



October 14, 2016

Michael Worden  
Deputy Director – Electric  
Department of Public Service  
Three Empire Plaza  
Albany, NY 12223-1350

Re: Pterra report titled “Review of NYSEG Requirements for Monitoring of Class 2 DR Renovus Solar Projects” related to connection status, real and reactive power, and voltage

Dear Mr. Worden,

This letter is in response to your October 7, 2016 letter and the above referenced Pterra report, which NYSEG and RGE (“Companies”) have reviewed.

The Companies have consistently articulated a rationale for metering and control beyond just the provisions of IEEE 1547. Included in that rationale is the monitoring and control functionality necessary for the realization of the Distribution System Implementation Plan (DSIP) and the associated implementation of the Distribution System Platform Provider (DSPP), as well as New York State’s initiative “Reforming the Energy Vision” (REV).

Pertaining to Pterra’s individual findings, the Companies offer the following:

- **Connection Status:** The Companies would agree that simply monitoring connection status can be accomplished locally, and that it does not serve as the basis for ensuring that the Distributed Energy Resource (DER) is not energizing a portion of the utility distribution system. However, the Companies have routinely promoted not only the monitoring of connection status, but also the ability to remotely lock out and block reclose of DER facilities. It is important to recognize the implications that the rapid growth of DER has or may have on the distribution system. *Local observation and manual lock out become a time consuming and inefficient method of securing the system during emergency events.* Monitoring with remote control functionality for our Energy Control Center (ECC) will be critical during circuit reconfigurations when DERs must be temporarily removed from the system. This functionality also sets the stage for the operability requirements applicable to a DSPP.
- **Real and Reactive Power:** With regard to real and reactive power, the Companies have pointed out that monitoring for compliance with the SIRs was a near term intent. As described in the DSIP filing information included in our response to the Pterra questions we were clear to point out the intent to dispatch DER output for both real and reactive power under the DSPP.

- Voltage: Pterra indicates that “We interpret the DSIP quotation above to mean that the observations of voltage taken from monitoring equipment supplied by project developer is to serve as supplementary observation to those provided by SCADA-enabled RTUs provided by NYSEG at the substations and/or on the feeders themselves as part of DSIP.” This misinterprets the plain language of the Companies’ DSIP filing. As articulated in that filing, the intent of the monitoring and control of DERs is to dispatch output (e.g., kilowatts (kW), kvar and volts). The Companies also disagree with Pterra’s quotation from IEEE 1547 that Class 2 DR installations are “unlikely to impact system voltage at the PCC.” Such a blanket statement does not accurately consider small feeders with light loading. The Companies have many circuits on its system with peak loads of four MWs or less and small minimum loads that may occur during substantial DER output.
- Future Needs: Pterra seems to envision REV as something that will be realized in the distant future. This doesn’t comport with the vision of New York State Government nor with the guidance received from various NYPSC Staff. DSIP Plans have already been filed and supplemental filings are due on November first of this year. Pterra also places great importance on consistency among utilities. Consistency for consistency’s sake tends to blunt innovation and delay timely implementation. Consistency is also not always possible due to differences in utility infrastructure and system topography.
- Planning Uses of Monitored Parameters: In this instance Pterra again limits its review to simply looking for consistency with IEEE 1547. The Companies’ planning efforts are not tied only to IEEE 1547. With the proliferation of DERs, simple monitoring of substations and feeders does not provide sufficient information for distribution planning or operations. It is critical that load and generation be determined independently. Monitoring only the circuit or the substation provides no data on system loads independent of the DERs. Only by individual monitoring of substations, feeders, and DERs, can planners and operators get an adequate picture of true system conditions. Going forward sufficient planning and reliable operation will dictate needing this information in real or near real-time. It is also important to note that more granular system data has been requested by solar developers as well. Obtaining this data can only be accomplished through installation of appropriate monitoring.

Based on your October 7, 2016 letter indicating Department of Public Service Staff concurrence with the Pterra report findings, the Companies will no longer require developers to provide monitoring of stand-alone inverter based distributed generation facilities in the size range from 250 kW to less than 1 MW solely based on IEEE 1547. Instead, this need will be determined on a case by case basis. For new CESIR reports where monitoring is found to be required, the Companies will provide the specific rationale for that finding. The Companies will also review completed CESIRs for projects in this size range that have not yet entered or completed construction and to the extent an RTU has not been installed and is no longer required, will eliminate the monitoring requirement. With respect to other types of DER resources, including behind the meter inverter based facilities, the Companies currently do not have a blanket requirement for monitoring and will continue to evaluate the need for monitoring on a case by case basis.

The Companies continue to believe that monitoring and control of facilities in this size range provide benefits from a safety, operational, and reliability perspective. Furthermore, we believe that such monitoring and control is in line with the direction the industry is moving with respect to New York State's REV. As such, the Companies will continue to work with the JUs, PSC Staff, NYSERDA and the Solar Industry toward development of comprehensive and consistent policies in this area.

Should you have any questions, please contact me at (607) 762-8701.

Sincerely,

A handwritten signature in black ink, appearing to read 'DK', written in a cursive style.

David Kimiecik  
Vice President – Energy Services

