

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF	)	CASE NO.
INTERCONNECTION AND NET METERING	)	2020-00302
GUIDELINES		

SALT RIVER ELECTRIC'S RESPONSE TO COMMISSIONS STAFF'S FIRST
REQUEST FOR INFORMATION

1. Refer to Case No. 2008-00169, *Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts* (Ky. PSC Jan. 8, 2009), Appendix A.

a. Provide red-lined tariff sheets for any updates or changes made to the utility's tariff regarding the interconnection and net-metering guidelines since the implementation of such guidelines in Case No. 2008-00169.

Response:

Please see the Commission's website, Records, Tariffs Library, Electric, Salt River Electric, Cancelled Tariff Pages for all of Salt River's tariff changes. Salt River's current net metering tariff can be found on the Commission's website, Records, Current Tariffs. Please see Salt River's Tariff, Rate Schedule NM – Net Metering (tariff sheet no. 88).

b. Provide any safety or engineering requirements currently required or available to net metering and interconnection customers to help ensure safety and reliability that are not required under the Commission's Interconnection and Net Metering Guidelines.

Response:

All safety and engineering requirements are contained in the application for interconnection.

Respondent: Chase Mills, Chief Operations Officer

c. Provide the current percent of cumulative capacity of the utility's single hour peak load during calendar year 2025. Explain how the utility calculated this percentage.

Response:

Salt River's current percentage of cumulative capacity of its single hour peak load for 2025 was 0.8%. This was calculated by taking Salt River's net metering and dividing by its single hour peak load (which includes its entire load).

Respondent: Phyllis Oliver, Manager of Office Services and Chase Mills, Chief Operations Officer

d. Provide the case number where each change or update was approved.

Response:

Case No. 2019-00440 increased kilowatts from thirty (30) to forty-five (45) effective 01/05/2020, Sheet #88 found in cancelled tariffs stamped as cancelled 01/05/2020.

Respondent: Phyllis Oliver, Manager of Office Services

2. Describe how many net-metering and interconnection customers the utility has, including what type of generating facility and energy storage, if applicable, each customer has.

Response:

321 Level 1 net metering customers/All Solar/ 29 have battery storage

Respondent: Phyllis Oliver, Manager of Office Services

3. Provide a breakdown of the approximate costs for the utility associated with interconnection for the past five years. In this response, separate the approximate costs associated with level 1 and level 2 applications.

Response:

Salt River Electric does not track the cost for interconnection. However, Salt River has made a high level estimate for purposes of this response. Salt River looked at the costs associated for equipment, overhead and labor for the net metering applications received and the costs would be somewhere between \$200 and \$300 per application. If the applicant then interconnects Salt River would also have lost revenues associated with that interconnection.

Respondent: Jaime Roby, Chief Financial Officer

4. Provide an overview of how the interconnection application and agreement process works. In this overview, explain approximately how long each step in the process takes, who is responsible for initiating each step of the process, when progress is communicated to the applicant, and what costs are associated with this process for the utility and applicants. Also explain, if a customer does not qualify or is ineligible during the review process, the protocols and considerations for coming to that determination and communicating that decision to the applicant.

Response:

Please see the Salt River Electric tariff beginning at sheet # 90.

Internal responsibility of the process beginning on tariff sheet #90:

- 1. Member or Solar Company submits application and specs to Salt River Electric Solar Designee.**
- 2. Application and specs are reviewed/scanned and emailed by Salt River Electric Solar Designee to Salt River Electric Engineer for review. (10 Minutes)**
If a member does not qualify or needs to submit additional information, Salt River Electric Solar Designee notifies member by phone or email.
- 3. Salt River Electric Engineer reviews and emails approval back to Salt River Electric**

Solar Designee. (30 Minutes)

4. **Salt River Electric Solar Designee emails approval to member and solar company. (5 Minutes)**
5. **Member installs solar system and has system inspected**
6. **Inspection is emailed to Salt River Electric Solar Designee/scanned to member Account – (10 Minutes)**
7. **Salt River Electric Solar Designee sends ticket to Salt River Electric Operations to change meter to Net Metering (5 Minutes)**
8. **Salt River may inspect and must complete field work including installation of a net metering meter. (120 Minutes)**
9. **Salt River Electric Solar Designee notifies member by mail, email or phone when meter change paperwork is processed of any cycle change, bank draft change, etc. (10 Minutes)**
10. **Salt River Electric Solar Designee then adds net metering member to the Solar Customer Service List where Battery storage and Watts are noted (5 Minutes)**

Respondent: Phyllis Oliver, Manager of Office Services

5. Explain whether the utility recovers in rates any expenses for the interconnection application process. If not, explain why not.

Response:

No, because this is a non-recurring expense and is completed as ordinary business. There are no recoverable expenses associated with a level 1 interconnection.

Respondent: Jaime Roby, Chief Financial Officer

6. Explain which IEEE Standard is currently applicable for purposes of interconnection. If IEEE Standard 1547-2018 is not currently applicable, explain the utilities' position for implementing IEEE Standard 1547-2018.

Response:

In Salt River Electric's application IEEE Standard 1547 is referenced. It is understood that the current version of the standard is applicable.

Respondent: Chase Mills, Chief Operations Officer

7. Explain the interconnection requirements if a customer does not qualify or is ineligible during the review process for a level one application; a level two application; and both levels.

Response:

If a customer does not qualify then that customer cannot interconnect.

Respondent: Chase Mills, Chief Operations Officer

8. Explain how behind the meter battery energy storage resources are considered under the existing tariff for both net-metering and non-net metering customers.

Response:

Behind the meter battery energy storage is not considered.

Respondent: Chase Mills, Chief Operations Officer

9. Explain what safety and technical standards are used to safely and reliably integrate behind-the-meter battery energy storage resources. Explain, if applicable, what changes to software, communications, billing, and utility systems would need to change in order to accommodate third party DER- aggregation. If not applicable, explain why not.

Response:

The safety and technical standard are the IEEE 1547 standard current version. Per PSC order 2012-00169 EKPC acts as the aggregator and third-party aggregators are not allowed.