

August 29, 2005 e-mail from PA PUC re: interconnection standards

Attached is the Staff strawman draft of the interconnection standards. Comments to the strawman are due by the close of business on **Monday, September 19, 2005**. The draft is largely based on the MADRI document produced on August 19th, 2005. There are several formatting/grammatical changes within the document to conform to regulatory drafting standards. However, there are a few significant departures from the MADRI document that should be noted.

In the definitional section, we have adopted the New Jersey definition of "Certified." This has the effect of eliminating Appendix 9 contained in the MADRI document. Staff specifically requests comments on this change, particularly as it relates to the elimination of a required external disconnect switch. The elimination of that disconnect switch requirement is another significant change and comments are expected on that subject. The strawman adopts the IEEE Standard 1547 as the technical standard to be followed. The MADRI document had recommended use of the PJM Small Generator Technical Requirements and Standards. The strawman also changes the aggregate generation ceiling on a particular line/network from a stated percentage OR kVa capacity, to a percentage only ceiling. The ceiling for aggregate generation has also been reduced from the MADRI recommended 90% to 85% of the short circuit interrupting capability.

The strawman does not establish a fee schedule, nor does it adopt specific standard form agreements. Staff intends to recommend to the Commission that specific fees be adopted through a tentative order/public comment/order process and follow the New Jersey fee schedule. Interested persons may feel free to comment on the New Jersey fee schedule in the context of this strawman. The form agreements will also be the subject of a tentative order/public comment/order process. Staff expects to use the MADRI forms as templates to recommend to the Commission in tentative order form. Interested Persons may comment on those form agreements at this time.

Lastly, the strawman is unusually long and detailed for regulations. Accordingly, staff is interested in suggestions for streamlining where ever possible.

Note that this strawman is posted for comments. After a review of all comments filed, staff will prepare a recommended Notice of Proposed Rulemaking for the Commission's consideration at a later Public Meeting. The Notice of Proposed Rulemaking will be subject to further public comment in the regulatory review process. It is emphasized that this strawman does not represent the position of any Commissioner on any of the issues addressed.