



December 21, 2022

To: U.S. Energy Information Administration
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: U.S. Energy Information Administration's Proposed Changes to its Electric Power and Renewable Electricity Surveys, OMB Control Number: 1905-0129

To Whom It May Concern,

Please find attached the Interstate Renewable Energy Council's comments, submitted pursuant to the above-referenced proposed changes to EIA's Electric Power and Renewable Electricity Surveys published in the Federal Register on 11/21/2022.¹

Should you have any questions, please don't hesitate to contact me.

Sincerely,

/s/ Radina Valova
Vice President – Regulatory
Interstate Renewable Energy Council, Inc.

125 Wolf Road, Suite 207
Albany, NY 12205
518.621.7379
radinav@irecusa.org

¹ Federal Register Doc. 2022-25287

I. Introduction

The Interstate Renewable Energy Council, Inc. (IREC) appreciates this opportunity to provide comments in response to the U.S. Energy Information Administration's (EIA) proposed changes to its Electric Power and Renewable Electricity Surveys (EPRES).² IREC commends the EIA's periodic efforts to review and modify the information it collects to keep pace with new energy technologies and determine the best way to compile and share critical data on the electric industry across the country.

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to build the foundation for the rapid adoption of clean energy and energy efficiency to benefit people, the economy and our planet. In service of our mission, IREC advances scalable solutions to integrate distributed energy resources (DERs), e.g., renewable energy, energy storage, electric vehicles, and smart inverters, onto the grid safely, reliably, and affordably. IREC supports the creation of robust, competitive clean energy markets, though IREC does not have a financial stake in those markets. IREC's team includes policy experts, lawyers, and electrical engineers who are well versed in the technical standards for interconnecting DERs to the electric power system. Drawing on that knowledge, IREC works across numerous diverse states to improve the rules, regulatory policies, and technical standards that enable the streamlined, efficient, and cost-effective interconnection of DERs.

IREC's interconnection work spans more than a decade and has included direct regulatory intervention and/or technical assistance to regulators and stakeholders in 36 states plus Washington, D.C. and Puerto Rico. Our expertise has been developed and further refined through discussions with utilities, distributed energy resource (DER) developers, and public

² Federal Register Doc. 2022-25287

service commission regulatory staff as part of regulatory proceedings, working groups, and grant-funded projects related to interconnection. Through these collaborative efforts, IREC identifies DER interconnection best practices which then inform the development of new resources and solutions.

One of the consistent themes throughout our work is the need for increased utility data transparency. In particular, improved access to utility interconnection data could help to identify areas for policy improvements to avoid interconnection delays or unpredictable costs, and evaluate the effectiveness of past regulatory changes adopted to address challenges within utility jurisdictions and/or states. Through its Electric Power and Renewable Electricity Surveys, the EIA has provided greater transparency on the number and capacity of DERs that are being added to the distribution system, among many other useful data points. And we applaud the EIA's efforts to include new questions related to energy storage devices in its proposed changes to forms EIA-860 and EIA-860M. However, IREC believes that these surveys should go beyond the data currently collected and include questions related to interconnection queues, timelines, and infrastructure upgrade costs. The section below will list the types of data that could be requested, explain why this information is critical to improving efficiency and cost certainty related to DER grid connection, and discuss the importance of standardized data collection to address data gaps and increase visibility into interconnection processes and potential barriers throughout the country.

II. IREC Supports Expanding EIA's Electric Industry Surveys to Include Data Collection on Interconnection Queues, Timelines, and Infrastructure Upgrade Costs

IREC reviewed the joint comments from the Solar and Storage Industries Institute (SI2) and the Solar Energy Industries Association (SEIA) filed on July 14, 2022, and we support their request for EIA to collect data on distribution utility interconnection queues, costs, and timelines.³ Tracking monthly and annual utility interconnection queue data, including the total capacity and number of active and withdrawn projects, would provide additional context around both planned capacity additions and the numbers of unviable projects. Understanding the amount of capacity that may be developed in the future can help with state and local planning as well as forecasting. In states or jurisdictions where public queue data may already be available, the corresponding utility or utilities should be able to compile the data with little effort. Providing data on withdrawn projects could help to identify areas where interconnection processes or costs may be preventing DER development. In addition to the number and total capacity of active and withdrawn projects, policymakers would benefit from data on the average time spent in the queue for completed and withdrawn projects by system size range (e.g., less than 1 megawatt, 1-5 megawatts, and greater than 5 megawatts).

To address challenges related to cost certainty within the interconnection process, the EIA should also collect data on infrastructure upgrade costs. These costs vary greatly depending on the size of a project and its location on the grid, which can lead to unpredictable estimates for interconnection applicants. States generally do not require utilities to report upgrade cost data unless it is in the form of a cost guide, which may include expected costs for common upgrades.⁴ Greater visibility into upgrade costs would assist policymakers and industry analysts with

³ Solar and Storage Industries Institute and the Solar Energy Industries Association, *Joint Comments of the Solar and Storage Industries Institute and the Solar Energy Industries Association*, July 14, 2022, filed under OMB Control No.: 1905-0129.

⁴ Laura Beaton, et al., *Interconnection Standards, Practices, and Procedures to Support Access to Solar Energy and Battery Storage for Maine Homes and Businesses*, Interstate Renewable Energy Council, pp. 72-73 (February 2022).

tracking soft costs related to interconnection to identify trends as well as jurisdictions where grid connection costs may be cost prohibitive. To reduce the reporting burden, the data could include the average cost for each type of common infrastructure upgrade, including transformers, metering, telemetry, and overhead and underground service, during the reporting period.

Interconnection timeline reporting is another critical area where data are lacking across jurisdictions and the EIA could help to increase visibility into the time it takes for DER projects to connect to the grid. By collecting timeline data, the EIA could provide an effective means to evaluate the efficiency of interconnection processes across the country. The information collected could include:

- Average number of days from interconnection application submittal until the utility provides permission to operate the DER system;
- Average number of days from interconnection application submittal until the applicant withdraws the project; and
- Average number of days from the signing of an interconnection agreement to the completion of any required grid upgrade.

Collecting these data points would allow for comparisons between different utility territories and regions and help to highlight both inefficiencies and model practices and policies.

For each of the topics discussed above, data gaps exist which prevent policymakers, DER customers, and other stakeholders from being able to analyze the costs and timeliness of connecting to the grid across jurisdictions. In many states, it is difficult for interconnection applicants to estimate the time it may take to install a project and what the cost to interconnect may be before they submit an application.⁵ These types of uncertainties can lead to higher

⁵ Lori Bird, et al., *Review of Interconnection Practices and Costs in the Western States*, National Renewable Energy Laboratory, p. 6 (April 2018).

financial risk, lower investor interest, and, in turn, decreased DER adoption which can then impact any progress toward meeting federal and state clean energy goals. Additionally, the lack of transparency can increase the number of speculative projects that must be reviewed and added to the interconnection queue only to be withdrawn at a later date, increasing the timelines and uncertainty for other projects in the queue.⁶

In addition to data gaps, there is also a lack of data standardization among states that require interconnection information to be collected and reported by utilities. For example, states may require different reporting frequencies for interconnection queue data updates or may have variations in the sizes of projects required to be listed in the queue.⁷ The EIA's data collection surveys offer the unique ability to standardize and centralize interconnection data for all utilities and other respondents, which could offer the ability to more effectively identify and address interconnection challenges related to delays and interconnection upgrade costs. Data standardization would allow for easier comparison between jurisdictions and visibility into interconnection barriers that may need to be addressed by policymakers to prevent the lengthy delays that have become more common for transmission projects recently.

III. Conclusion

IREC appreciates the opportunity to comment on the proposed changes to the EIA's data collection surveys and looks forward to continuing to work collaboratively to improve upon any efforts to increase transparency related to interconnection timelines, cost, and queue management.

⁶ Ibid.

⁷ For example, Pepco includes projects greater than 500 kW AC in its Maryland territory, but in its Washington, D.C. territory, it includes all Level II projects (not restricted to a minimum capacity) and above; *see*: <https://www.pepco.com/SmartEnergy/MyGreenPowerConnection/Pages/DevelopersContractors.aspx>