

Drinker Biddle

The Grid and the Microgrid:
Love among the Regulations

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C. Baird Brown

The Grid

- The most **complex machine** ever devised
 - The source of tremendous **economic development**
 - Run 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 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

Why is a Microgrid Desirable?

- Provides resiliency
 - Acts as a control area when isolated from the grid
 - More reliable than backup generation
- Saves money and the environment
 - Integrated management of electric and thermal loads
 - Integration of renewable energy

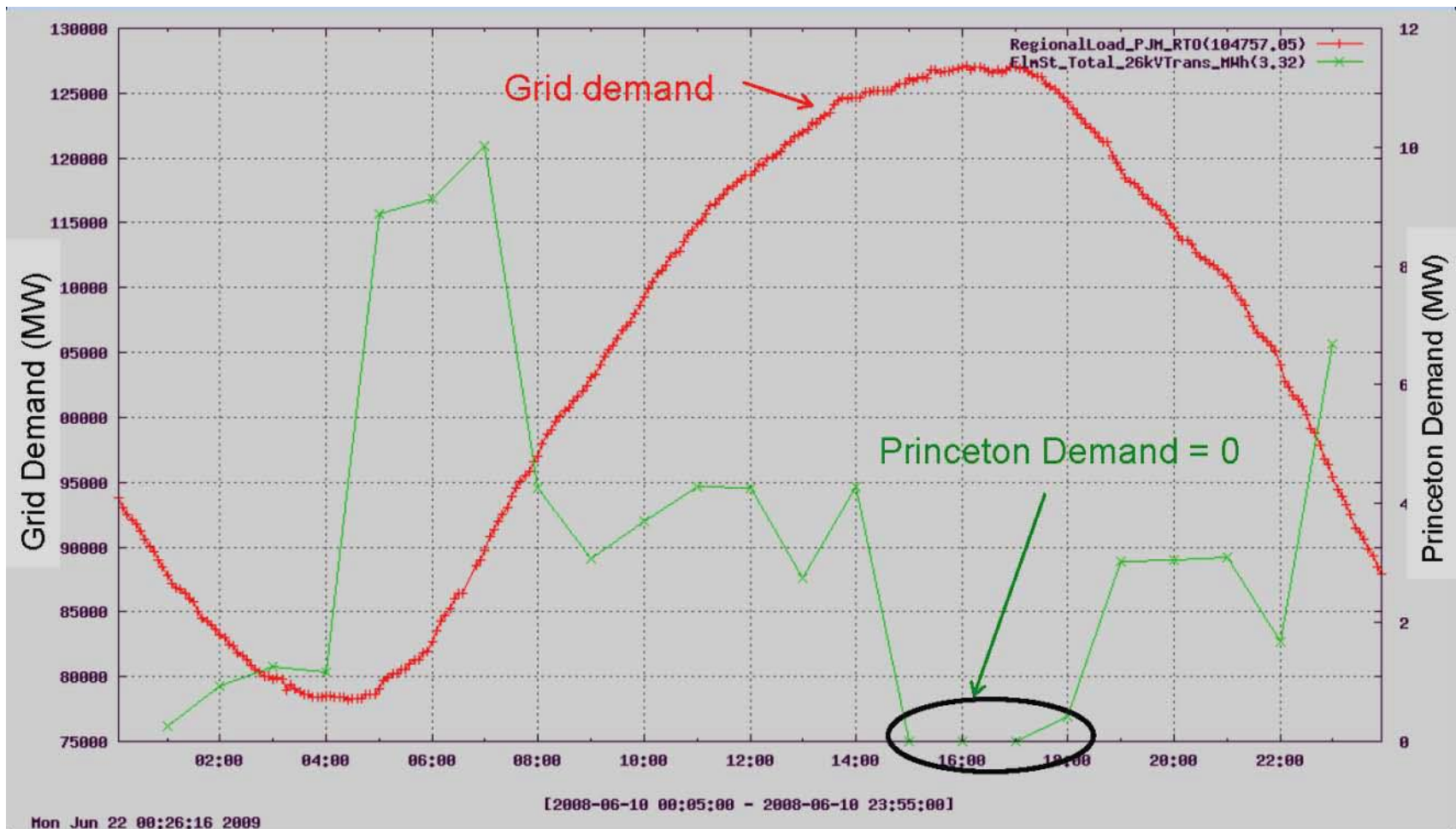
Customer value from Microgrids is driving rapid adoption of new technologies

Microgrid Performance

- Cogeneration efficiency beats the grid 80 to 35%
- Microgrids integrate Variable Energy Resources with hybrid generation
- Smart management of thermal loads uses buildings as thermal storage
- Customers arbitrage fuels and time of day

These capabilities allow Microgrids to provide multiple services to the grid at favorable prices

Princeton Load Shape



The Grid of the Future

- A **self-healing grid** in emergencies
 - The grid can separate into self-supporting **islands**
 - Each island is its own **semiautonomous** control area
 - Each supplied by **Distributed Energy Resources** (DER)
 - The islands can support one another
 - DERs (microgrids are the best) provide **grid support services** when not in emergency mode
 - DER are mostly **clean energy resources**
 - The grid operators **conduct the concert**
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So What's Wrong with this Relationship?

- You need a legal interconnection
 - FERC Order 888 - Open Access Transmission Tariff
 - Small generator interconnection procedure – up to 20 MW
 - RTO supervision of studies
 - Antiquated state regulations
 - Wholesale market rules
 - Jealous Utilities
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State Regulatory Barriers

- Is a Microgrid a utility? Does it need a franchise?
 - 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
 - Not “holding oneself out to serve the public”
 - Other regulatory options
 - Retail electric supplier
 - Utility/Private Partnership
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RTO Wholesale Markets

- Federal Energy Regulatory Commission allows wholesale services from behind the meter in RTOs
 - Order 745 - Demand response
 - Order 755 - Regulation
 - Order 784 - Storage
 - Order 819 - Frequency
- EPSCA v. FERC has given FERC clear authority
 - Wholesale market is not an intrusion on the retail price
- Hughes v. Talen Energy Marketing
 - States have broad power; can't interfere with wholesale market

RTO reality lags behind the promise

Utilities see DERs as a Threat

- To grid operation
 - Too many variable energy resources (VERs) requires additional reserves
 - VERs don't provide frequency response (FERC Docket)
 - Demand Response is unreliable
 - 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
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Utility 2.0

- Several State PUCs are undertaking reviews of utility regulation
 - Looking at **new utility business models**
 - Considering the effect of widespread adoption of DERs
 - New York Public Service Commission **Renewing the Energy Vision (REV)** proceeding
 - Utilities serve as **distributed service platforms (DSPs)** for integrating widespread DERs
 - DSPs will run markets for services from DERs analogous to RTOs
 - California PUC DER Planning Process
 - Map the locations on the **Distribution System** where DER can contribute
 - Conduct **Requests for Proposals** for DER solutions
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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 contracts**
 - Utilities issue RFPs for DER services
 - Contract is a **“regulatory asset”** that earns a rate of return
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Questions?

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