



# NARUC

*Serving the consumer interest  
by seeking to improve the  
quality and effectiveness  
of public utility regulation  
in America.*

## *Impacts of Distributed Generation*

Susan K. Ackerman

Chair, Oregon Public Utility Commission

Second Vice President, NARUC

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# Opportunities in Distributed Generation

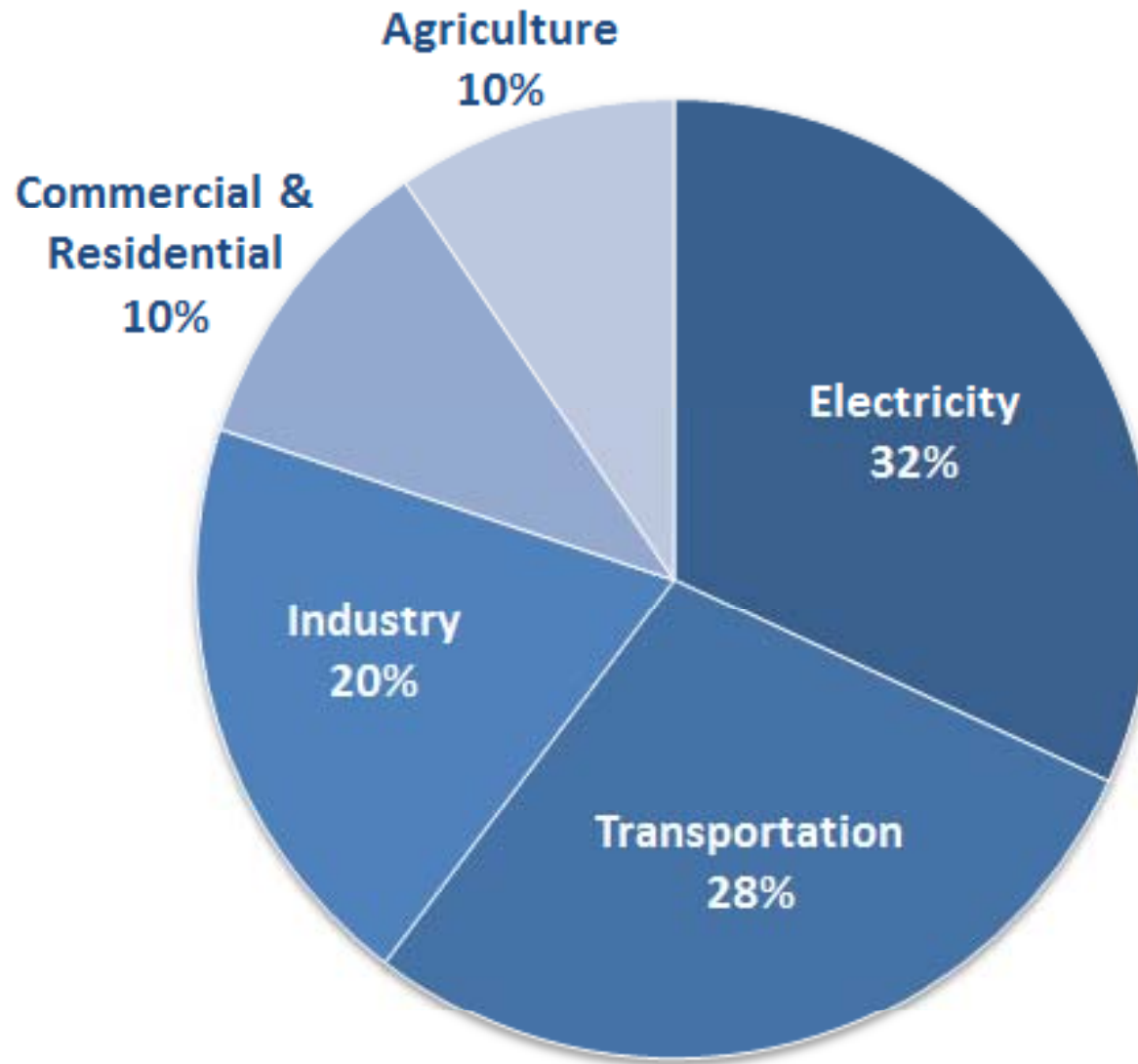
## ➤ Distributed Generation (DG) includes small-scale, on-site power sources

- Solar Photovoltaics (Solar PVs)
- Demand Response
- Micro-Turbines
- Storage
- Fuel Cells
- Combined Heat and Power (CHP)

## ➤ Primarily Solar Photovoltaics (Solar PVs):

- Popular with customers and policy makers
- Incentivized through net metering, utility subsidies, feed in tariffs, business & residential tax credits

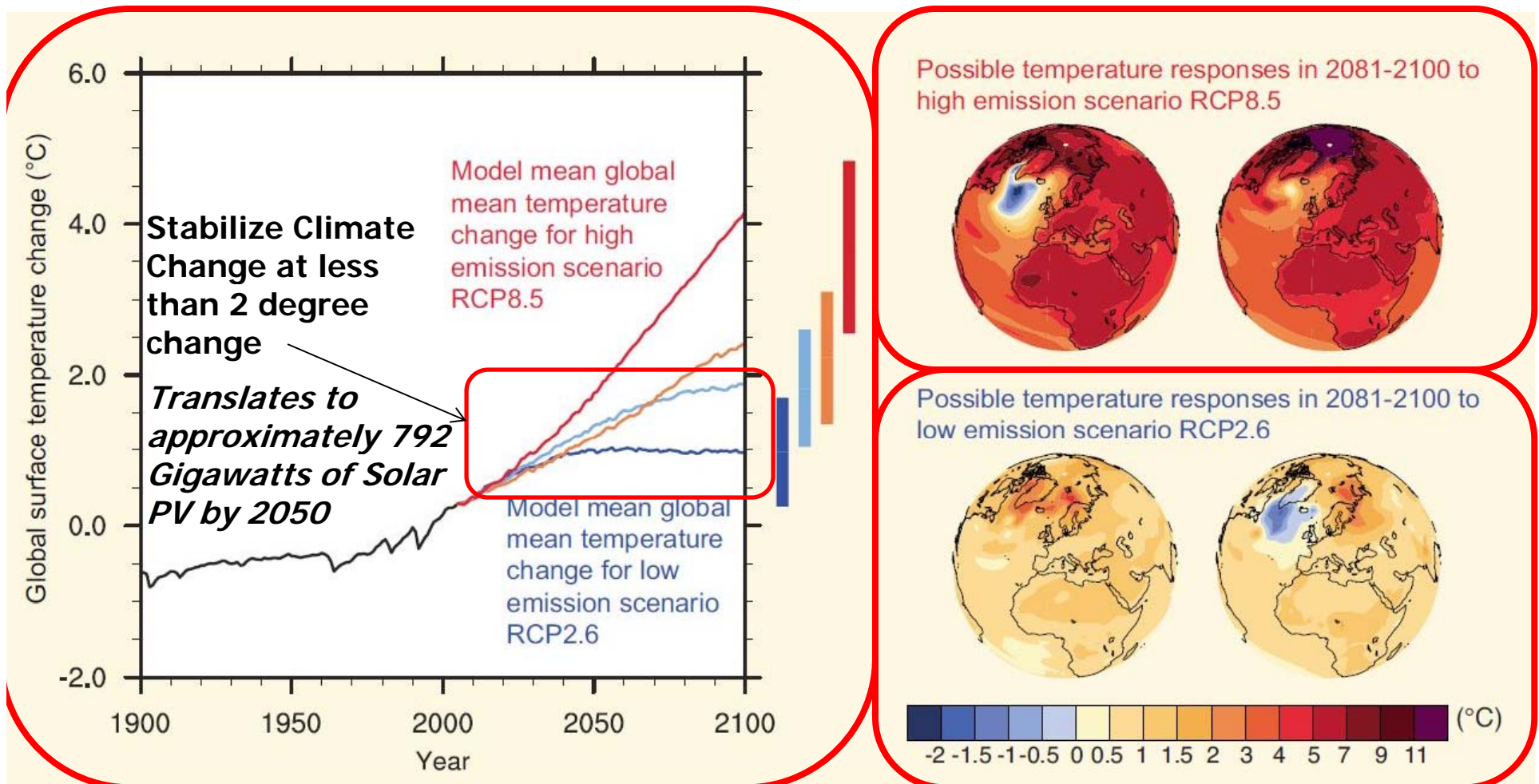
# Greenhouse Gas Sources in the US



Source: Environmental Protection Agency, *available at*:  
<http://www.epa.gov/climatechange/Downloads/ghgemissions/US-GHG-Inventory-2013-Chapter-3-Energy.pdf>

# Climate Change

## High and Low Emissions Scenarios





# Realizing the Opportunities

- Strong societal value in decarbonizing the power system – Solar PV could help
- But first:
  - Must fully explore the challenges and barriers
  - Work together find solutions



# Challenges in Distributed Generation

- Intermittency - safety & reliability
  - Fairness & equity - cost shifts to non-participants
    - ❖ Affordable Power Supply
  - Shared cost recovery
  - Utility investor
- inextricably linked***



***What are the options for addressing these challenges?***

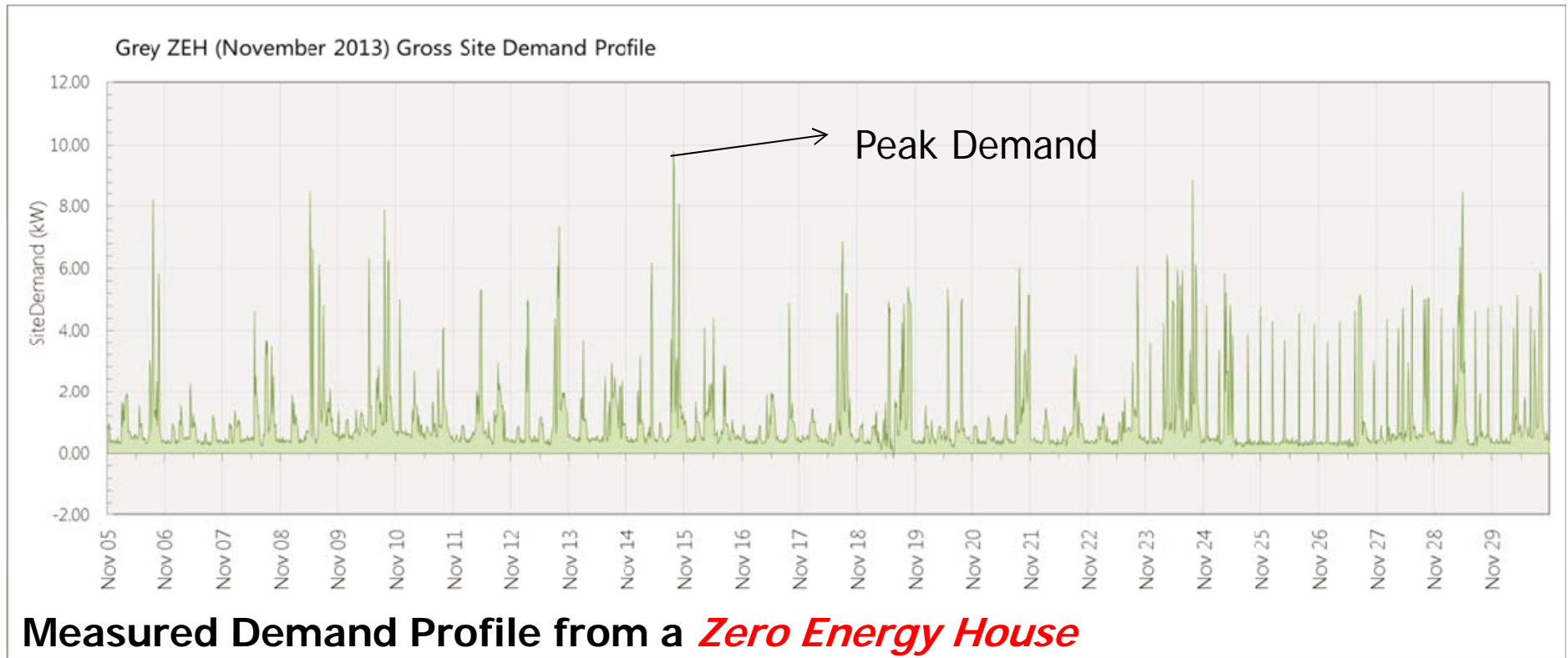


# Challenges: Safety & Reliability Intermittent Resources

- How much intermittent resource can the grid absorb without violating safety or reliability metrics?
  - Significant disruptions if Solar PV approaches 20% of total energy on local grid
  - Need feeder-by-feeder power system impact study to assess costs & benefits
- Analysis → impact of Solar PV on distribution system
  - Overvoltage and voltage variations
  - Solar PV masks demand on system: net zero *energy* is **not** net zero *demand*
  - Impact on equipment operation – feeder regulators, load tap changes, switched capacitor banks
  - System protection - relay desensitization, unintentional islanding
  - Each feeder has unique hosting capacity and at increasing penetration levels, violations can happen (voltage, protection, power quality, thermal)



# Demand versus Energy

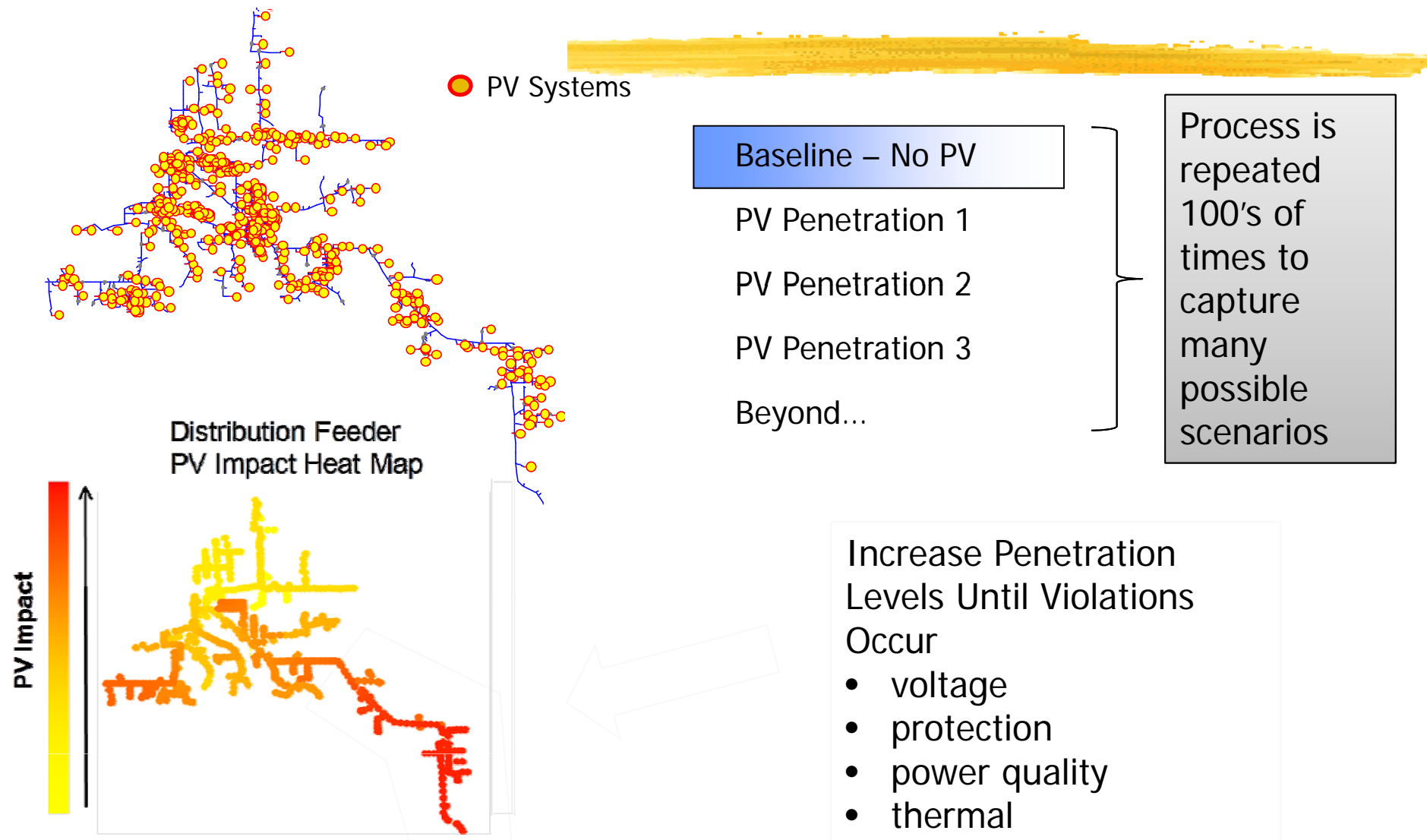


**Energy Rich but Capacity/Demand Poor**



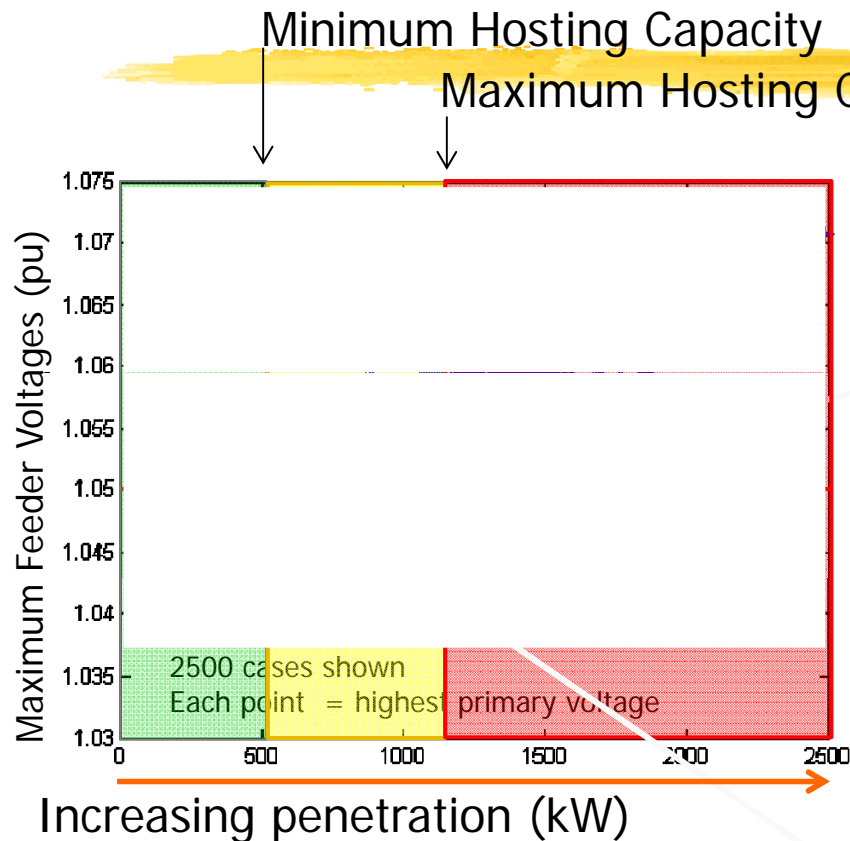
# Assessing Distribution System Impact

## Feeder Hosting Capacity: A Brief Primer



# Hosting Capacity – Sample Results

## Overvoltage Results Shown for Feeder J1



No observable violations regardless of size/location

Possible violations based upon size/location

Observable violations occur regardless of size/location

Total PV:  
1173 kW

Voltage violation

Total PV:  
540 kW



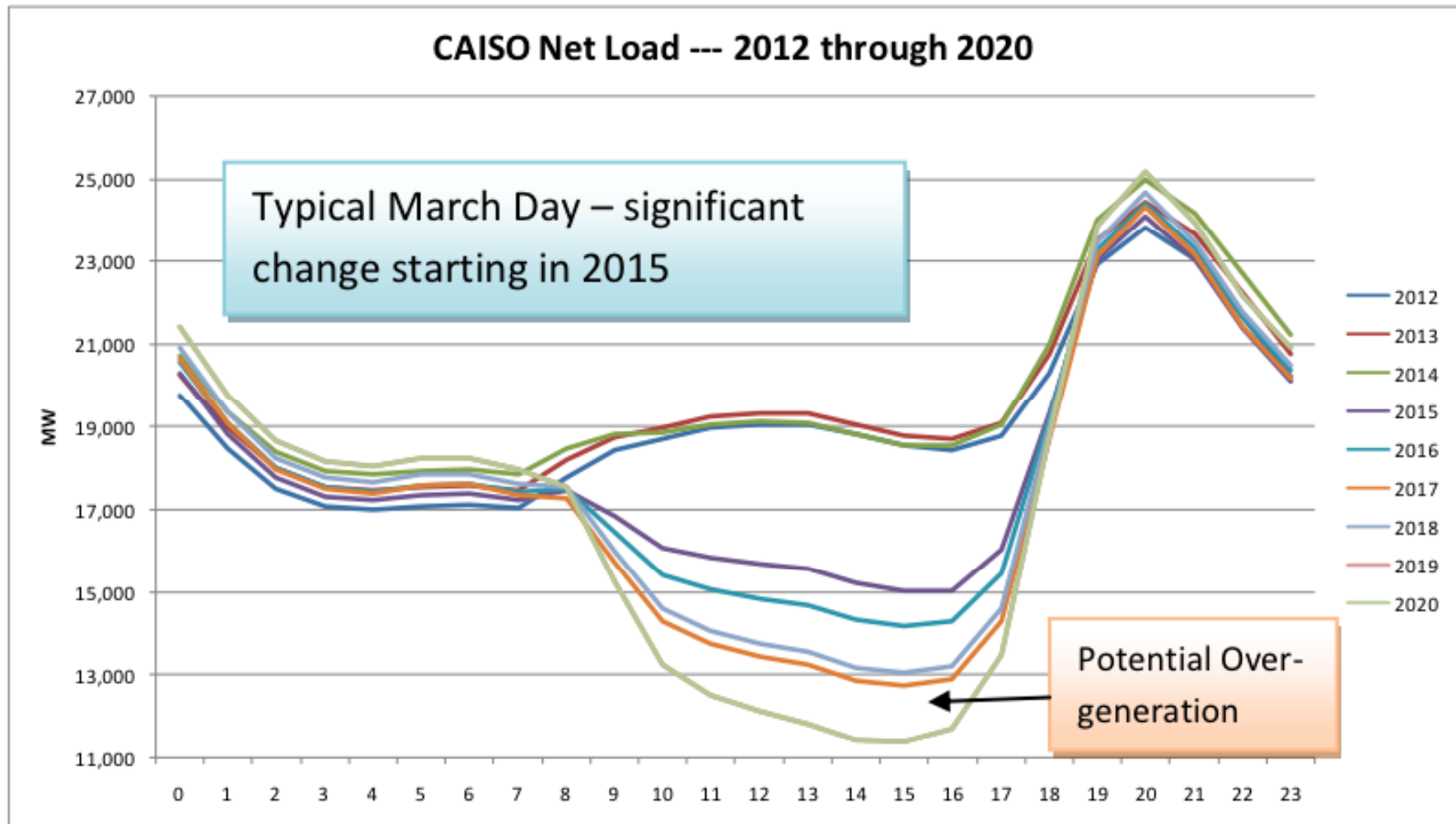
# Challenges: Safety & Reliability Bulk Power Systems Impacts

- **Resource adequacy** – ramp rate, over generation, cycling
- **System stability** – frequency, voltage
- **Transmission flow** – constraints, protection and coordination
- **Need grid support:**
  - Smart inverters, with 2-way communication, will be necessary at higher penetration levels
  - Germany is now retrofitting more than 300,000 Solar PVs with smart inverters
  - California is beginning a smart inverters rulemaking process



# Challenges: Safety & Reliability

## California "duck" chart Example





# Challenges: Fairness & Equity Net Metering & Cost Shifts

- Net metering policies vary by jurisdiction, but *generally* –
  - Rooftop Solar PV customers credited for any electricity sold via power grid
  - Electric companies must buy electricity at full retail rate- includes fixed costs
- Net metering credits generally allow Solar PV customers to avoid paying fixed costs – and those costs are shifted to non-participating customers through higher utility bills
- In the U.S., Solar PV participants tend to have wealth
  - Even with subsidies, less well off don't have capital or credit ratings to participate
- California cost shift to non-participants estimated to be between \$370 million and \$1 billion by 2020\*
- Cost shifting & net metering may result in overall increases in costs, making power less affordable

*Should policymakers should re-examine Solar PV incentives?*

\* California Public Utilities Commission Energy Division, *California Net Metering (NEM) Draft Cost-Effectiveness Evaluation*, p. 7, Table 2 – Net Cost of all NEM generation in 2020, September 26, 2013.



## Challenges: Shared Cost DG Needs the Grid

- DG needs the grid to thrive
  - A “grid-less” future not likely
  - Remember the example of “net zero home” – still places demand on the system
- Net metering and FIT rules are unlikely to require Solar PV hosts to pay equivalently for fixed costs
- Most rate designs do not require Solar PV hosts to pay for grid costs like non-participants



## Challenges: Shared Cost “Death Spiral”

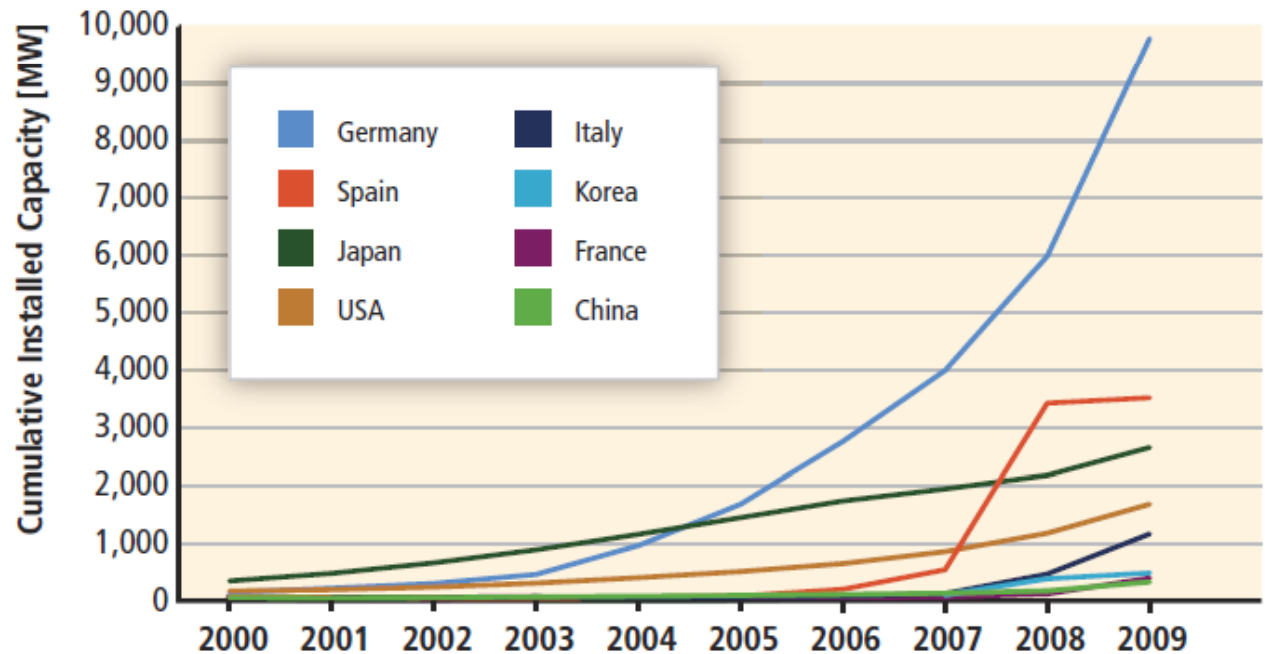
- Closely related issue: utility’s ability to recover existing system costs
- Is there a “death spiral”?
  - Some customers eventually may be able to fully disconnect from grid, like cell phone users have disconnected from landlines
- CREPC study: not a serious revenue threat until 10% of generation is Solar PV
- These developments beg a question of timing & location – it will develop differently depending on the jurisdiction’s current system and drivers





# Potential Solutions Options for Regulators

- Solar PV Penetration differs by jurisdiction-
- Germany: 20%
  - US: 1% now, but ramping up
  - California: nearing 5% limit for net metering



Source: International Panel on Climate Change, *Chapter 3: Direct Solar Energy*, pg. 361, Fig. 3-9 installed PV capacity in eight markets. In: *IPCC Special Report on Renewable Energy Sources and Climate Change Mitigation*.

## **Where possible, we must address:**

- ☐ Safety & reliability
- ☐ Fairness & equity
- ☐ Shared costs/Impact on the utility



# Potential Solutions Safety & Reliability

- Examine interconnection standards & refresh
- Ability to require smart inverters with 2-way communication
  - Smart inverters enable grid supportive Solar PV and permit more Solar PV
- Let utility “throttle” amount of Solar PV on feeders
  - Distribution planning
  - Ability to say “no” (or, “not on this feeder but on this other feeder”)



# Potential Solutions Fairness & Equity

## ➤ Fairness & equity

- Addressing shared cost recovery may also address fairness & equity issues
- Third party leasing may bring in more participants that are not as wealthy
- Lawmakers incentivize Solar PV- lawmakers could authorize bill payment assistance
- Can be a difficult and frustrating issue in US



# Potential Solutions Shared Costs

- Contributor to “fairness & equity” challenge
- Even net-zero buildings use the grid and the utility’s central station generation
  - Exception: generation with batteries/storage and complete disconnection from the grid
- Predominantly a rate design issue
  - “Price per kWh sold” rate designs shift shared fixed costs to others (non-participants)



# Potential Solutions: Shared Costs Alternatives to per kWh sold pricing

## Three Example Alternatives:

### ➤ **Straight fixed-variable rate design**

- Imposes a fixed charge to customers, designed to recover all of a utility's fixed costs

### ➤ **Customer demand charge**

- May include fixed charges and a volumetric rate for each kilowatt-hour of consumption, but may also include a variable charge based on the individual customer's peak demand
- May accurately allocate non-energy costs of serving customers because utility must design its system and plan for the ability to meet customers' peak needs

### ➤ **Performance Based Ratemaking**

- Utility's revenues adjusted based on performance and incentives set for utilities to meet or exceed benchmarks determined for certain operations
- If a benchmark is not met, the utility must absorb the extra costs.
- If benchmark met or slightly better, utility keeps the profits and shares them with shareholders;
- If benchmark exceeded by determined margins, money is returned to customers



# Utility Business Models

## ➤ New business opportunities for utilities

- ☐ customer demand aggregation
- ☐ utility turnkey operations
- ☐ utility-led community solar projects
- ☐ partnership and investment in third-party leasing
- ☐ value-added consulting services
- ☐ as a virtual power plant operator

## ➤ Key considerations for regulators:

- ☐ regulatory changes necessary to enable new business models
- ☐ potential implications on competition, reliability, and market access
- ☐ Challenges to fundamental regulatory concepts like nondiscrimination



# Conclusions

- Opportunities in DG and Solar PV deployment
- Consumer & policy interest likely to continue due to climate change
- Increased Solar PV penetration heightens challenges related to (1) safety & reliability, (2) fairness & equity, and (3) shared costs/utility impact
- Challenges differ by jurisdiction – For example, compare Germany, California, and Oregon
- Potential solutions to shared cost/utility impact issues may increase average rates for all customers
- Fairness & equity issue, through impacts of Solar PV on non-participants, is an intractable issue
- Impact on stakeholder return – can be addressed through rate design





# Questions?

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