

Frequently Asked Questions

Queue Reform Stakeholder Process

Question 1

Will any proposed changes to the interconnection procedures alter any existing fully executed Interconnection Agreements (IAs)?

Answer 1

No, DESC is not proposing to alter any existing IAs.

Question 2

How will interconnection requests be grouped for study under the proposed process?

Answer 2

The first step is a time-based temporal grouping based on queue position. The next step is positional/location grouping by electrical interactions among the projects. The temporal grouping is based on timing (projects submitted during the 150 day Enrollment Window) when the Interconnection Customer (IC) has entered into a cluster for that year. Locational grouping is based on point of interconnection and the impact of multiple interconnecting generators in the cluster on the transmission and distribution system.

Question 3

Is the temporal and location grouping decided by the IC or Dominion Energy?

Answer 3

All projects submitted during the 150-day Enrollment Window will be in the same temporal grouping. The locational grouping will be based on power flow studies run by Dominion Energy.

Question 4

How will upgrade costs be allocated or shared among projects in a cluster?

Answer 4

Upgrade costs are allocated based on a pro-rata share of network upgrades and on a per-capita basis for station upgrades. Please see slide 34 of the stakeholder presentation from February 10, 2021.

Question 5

At what study stage will Dominion Energy engage with affected systems? Will the study stages be placed on hold while affected system studies are completed?

Answer 5

Dominion Energy will identify Affected Systems during the System Impact Study phase and invite them to attend interconnection meetings. The Interconnection Customer is expected to work with the Affected Systems to complete the studies for identifying modifications to the Affected Systems. Neighboring utilities have been responsive to date and are anticipated to continue cooperating. Dominion Energy supports neighboring utilities' and their Interconnection Customers when it is identified as an Affected System.

Question 6

Is the Request Validation period of 30 days for all ICs entering the cluster or is it simply a buffer to allow late-submitting projects to be reviewed?

Answer 6

Dominion Energy will not accept late requests submitted after the request window closes. Dominion Energy will review Interconnection Requests as they are submitted. Requests are validated by various departments to assure they meet the requirements. The request validation window provides a buffer to ensure deficiencies are resolved. The models are validated during the Customer Engagement and as scoping meetings are held with ICs.

Question 7

Will the pre-application process still be around? How does it work with the informational study process?

Answer 7

The pre-application process is a component of the SCGIP and SGIP only. The proposed informational study will be available under the SCGIP and LGIP.

Question 8

Is Dominion Energy planning on one cluster study cycle per year?

Answer 8

The proposed cycle is one per year. Please see the slides 16 and 17 of the stakeholder presentation from February 10, 2021, for a more detailed study timeline.

Question 9

How would upgrade costs be allocated under a cluster study approach? Are they socialized irrespective of the impact of the project on the upgrade?

Answer 9

The network upgrade costs are allocated based on pro-rata and per-capita basis as stated in slide 34. Please see slide 35 of the stakeholder presentation from February 10, 2021, for an example.

Question 10

Are cluster studies only applicable to generators selling to the grid while the serial process is for those projects that are "behind the meter"?

Answer 10

Any project that cannot be evaluated under the 20 kW Inverter Process or the Fast Track Process must enter a future cluster study. The cluster study process includes an expedited path for projects that don't have an impact on the transmission system or complicated interdependencies. Please see slide 33 of the stakeholder presentation from February 10, 2021, for more information on how projects will be grouped and move through the study process.

Question 11

Does Dominion Energy have a set of defined procedures (or agreements with neighboring systems) regarding Affected System Studies?

Answer 11

No, not at this time.

Question 12

Can you provide some detail on what "evidence of ability to sell into a solicitation process" might look like?

Answer 12

Dominion Energy, or another utility accessible from the Dominion Energy system, must have an open solicitation process at the time of the cluster study formation and the project must have been successfully entered into that process for evaluation.

Question 13

Are the P1-P4 penalties cumulative?

Answer 13

These are not cumulative penalties; the additional study deposits are only collected from non-ready projects. Please see slides 24, 25, 26, and 31 of the stakeholder presentation from February 10, 2021, for more information and examples.

Question 14

Under the SCGIP, why would the M4 milestone be the higher of 100% of the system upgrade costs identified by the Facilities Study or a minimum deposit based on nameplate capacity?

Answer 14

Similar to the Duke and PSCO proposals, the milestones are set such that first-ready, first-served projects pass through the cluster and reach commercial operation date (COD) as efficiently as possible.

Question 15

If the withdrawal penalty is less than the financial security, will the balance of the financial security be refunded (in the event of withdrawal)?

Answer 15

The balance of the financial security will be refunded after the deduction of any accrued costs and any penalties.

Question 16

If the study for M2 only costs ~\$50,000, would the withdrawal payment be adjusted to reflect actual costs?

Answer 16

The withdrawal penalty is based on the actual study cost. Please see slides 24, 25, 26 and 31 of the stakeholder presentation from February 10, 2021, for more information.

Question 17

On slide 27 of the stakeholder presentation from February 10, 2021, is the 90/10 withdrawal penalty distribution also the way study costs are going to be allocated?

Answer 17

The administering Utility shall determine each IC's share of the costs of completing the DISIS¹ Cluster Study (including general queue administration costs and overheads) by allocating: (1) ten percent (10%) of the applicable study costs to Interconnection Customers on a per capita basis based on number of

¹ Definitive interconnection system impact study.

Interconnection Requests included in the applicable Cluster; and (2) ninety percent (90%) of the applicable study costs to Interconnection Customers on a pro-rata basis based on requested megawatts included in the applicable Cluster.

Question 18

Are the proposed cost allocation mechanisms basically the same as Duke?

Answer 18

Yes, basically the same as Duke

Question 19

There will be a second stakeholder process on general provisions of the SCGIP. Will this be a parallel process; do these processes relate?

Answer 19

The two stakeholder processes are separate, and Dominion Energy anticipates the processes will overlap. The content of the stakeholder phases will not overlap.

Question 20

Will the reform impact the Fast Track Process?

Answer 20

The first phase of the interconnection reform process addresses the serial study process and the transition to a cluster study process. The second phase of the SCGIP reform process will address any other aspect of the SCGIP and could include changes to the Fast Track Process.

Question 21

Will a DISIS Enrollment Window be opened as soon as the reform is approved or will the first DISIS Enrollment Window be delayed until after the transitional studies are completed?

Answer 21

Once fully approved, the first cluster study will be the transitional cluster study. The timing of the first open Enrollment Window is unknown at this time. Dominion Energy anticipates the first Enrollment Window will be timed such that the phase 2 study from the transitional cluster will be completed prior to beginning the Customer Engagement Window of the second cluster.

Question 22

Are projects less than 1MW going to be clustered or follow a serial process?

Answer 22

The current Fast Track Process will remain in the SCGIP and SGIP. Small certified inverted based generators may be eligible for the Fast Track Process and, if so, would not need to enter the cluster process.

Question 23

In the example on slide 26 of the stakeholder presentation from February 10, 2021, it specifies an actual cost of \$125K; is that after phase 1 or 2?

Answer 23

Dominion Energy has added a more detailed example to the stakeholder presentation from February 10, 2021. Please see slide 38 of the updated presentation.

Question 24

Is the IC required to have site control for both the site and ROW for Interconnection Facilities?

Answer 24

The requirements for site control are different between SCGIP and FERC LGIP, the SCGIP requires exclusive site control while FERC LGIP an escalating criteria. Dominion Energy has added a more detail example, slide 38, to the stakeholder presentation from February 10, 2021.

Question 25

If the DISIS Enrollment Window is not opened immediately after approval then how will DESC handle new interconnection requests? Will they be studied serially or will they just be put on hold until the transitional studies are completed

Answer 25

After approval of the proposed reforms, new interconnection requests that aren't eligible for the 20 kW Inverter Process or the Fast Track Process will be received during the next Enrollment Window and included in the next cluster study.

Question 26

Is it accurate that, under the proposed changes, an Interconnection Customer will have three choices: 1) enter the cluster study, 2) enter the transitional study, or 3) withdraw?

Answer 26

Interconnection Customers with a completed System Impact Study may remain in the transitional serial process. Interconnection Customers currently in queue that don't have a completed System Impact Study and meet the transitional cluster study requirements, may enter the transitional cluster. An interconnection customer that isn't eligible for the transitional cluster, or an interconnection customer that withdraws, may enter the cluster study process at a future point in time. See slide 14 and 15 of the stakeholder presentation from February 10, 2021, for more information on the transition process.

Question 27

If a project withdraws during the phases, and the resulting impacts cause other projects to withdraw, will they avoid penalties. Is there any ability for impacted projects to withdraw without penalties?

Answer 27

An Interconnection Customer shall be subject to a Withdrawal Penalty if it withdraws its Interconnection Request from the Queue or the Generating Facility does not otherwise reach Commercial Operation unless the Transmission Provider determines consistent with Good Utility Practice that (1) the withdrawal does not negatively affect the timing or cost of equal or lower queued projects; (2) the cost responsibility identified for that Interconnection Customer in the current study report associated with new Network Upgrades to the Transmission Provider's System increased by more than twenty-five percent (25%) compared to the costs identified in the previous report; or (3) if the customer withdraws after the Interconnection Facilities Study report is published and before providing the final Milestone Payment, and the cost responsibility for that Interconnection Customer identified in the Interconnection Facilities Study report increases by more than one hundred percent (100%) compared to the prior report.