# **McGuireWoods**

McGuireWoods LLP Gateway Plaza 800 East Canal Street Richmond, VA 23219-3916 Phone: 804.775.1000 Fax: 804.775.1061 www.mcguirewoods.com Jontille D. Ray Direct: 804.775.1173 jray@mcguirewoods.com

January 2, 2025

#### BY ELECTRONIC DELIVERY

Bernard Logan, Clerk State Corporation Commission Document Control Center Tyler Building, First Floor 1300 East Main Street Richmond, Virginia 23219

Commonwealth of Virginia, ex rel. State Corporation Commission Ex Parte: In the matter considering utility distributed energy resource interconnection-related issues and questions

### Case No. PUR-2022-00073

Dear Mr. Logan:

Enclosed for electronic filing in the above-captioned proceeding, please find the *Virginia Electric and Power Company's Pilot on Targeted Cluster Study Approach to Interconnection Requests Quarterly Report*.

Please do not hesitate to contact me if you have any questions regarding this filing.

Highest regards,

/s/ Jontille D. Ray

Jontille D. Ray

#### Enclosures

cc: Paul E. Pfeffer, Esq. Lauren W. Biskie, Esq. Briana M. Jackson, Esq. Service List

# PILOT ON TARGETED CLUSTER STUDY APPROACH TO INTERCONNECTION REQUESTS OUARTERLY REPORT

**January 2, 2025** 

#### **INTRODUCTION**

On August 7, 2024, the State Corporation Commission of Virginia ("Commission") issued an Order Directing Evidentiary Proceeding, Pilot, and Improvements to the Interconnection Process in Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter considering utility distributed energy resource interconnection-related issues and questions, Case No. PUR-2022-00073 ("Order"). The Order directed the Company to conduct a pilot examining the use of targeted cluster studies as a possible alternative to, or addition to, the current interconnection study process. The Commission specifically directed the Company to work with Commission Staff to establish reasonable parameters for this pilot.

Since filing the first quarterly report on October 1, 2024, outlining the proposed scope of the pilot, the Company has met with Commission Staff to review the proposed pilot parameters and reporting metrics. Additionally, the Company has filed a motion to propose a pilot timeline, which includes a modification to the pilot completion date from December 31, 2025 to June 30, 2026. The Company proposes an Open Enrollment Period from February 3, 2025, to June 30, 2025, for developers to enter a series of eligible projects into the Cluster Study Pilot. In accordance with the Order, the Company submits its second quarterly report.

#### **PILOT ELIGIBILITY**

The Company will accept projects that meet all the following requirements between February 3, 2025, and June 30, 2025, into the Cluster Study Pilot. Submission of the form attached to this report is required; a copy of the form can also be found on the Dominion Energy website at dominionenergy.com.

For the purposes of the Cluster Study Pilot, interconnection requests desiring to be studied as a cluster must be 3 MW or less in size. The interconnection requests must be in sequential queue position on a substation transformer, but not necessarily have sequential queue numbers. There is no cap on the number of projects participating in a cluster or the total size of a cluster. However, all interconnection requests desiring to participate in a cluster must be controlled by the same entity; however, the Interconnection Customer may be different. Requests to participate in the Cluster Study Pilot must be submitted by the Controlling Entity before the full execution of the initial study agreement of the earliest queued request desiring to participate in a cluster. Interconnection requests can only be studied in a cluster or individually, but not both. There is no limit to the total number of clusters the Company will accept into the Cluster Study Pilot during the Open Enrollment Period.

#### Virginia Electric and Power Company

In combination with the pilot parameters outlined in this report and the quarterly queue status reports to be published on February 3, 2025, and May 1, 2025, developers can determine which projects are eligible for participation and notify the Company of those projects they wish to include. Upon receiving the Notice of Cluster Study Pilot Participation form attached to this report, the Company will provide the required study agreements for execution.

#### **PILOT ADMINISTRATION**

Dominion Energy Virginia proposes to administer the Cluster Study Pilot in such a way that utilizes existing interconnection regulations. As such, clusters will be managed under interdependency and Material Modification criteria in Virginia Interconnection Regulations. The interdependency status of a cluster will match that of the earliest queued request in the cluster. The Controlling Entity of a cluster may elect to have the requests within a cluster studied individually or combined. The appropriate study agreements will be executed and deposits collected for each of the interconnection requests participating in the cluster. Study agreements and Interconnection Agreements for each request in a cluster will be developed, issued, and executed concurrently, reflecting the cluster parameters. Execution of all study agreements and interconnection agreements for requests in a cluster is required before the cluster can begin study or begin construction. Authorization for construction requires full execution and satisfaction of estimated charges for all agreements in the cluster unless a request withdraws during the study process. Should any request within a cluster desire to withdraw from the queue during the study process, the cluster will be subject to Section 20 VAC 5 - 314 - 39 and as such, reductions shall be limited to 10% of the generating capacity of the total cluster. Alternatively, the Controlling Entity of the cluster can elect to continue study at the cluster's original Maximum Generation Capacity or at a reduced capacity if the reduction is within 10% of the original capacity of the cluster.

The cluster will be studied, and upgrades determined using the sum of the capacity of all requests participating in the cluster. Attachment Facilities will be assessed individually for each request in the cluster. Estimated costs of Attachment Facilities and associated operations and maintenance ("O&M") contributions will be assigned to each individual request in a cluster.

Upgrade costs will be assigned using the following formula:

Upgrade Cost Assignment Per Interconnection Request = Estimated Upgrade Cost of Cluster x {Interconnection Request Maximum Generation Capacity / Cluster Maximum Generation Capacity}

Final Accounting and Billing will be developed upon completion of construction, with costs split among participants using the following formula:

Final Billing per Interconnection Request in a Cluster =
(Final Billing associated with the Cluster) x (Interconnection Request Maximum Generating Capacity/Cluster Maximum Generating Capacity)

### **Cluster Study Pilot Participation Notification Form**

Upon submission of this form, the Company will review the request to ensure it meets the eligibility requirements outlined in the January 2, 2025 Quarterly Report. If all projects requesting to participate in the cluster are deemed eligible, the Company will notify the Controlling Entity of acceptance into the Cluster Study Pilot. Upon notification of acceptance, the Controlling Entity will elect individual or combined study for the required studies within the cluster, and the Company will provide the appropriate agreements. Study agreements and associated deposits will be required for each request participating in the cluster.

Controlling Entity	
Controlling Entity Name:	
Contact Person:	
Title:	
Contact Email:	
Contact Phone Number:	
Cluster Information:	
Projects to be Included in Cluster:	
1. Queue Number / Capacity: 2. Queue Number / Capacity: 3. Queue Number / Capacity: 4. Queue Number / Capacity: 5. Queue Number / Capacity: 6. Queue Number / Capacity: 7. Queue Number / Capacity: 8. Queue Number / Capacity: 9. Queue Number / Capacity: 10. Queue Number / Capacity:	
Proposed Cluster Maximum Generating Capacity:	

## Virginia Electric and Power Company

I, the undersigned, declare that I am authorized to submit this form on behalf of the Controlling
Entity and that the information provided herein is accurate and complete to the best of my
knowledge. I understand that participation in the Cluster Study Pilot is subject to the terms and
conditions outlined in the parameters detailed in the January 2, 2025 Quarterly Report and the
Virginia Interconnection Regulations as outlined in Section 20 VAC5-314.

Signature	
Printed Name	
Title/Position	
Controlling Entity	

#### CERTIFICATE OF SERVICE

I hereby certify that on this 2<sup>nd</sup> day of January 2025, a true and accurate copy of the foregoing filed in Case No. PUR-2022-00073 was hand delivered, electronically mailed, and/or mailed first class postage pre-paid to the following:

Arlen Bolstad, Esq.
K. Beth Clowers, Esq.
Frederick D. Ochsenhirt, Esq.
Austin Skeens, Esq.
Office of General Counsel
State Corporation Commission
1300 E. Main Street, Tyler Bldg., 10<sup>th</sup> Fl.
Richmond, VA 23219

C. Meade Browder, Jr., Esq. John E. Farmer, Jr., Esq. Office of the Attorney General Division of Consumer Counsel 202 N. Ninth Street Richmond, VA 23219

Carrie H. Grundmann, Esq. Barry A. Naum, Esq. Spillman Thomas & Battle, PLLC 110 Oakwood Dr., Suite 500 Winston-Salem, NC 27103 Jonathan L. Gold, Esq. Dickinson Wright PLLC 1825 Eye St. NW, Suite 900 Washington, DC 20006-5468

Nathaniel H. Benforado, Esq. Josephus Allmond, Esq. Southern Environmental Law Center 120 Garrett St., Suite 400 Charlottesville, VA 22902 Noelle J. Coates, Esq. American Electric Power Service Corporation 1051 East Cary Street, Suite 1100 Richmond, VA 23219

Rachel W. Adams, Esq. Sean Breit-Rupe, Esq. Michael J. Quinan, Esq. Cliona Mary Robb, Esq. Thompson McMullan, P.C. 100 Shockoe Slip, 3<sup>rd</sup> Floor Richmond, VA 23219 Brian R. Greene, Esq. Eric W. Hurlocker, Esq. Eric J. Wallace, Esq. GreeneHurlocker, PLC 4908 Monument Avenue, Suite 200 Richmond, VA 23230

Kendrick R. Riggs, Esq. Stoll Keenon Ogden, PLLC 2000 PNC Plaza 500 W Jefferson St. Louisville, KY 40202 Mary Ellen Wimberly, Esq. Stoll Keenon Ogden, PLLC 300 West Vine St. Suite 2100 Lexington, KY 40507

Sarah V. Judd, Esq. Allyson K. Sturgeon, Esq. PPL Services Corporation 220 West Main Street Louisville, KY 40202 William Giese Solar Industries Association 1425 K Street, Suite 1000 Washington, DC 20005 Lauren Gonzalez Clean Virginia 213 7<sup>th</sup> Street NE Charlottesville, VA 22902

Matthew Meares Sunworks NC, LLC 106 Woodall Dr. Henrico, VA 23229

Harry Warren Center For Renewable Integration, Inc. 107 S West, Suite 731 Alexandria, VA 22314

Chris Gordon EDF Renewables 300 E Main Street, Suite 213 Charlottesville, VA 22902 Hillel Halberstam SynerGen Solar, LLC 600 Reisterstown Rd., Suite 310 Pikesville, MD 21208

Danny Van Clief Devin Welch Sun Tribe Solar 107 5<sup>th</sup> Street SE Charlottesville, VA 22902

Michael Weiss Virginia Advanced Energy Economy 1010 Vermont Avenue NW, Suite 1050 Washington, DC 20005

Jacob R. Newton, Esq. Samuel R. Brumberg, Esq. Virginia, Maryland & Delaware Association of Electric Cooperatives 4201 Dominion Blvd., Glen Allen, VA 23060

/s/Jontille D. Ray