

Net-Metering Permitting Timelines

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Rooftop Systems and Small Systems on the Ground

- Includes all rooftop systems (through 500 kW) and small systems through 15 kW on the ground (approx. 3 solar trackers)
- Simple registration form process
 - Commission only considers system's effect on "system stability and reliability" of the electric grid
 - Either a 10-business-day or a 30-calendar-day comment period, depending on the size of the system
 - If no problems with interconnection, a CPG is automatically "deemed issued" (no order or CPG is written) the day after the comment period ends
 - If electric utility raises a concern with interconnection, applicant files a response to utility's concern

Medium-Sized Systems on the Ground

- Includes systems through 50 kW (up to approx. 1/3 acre of disturbed area)
- “Application” form process
 - Commission considers variety of environmental criteria, planning criteria, and “system stability and reliability” of electric grid
 - Notice provided to electric utility, State agencies, town, regional planning commission, neighbors for their own review and comment
 - 30-day comment period
 - If comments received, there may be further written filings and evidentiary hearing
 - Commission writes approx. 4-page order and, if granted, 3-page CPG

Large Systems on the Ground

- Includes systems greater than 50 kW through 500 kW (solar panels cover up to approx. 4 acres; disturbed area could be significantly larger)
- “Petition” process
 - Commission considers variety of environmental criteria, planning criteria, and “system stability and reliability” of electric grid
 - Notice provided to electric utility, State agencies, town, regional planning commission, neighbors for their own review and comment
 - 30-day comment period
 - If comments received, there may be further written filings and evidentiary hearing
 - Commission writes approx. 20-page order and, if granted, 3-page CPG

Processes Balance Competing Interests

- Legislature directed Commission to:
 - Streamline net-metering review processes where appropriate
 - Ensure adequate opportunities for members of the public to participate
- Commission designed current net-metering rule in part to meet both of those directives while also protecting the environment and ensuring the stability and reliability of the electric grid

Time to Resolve Cases

Type of System	Cases Resolved in FY18	Cases Resolved to Date in FY19
Rooftop systems and small systems on the ground	2,445 cases resolved: Approx. 97% on 11 th business or 31 st calendar day after filing	1,790 cases resolved: Approx. 92% on 11 th business or 31 st calendar day after filing
Medium-sized systems on the ground	4 cases resolved: 50% within 60 days 100% within 90 days	3 cases resolved: 33% within 60 days 100% within 90 days
Large systems on the ground	14 cases resolved: 43% within 120 days 85% within 270 days 2 cases took longer	51 cases resolved: 47% within 120 days 88% within 270 days 6 cases took longer

Why do some cases take longer than others?

- Location matters
 - Potential for environmental impacts
 - Aesthetic considerations
 - Electric grid constraints
 - Neighbors' and host town's interest in the project
- When concerns are raised about a proposed project, more process is necessary to give all parties to a case the opportunity to address those concerns through written filings and potentially evidentiary hearings

Participation in Net-Metering Cases

- For large net-metering systems (“Petition” cases), parties can include:
 - 5 State agencies (Department of Public Service, Agency of Natural Resources, Division for Historic Preservation, Agency of Agriculture, Food & Markets, and, less frequently, Natural Resources Board)
 - Town where project would be located
 - Neighbors
 - Electric utility

Interconnection

- In certain areas of the electric grid, the electric utility may need to perform more analysis and in-depth studies to make sure the project can be safely interconnected to the electric grid without affecting reliability
- As more distributed generation is interconnected to the electric grid, a larger percentage of proposed projects require more analysis
- Some utilities can use their staff to perform these analyses while others need to use contractors
- Studies may show that upgrades need to be made to the grid to accommodate the project

Interconnection (part 2)

- Commission's net-metering rule requires that large net-metering projects include with their initial filing a letter from the interconnecting electric utility stating that the project can be safely interconnected without adversely affecting system stability and reliability
- For small projects and rooftop systems, the Commission will not “deem” a CPG to be issued until interconnection issues (if any) have been addressed
- Commission has rules that govern interconnection and is considering modifying those rules

Net-Metering Systems are Different From Telecommunications Towers

- Most telecommunications siting cases (Section 248a) involve putting equipment on existing towers or buildings with minimal impact on land; these follow a streamlined process that results in most of them being resolved within 60 days
 - This streamlined process is more like the streamlined process the Commission has implemented for rooftop net-metering systems and small net-metering systems on the ground

Net-Metering Systems are Different From Telecommunications Towers (part 2)

- Most new telecommunications towers:
 - Have a 25-foot by 25-foot compound area and do not involve building new roads; this small footprint means they have less potential for environmental impacts
 - Are located in forested areas, which minimizes the aesthetic impact on surrounding neighbors
- When a telecommunications tower siting case has significant environmental or aesthetic impacts, the timeline for that case more closely resembles the timeline for a contested net-metering case; neither would be resolved within 180 days

Commission's Workload

- The Commission spends almost 40% of its staff time on net-metering cases
- The remaining 60% is spent on all other regulatory matters (approx. 450 cases in FY2018), including:
 - Utility rate cases
 - Policy investigations directed by the Legislature
 - Siting of larger generation projects and utility transmission projects

Realistic Timelines

- The Commission is not seeking the imposition of timelines for resolving net-metering cases
- If the Legislature chooses to impose such timelines, the Commission requests that they be realistic and take into account the Commission's other workload