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November 27, 2018

Elijah Abinah
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

**RE: In the Matter of the Proposed Rulemaking on Interconnection of Distributed Generation Facilities
(Docket No. RE-00000A-07-0609)**

Dear Mr. Abinah,

I am writing to lend support for ongoing efforts by Arizona Corporation Commission (“Commission”) Staff and stakeholders to make changes to the language related to Maximum Capacity in the draft interconnection standards filed on April 18, 2018 in Docket No. RE-00000A-07-0609.

The Energy Storage Association (“ESA”) is the national trade association dedicated to energy storage, working toward a more resilient, efficient, sustainable and affordable electricity grid – as is uniquely enabled by energy storage. With more than 160 members, ESA represents a diverse group of companies, including independent power producers, electric utilities, energy service companies, financiers, insurers, law firms, installers, manufacturers, component suppliers and integrators involved in deploying energy storage systems around the globe.

ESA has followed and engaged in this docket over the past few years. As we have noted in previous comments, ESA commends the Commission and Staff for engaging a wide range of stakeholders in its review and update to the State of Arizona’s distribution interconnection standards. ESA was pleased to see in the latest draft regulations incorporation of many of the proposals that the energy storage community has advocated for. In January 2018, ESA published a white paper titled *Updating Distribution Interconnection Procedures to Incorporate Energy Storage* that outlines a number of these recommendations.

While ESA was encouraged by the new Maximum Capacity definition in the draft regulations, we believe additional clarity is needed to ensure that the new revised rules facilitate an accurate and fair assessment of energy storage systems, particularly AC-coupled systems that include both a solar photovoltaic and energy storage device. Specifically, ESA believes the Maximum Capacity definition should be assumed to apply to all customers, rather than applying only in instances where the utility and customer reach agreement to do so. The exceptions should be the cases where it is determined that the Maximum Capacity definition should not be used to study the impact of the system. This is in line with what several states and utilities have incorporated into their interconnection rules, most recently

Nevada's Rule 15, New York's Standard Interconnection Requirements (SIR), and interconnection guidance for storage by Xcel Energy in Colorado.

ESA appreciates the opportunity to provide these comments in support of Staff's ongoing efforts to refine the proposed changes to the distribution interconnection rules. These new interconnection standards, if adopted with an enhanced definition of nameplate capacity, would place Arizona among the leading states in facilitating the deployment of customer-sited energy storage to advance a more resilient, efficient, sustainable and affordable electric grid.

Respectfully,

A handwritten signature in black ink, appearing to read 'Nitzan Goldberger', with a large, sweeping flourish extending to the right.

Nitzan Goldberger
State Policy Director
Energy Storage Association