

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

AT RICHMOND, MAY 24, 2022

SCC CLERK'S OFFICE  
REGULATORY CONTROL CENTER

2022 MAY 24 A 11: 58

COMMONWEALTH OF VIRGINIA, *ex rel.*

STATE CORPORATION COMMISSION

CASE NO. PUR-2022-00073

*Ex Parte*: In the matter considering utility  
distributed energy resource interconnection-related  
issues and questions

ORDER FOR COMMENT

As part of its Final Order in Case No. PUR-2021-00127, the State Corporation Commission ("Commission") found that it would, by separate order, open a docket to explore interconnection issues related to utility distributed energy resources ("DER") in a comprehensive manner.<sup>1</sup> In accordance with that finding, we hereby establish this proceeding to provide interested persons an opportunity to comment on such DER interconnection issues.

NOW THE COMMISSION, upon consideration of this matter, is of the opinion and finds that interested persons should be provided an opportunity to comment on utility DER interconnection issues. As part of any comments, interested parties may wish to address the following:

- What are the primary obstacles (*e.g.*, sources of delay or cost) to the interconnection of DER on the distribution system?
- What solutions have utilities implemented to facilitate the efficient interconnection of DER to the distribution system? Have they been effective? How can they be improved?
- What additional solutions do utilities plan to implement, or are considering for implementation, to facilitate the interconnection of DER on the distribution system?
- Are there "best practices" in place in other jurisdictions that the Commission should consider?

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<sup>1</sup> See *Petition of Virginia Electric and Power Company, For approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia*, Case No. PUR-2021-00127, Doc. Con. Cen. No. 220110126, Final Order at 26 (Jan. 7, 2022).

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- What additional actions could the Commission take to help facilitate the interconnection of DER on the distribution system?
- What steps should the Commission take with regard to aggregation of interconnected DERs for possible participation by such aggregations in the PJM<sup>2</sup> wholesale market, per FERC Order 2222? Are any such steps best addressed in this docket or in a separate proceeding?
- Are there any changes to the Regulations Governing Interconnection of Small Electrical Generators and Storage (20VAC5-314) or other Commission actions that could enable the usage of IEEE-1547-2018 compliant inverters to facilitate the integration of DER on the distribution system? Are any such changes or actions best addressed in this docket or in a separate proceeding?
- Are there additional changes that could be made to the Regulations Governing Interconnection of Small Electrical Generators and Storage (20VAC5-314) that could facilitate the integration of DER on the distribution system? If so, please describe such proposed changes.

The Commission takes judicial notice of the ongoing public health issues related to the spread of the virus that causes COVID-19. The Commission has taken certain actions, and may take additional actions going forward, that could impact the procedures in this proceeding.<sup>3</sup>

Consistent with these actions, in regard to the terms of the procedural framework established below, the Commission will, among other things, direct the electronic filing of comments.

We will direct that the Clerk of the Commission provide, by electronic transmission, copies of this Order for Comment to the Service List in Case No. PUR-2021-00127. We will

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<sup>2</sup> PJM Interconnection, L.L.C., regional transmission entity.

<sup>3</sup> See, e.g., *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: Electronic Service of Commission Orders*, Case No. CLK-2020-00004, 2020 S.C.C. Ann. Rept. 76, Order Concerning Electronic Service of Commission Orders (Mar. 19, 2020), *extended by* 2020 S.C.C. Ann. Rept. 77, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (May 11, 2020); *Commonwealth of Virginia, ex rel., State Corporation Commission, Ex Parte: Revised Operating Procedures During COVID-19 Emergency*, Case No. CLK-2020-00005, 2020 S.C.C. Ann. Rept. 77, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (Mar. 19, 2020) ("Revised Operating Procedures Order"), *extended by* 2020 S.C.C. Ann. Rept. 78, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (May 11, 2020); *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: Electronic service among parties during COVID-19 emergency*, Case No. CLK-2020-00007, 2020 S.C.C. Ann. Rept. 79, Order Requiring Electronic Service (Apr. 1, 2020).

also direct the Staff of the Commission's Division of Public Utility Regulation ("Staff") to identify other persons or entities that potentially may have an interest in this matter, and to provide these persons or entities with copies of this Order for Comment by electronic transmission. Further, we will direct the Director of the Commission's Division of Information Resources to post a copy of this Order for Comment on the Commission's website.

Accordingly, IT IS ORDERED THAT:

- (1) This matter is docketed as Case No. PUR-2022-00073.
- (2) Within five (5) business days of the filing of this Order for Comment with the Clerk of the Commission, Staff shall electronically transmit copies of this Order to those persons and entities identified by Staff as potentially having an interest in this matter. Staff shall promptly file with the Clerk of the Commission a certificate of transmission and include a list of names and addresses of the persons and entities to whom the Order was transmitted.
- (3) The Director of the Commission's Division of Information Resources promptly shall post a copy of this Order for Comment on the Commission's website.
- (4) All comments in this matter shall be submitted electronically to the extent authorized by Rule 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice and Procedure.<sup>4</sup> Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, *Confidential information*, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or

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<sup>4</sup> 5 VAC 5-20-10 *et seq.*

other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.<sup>5</sup>

(5) On or before August 1, 2022, any interested person may submit written comments concerning the issues described herein by following the instructions found on the Commission's website: [scc.virginia.gov/casecomments/Submit-Public-Comments](http://scc.virginia.gov/casecomments/Submit-Public-Comments). Those unable, as a practical matter, to submit comments electronically may file such comments by U.S. mail to the Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2022-00073.

(6) On or before September 19, 2022, the Staff may file with the Clerk of the Commission a report on or a response to any comments submitted to the Commission concerning the issues described herein.

(7) This matter is continued.

A COPY hereof shall be sent electronically by the Clerk of the Commission to all persons on the official Service List for Case No. PUR-2021-00127. The Service List is available from the Clerk of the Commission.

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<sup>5</sup> As noted in the Commission's Revised Operating Procedures Order, submissions to the Commission's Clerk's Office via U.S. mail or commercial mail equivalents may be subject to delayed processing due to the COVID-19 public health issues.