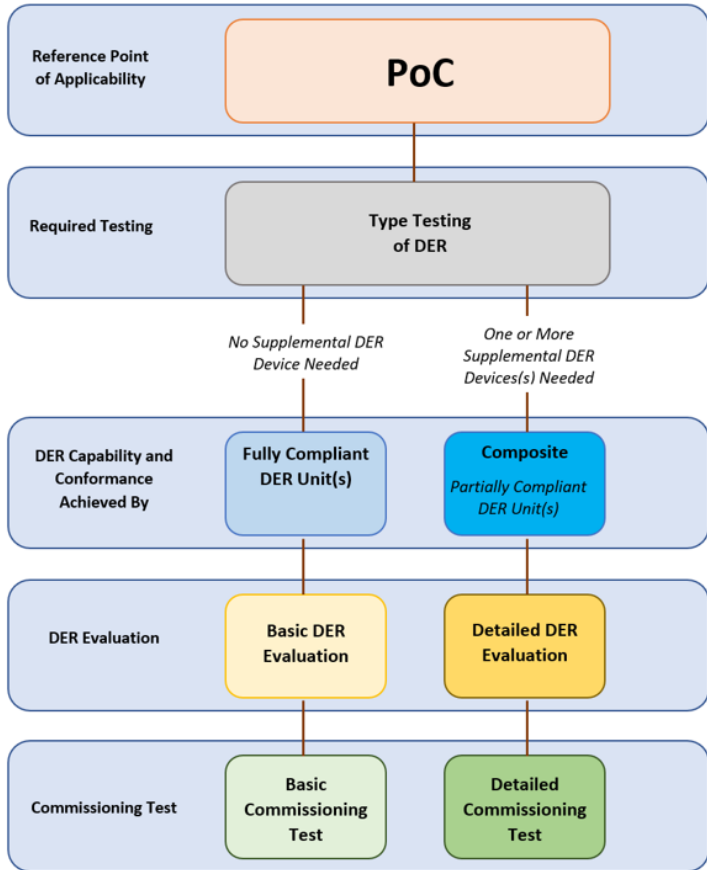
- PCC, PoC, A point between PCC and PoC, or Multiple RPAs for different DER units

## 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

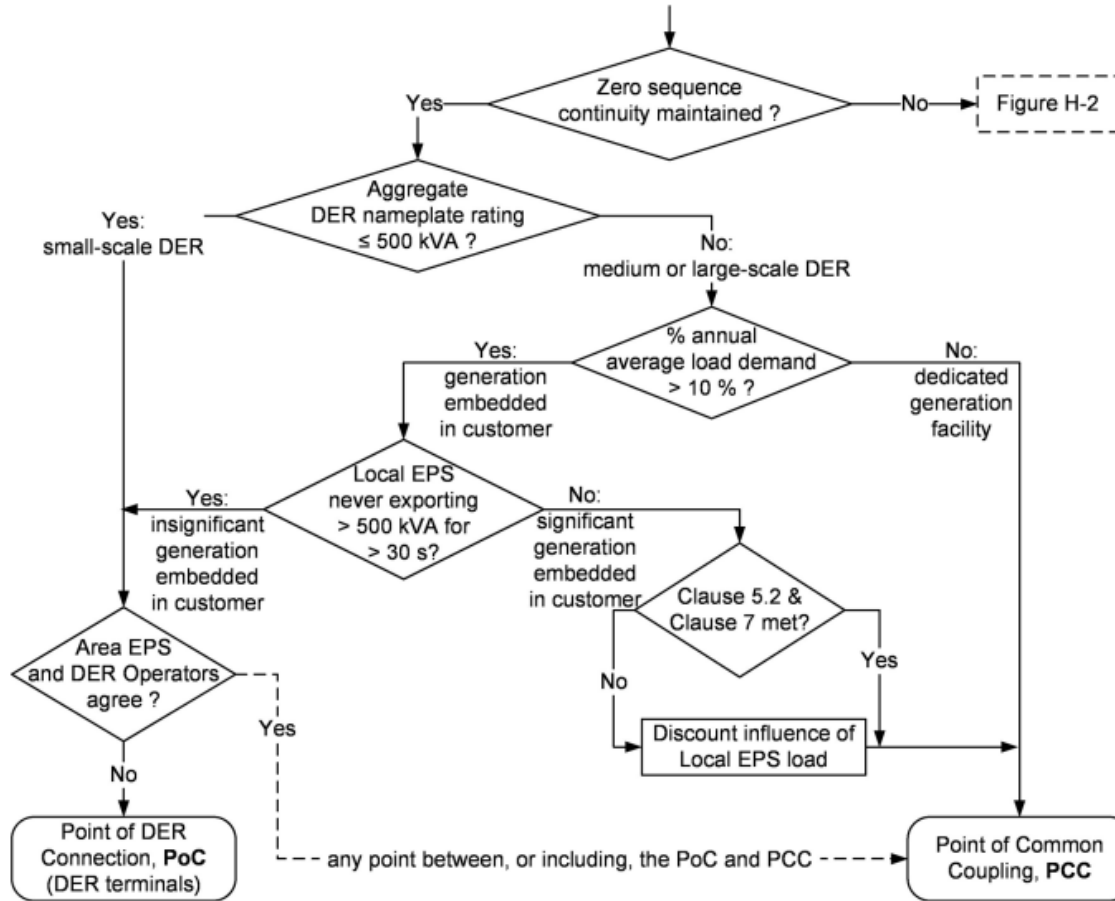


Figure H.1 of IEEE 1547-2018 (Decision tree for local EPS where zero sequence continuity maintained)

# RPA – Evaluation and Commissioning

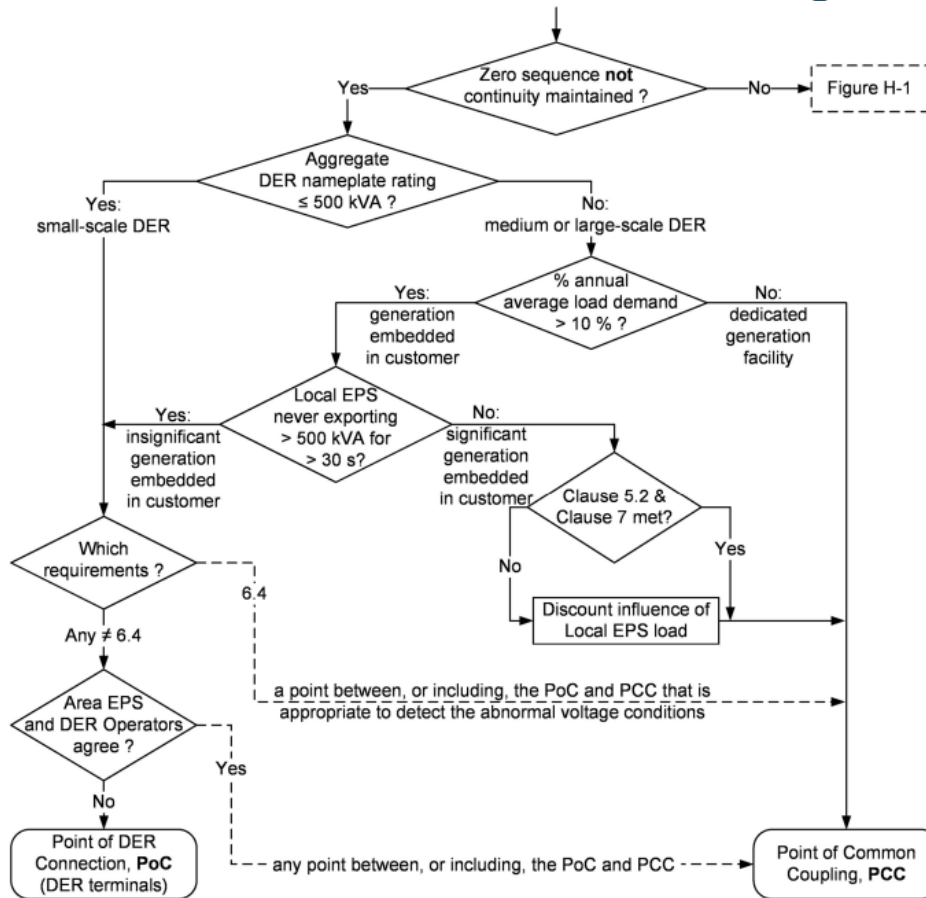


Figure H.1 of IEEE 1547-2018 (Decision tree for local EPS where zero sequence continuity is not maintained)



## 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 Provider<sup>91</sup> 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.*

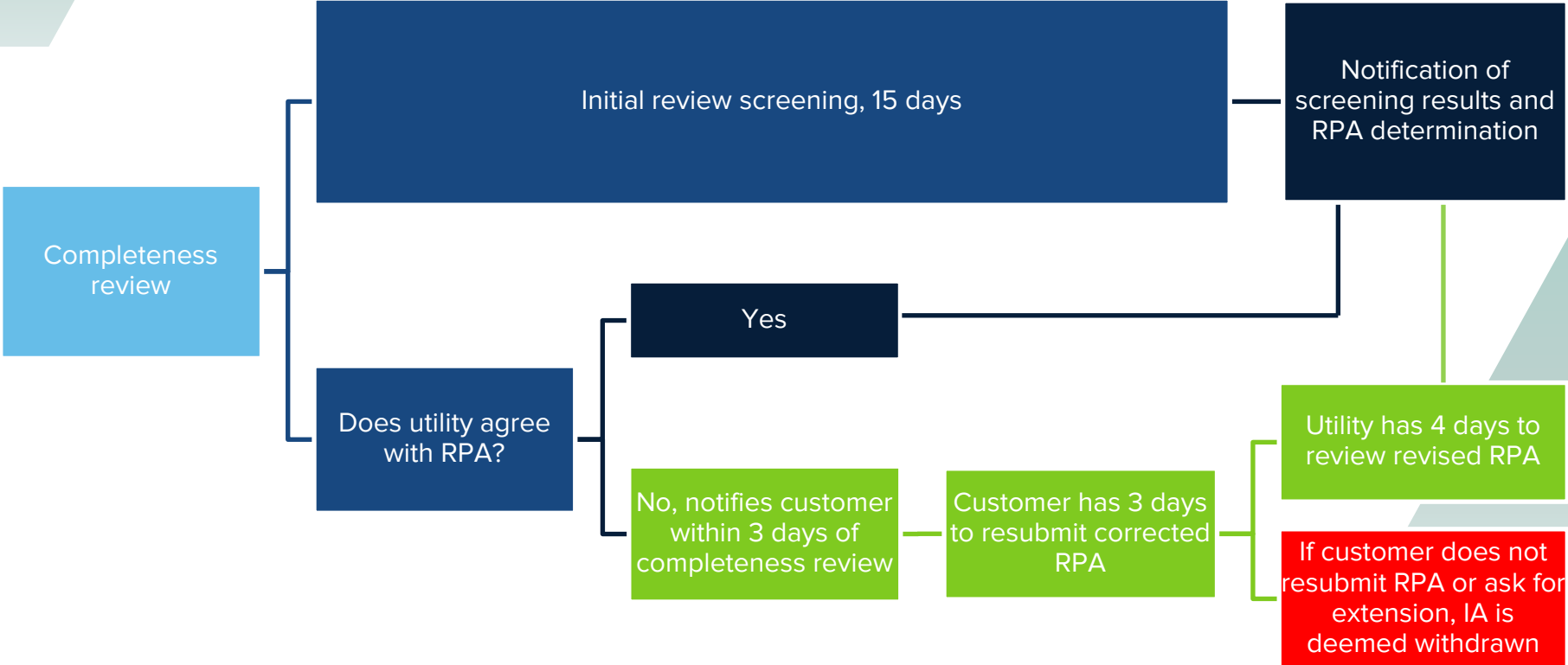
*2.2.1 If it is determined that the Reference Point of Applicability is appropriate the Distribution Provider will notify the Interconnection Customer when it provides Initial Review results and proceed according to sections 2.3.2 to 2.3.4 below.*

*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.*

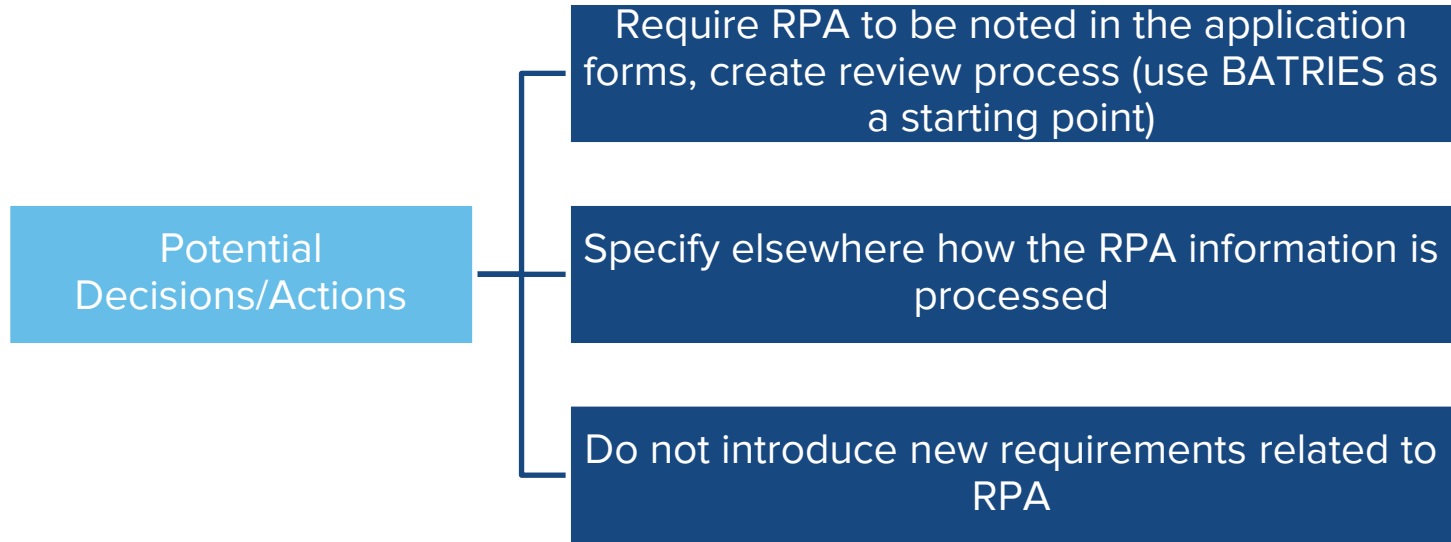
[Note: Initial Review is renumbered to 2.3]

*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



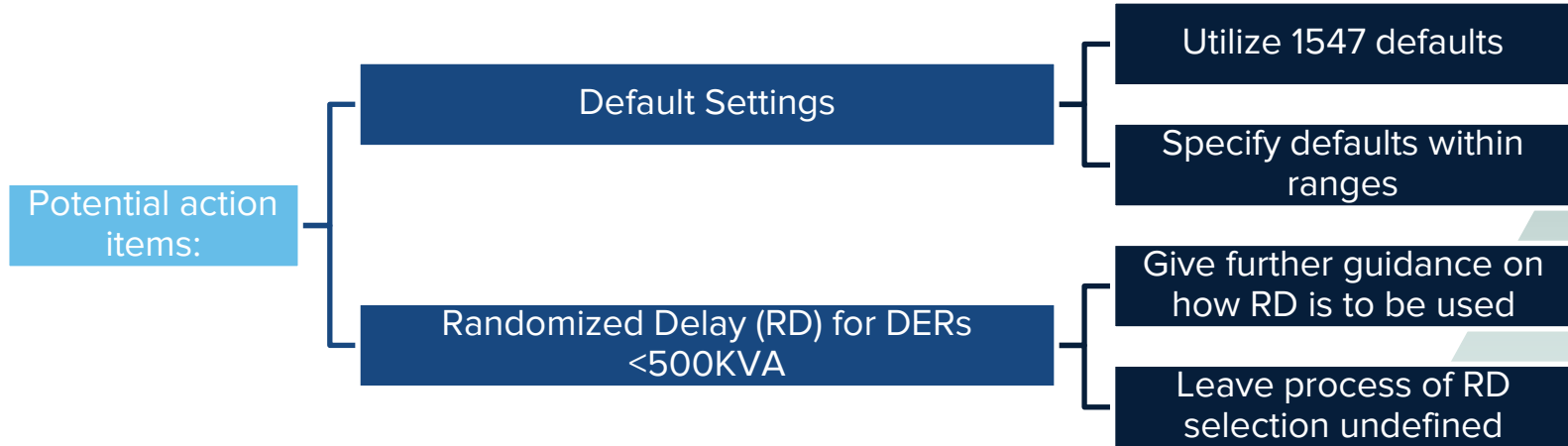
## RPA Process – What Should Be Considered?



# 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

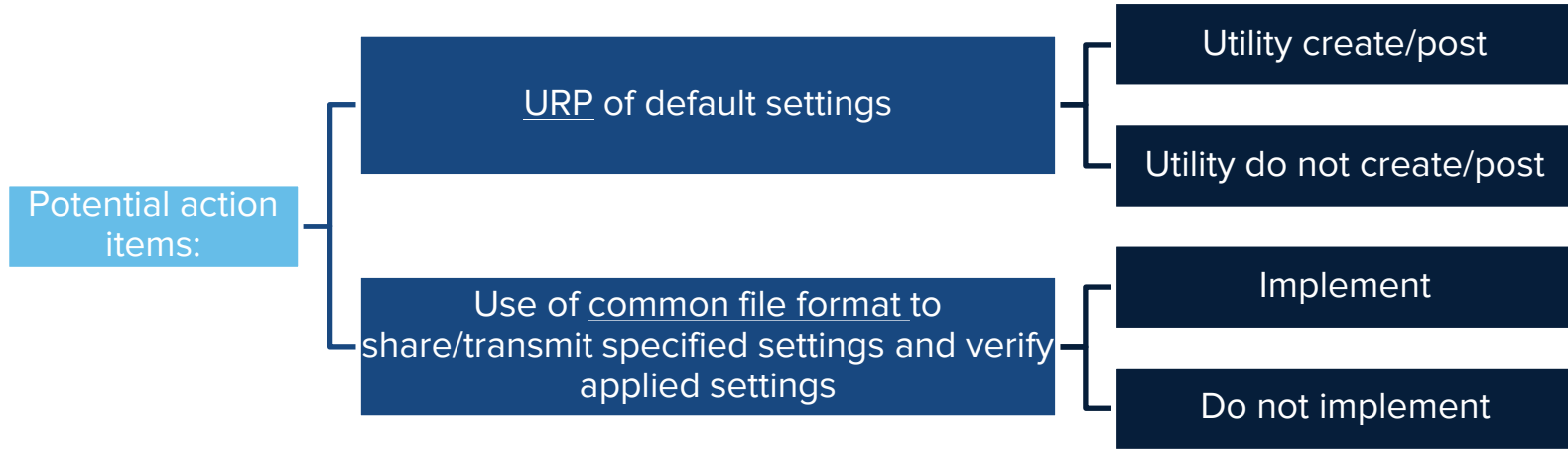
The screenshot shows the EPRI website interface for searching DER settings. The header includes the EPRI logo and the text 'ELECTRIC POWER RESEARCH INSTITUTE' and 'DER Performance Capability and Functional Settings Database'. Below the header is a search form with the following fields:

- Select Utility Name: All/Any
- Select Geographical Region - Country: United States
- Geographical Region - State: All/Any, IL
- Choose Applicable Date: 1/1/2000
- Select Power Conversion Device(s): All/Any
- Select DER Normal Performance Categories: Category A, Category B
- Select DER Abnormal Performance Categories: Category I, Category II, Category III

There is a 'More/Less Search Options' button and a 'Search' button. Below the search form is a table with columns for File, Utility, Applicable Date, and Download. At the bottom right, there is a pagination control showing 'Items per page: 10' and '0 of 0'.

<https://dersettings.epri.com/search>

## Utility Required Profile (URP)



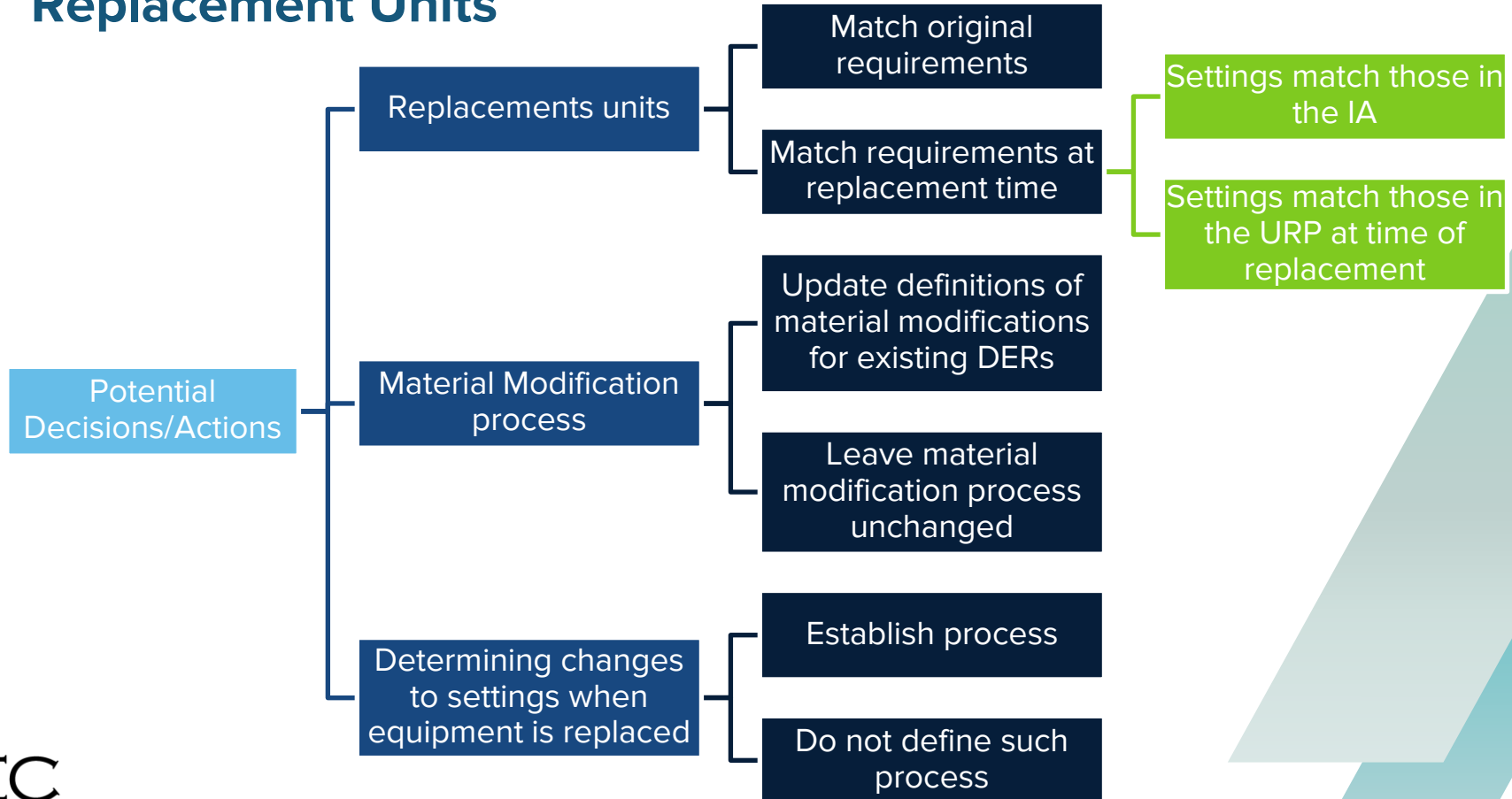


## Replacement Units

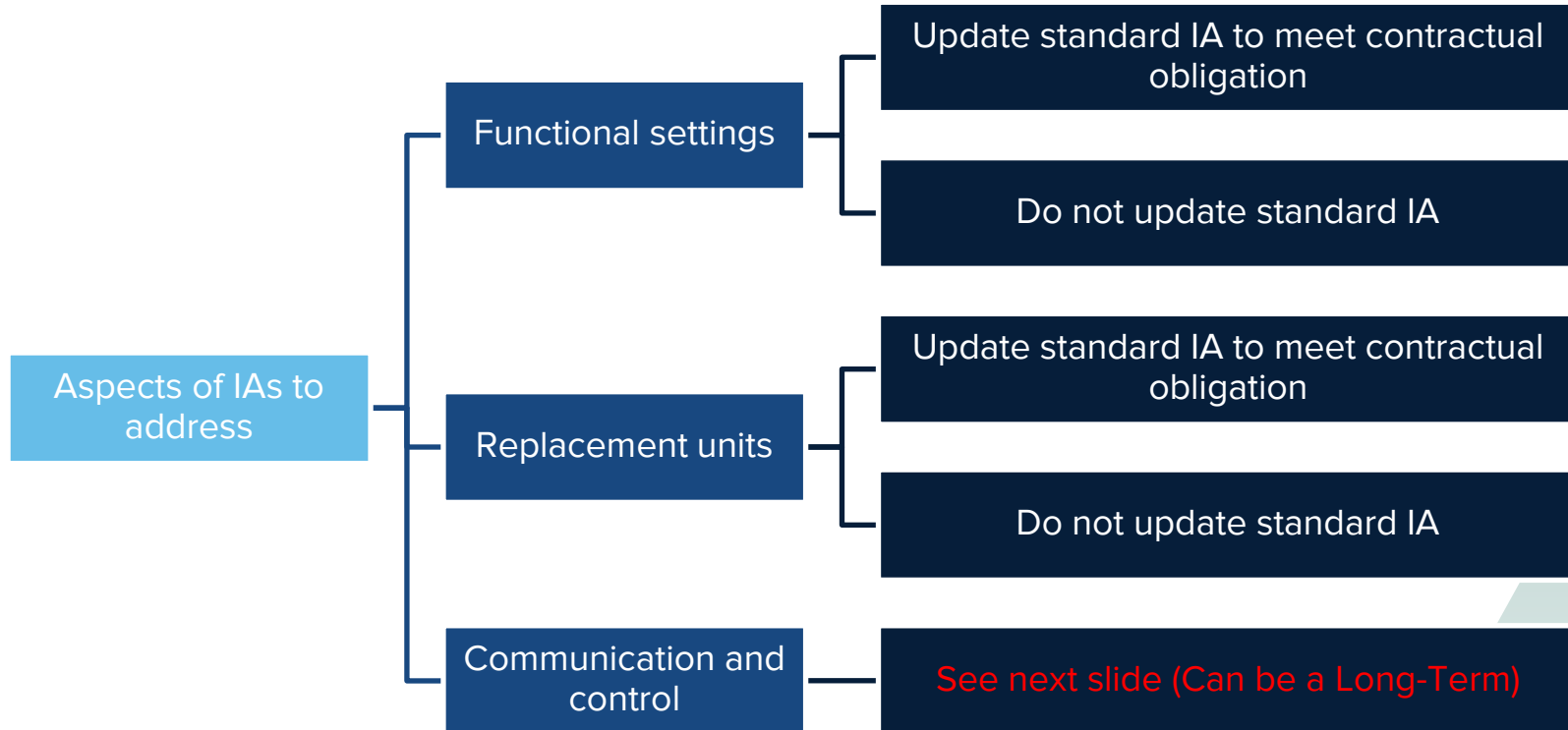
For end-of-life, define whether the most recent technical requirements, certifications and settings must be followed. However, make exceptions on like-for-like:

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

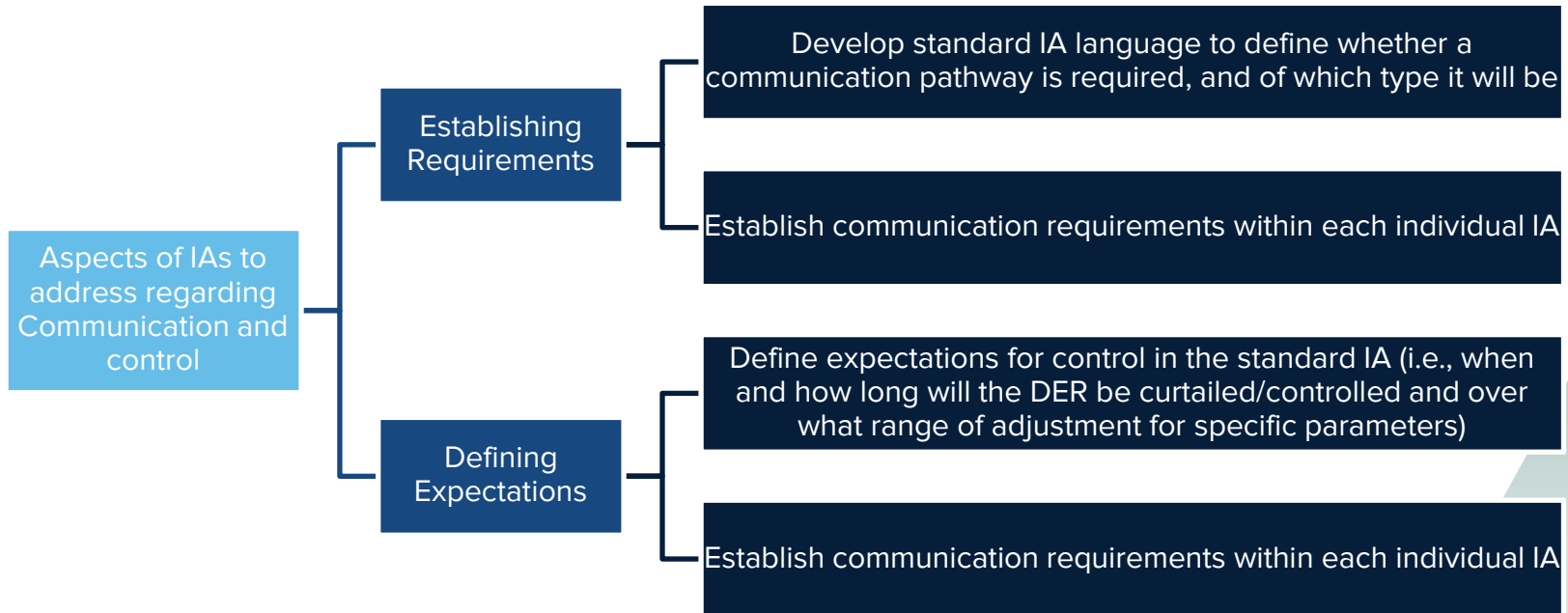
# Replacement Units



# Interconnection Agreements (IA)



## Interconnection Agreements (IA) – Can be Long-Term



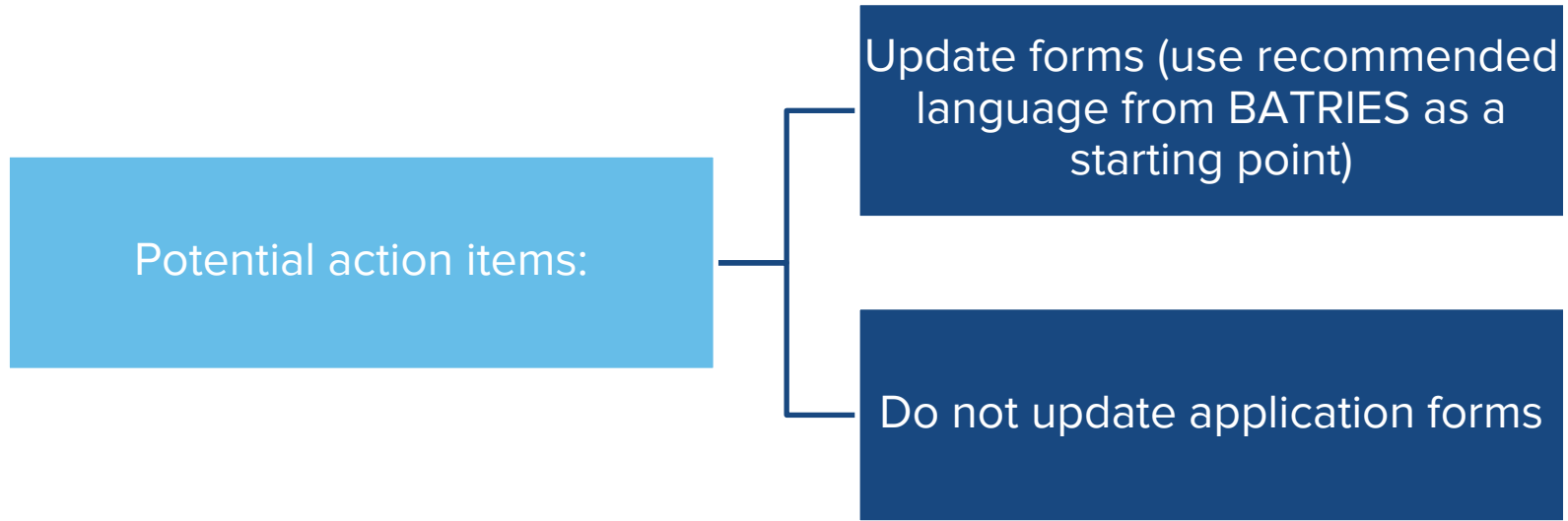
## Application Forms

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

*BATRIES addressed some of these, and provides recommended language*

## Application Forms



See sample recommended language from BATRIES in next slides

## Application Forms

VIII. UL 1741 and PCS related: The project team recommends the application forms ask whether or not a PCS is included in the DER system design. Note the blank \_\_\_ section 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*

## Application Forms

- IX. IEEE 1547-2018 related: 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).

*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.*



## Application Forms

*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)*

## Application Forms

*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 per-unit curves for individual unit Nameplate Ratings)*
  - Denote in one-line diagram the voltage-active power settings of each DER 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 voltage-active 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 voltage-active power function? [yes / no]*

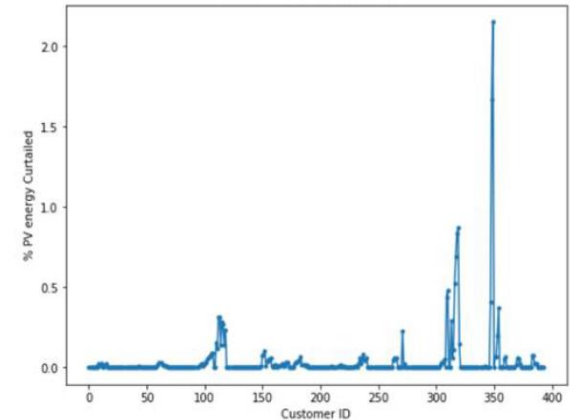
## Volt-Watt Curtailment

Ensure complaint process handles DER complaints appropriately

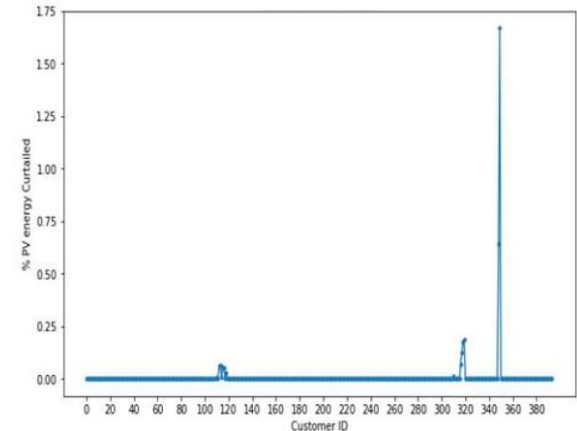
Consider reporting on how many voltage-based curtailment issues arise

Consider metric based on voltage data to determine potential for curtailment

VROS – total curtailment



Method 1 – V-W curtailment



# Volt-Watt Curtailment Reports

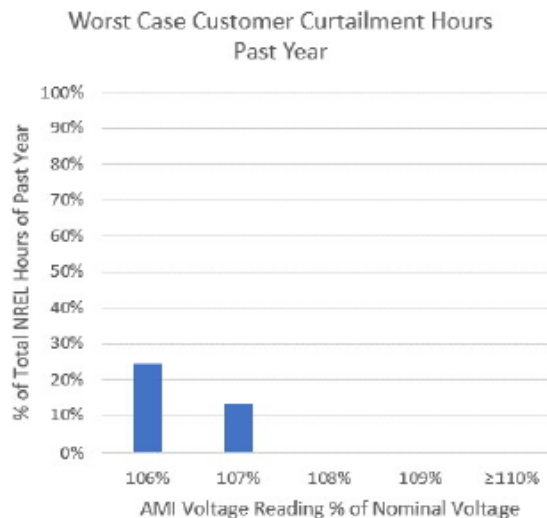
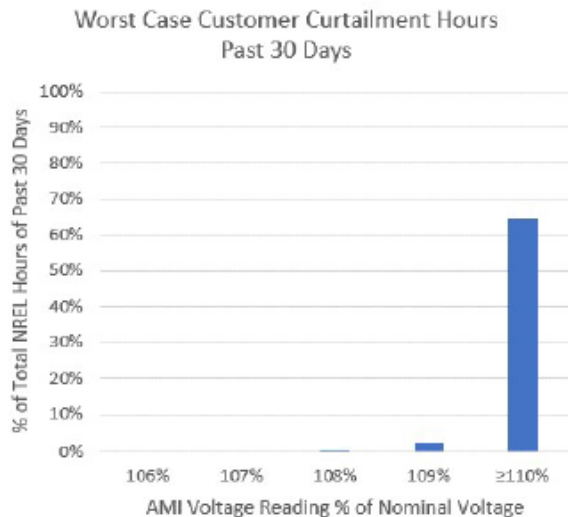
## California Experience

- 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 Curtailment %	# of Customers with 1 year Curtailment %	# of Customers with 1 month Curtailment %
≤ 2%	15	10
> 2% ≤ 4%	0	1
>4%	4	8
<b>Total</b>	<b>19</b>	<b>19</b>

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

#### Worst Case Customer (>5% Curtailment) Voltage Histograms



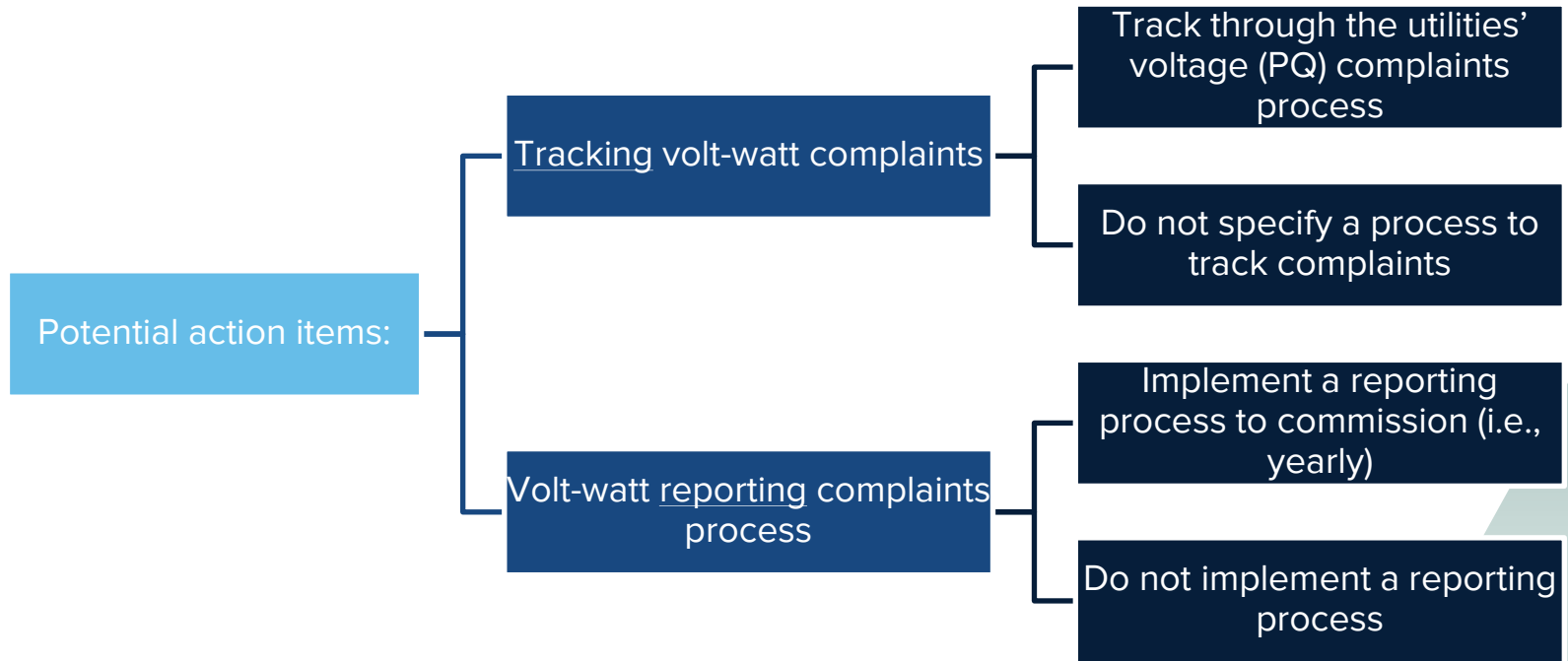
Per Customer Curtailment Calculations and Mitigations				
Customer ID	1 Year Curtailment %	1 Month Curtailment %	Mitigation	
1	0.2%	0.0%	CUSTOMER ISSUE	
2	3.8%	0.0%	CUSTOMER ISSUE	
3	1.2%	7.4%	CUSTOMER ISSUE	
4	0.0%	0.3%	CUSTOMER ISSUE	
5	0.1%	0.1%	CUSTOMER ISSUE	
6	0.8%	5.2%	CUSTOMER ISSUE	
7	0.0%	0.1%	CUSTOMER ISSUE	
8	0.8%	0.0%	CUSTOMER ISSUE	
9	0.0%	0.1%	CUSTOMER ISSUE	
10	0.0%	0.3%	CUSTOMER ISSUE	
11	0.2%	0.0%	CUSTOMER ISSUE	
12	0.4%	0.1%	CUSTOMER ISSUE	
13	0.2%	0.0%	CUSTOMER ISSUE	
14	0.1%	0.2%	CUSTOMER ISSUE	
15	0.2%	0.4%	CUSTOMER ISSUE	
16	2.1%	11.6%	CUSTOMER ISSUE	
17	0.1%	0.0%	CUSTOMER ISSUE	
18	0.0%	0.1%	CUSTOMER ISSUE	
19	0.3%	1.0%	DIST - CHANGE SETTINGS	
20	0.1%	0.0%	DIST - REPAIR EQUIPMENT	
21	1.4%	8.6%	DIST - REPAIR EQUIPMENT	
22	0.1%	1.4%	DIST - REPAIR EQUIPMENT	
23	0.3%	0.0%	DIST - REPAIR EQUIPMENT	
24	0.2%	0.0%	DIST - TREE TRIMMING	
25	1.8%	2.2%	PENDING	
26	0.1%	1.1%	PENDING	
27	7.3%	21.3%	PENDING	
28	0.4%	4.3%	SEC/SVC - REPAIR	
29	1.6%	8.4%	SEC/SVC - REPAIR	
30	0.1%	0.2%	SEC/SVC - REPAIR	
31	0.2%	0.0%	SEC/SVC - REPAIR	
32	5.8%	16.2%	SEC/SVC - REPLACE	
33	0.1%	0.0%	SEC/SVC - REPLACE	
34	0.4%	0.0%	SEC/SVC - REPLACE	
35	0.4%	4.6%	SUB/TRANS - CHANGE SETTINGS	
36	4.5%	22.1%	TX - REPLACE	
37	5.8%	67.2%	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

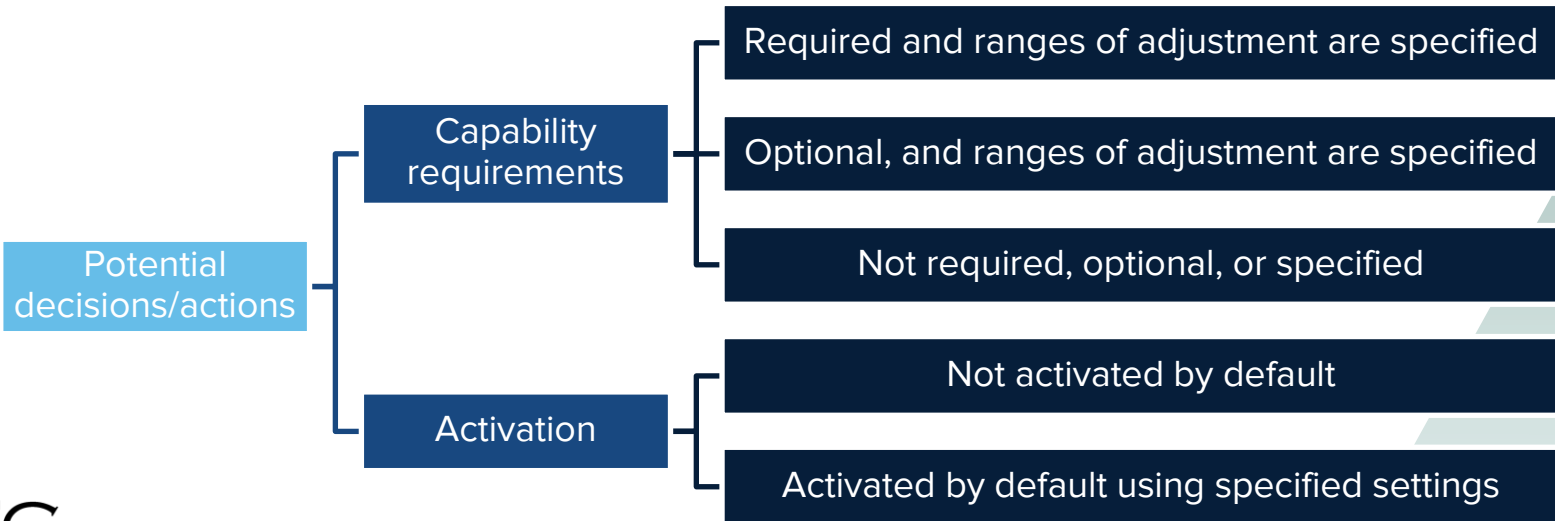




## Normal Ramp Rate (NRR)

NRR is used when transitioning between output levels:

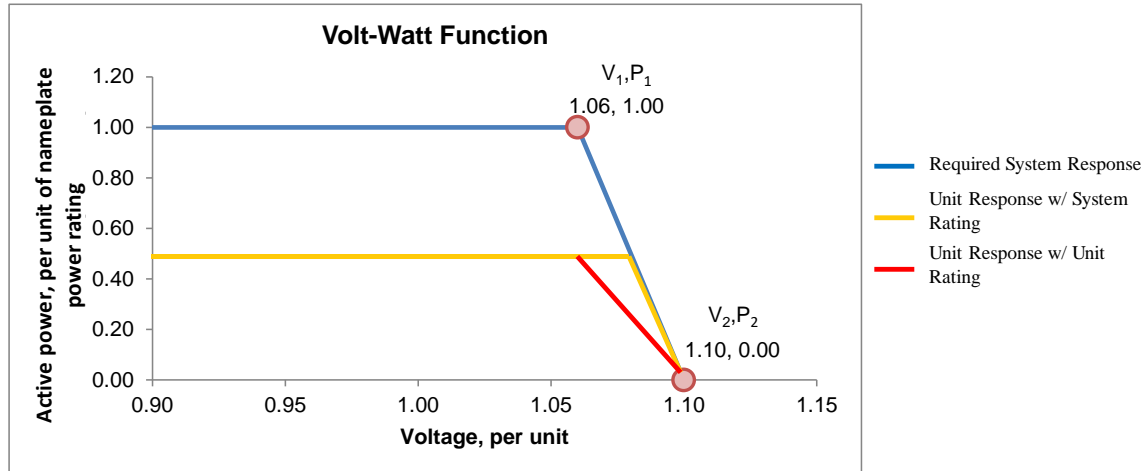
- Based on UL 1741 SA certification. Presently, testing only supports verification of ramp up (not ramp down)



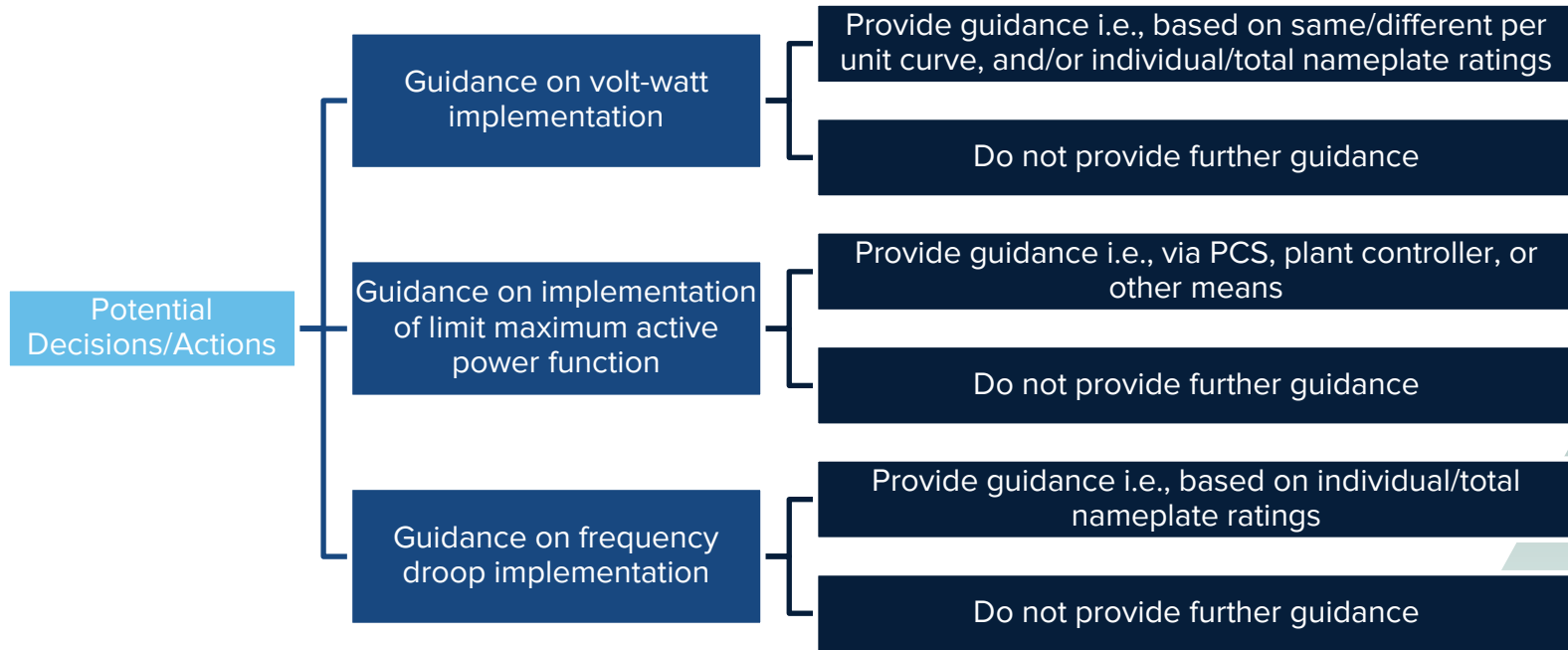
# Nameplate Ratings

## What to consider

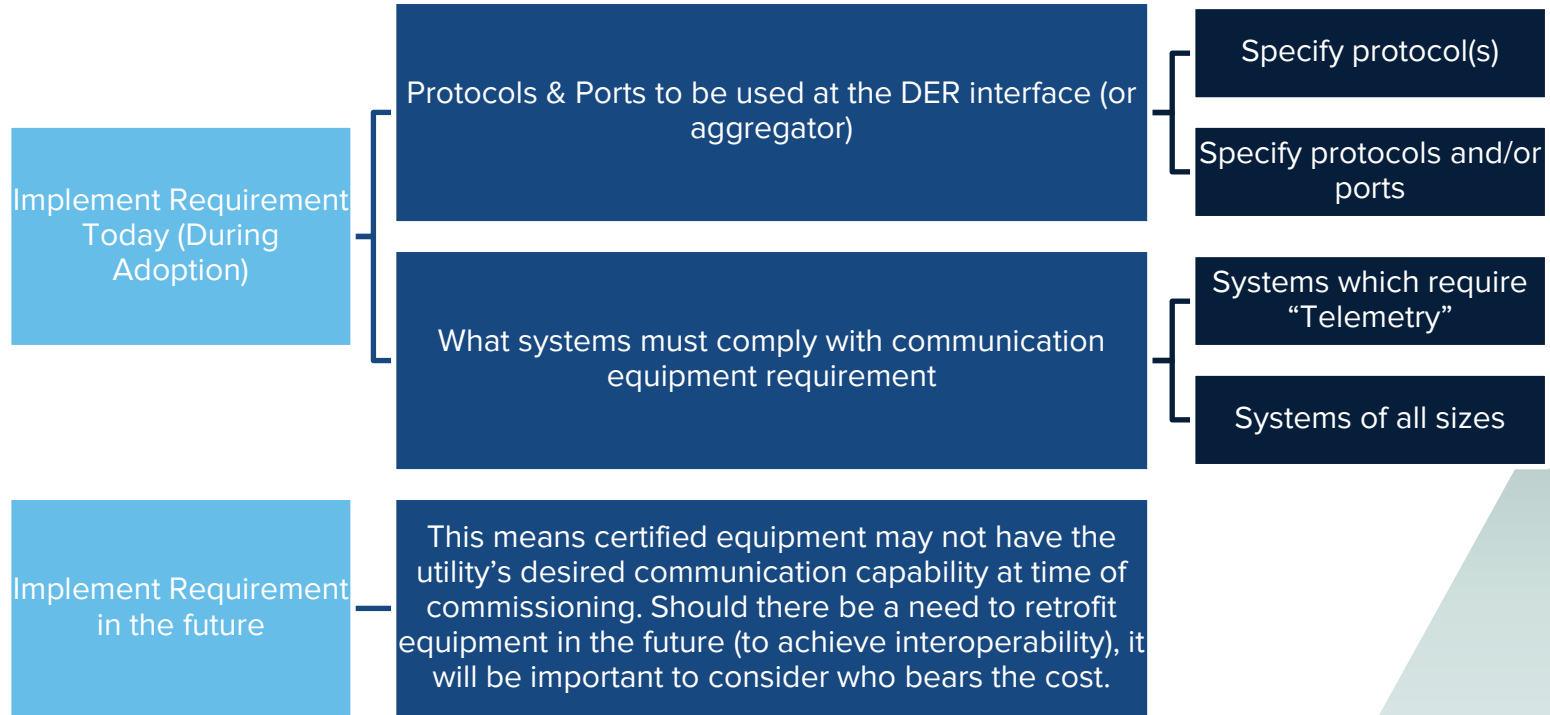
- Consider addressing nameplate ratings issues related to volt-watt, limit maximum active power, and frequency droop
- Interconnection application forms may need to allow applicants to describe how the functions are achieved



# Nameplate Ratings



# Communications – Protocols, Ports & Telemetry



# Interconnection Screens/Study + Export Controls:

**These are topics for the other WG but influenced by standard adoption. (Discuss as needed).**

## Secondary Transformer Screen

The existing Shared secondary Tx Screen says

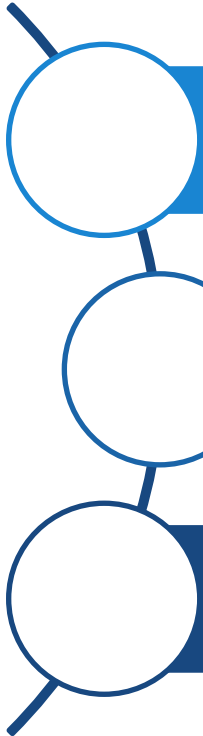
*“If the proposed DER is to be interconnected on a single-phase shared secondary, the aggregate Export Capacity on the shared secondary, including the proposed DER, shall not exceed”*

- *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.

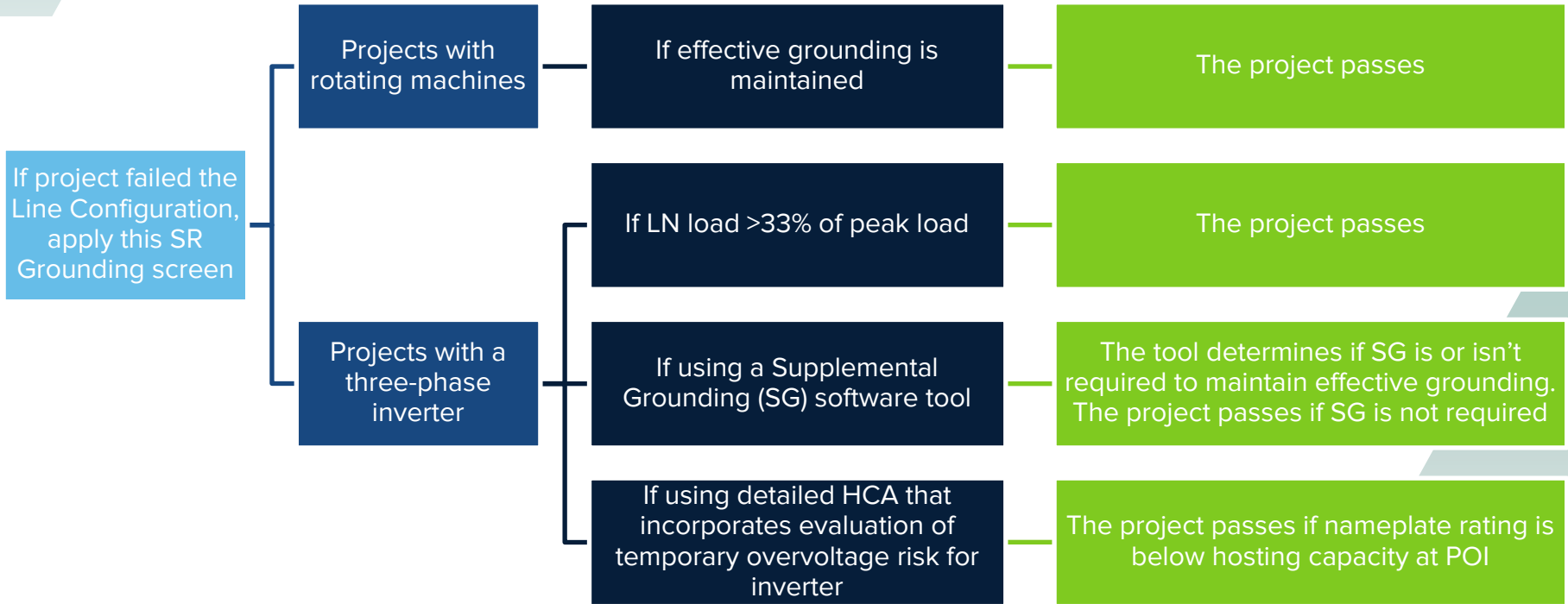
Consider using the revised table from BATTRIES (next slide)

## Line Configuration Screen (LCS)

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



## 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

# Long-Term Topics

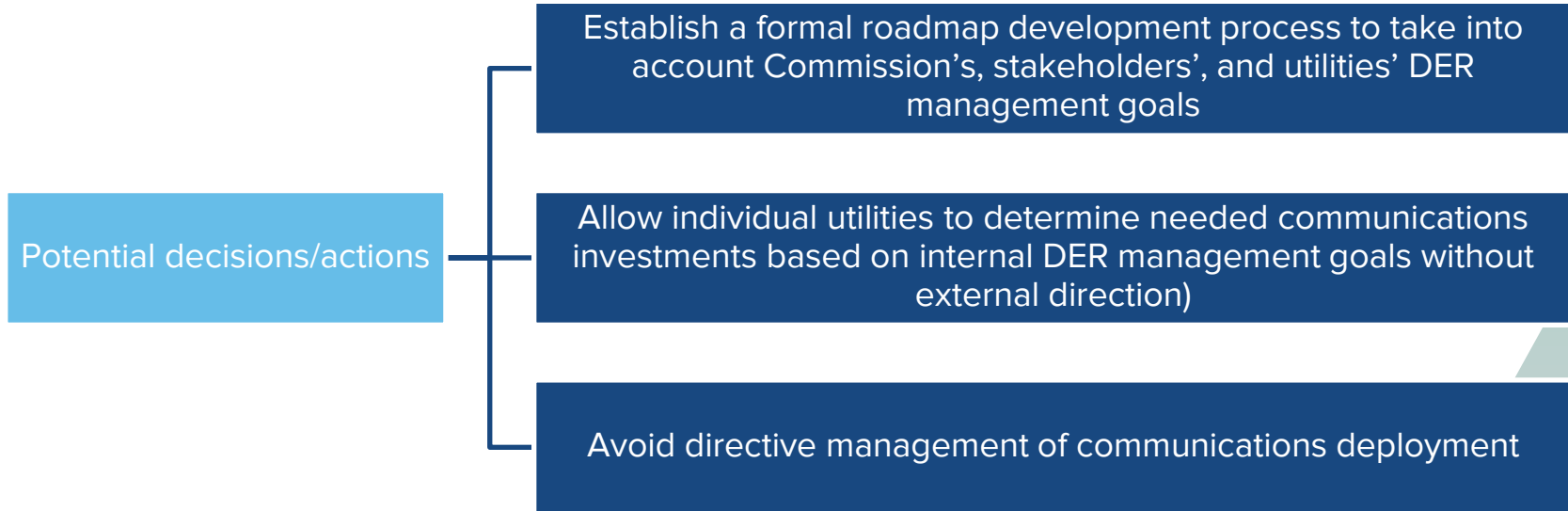


## DER Communications/controls roadmap

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



## 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

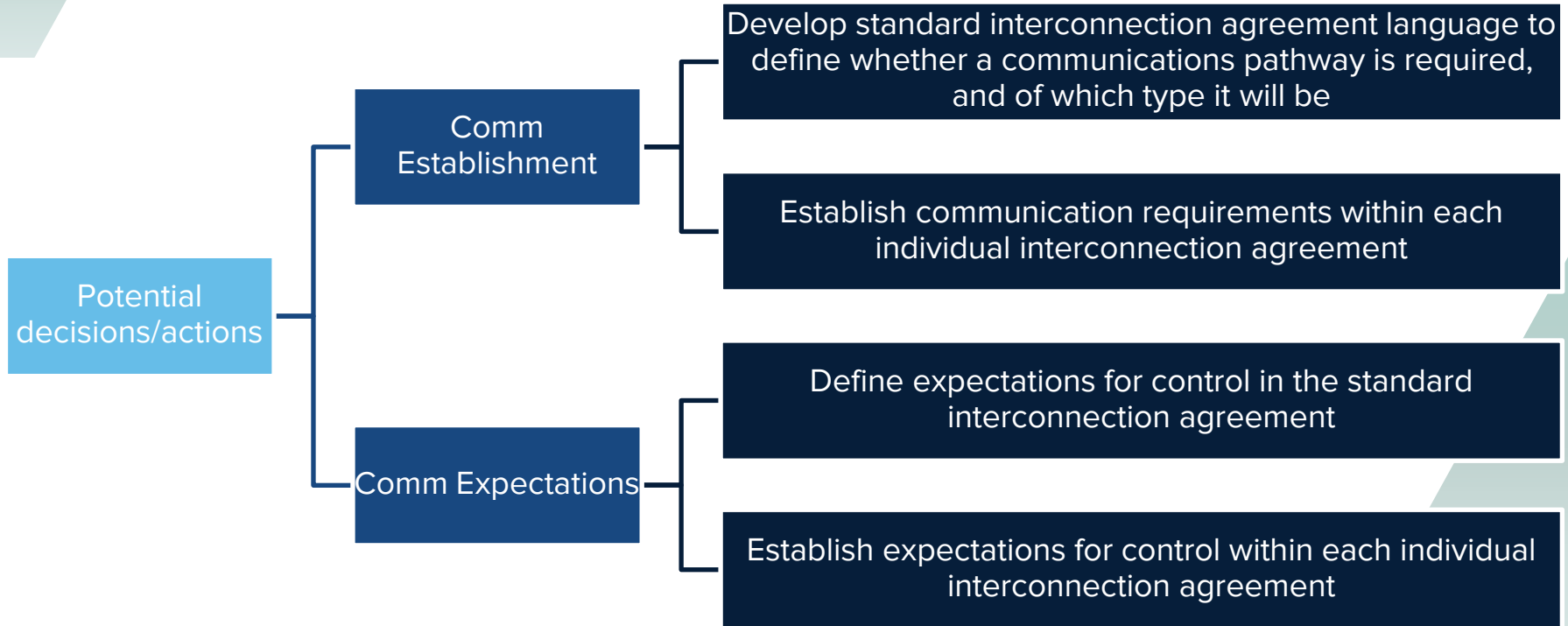
## Interconnection Agreement (IA) for comms/control

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

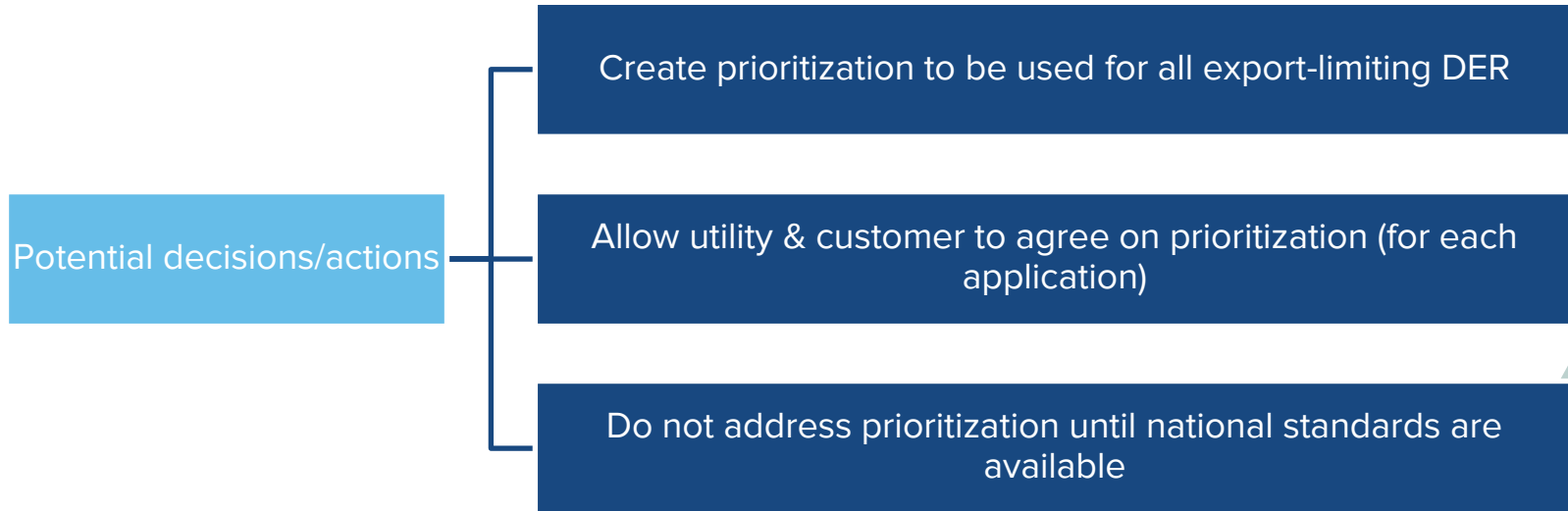


## Prioritization vs. Export Limiting

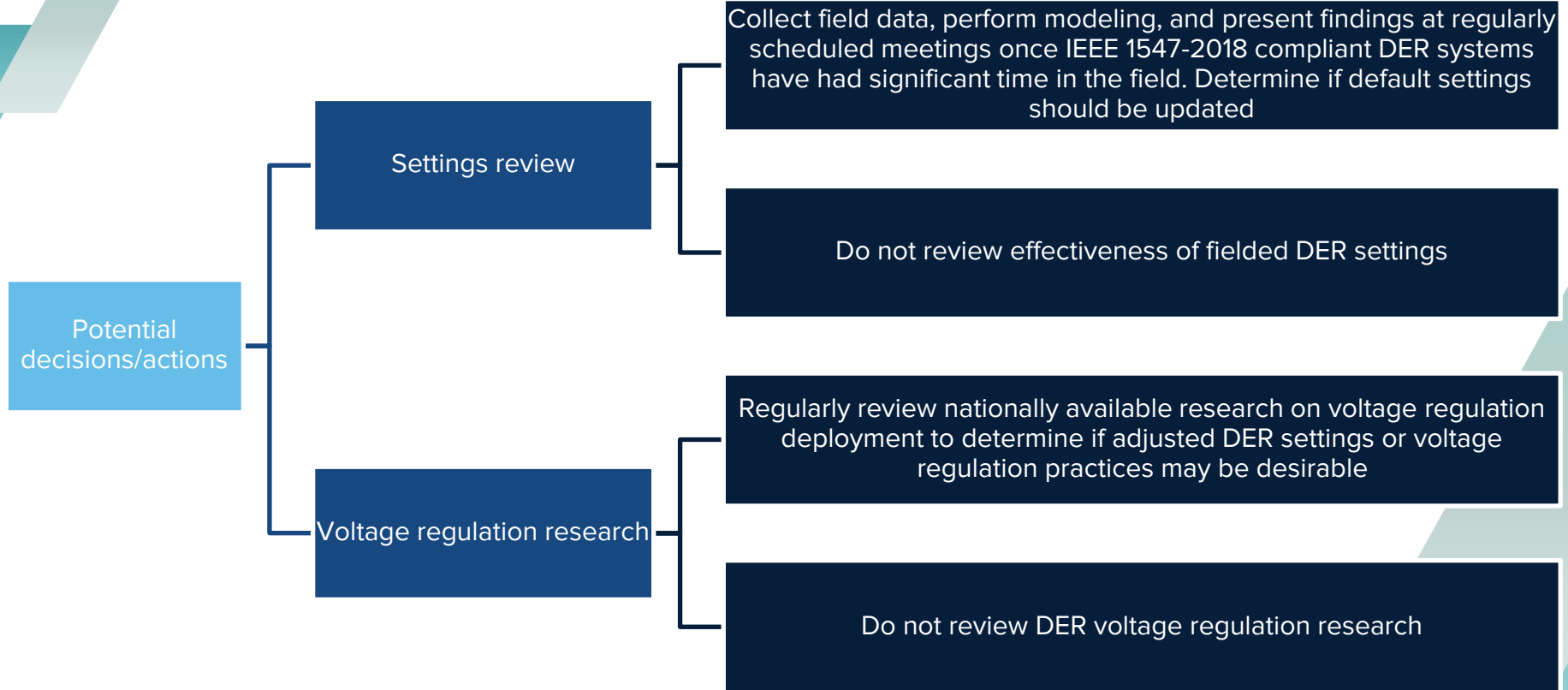
Export limits can potentially interfere with DER systems providing full grid support capability:

- 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:

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# Next Steps



- Staff to provide meeting notes – with questions for stakeholders
- Circulate responses to **service list** 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 1373
  - Meeting ID: 161 631 5107
  - Passcode: 6623001161

## Workshop 4: Incorporating Updated Standards

- Date: November 22
- Time: 9:00 AM – 12:00 PM
- Location: Zoom
  - [Link to Meeting](#)
  - Dial-In: 1-551 285 1373
  - Meeting ID: 161 631 5107
  - 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 1547™-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 [\*Making the Grid Smarter: Primer on Adopting the New IEEE 1547™-2018 Standard for Distributed Energy Resources\*](#) ("MTGS")<sup>1</sup> 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, [\*The Toolkit and Guidance for the Interconnection of Energy Storage and Solar-Plus-Storage\*](#) ("BATTERIES Toolkit")<sup>2</sup> offers potential solutions for several DOs.

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

<sup>2</sup> <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.

Topic	What to Consider	Decision Option (DO) Description	Utilize ?
<b>A. Near Term</b>			
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 market by around April 2023 (dependent on several factors). More information is available on <a href="#">IREC's research on equipment availability</a> . <sup>3</sup> [MTGS II]	<b>DO 1a-1:</b> Comply with IEEE 1547-2018 beginning [some date before April 1, 2023].	<input type="checkbox"/>
		<b>DO 1a-2:</b> Comply with IEEE 1547-2018 beginning ~April 1, 2023 or a later date.	<input type="checkbox"/>
		<b>DO 1a-3:</b> Comply with IEEE 1547-2018 when the equipment is readily available (TBD by Commission action).	<input type="checkbox"/>
		<b>DO 1b-1:</b> Base compliance date on application submission date.	<input type="checkbox"/>
		<b>DO 1b-2:</b> Base compliance date on installation date (may be useful for larger projects with long lead times).	<input type="checkbox"/>
		<b>DO 1b-3:</b> Differentiate compliance date mechanism between smaller and larger projects.	<input type="checkbox"/>
		<b>DO 1c-1:</b> Allow interim compliance with IEEE 1547-2018 beginning immediately.	<input type="checkbox"/>
		<b>DO 1c-2:</b> Define another interim compliance pathway.	<input type="checkbox"/>

<sup>3</sup><https://irecusa.org/blog/regulatory-engagement/new-research-sheds-light-on-when-key-smart-inverters-will-be-available/>



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 the Authority Governing Interconnection Requirements—often the Public Utilities Commission. [MTGS V.A]	<b>DO 2-1:</b> 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.	<input type="checkbox"/>
		<b>DO 2-2:</b> IEEE 1547-2018 Category II Ride-Through capabilities must be supported by inverter-based DERs, at minimum. Rotating DERs must meet Category I Ride-Through capabilities, at minimum.	<input type="checkbox"/>
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 on technology type. [MTGS V.A]	<b>DO 3-1:</b> Inverter-based DERs must meet reactive power requirements of 1547-2018 Category B. Rotating DERs must meet Category A, and may meet Category B.	<input type="checkbox"/>
		<b>DO 3-2:</b> All DER types (inverter-based and rotating) shall meet reactive power requirements of 1547-2018 Category A, and may meet Category B.	<input type="checkbox"/>
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 interconnect without unduly impacting grid support requirements.	<b>DO 4-1:</b> Define process for how exceptions to these category assignments are handled (e.g., for an inverter-based technology that cannot meet Category III capabilities).	<input type="checkbox"/>
		<b>DO 4-2:</b> Leave process undefined for how exceptions to these category assignments are handled.	<input type="checkbox"/>
Voltage trip settings and ranges	Consider local distribution utility protection practices and make 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.	<b>DO 5-1:</b> Align default settings with 1547.	<input type="checkbox"/>
		<b>DO 5-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
Frequency trip settings and ranges	Ensure that the under/overfrequency trip settings are 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.	<b>DO 6-1:</b> Align default settings with 1547.	<input type="checkbox"/>
		<b>DO 6-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
Frequency droop <sup>4</sup> settings	This capability is required for all DERs (with some limitations on 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]	<b>DO 7-1:</b> Align default settings with 1547.	<input type="checkbox"/>
		<b>DO 7-2:</b> Select other default settings within 1547 ranges of adjustment.	<input type="checkbox"/>
		<b>DO 8a-1:</b> Adjustable constant power factor is activated.	<input type="checkbox"/>

<sup>4</sup> Per IEEE 1547-2018, this function cannot be disabled.



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

<sup>5</sup> 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.

<sup>6</sup> 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

<sup>7</sup> Note: Constant var mode is only required for normal performance Category B.

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

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



Topic	What to Consider	Decision Option (DO) Description	Utilize ?
<b>B. Mid Term</b>			
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 application portals), initial review processes, and provisions to allow RPA review/discussion during the scoping meeting. [MTGS IV]	<b>DO 11-1:</b> Require RPA to be noted in the application forms and use RPA recommended language from <a href="#">Appendix E and F of BATRIES Toolkit</a> as a starting point.	<input type="checkbox"/>
		<b>DO 11-2:</b> Specify elsewhere how the RPA information is processed.	<input type="checkbox"/>
		<b>DO 11-3:</b> Do not introduce new requirements related to the RPA.	<input type="checkbox"/>
Enter service settings	It is important to consider whether non-default enter service settings are preferred for voltage and frequency ranges, delay time, and ramp rate. The standard allows for the duration of enter service period (ramp rate) to be adjustable over 1-1000 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.	<b>DO 12a-1:</b> Utilize 1547 default settings for voltage range, frequency range, reconnect delay, and ramp duration.	<input type="checkbox"/>
		<b>DO 12a-2:</b> Specify default settings within the ranges allowed by 1547.	<input type="checkbox"/>
		<b>DO 12b-1:</b> Give further guidance on how randomized delay times are to be used for DERs smaller than 500 kVA (consider application form addition).	<input type="checkbox"/>
		<b>DO 12b-2:</b> Leave process for randomized delay selection undefined for DERs smaller than 500 kVA.	<input type="checkbox"/>
Utility-required profile (URP)	Finalize URP with all default settings and consider posting that in the EPRI URP database <sup>10</sup> (publicly available). Implement use of EPRI's Common File Format for DER Settings Exchange and Storage. <sup>11</sup> [MTGS IV, VI]	<b>DO 13a-1:</b> Utility to create and post URP of default settings.	<input type="checkbox"/>
		<b>DO 13a-2:</b> Do not create and post URP of default settings.	<input type="checkbox"/>
		<b>DO 13b-1:</b> Utility to implement use of common file format to transmit specified settings to customer and verify applied settings.	<input type="checkbox"/>
		<b>DO 13b-2:</b> Do not implement common file format.	<input type="checkbox"/>
Requirements for replacement units	For end-of-life or other equipment replacements, define whether or not the most recent technical requirements,	<b>DO 14a-1:</b> Allow replacement equipment to match the certification and technical requirements of originally evaluated	<input type="checkbox"/>

<sup>10</sup> <https://dersettings.epri.com/>

<sup>11</sup> *Common File Format for Distributed Energy Resources Settings Exchange and Storage*, EPRI (December 2020), <https://www.epri.com/research/products/00000003002020201>

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



Application forms	<p>Update application forms (including online portals) for the following items:</p> <ul style="list-style-type: none"> <li>• RPA selection</li> <li>• Enter service randomized delay</li> <li>• Volt-watt implementation</li> <li>• Limit active maximum power function implementation</li> <li>• Frequency droop implementation</li> <li>• Intentional islanding</li> <li>• Emergency backup systems</li> <li>• DER communication capabilities</li> <li>• Export/import limiting</li> <li>• Power control systems (PCS)</li> <li>• Inverter fault current</li> </ul>	<p><b>DO 16-1:</b> Update application forms (use recommended language from Appendix F of BATTRIES Toolkit as a starting point).</p>	<input type="checkbox"/>
		<p><b>DO 16-2:</b> Do not update application forms.</p>	<input type="checkbox"/>
Volt-watt process/reporting	<p>Volt-watt can have an impact on the DER customer’s energy production. Curtailment is based on utility voltage that the customer has no control over. Consider a reporting process to understand if volt-watt curtailment becomes an issue for customers now or in the future. [MTGS V.B]</p>	<p><b>DO 17a-1:</b> Ensure volt-watt curtailment complaints are tracked through the utilities’ voltage/power quality complaint process.</p>	<input type="checkbox"/>
		<p><b>DO 17a-2:</b> Do not specify a process to track volt-watt curtailment complaints.</p>	<input type="checkbox"/>
		<p><b>DO 17b-1:</b> Implement a reporting process to Commission to review volt-watt complaints on a regular basis (e.g., yearly).</p>	<input type="checkbox"/>
		<p><b>DO 17b-2:</b> Do not implement a reporting process.</p>	<input type="checkbox"/>
Normal ramp rate	<p>The normal ramp rate is used when transitioning between power output levels over the normal course of operation. This capability is based on UL 1741 SA certification (not UL 1741 SB). Consider whether the capability may be utilized (if available). Though not required by IEEE 1547-2018, this feature may be useful to avoid rapid voltage changes, 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.</p>	<p><b>DO 18a-1:</b> Normal ramp rate certification is required, and ranges of adjustment are specified.</p>	<input type="checkbox"/>
		<p><b>DO 18a-2:</b> Normal ramp rate capability/certification is optional, and ranges of adjustment are specified.</p>	<input type="checkbox"/>
		<p><b>DO 18a-3:</b> Normal ramp rate is not required or specified.</p>	<input type="checkbox"/>
		<p><b>DO 18b-1:</b> Normal ramp rate is not activated by default.</p>	<input type="checkbox"/>
		<p><b>DO 18b-2:</b> Normal ramp rate is activated by default using specified settings.</p>	<input type="checkbox"/>



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

<sup>12</sup> <https://energystorageinterconnection.org/viii-incorporating-updated-interconnection-standards-into-interconnection-procedures/>

<p>The Fast Track,<sup>13</sup> Supplemental Review (SR), and detailed study interconnection review processes should be updated to reflect IEEE 1547-2018. The existing Fast Track includes:</p> <ul style="list-style-type: none"> <li>• The “shared secondary transformer screen,” which may not reflect voltage regulation (e.g., volt-var settings) activated by the DER</li> <li>• The “line configuration screen,” which may not recognize the difference between inverters vs. rotating machines [MTGS V.D]</li> </ul> <p>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].</p> <p>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.</p> <p>In addition, best practices for rapid voltage change (RVC) and flicker evaluation should be developed. While DO 10c-1 would 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</p>	<p><b>DO 21a-2:</b> Do not update screen. Keep screen conservative as is.</p>	<input type="checkbox"/>
	<p><b>DO 21a-3:</b> Determine alternative methods for screening overvoltage risk with voltage regulation.</p>	<input type="checkbox"/>
	<p><b>DO 21b-1:</b> Update line configuration screen to treat inverters and rotating machines distinctly (see BTRIES Toolkit Chapter VIII).</p>	<input type="checkbox"/>
	<p><b>DO 21b-2:</b> Use existing or alternative line configuration screens.</p>	<input type="checkbox"/>
	<p><b>DO 21c-1:</b> Revise Supplemental Review to include new grounding review for three-phase inverters based on line-to-neutral connected load (see BTRIES Toolkit Chapter VIII).</p>	<input type="checkbox"/>
	<p><b>DO 21c-2:</b> Revise Supplemental Review to utilize a tool to determine supplemental grounding needs for inverters (see BTRIES Toolkit Chapter VIII).</p>	<input type="checkbox"/>
	<p><b>DO 21c-3:</b> Use existing or alternative grounding review practices.</p>	<input type="checkbox"/>
	<p><b>DO 21d-1:</b> Review practices for provision of inverter fault current test data (see BTRIES Toolkit Chapter VIII).</p>	<input type="checkbox"/>
	<p><b>DO 21d-2:</b> Rely on existing or undefined practices for determining inverter fault current values.</p>	<input type="checkbox"/>
	<p><b>DO 21e-1:</b> Review flicker, RVC, and other power quality screening practices to ensure they are in alignment with the standards, as well as best practice.</p>	<input type="checkbox"/>
<p><b>DO 21e-2:</b> Leave power quality screening practices undefined and open to interpretation.</p>	<input type="checkbox"/>	

<sup>13</sup> 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. <sup>14</sup> 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, BTRIES Toolkit]	<b>DO 22a-1:</b> Include specific technical and certification requirements for export controls and PCS in the interconnection rule (see <a href="#">BTRIES Toolkit Chapter III</a> <sup>15</sup> ).	<input type="checkbox"/>
		<b>DO 22a-2:</b> Leave technical and certification requirements for export controls undefined.	<input type="checkbox"/>
		<b>DO 22b-1:</b> Add information on PCS and export limiting equipment to application forms (see BTRIES Chapter VIII).	<input type="checkbox"/>
		<b>DO 22b-2:</b> Do not update application forms with export controls information.	<input type="checkbox"/>
		<b>DO 22c-1:</b> Implement other elements of BTRIES Toolkit export control recommendations (e.g., Chapters <a href="#">II</a> , <sup>16</sup> <a href="#">IV</a> , <sup>17</sup> <a href="#">VI</a> , <sup>18</sup> <a href="#">VII</a> , <sup>19</sup> <a href="#">IX</a> <sup>20</sup> ).	<input type="checkbox"/>
<b>DO 22c-2:</b> Do not implement other BTRIES Toolkit elements at this time.	<input type="checkbox"/>		

Topic	What to Consider	Decision Option (DO) Description	Utilize ?
<b>C. Long Term</b>			
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	<b>DO 23-1:</b> Establish a formal roadmap development process to take into account Commission’s, stakeholders’, and utilities’ DER management goals.	<input type="checkbox"/>

<sup>14</sup> 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>.

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

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

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

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

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

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

	<p>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<sup>21</sup> be optimized to meet various goals? Consider the linkage to grid modernization discussions. [MTGS V.C]</p>	<p><b>DO 23-2:</b> Allow individual utilities to determine needed communications investments based on internal DER management goals without external direction.</p>	<input type="checkbox"/>
		<p><b>DO 23-3:</b> Avoid directive management of communications deployment.</p>	<input type="checkbox"/>
<p>Communications deployment</p>	<p>DER communications deployment is still nascent and best practices for interconnection rules and technical requirements 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<sup>22</sup>," 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]</p>	<p><b>DO 24a:</b> If not done previously, specify protocols and ports to be used at the DER interface or aggregator.</p>	<input type="checkbox"/>
		<p><b>DO 24b:</b> Define equipment requirements for DER or aggregator, and whether or not those apply to systems below the "telemetry" size threshold.</p>	<input type="checkbox"/>
		<p><b>DO 24c:</b> Create or reference a guide for utilization of communications protocol(s) (e.g., California Common Smart Inverter Profile).</p>	<input type="checkbox"/>
		<p><b>DO 24d:</b> Update "telemetry" requirements to change size threshold.</p>	<input type="checkbox"/>
		<p><b>DO 24e:</b> Update "telemetry" and/or other communication requirements to reference IEEE 1547 communications requirements.</p>	<input type="checkbox"/>
		<p><b>DO 24f:</b> Include certification/validation requirements for communications equipment (e.g., California Common Smart Inverter Profile).</p>	<input type="checkbox"/>
		<p><b>DO 24g:</b> Define standard aggregator requirements and agreements.</p>	<input type="checkbox"/>
<p>Interconnection agreement updates for communications/control</p>	<p>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 can affect energy production/delivery and have financial repercussions on the affected DER. It should be understood and agreed as to how these functions will be used. These aspects should be memorialized in the interconnection</p>	<p><b>DO 25a-1:</b> 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).</p>	<input type="checkbox"/>
		<p><b>DO 25a-2:</b> Establish communication requirements within each individual interconnection agreement.</p>	<input type="checkbox"/>
		<p><b>DO 25b-1:</b> Define expectations for control in the standard interconnection agreement (e.g., when and how long will the</p>	<input type="checkbox"/>

<sup>21</sup> Advanced distribution management system (ADMS), distributed energy resources management system (DERMS), advanced metering infrastructure (AMI)

<sup>22</sup> Supervisory control and data acquisition (SCADA)

	agreement. A standardized agreement can be developed to help establish expectations and limits while streamlining the interconnection process.	DER be curtailed or controlled and over what range of adjustment for specific parameters).	
		<b>DO 25b-2:</b> Establish expectations for control within each individual interconnection agreement.	<input type="checkbox"/>
Prioritization vs. export limiting	Export limits can potentially interfere with DER systems providing full grid support capability. For example, a non-exporting storage system may not be able to fully increase power output in line with frequency droop requirements for underfrequency events if output would exceed local load. IEEE 1547-2018 does not address situations related to export limiting in its prioritization of DER responses in subclause 4.7. 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.	<b>DO 26-1:</b> Create prioritization to be used for all export-limiting DERs.	<input type="checkbox"/>
		<b>DO 26-2:</b> Allow utility and customer to agree on prioritizations for each individual interconnection application as needed.	<input type="checkbox"/>
		<b>DO 26-3:</b> Do not address prioritization for export-limited DERs until national standards are established.	<input type="checkbox"/>
Ongoing reevaluation of default settings	Investigate whether fielded functional settings (voltage regulation and voltage/frequency settings) are optimized. Address the following: <ul style="list-style-type: none"> <li>• Are voltage regulation settings and trip settings working well or should they be revised?</li> <li>• Are volt-watt issues present that need to be addressed?</li> <li>• Are new insights available that can be leveraged to improve grid integration?</li> </ul>	<b>DO 27a-1:</b> Collect field data, perform modeling, and present findings at regularly scheduled meetings once IEEE 1547-2018 compliant DER systems have had significant time in the field. Determine if default settings should be updated.	<input type="checkbox"/>
		<b>DO 27a-2:</b> Do not review effectiveness of fielded DER settings.	<input type="checkbox"/>
		<b>DO 27b-1:</b> Regularly review nationally available research on voltage regulation deployment to determine if adjusted DER settings or voltage regulation practices may be desirable.	<input type="checkbox"/>
		<b>DO 27b-2:</b> Do not review DER voltage regulation research.	<input type="checkbox"/>
Evaluation/commissioning	IEEE 1547-2018 and 1547.1-2020 contain expanded guidance on how evaluation of DER systems should be performed and what commissioning tests are to be completed. The different options for type tests, DER evaluations, and commissioning tests are dependent on the RPA of the DER system, whether or not it is fully certified, and other factors. Interconnection 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]	<b>DO 28-1:</b> Update interconnection rule to address different evaluation and commissioning concepts introduced by the standards.	<input type="checkbox"/>
		<b>DO 28-2:</b> Update utility handbooks to address evaluation and commissioning.	<input type="checkbox"/>
		<b>DO 28-3:</b> Do not address evaluation or commissioning updates.	<input type="checkbox"/>