

DERG Material Modifications: Guidance Document

This document lays out consensus-based examples of what are typically considered to be material vs non-material modifications for ~~in-queue~~ DERG applications that are part of the SIR application process.

Examples listed may be subject to change in materiality pending complexities or unique circumstances that may arise on a case by case basis. Although in most cases, these examples would represent an appropriate classification as they are intended to provide guidance to applicants desiring project changes.

Under all modification cases, including like-kind substitutions, the owner or applicant shall notify the utility through utility interconnection online application portal and/or via e-mail. The modification shall be reviewed and approved by the utility prior to acceptance of the change.

For projects above 50kW:

Material modifications typically include the following:

- A change in point of interconnection (POI) to a location served by a different circuit, moved to a different line segment (i.e. 3-phase to 1-phase segment, or change in zone of protection), change in site control¹ or any change in point of interconnection (POI) for projects interconnecting to network systems.
- A change from certified (NRTL, e.g. UL listed) to non-certified devices.
- An increase in the name plate of the DG or ESS facility of more than 2%, or any increase causing adverse impact to subsequent applications' ability to interconnect.
- Addition of DG at the facility (other than the 2% increase in ~~nameplate~~ ~~export~~) not disclosed in the application. This would include existing non-disclosed and requested additional generation.
- Change in DER ~~proposed~~ operating characteristics or schedules, such as operating mode and smart inverter settings unsolicited by the utility.
- A change of transformer connection(s) or grounding from that originally installed.
- Adding DC coupled energy storage to a project after the CESIR period or to a project previously installed.
- Adding AC coupled energy storage.
- A change in the kwh rating of an ESS, where the originally proposed or installed kwh ratings are required, specified or included as a performance characteristic of a specific rate, program or contract.

Non-material modifications typically include, but not limited to, the following:

- A change or replacement of generating equipment such as generator(s), inverter(s), transformers, relaying, controls, etc. that is like-kind substitution in size, ratings, impedances, efficiencies or capabilities of the equipment specified in the original or preceding ~~interconnection~~ ~~Request~~ as long as the ~~net export~~ AC nameplate does not increase beyond the 2% threshold described above.
- A change of transformer connection(s) or grounding from that originally proposed within the CESIR period.
- A change reducing the AC output or nameplate rating of the generating facility.
- A change in point of interconnection (POI) to a new location not described under material modifications.
- A change in ownership of a generating facility.

Commented [CV1]: What is this defined as? It seems that this would not be accurate for the content as is.

Commented [CV2R1]: LG & JP – agreed. In-queue to be removed.

Commented [CV3]: How does this mesh with like kind?

Commented [CV4]: Added to address industry concerns. See NMM sentence below as well.

Commented [CV5]: Add language to any of these things that may be material in post operation phase or during any of the study phases.

Commented [CV6R5]: See front matter language on subject to change.

Commented [CM7]: What is the definition of "like kind"?

Commented [CV8R7]: This is a commonly understood term.

Commented [CM9]: Why is this not considered a material modification? Isn't transformer configuration and maintaining effective grounding a requirement by the utilities??

Commented [CV10R9]: Timing matters here. If not defined this is not true.

- Any necessary change not associated with the project modification or a suggested change requested by the utility.
- Adding DC coupled energy storage to a project within the CESIR period.
- A change in the kwh rating of an ESS, where the original CESIR results were not defined or influenced by kwh characteristics.

For projects 50kW and below:

The following are considered non-material modifications for either projects ~~which have already or have not yet received their PTO:~~

- A change in ownership of a generating facility
- A like-for-like change or replacement of generating equipment of same nameplate and characteristics such as generator(s), inverter(s), solar panel(s), transformers, relaying, controls, axis-tracking or fixed-tilt hardware.
- An increase in the AC ~~export potential across the PCC~~nameplate for the DG facility no greater than 1kW or 10%.

~~The owner will notify the utility of like for like substitutions, which shall be reviewed and approved by the utility's project engineer prior to acceptance of the change.~~

ⁱ NOTE: The SIR requirements pertaining to “Landowner Consent” and “Site Control” always apply. Therefore, at all points in the interconnection process, a project and its configuration must fall within the land area that is covered by the applicable document (Landowner Consent or Site Control). Put plainly, if the land area for a project changes from what is addressed by its applicable site documentation, it must re-apply

ⁱⁱ Changes due to integrating ESS to existing PV projects shall follow the “PV plus ESS Interim Guidelines document”.

Commented [CV11]: Sentence to address industry concern on kwh changes

Commented [CV12]: This is confusing vs the front matter.

Commented [CV13]: Questions here on language. Is this meant to be nameplate? Should change to be consistent.

Commented [CV14]: How does this mesh with like kind?

Commented [CV16]: Retire the ESS doc and bring forward the new MM language. Language in the guide should reference superseding the interim ESS doc.

Commented [CV17R16]: LG - the ESS will be referenced and retired in the filing.

Commented [CV18R16]: Added examples of ESS mods