



**Department of
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Three Empire State Plaza, Albany, NY 12223-1350
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October 14, 2016

Chris Kelly
SVP of Electric Process and Engineering (Acting)
National Grid
40 Sylvan Road
Waltham MA 02451

Dear Mr. Kelly:

Solar City filed a complaint with Department of Public Service Staff (Staff) on August 9, 2016, asserting that National Grid's analysis of the Town of Moreau's 288 kW solar project application was flawed. In particular, Solar City challenged National Grid's determination that substation backfeeding protection would be required for the project to interconnect.

Staff, with the assistance of Pterra Consulting (Pterra), has reviewed the original and revised Coordinated Electric System Interconnection Reviews (CESIRs) performed for this project (dated 1/8/2016 and 9/29/16, respectively) in which National Grid determined that both additional anti-islanding (DTT) and substation backfeeding protection (3V0) were necessary for the Moreau project.¹

Pterra disagrees with National Grid's conclusions on the need for these system upgrades. Pterra's review found that: (1) there is no need for 3V0 protection, and (2) the need for additional anti-islanding protection could be eliminated if this project and another solar installation on this same circuit used the same type of inverter. Pterra's reports, which are attached to this letter, provide the basis and rationale for Pterra's findings.

Staff concurs with Pterra's analysis and conclusions. Accordingly, Staff recommends that National Grid remove the 3V0 requirement from the project, and consider removing the anti-

¹ Solar City also asserted that National Grid used inconsistent data in performing its studies of the project and failed to respond in a timely and substantive way to Solar City's questions and concerns about the analysis. Staff is continuing to review these issues and will address them separately.

islanding protection if the Moreau project adopts the same inverter type as is being used for the existing solar plant on the same circuit.

Please respond within five business days and indicate National Grid's position with respect to Pterra's analysis and Staff's recommendation. National Grid's response should also indicate the company's plan of action. If you have any questions, I can be reached at (518) 486-2498. Thank you for your anticipated cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Worden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Worden
Deputy Director - Electric