

Burnshire HydroElectric, L.L.C.

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Mr. Tim Faherty
Virginia State Corporation Commission
PO Box 1197
Richmond, VA 23218-1197

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Thank you for the opportunity to comment on the proposed changes to the Virginia interconnection process. As both a consumer and supplier of interconnection equipment, we believe the draft document and procedures set forth offer a predictable, coherent, and evidence-based approach for interconnection. We strongly support the use of the Federal Energy Regulatory Commission (FERC) boilerplate interconnection procedures.

With particular experience in inverter based distributed generation, we offer a word of caution. In our experience, relying on individual utility engineering studies and processes, that were not aligned with prevailing national standards or reasonable best practices, jeopardized the viability of our project. The flexibility in the current document still allows for the utility to determine scope and charges for attachment facilities. This has the potential to create contention, particularly in light of the FERC standard, and proposed Virginia standard in Schedule 2, that “certified equipment shall not require further type test review, testing, or additional equipment to meet the requirements of this interconnection procedure.”

One utility requires, even when using UL1741 certified equipment, additional utility supplied power quality equipment to be installed. During our interconnection process, the price of this utility supplied equipment was quoted at \$32,000 which exceeded the cost of our entire UL1741 inverter system and compared to approximately \$10,000 if we installed the equipment ourselves. If utilities arbitrarily “require” expensive or unnecessary attachment facilities, this will add costs and deter the deployment of distributed and renewable generation, especially those that are smaller in scale. With this more defined procedure for interconnection, the SCC must remain vigilant in monitoring utilities to ensure sound and prudent engineering practices are upheld to avoid obstructive requirements.

Overall, this source document is a significant leap forward that will allow distributed generation projects to move forward using national standards and with less ambiguity but we caution that there is potential for misapplication of the standards. Again, thank you for the opportunity to add input to this positive step forward and we stand ready to assist in any way.

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R. Lee Harvey, Jr.