



**DATE:** June 18, 2018

**TO:** Jason Pause, Electric Distribution Systems,  
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Department of Public Service  
3 Empire State Plaza, Albany, NY 12223

**FROM:** Joint Utilities of New York – Interconnection Technical Working Group

**RE:** 5/10/18 ITWG Meeting Follow-Up – JU Response to CESIR Template Comments

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The following is a response from the Joint Utilities of New York (“JU”) regarding the development of a standardized Coordinated Electric System Interconnect Review (CESIR) report template addressing the feedback provided by developers through the Interconnection Technical Working Group (ITWG). A redline of the template is also included. The response reflects the position of all of the utilities identified on this letterhead, although it does not necessarily apply to reviews completed on network systems.

DRAFT

## Section 3.0: Company EPS Parameters

### Substation

- Developer feedback: Add “Circuit Distance from Substation”
  - This has been added to the attached redlined revision.
- Developer feedback: Add clarifying language which confirms that interconnected and queued DG identified are ahead of the proposed project.
  - This has been addressed by adding the language, “queued ahead” in the attached redlined revision.

### System Fault Characteristics

- Developer feedback: Include data for both with and without the proposed PV project.
  - The Joint Utilities will provide data on fault characteristics before the developer’s proposed project is modeled, which will allow the developer to calculate the fault characteristics with the proposed project included.

### Addition of “EPS Equipment” Section

- Developer feedback: Add an “EPS Equipment” Section that identifies the protective and regulatory equipment between the proposed project and the substation. This should include data on capacitor banks, voltage regulators, main-line fuses, and reclosers.
  - This information is intended to be included in Section 6 by default. A sentence was added in the attached redlined revision to indicate that the System Upgrades will be identified in Section 6.
- Developer feedback: This should also identify which of these items are affected by the proposed system.
  - Any upgrades identified would be due to impacts of the proposed system.

## Section 5.0: System Impact Analysis

### Voltage – Substation Regulation for Reverse Power

- Developer feedback: Add a description of what minimum load is being used for this study
  - This is already included in Section 5.0: System Impact Analysis in the “Limit” column of the table.

### Voltage – Feeder Regulation for Reverse Power

- Developer feedback: Add a description of what minimum load is being used for this study
  - This is already included in Section 5.0: System Impact Analysis in the “Limit” column of the table.

### Voltage – Fluctuation

- Developer feedback: Add mention of agreed upon 75% generation change for the initial voltage fluctuation screen.
  - The 75% generation change was only agreed upon for regulator impacts (Screen H, Item 3 within the revised SIR). This screen will be applicable for CESIRs as well.

- Developer feedback: Expected maximum movement of regulators should be examined and compared against their rated bandwidth over their replacement lifetime instead of employing the “exceeds 1 position” rule.
  - This concept was never discussed in the context of CESIR analysis and requires further discussion. The JU recommend moving forward with the CESIR template and discussing this topic on future ITWG agendas.

### Voltage – Flicker

- Developer feedback: If failed, should include mention of additional time-series analysis study which may be performed post-CESIR.
  - This was added to Section 6 in the attached redlined revision.<sup>1</sup>

### Equipment Ratings – Thermal (Continuous Current)

- Developer feedback: These thermal limits should include the load. Add language to show what load is being used for this analysis. Additional study may be prompted to include time of year for the analysis.
  - The JU is unclear what specifically is being requested. This requires clarification at the June 20<sup>th</sup> ITWG meeting.

### Protection – Ground Fault Detection

- Developer feedback: We highly suggest that the JU agrees to provide settings which work with their system if failed. Especially if the transformers are already being studied by a contracted resource.
  - This concept was never discussed within the ITWG. While the JU will provide guidance to developers, the JU is not responsible for designing the DG facility.

### Protection – Overvoltage – Distribution System Fault

- Developer feedback: The limit shown on voltage rise is 125%; however, the effective grounding standard limit is 138%.
  - This change cannot be made across the Joint Utilities as the standard varies between utilities, not only for DER interconnections, but for general system design requirements as well.

## Section 7.0: Conceptual Cost Estimate

### Notes

- Developer feedback: Language should be added which re-states the SIR guideline that all technical reasonings for the above upgrades should be shared with the developers. Also, that the information requested by the standard CESIR is required. Additional information may be added but not in exchange for the required information outlined in this template.
  - The Joint Utilities believe this is covered in Section 6: Mitigations for System Impact Analysis Failures.

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<sup>1</sup> National Grid is evaluating the direction of time-series analysis at this time.