

# FLASEIA



## FLORIDA SOLAR ENERGY INDUSTRIES ASSOCIATION

145 Wekiva Springs Road, Suite 149B • Longwood, Florida 32779

(407) 774-9939 • Fax (407) 774-9941

Website: [www.flaseia.org](http://www.flaseia.org)

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### COMMENTS

#### UNDOCKETED, PROPOSED NEW RULE 25-6.065, INTERCONNECTION OF SMALL PHOTOVOLTAIC SYSTEMS

The Florida Solar Energy Industries Association (FlaSEIA) encourages the Public Service Commission to move forward with its efforts to establish a standard for the interconnection of Photovoltaic (PV) systems with Florida's electric utilities. The rationale for a standard specific to PV systems (vs. Independent Power Producers and Cogenerators) is that the scope of a PV installation in the Florida market today is on a much smaller scale than traditional distributed generation projects, and that IEEE has recently released a consensus standard directly on point. The proposed rule promulgated by the PSC staff is comprehensive and represents an excellent strawman for consideration by all stakeholders involved. However, FlaSEIA would like to offer the following recommendations for consideration in amending the proposed rule.

1. FlaSEIA supports the amendments presented by the Florida Solar Energy Center (FSEC) during the workshop on the proposed rule, January 10, 2001. Specifically, FlaSEIA believes that net metering should be at the option of the customer, not the utility. The current rule governing interconnection with utilities offers this preference. The scale of projects contemplated under the current rule are significantly larger and present greater rate impacts than the rule proposed for PV interconnection. In addition, experience in other jurisdictions has indicated that the single meter is the least cost option for both the utility and customer. We acknowledge the concern of the utilities regarding their lack of experience in measuring the PV system output for purposes of quantifying the rate impact for multiple installations within their service areas. However, the probability that the impact will be significant enough to warrant separate metering is unlikely. FlaSEIA has no objection to the utilities, at their option and expense, monitoring the system performance, either through the installation of a separate meter or in conjunction with monitoring efforts such as those currently being conducted by FSEC. We further have no objection to providing an avenue for relief (such as a tariff filing) in the event these monitoring efforts demonstrate clear and convincing evidence that net metering presents an inequity to the utility's shareholders or general body of ratepayers.

2. FlaSEIA does not support the imposition of "caps" on numbers of PV installations as a stop-gap effort to avert potential negative impacts on the utility, their stockholders, or ratepayers. We prefer the option of a separate tariff filing (see (1) above) to a cap to address such contingencies.

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We believe a cap will send a mixed message to Florida's energy consumers, that is, the tentative support of PV interconnection and use of solar energy. In addition, it would provide a potentially chaotic introduction of a procedure which has been designed to improve the process of interconnection.

3. FlaSEIA understands that this rule is not directed to a specific class of rate-payers, i.e., residential customers, but that it applies to all classes of ratepayers, without distinction.

4. FlaSEIA fully supports local building official inspection and approval of PV installations. To require utility inspection presents liability issues which the utilities would, understandably, prefer to avoid. If the utility does wish to inspect the installation, it should be at their option, and should not substitute for inspection by the local building official. The nature of the PV installation will require a permit from the local building jurisdiction and, as such, will require inspection by the appropriate building inspector. FSEC has training programs in place to assure a fully trained contingent of inspectors.

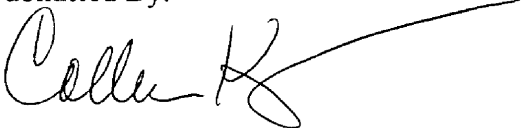
5. FlaSEIA believes that the process of interconnection must be streamlined, reasonable, and equitable. As such, the application and documentation process should be well-defined and uniform. We support the use of the form developed by FSEC, "Application and Compliance Form" (amended to conform to the recommendations herein) to facilitate the process. Utility response should be timely, and a ten day turn-around should be the norm.

6. FlaSEIA supports, subject to review of the specific language offered by the utilities, the indemnification of the utility by the homeowner and system provider. The indemnification provision should be included in a document such as the "Application and Compliance Form" referred to above. However, by accepting the concept of indemnification, FlaSEIA would insist that the insurance requirement imposed by the utility on the PV system owner be limited to \$100,000 coverage, which could be met with the standard homeowner policy.

7. FlaSEIA would like to provide the utilities with the option of accepting interconnection of PV systems up to 500kW under the standards imposed by this rule. The recommendation is consistent with IEEE 929-2000, clause 1.1. The system size is also consistent with current trends in the PV market.

Thank you for the opportunity to participate in the staff workshop. Your consideration of our comments is appreciated, and we look forward to further progress in this crucial effort.

Submitted By:



Colleen Kettles, Executive Director  
Florida Solar Energy Industries Association, Inc.  
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