

January 4th, 2021

Luly E Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI. 02888

RE: RIPUC Docket 5077 - Public Comment of Sol Power, LLC

Dear Ms. Massaro:

We, the undersigned, would like to propose a change to the *Standards for Connecting Distributed Generation, R.I.P.U.C. No. 2244* ("Tariff"). We represent a range of organizations, including solar installers, environmental champions, municipal entities and legislators.

The interconnection application process for an average residential solar installation is becoming too long and prohibitively expensive due to the maximum size limit of the simplified interconnection process. It is important that we remove unnecessary barriers so that the interconnection process for batteries and residential solar remains within the financial means and timeline of homeowners.

We propose that the maximum single phase AC system size limit should be increased from 15 kW to at least 25 kW for single phase photovoltaic projects. This proposal has the support of RI solar installers, environmental advocates and organizations. The exact changes proposed are submitted as an attachment at the end of this letter.

The average AC size of a residential photovoltaic system in RI has increased substantially due to the feasibility of battery storage, technological improvements in panel efficiency, and the electrification of our grid. 15 kW AC is no longer large enough to accommodate most residential solar installations via the simplified interconnection process. Battery storage is an essential component of increasing renewable penetration on our grid and providing resiliency for homeowners experiencing ever more frequent power outages. Electric vehicles and heat pump heating systems will play a significant part in decarbonizing our energy supply and electrifying our power usage. Battery storage and increased electrical usage have driven AC photovoltaic system sizes above 15kW AC and, as such, require these residential projects to apply for interconnection via the expedited process.

The expedited interconnection process is outside the feasible scope of most residential installations due to both time and cost. Compared to the simplified process, the expedited interconnection process can add months to the time it takes to obtain interconnection approval. It can also add thousands of dollars to the project cost in engineering analysis, document preparation, submission time, application fees, and review time. Months of delays in the approval process will stall or cancel most residential installations, and homeowners cannot afford thousands of dollars just to apply for interconnection. As such, homeowners and

residential installers are currently forced to remove battery storage and reduce PV system sizes to stay within the simplified interconnection process: this hinders progress toward meeting our state's commitment to increasing our usage of renewable energy.

At a minimum we propose increasing the simplified application AC system size limit to 25 kW for single phase photovoltaic projects, and we would not be opposed to a larger limit. This is an essential and easy change to enable more battery storage and increased photovoltaic adoption for our grid. This would have a significant impact for residential solar installers and homeowners in RI. We are not aware of any opposition to the change.

We acknowledge that this does not address the cost of electrical infrastructure upgrades, and projects requiring infrastructure upgrades will still need to apply for interconnection via the expedited process. However, this is a simple and important first step toward enabling battery storage and more solar adoption. Homeowners should not have to spend thousands of dollars and wait months due to an arbitrary 15kW system size limit, only to find out that their project requires an infrastructure upgrade. Residential solar installations should be able to find out if infrastructure upgrades are required via the simplified interconnection application process, before the application is escalated to the expedited process to determine the necessary upgrades.

As such, we recommend increasing the single phase AC size limit for the simplified interconnection process to 25 kW and appreciate your consideration of our proposal.

Signed in support of this proposal,

**Rhode Island Solar Installers**



Eric Beecher, President, Sol Power Solar

Doug Sabetti, Owner, Newport Solar

Zachary Kahn, Northeast Senior Policy Advisor, Tesla

Taylor Yeager, VP of Sales, NEC Solar



Sunwatt Solar Sales and Finance Director



Pete Fine, President, US SolarWorks, LLC

## **Elected Officials**



Representative Deborah Ruggiero  
House District 74 - Jamestown/Middletown

Representative Katherine Kazarian  
House District 63 - East Providence

Representative Susan Donovan  
House District 69 - Bristol/Portsmouth

Representative Terri Cortvriend  
House District 72 - Middletown/Portsmouth

Representative Lauren Carson  
House District 75 - Newport

Representative June Speakman  
House District 68 - Bristol/Warren

## **Organizations, Municipal Agencies and Individuals**



Leah Bamberger, Director of Sustainability for the City of Providence

The Nature Conservancy, Sue Anderbois



Kai Salem, Policy Coordinator at Green Energy Consumers Alliance

Aaron Regunberg  
Former Representative House District 4 - Providence



Handy Law, LLC

## Appendix: Proposed Changes

### Sheet 13 - 3.1 Simplified Process

Interconnecting Customers using Listed ~~single-phase~~ inverter-based Facilities with power ratings of ~~15 kW or less at locations receiving single-phase secondary service from a single-phase transformer, or using Listed three-phase inverter-based Facilities with power ratings of 25 kW or less at locations receiving three-phase secondary service from a three-phase transformer configuration~~, and requesting an interconnection on radial EPSs where the aggregate Facility capacity on the circuit is less than 15% of circuit annual peak load qualify for Simplified interconnection.

### Sheet 24 - Figure 1 - Schematic of Rhode Island DC Interconnection Process

4. Is the Facility power rating ~~≤15 kW single-phase or~~ ≤ 25 kW ~~three-phase~~?

### Sheet 25 - Figure 2 - Simplified Interconnection to Networks

Does the Facility use a Listed Inverter (UL 1741) with a power rating ≤ ~~25~~ 15 kW single-phase?

### Sheet 59 - Exhibit A - Simplified Process Interconnection Application Instructions - General Information

Interconnections that may be eligible for this Simplified Process include UL 1741-Listed inverter-based Facilities ~~that are either (1) connecting to radial electric power systems with power ratings of ≤10 kW single-phase or ≤25 kW three-phase, or (2) connecting to spot network electric power systems with power ratings of ≤15 kW single-phase.~~