

Drinker Biddle

Working with Utilities in a
Complex Regulatory Environment

Microgrid 2017

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C. Baird Brown

The Grid

- The most **complex machine** ever devised
 - The source of tremendous **economic development**
 - Runs on coal – a **threat to the planet**
 - Operational risk – **cascading failure**
 - An electric power system with **common automatic controls** that:
 - **Balances** power from generation and imports with load
 - Maintains scheduled **interchange** with other control areas
 - Maintains the **frequency** of the electric power system
 - Maintains **operating reserves**
 - **Control areas** now are:
 - **Integrated utilities**
 - **Regional Transmission Organizations (RTOs)**
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The Grid of the Future

- A **self-healing grid** provides **resiliency**
 - The grid can separate into self-supporting **islands**
 - Each island is its own **semiautonomous** control area supplied by DER
 - The islands can support one another through distributed energy resource management systems (**DERMS**)
 - Microgrids provide **grid support services** when not in island mode
 - Smaller, local, diverse resources reduce grid risk
 - Utilities **invest in the platform**
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The Microgrid

A microgrid is a local electric system (**a local control area**) or combined electric and thermal system:

- that includes retail load and the ability to provide energy and energy management services needed to meet a significant proportion of the included load on a non-emergency basis
- that is capable of operating either in parallel or in isolation from the electrical grid
- that, when operating in parallel, is capable of providing energy, capacity or related services to the grid

Microgrid Performance

- Cogeneration efficiency beats the grid 80 to 35%
- Microgrids integrate Variable Energy Resources with hybrid generation
- Smart, integrated management of thermal loads
 - Uses thermal storage including building mass
- Customers arbitrage fuels and time of day

Microgrids invest to meet own needs, can provide multiple services to the grid at favorable prices

The Utility

- Retail distribution
 - Plans and manages the Distribution System
 - Bills for energy and wires
 - In an RTO
 - Maintains its transmission for RTO
 - Revenue requirement is wrapped by RTO tariff
 - Outside an RTO
 - Typically vertically integrated
 - Acts as control area operator
 - Provides open access to transmission
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Utility DER Concerns

- Risks to grid operation
 - Too many variable energy resources (VERs) requires additional ramping resources and reserves
 - DER are invisible and unresponsive
 - Risks to utility business models
 - DERs aren't paying costs of system – need large standby charges
 - Net metering is an unfair subsidy
 - DERs are destroying load and revenues (even if the utility doesn't own generation)
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Utility Constraints

- Must serve all customers fairly
 - Assets in rate base must be used to optimize grid for all customers.
 - Can't generally own assets behind the meter
 - Can't optimize customer energy use
 - State policies on generation ownership should be respected
 - Utility - Private Partnership
 - Take advantage of strengths of each party
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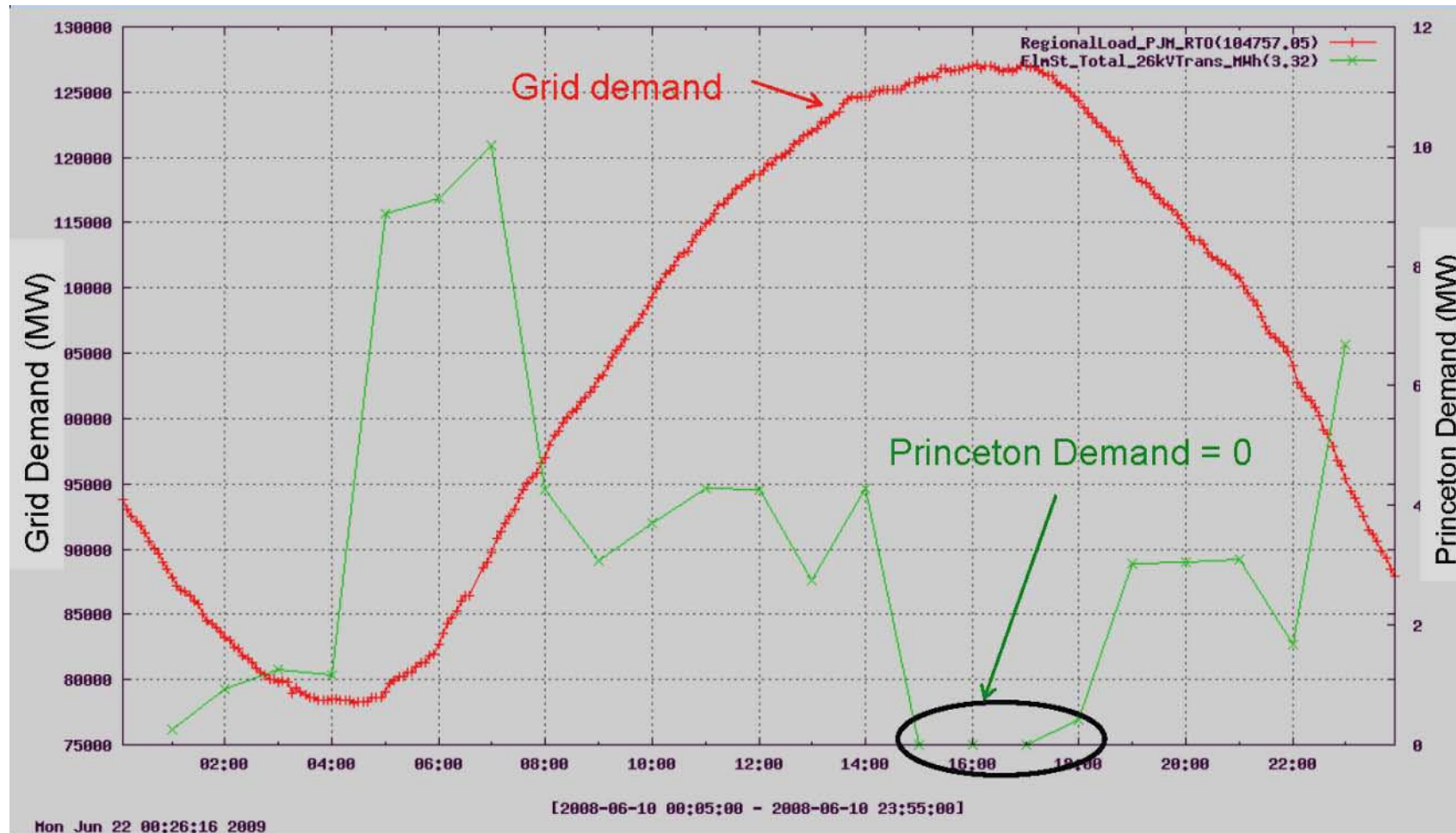
Microgrid Constraints

- Is a Microgrid a utility?
 - Can it sell at retail?
 - Can it own wires?
 - Self Generation is usually permitted
 - Most states allow a third party supplier on site
 - Some states exempt multiple local customers
 - New York Qualified Facility exemption
 - Other regulatory options
 - Retail electric supplier, Community Choice Aggregation
 - Utility/Private Partnership
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Princeton Microgrid

- Includes:
 - 15 MW cogeneration
 - 4.5 MW solar
 - 400 MWh Thermal Energy Storage
 - Advanced building controls
 - Advanced grid interface
 - Survived Hurricane Sandy as an island
 - Sells demand response and frequency regulation
 - Arbitrages thermal storage and fuel diversity
 - Supports critical research power quality needs
 - Few regulatory hurdles
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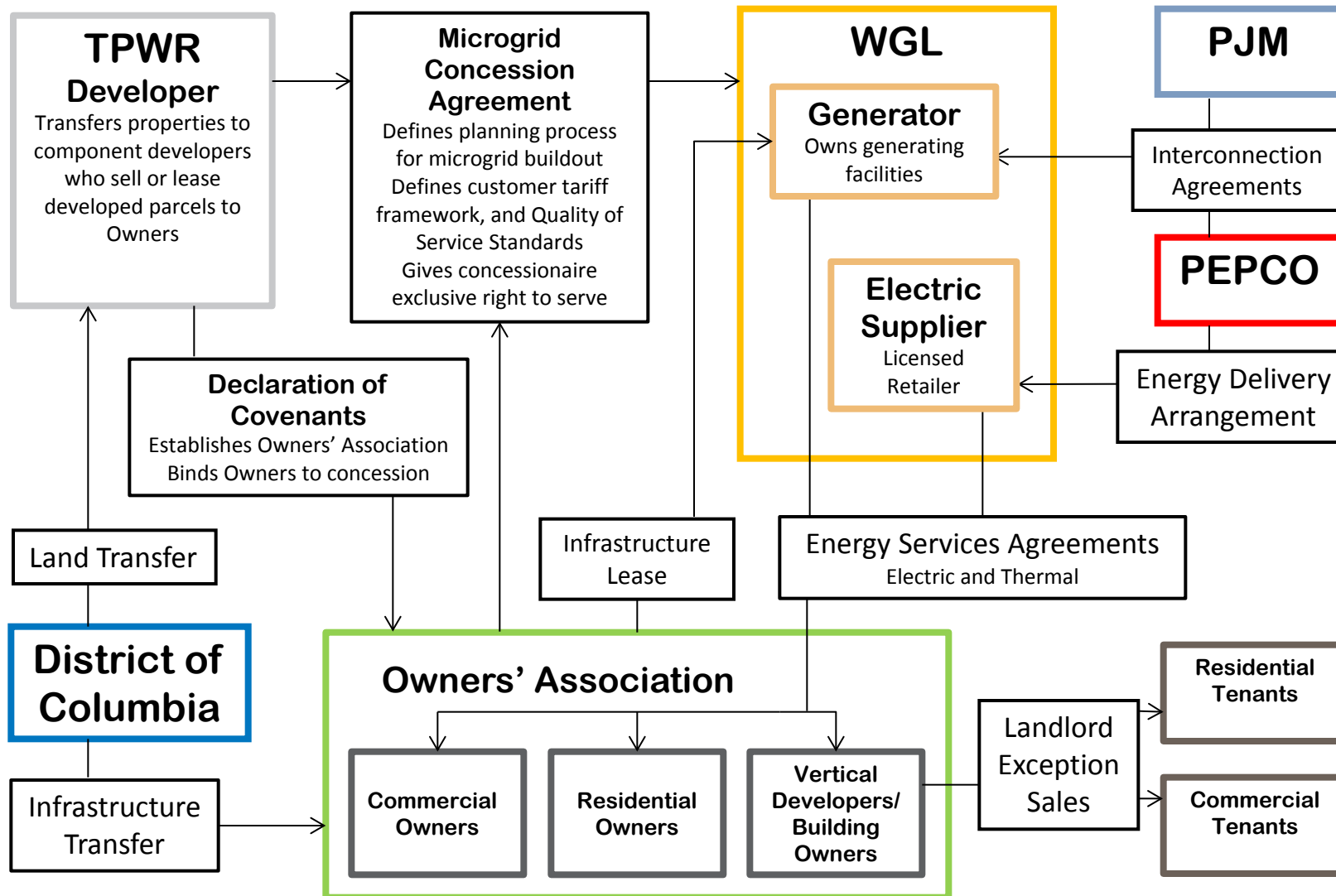
Princeton Load Shape



The Parks at Walter Reed

- Multiuse development on former Army site
 - DC defines utility by wires ownership
 - Exception for self supply
 - Owners association (OA) owns the wires
 - Collective self supply
 - Concession agreement with microgrid operator
 - OA leases wires to operator
 - Developer leases generating sites to operator
 - OA enforces the concession agreement
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The Parks at Walter Reed – Microgrid Structure



Brooklyn Microgrid

- Benefit Corporation will run a market for excess power generated by rooftop solar in a Brooklyn neighborhood
 - Block-chain technology implemented through smart meters will set “peer to peer” price for solar
 - Brooklyn Microgrid is a retail electric supplier
 - Solar owners are “qualified facilities” under PURPA
 - Utility bills customers based on Brooklyn Microgrid’s settlement
 - Future submarket microgrids will use cogeneration
 - Need to own wires or partner with utility to permit island operation
 - Retail electric supply regulations form initial basis for partnership without additional negotiation
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Duke University

- Duke Power proposes to install a new cogeneration facility on the Duke University campus.
 - The electric generation is owned by Duke Power, it is financed in rate base and is operated to optimize the utility distribution system
 - The utility is permitted to own generation and there are no RTO power markets, only the utility
 - Generation is paid for by ratepayers and operates for ratepayer benefit
 - Duke University gets low cost thermal energy, and its payments reduce the cost for utility ratepayers
 - Duke University can't use generation to optimize its system
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Borrego Springs

- San Diego Gas and Electric serves an isolated community at the end of a long feeder
 - The community experienced repeated outages
 - The utility installed islanding switchgear on the feeder and batteries in the community
 - Other generation was added with third party ownership
 - No “special services” are provided – the project allows the utility to provide reliable service
 - Utility improvements are included in rate base
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PEPCO Maryland Proposal

- PEPCO agrees in merger to do public purpose microgrids
 - Prince Georges County proposal would include County building, medical center, pharmacy, gas station and grocery store
 - PEPCO will install islanding switchgear and controls
 - PEPCO will issue RFP for included generation to be built and operated by third parties – will pay for some services
 - Customers continue to have retail choice when the microgrid is not in island mode
 - Proposed microgrid includes solar, batteries and gas generation
 - No cogeneration proposed
 - Can RFP respondent's propose cogeneration and offer thermal services?
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Services to the Grid

- Wholesale markets
 - **Energy, capacity, ancillary services**
 - EPSA v. FERC has given FERC clear authority
 - Aggregators are the real market participants
 - Market sets the price
 - Resources must be visible and responsive
 - Bids not baselines
 - Distribution support services
 - Avoid upgrading wires or substations, local peak support
 - California PUC DER Planning Process
 - Map the locations on the **Distribution System** where DER can contribute
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Contracts and Pricing

- Conduct **Requests for Proposals** for DER solutions
 - Virginia unsolicited proposal model for transportation projects
 - Distribution company enters long-term performance-based contract that serves as (partial) basis for financing
 - Penalties for failure to deliver
 - Alternative is a fixed tariff or resilient resource credit rewarding resilient resources
 - Hughes v. Talen Energy Marketing
 - States have broad power; can't interfere with wholesale market
 - Zero Emissions Credits upheld in courts
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New Utility Incentives

- Decoupling
 - Utility does not automatically earn all customer charges
 - Incentive Ratemaking
 - Utility earns extra return for meeting specific goals:
 - **Reducing load**
 - **Interconnecting DER**
 - Rate base treatment for DER contracts
 - Contract is a **“regulatory asset”** that earns a rate of return
 - Making the Utility indifferent
 - Integration with wholesale markets
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Questions?

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