

Rulemaking Regarding Interconnection of Distributed Generation Facilities (Docket No. RE-0000A-07-0609)

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April 13, 2016



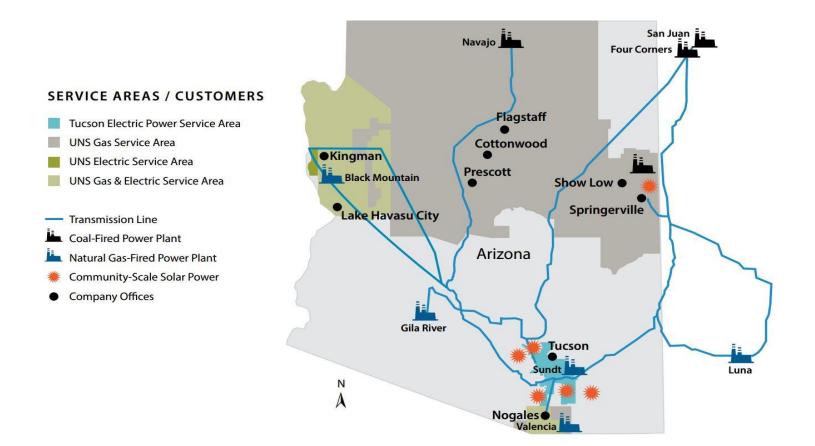


Overview

- Process Standardization
- AC Disconnect Switch
- Process Screens
- New Technology
- Recap



Service Areas





Overview

	ΤΕΡ	UNS Electric
Service Territory Population	1,000,000	250,000
Retail Peak Demand (2015)	2,218 MW	429 MW
Customers	417,000	93,000
Residential DG Customers	~ 11,000	~ 2,000



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Process Standardization

- Generally support standardized
 - Application forms, fees, & requirements
 - Study agreements
 - Pre-operational testing
 - Process and use of a modified IREC or FERC process

- Utility needs flexibility in determining technical requirements
 - Interconnection agreements
 - Technical manual
 - Technical specifications
 - Study thresholds



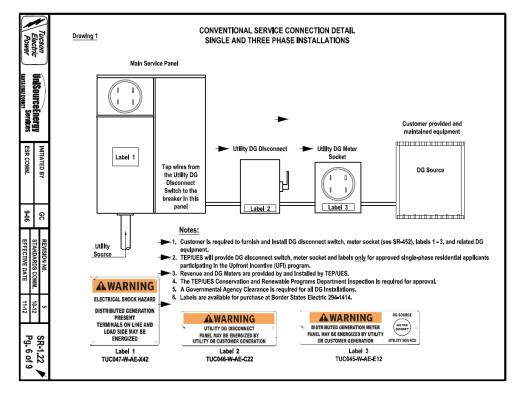
AC Disconnect Switch

Strongly support requirement of an AC disconnect switch

- Ensures the Safety of our Workforce
 - Customer panel breaker is not a suitable disconnecting means per NFPA 70E
 - Safety device for both utility workers & emergency responders
 - Not redundant
- Disconnect Switch Benefits
 - Personnel Safety
 - Visible-open, lockable in the open position
 - Consistency for all DG systems
 - Easier and faster maintenance
 - Less disruption to customer
 - TEP/UNSE supplies the disconnect for residential customers at no cost



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- Do not support a blanket increase of the system size thresholds presently defined by the Level screens
 - The screens do not always result in additional studies
 - The screens support the process for escalation if a project could pose a risk
 - The screens should not be interpreted as automatic project approval if they are met
- Support further exploration of the concept of supplemental reviews

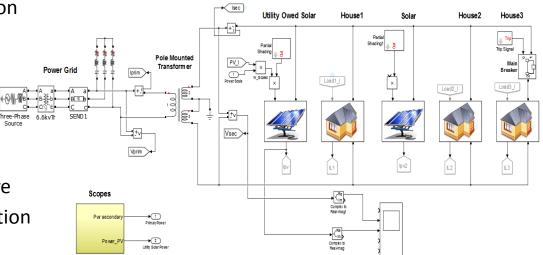


New Technology

Micro-Grids

- TEP is researching the integration of micro-grids
 - Simulations
 - Volt/VAR Optimization
 - Advanced Inverters
 - Energy Storage
 - Grid Management Software
- Micro-grids must break connection from the grid before energizing local source
- Support private micro-grids with the appropriate grid service charge and operational protocols

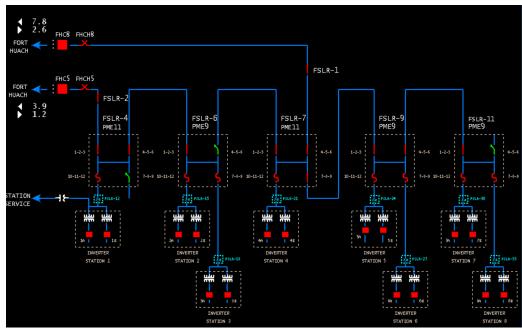




New Technology

Advanced Inverters

- Support creating an advanced inverter requirement/specification
- Standardized factory settings and testing procedures would be beneficial





New Technology

Energy Storage

- Support inclusion of energy storage in definition of "Generation Facility"
- Support requirement of advanced inverters for energy storage
- Additional study work is needed to better understand the impacts of energy storage on the grid
- Energy Storage and Rotating Machine technology should follow study track







- Utility specific technical manuals
- AC Disconnect switch is critical to safety
- Adopt process standards for new technology to support continued integration of DG

