

City of St. George



Energy Services Department

NET METERING POLICY #10.95

October 2005

Updated July 1, 2011

SUBJECT: Net Metering and Interconnection Policy for Renewable Energy Systems

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POLICY NO.: 10.95

APPROVED BY: City Council

EFFECTIVE DATE: October 2005

METHOD OF APPROVAL: Recommend to the City Council by the Water and Energy Services Board

Scope

This policy sets forth requirements for the interconnection of customer electric generating facilities, including those that generate renewable energy, within the City of St. George electric distribution systems,

Definitions

The following words and terms, when used in this policy shall have the following meanings, unless the context clearly indicates otherwise.

"Avoided cost of wholesale power" means the average locational marginal price of energy in the utility's transmission zone.

"Renewable energy" means a system that generates wind or solar power which is installed on or by the City of St. George Energy Services Department.

"Customer" means a City of St. George customer that generates electricity, on the customer's side of the meter and receives an electric utility bill from the City of St. George.

"Customer-generating facility" means the equipment used by a customer-generator to generate, manage, and monitor electricity. A Customer-Generating Facility typically includes an electric generator and/or an equipment package, as defined herein.

"Electric distribution system" means that portion of an electric system which delivers electricity from transformation points on the transmission system to points of connection at a customer's premises. An electric distribution system generally carries less than 69 kilovolts of electricity.

"Electric power supplier" means the City of St. George Energy Services Department.

"Equipment package" means a group of components connecting an electric generator with an electric distribution system, and includes all interface equipment including switchgear, inverters, or other interface devices. An equipment package may include an integrated generator or electric source.

“Fault current” means electrical current that flows through a circuit and is produced by an electrical fault, such as to ground, double -phase to ground, three-phase to ground, phase-to-phase, and three-phase. A fault current is several times larger in magnitude than the current that normally flows through a circuit.

“Good utility practice” means a practice, method, action or policy that is engaged in and/or accepted by a significant portion of the electric industry in a region in which a reasonable utility official would expect, in the light of the facts reasonably discernable at the time, to accomplish the desired result reliably, safely and expeditiously.

“IEEE standards” means the standards published by the Institute of Electrical and Electronic Engineers, available at www.ieee.org.

“Interconnection agreement” means an agreement between a customer-generator and the City which governs the connection of the Customer-Generating Facility to the electric distribution system, as well as the ongoing operation of the Customer-Generating Facility after it is connected to the system. An interconnection agreement will follow the standard form agreement developed by the St. George Energy Services Department (SGESD) and posted on the City’s web site, www.sgcity.org.

“kW” means kilowatts, a unit of power representing 1,000 watts. A kW equals 1/1000 of a MW, as defined herein.

"Net metering" means a system of metering electricity in which the City:

1. Credits a customer-generator at the full retail rate for each kilowatt-hour produced by a class I renewable energy system installed on the customer generator’s side of the electric revenue meter, up to the total amount of electricity used by that customer during an annualized period;
2. Compensates the customer-generator at the end of the annual billing period for any remaining credits, at a rate equal to the supplier/provider's avoided cost of wholesale power.

“MW” means megawatts, a unit of power representing 1,000,000 watts. A megawatt equals 1000 kW.

“Point of common coupling” has the same meaning as assigned to this term in IEEE Standard 1547 Section 3.0 (published July 2003), as amended and supplemented, which is incorporated herein by reference. IEEE standard 1547 can be obtained through the IEEE website at www.ieee.org. As of {effective date of this rule}, IEEE Standard 1547 Section 3.0 defined this term as "the point in

the interconnection of a Customer-Generating Facility with an electric distribution system at which the harmonic limits are applied."

"Renewable Energy Credit" (REC) is the renewable attributes associated with the system.

"Solar electric generation" has the meaning of a photovoltaic system installed at the customer-generator site and approved by the Energy Services Department.

"Spot network" has the same meaning as assigned to the term under IEEE Standard 1547 Section 4.1.4, (published July 2003), as amended and supplemented, which is incorporated herein by reference. IEEE standard 1547 can be obtained through the IEEE website at www.ieee.org. As of {effective date of this rule}, IEEE Standard 1547 defined "spot network" as "a type of electric distribution system that uses two or more inter-tied transformers to supply an electrical network circuit." A spot network is generally used to supply power to a single customer or a small group of customers.

1. NET METERING GENERAL PROVISIONS

(a) The City will offer net metering to their customers that generate electricity, on the customer's side of the meter, using renewable energy sources, provided that the generating capacity of the customer-generating facility does not exceed ten megawatts or exceed the customer's peak electric needs or exceed the capacity of the distribution circuits (see the section titled **Level 1**)

(b) The City will develop a tariff providing for net metering. The City will make net metering available to eligible customers on a first come, first-served basis.

(c) If, in a given monthly billing period, a customer supplies more electricity to the electric distribution system than the City delivers to the Customer, the City will credit the customer for the excess. To do this, the City will reduce the customer's bill for the next monthly billing period to compensate for the excess electricity in the previous billing period. If a kWh credit is generated for twelve (12) consecutive months, SGESD will buy that amount of kWh at its avoided cost of power.

(d) The City will submit an annual net metering report to the Water and Energy Services Board. The report will be submitted by June 30th of each year, and will include the following information for the one-year period ending May 31st of that year:

- 1 The total number of customer-generator facilities;
- 2 The total estimated rated generating capacity of its net metering customer generators;

- 3 The total estimated net kilowatt-hours received from customer-generators; and
- 4 The total estimated amount of energy produced by the customer-generators, which shall be calculated using protocols approved by the Board.

(e) Photovoltaic systems must meet the following warranty requirements:

- Panels – 20 years
- Inverters – 5 years
- Installation (labor) – 1 year
- New Equipment

(f) A Utah licensed electrical contractor (S200, S201 or S202) or equivalent must install the photovoltaic systems.

(g) The Building Department should be contacted regarding installations to assure required permits are obtained.

2. REBATES AND RENEWABLE ENERGY CREDITS

A maximum rebate of \$2,000 per installed kW may be available to a customer installing a solar (PV) system. Funding levels and capacity requirements will be considered when determining the availability of rebates. The actual rebate will be based on estimated system efficiency as determined by the St. George Energy Services Department (SGESD). The Customer's acceptance of the incentive assigns the rebated portion of Renewable Energy Credits (REC) derived from operation of the PV system to the SGESD. The portion of total RECs transferred to SGESD shall be in the same proportion as the total incentive payment.

3. METERS AND METERING

(a) A Customer-generating facility used for net metering shall be equipped with metering equipment that can measure the flow of electricity in both directions at the same rate. This is typically accomplished through use of a single bi-directional meter. Meter equipment shall be approved by the City.

(b) The city will require a production meter to be installed for each generating facility. The production meter will be placed to meter total kWh production from the PV system.

4. GENERAL INTERCONNECTION PROVISIONS

(a) The City will provide the following three review procedures for applications for interconnection of customer-generating facilities:

Level 1 – The City will use this review procedure for all applications to connect inverter-based customer-generating facilities, which has a power rating of 10 kW or less.

Level 2 – The City will use this review procedure for applications to connect customer-generating facilities with a power rating of 2 MW and greater than 10 kW.

Level 3 – The City will use this review procedure for applications to connect customer-generator facilities with a power rating of greater than 2 MW, which do not qualify for either the level 1 or level 2 interconnection review procedures.

(b) The City will designate an employee or office from which a customer can obtain basic application forms and information through an informal process. On request, this employee or office will provide all relevant forms, documents, and technical requirements for submittal of a complete application for interconnection review under this section, as well as specific information necessary to contact the City representatives assigned to review the application.

(c) Upon request, the City will meet with a customer who qualifies for level 2 or level 3 interconnection review, to assist them in preparing the application.

(d) An application for interconnection review shall be submitted on a standard form, available from the City and posted on the City's website at www.sgcity.org. The application form will require the following types of information:

- 1 Basic information regarding the customer.
- 2 Information regarding the type and specifications of the Customer-Generating Facility.
- 3 Information regarding the contractor who will install the Customer-Generating Facility
- 4 Certifications and agreements regarding utility access to the customer generator's property, emergency procedures, liability, compliance with electrical codes, proper operation and maintenance, receipt of basic information.
- 5 Other similar information that is necessary to determine compliance with this policy.

(e) The City will not be responsible for the cost of determining the rating of equipment owned by a customer-generating facility, or of equipment owned by other local customers.

(f) The provisions of this policy that apply to interconnection are primarily intended for customer-generator facilities that are eligible for net metering; that is, renewable generation facilities with a capacity no greater than two megawatts, which generate electricity for retail transactions. However, these provisions may be used for review of other interconnections at the discretion of the City.

(g) If the interconnection of a customer-generating facility is subject to interconnection requirements of FERC or WECC, the provisions of this policy that apply to interconnection apply to that facility only to the extent that they do not conflict with the interconnection requirements of FERC or WECC.

(h) If a customer applying for interconnection disagrees with the City's determination of fact or need regarding matters covered in this policy, or if any person has a complaint regarding matters covered herein, the customer or other person may file an informal complaint with the Water and Energy Services Board.

5. CERTIFICATION OF CUSTOMER-GENERATOR FACILITIES

(a) In order to qualify for the level 1 and the level 2 interconnection review procedures, a customer-generating facility must be certified as complying with the following standards, as applicable:

- 1 IEEE 1547, Standard for Interconnecting Distributed Resources with Electric Power Systems, as amended and supplemented, which is incorporated by reference herein. IEEE standard 1547 can be obtained through the IEEE website at www.ieee.org; and
- 2 UL 1741, Inverters, Converters, and Controllers for Use in Independent Power Systems (January 2001), as amended and supplemented, which is incorporated by reference herein. UL standards can be obtained through the Underwriters Laboratories website at www.ul.com.

(b) An equipment package shall be considered certified for interconnected operation if it has been submitted by a manufacturer to a nationally recognized testing and certification laboratory, and has been tested and listed by the laboratory for continuous interactive operation with an electric distribution system in compliance with the applicable codes and standards listed in (a) above.

(c) If the equipment package has been tested and listed in accordance with this section as an integrated package, which includes a generator or other electric source, the equipment package shall be deemed certified, and the City generally will not require further design review, testing or additional equipment.

(d) If the equipment package includes only the interface components (switchgear, inverters, or other interface devices), an interconnection customer must show that the generator or other electric source being utilized with the equipment package is compatible with the equipment package and consistent with the testing and listing specified for the package. If the generator or electric source being utilized with the equipment package is consistent with the testing and listing performed by the nationally recognized testing and certification laboratory, the equipment package will be deemed certified, and the City generally will not require further design review, testing or additional equipment.

6. LEVEL 1 INTERCONNECTION REVIEW

(a) The City will adopt a level 1 interconnection review procedure. The City will use the level 1 review procedure only for an application to interconnect a customer generating facility that meets all of the following criteria:

1. The facility is inverter-based;
2. The facility has a capacity of 10 kW or less; and
3. The facility has been certified by the City.

(b) For a Customer-Generating Facility described at (a) above, the City will approve interconnection under the level 1 interconnection review procedure if all of the applicable requirements at (c) through (g) below are met. The City will not impose additional requirements not specifically authorized under this section.

(c) The aggregate generation capacity on the distribution circuit to which the Customer Generating Facility will interconnect, including the capacity of the Customer-generating Facility, shall not contribute more than 10% to the distribution circuit's maximum fault current at the point on the high voltage (primary) level that is nearest the proposed point of common coupling as determined by the City.

(d) A Customer-Generating Facility's point of common coupling shall not be on a transmission line or a spot network.

(e) If a Customer-Generating Facility is to be connected to a radial distribution circuit, the aggregate generation capacity connected to the circuit, including that of the Customer-Generating Facility, shall not exceed 10% (15% for solar electric generation) of the circuit's total annual peak load, as most recently measured at the substation.

(f) If a Customer-Generating Facility is to be connected to a single-phase shared secondary, the aggregate generation capacity connected to the shared secondary, including the Customer-Generating Facility, shall not exceed 20 kilovolt-amperes (kVA).

(g) If a single-phase Customer-Generating Facility is to be connected to a transformer center tap neutral of a 240 volt service, the addition of the Customer-Generating Facility shall not create an imbalance between the two sides of the 240 volt service of more than 20% of nameplate rating of the service transformer.

(h) A Customer shall submit an application for level 1 interconnection review on a standard form, available from the City and posted on the City's website at www.sgcity.org. A customer may choose to simultaneously submit the City's standard form Net Metering Agreement executed by the Customer.

(i) Within five business days after receiving an application for level 1 interconnection review, the City will provide written or e-mail notice to the customer that it received the application and whether the application is complete. If the application is incomplete, the written notice will include a list of all of the information needed to complete the application.

(j) Within ten business days after the City notifies the customer that the application is complete under (i) above, the City will notify the customer that:

- 1 The Customer-Generating Facility meets all of the criteria of (c) through (g) above that apply to the facility, and the interconnection will be finally approved upon completion of the process set forth at (k) through (o) below; or
- 2 The Customer-Generating Facility has failed to meet one or more of the applicable criteria of (c) through (g) above, and the interconnection application is denied.
- 3 If a Customer-Generating Facility meets all of the applicable criteria at (c) through (g) above, the City will (c) through (g) above notify the customer that a City inspection of the Customer-Generating Facility for compliance with this policy is required prior to starting operation of the facility; and Execute and send to the customer a level 1 Net Metering Agreement.

(k) A customer that receives a Net Metering Agreement under (j) above shall execute the agreement and return it to the City at least five business days prior to starting operation of the Customer-Generating Facility. The customer shall indicate the anticipated start date for operation of the Customer-Generating Facility. The Customer shall not begin operating the facility until completion of the City's building inspection and utility verification.

(l) Upon receipt of the executed Net Metering Agreement from the Customer and satisfactory completion of an inspection and verification, the City will approve the interconnection, conditioned on approval by the electrical code officials with jurisdiction over the interconnection.

(m) If an application for level 1 interconnection review is denied because it does not meet one or more of the applicable requirements in this section, a Customer may resubmit the application under the level 2 or level 3 interconnection review procedure, as appropriate.

7. LEVEL 2 INTERCONNECTION REVIEW

(a) The City will adopt a level 2 interconnection review procedure. The City will use the level 2 interconnection review procedure for an application to interconnect a Customer-Generating Facility that meets both of the following criteria:

1. The facility has a capacity of 2 megawatts or less; and greater than 10 kW
2. The facility has been certified by the City

(b) For a Customer-Generating Facility described at (a) above, the City will approve interconnection under the level 2 interconnection review procedure if all of the applicable requirements at (c) through (l) below are met.

(c) The aggregate generation capacity on the distribution circuit to which the Customer-Generating Facility will interconnect, including the capacity of the Customer-Generating Facility, will not cause any distribution protective equipment (including but not limited to substation breakers, fuse cutouts, and line reclosers), or customer equipment on the electric distribution system, to exceed 90 percent of the short circuit interrupting capability of the equipment. In addition, a Customer-Generating Facility will not be connected to a circuit that already exceeds 90% of the short circuit interrupting capability, prior to interconnection of the facility.

(d) If there are posted transient stability limits to generating units located in the general electrical vicinity of the proposed point of common coupling (e.g., within 3 or 4 transmission voltage level busses), the aggregate generation capacity (including the Customer-Generating Facility) connected to the distribution low voltage side of the substation transformer feeding the distribution circuit containing the point of common coupling shall not exceed 10 kW.

(e) The aggregate generation capacity connected to the distribution circuit, including the Customer-Generating Facility, shall not contribute more than 10% to the distribution circuit's maximum fault current at the point on the high voltage (primary) level nearest the proposed point of common coupling.

(f) If a Customer-Generating Facility is to be connected to three-phase, four wire primary City distribution lines, a three-phase or single phase generator shall be connected line to-neutral and shall be effectively grounded.

(g) If a Customer-Generating Facility is to be connected to a single-phase shared secondary, the aggregate generation capacity on the shared secondary, including the Customer-Generating Facility, shall not exceed 20 kilovolt-amperes (kVA).

(h) If a Customer-Generating Facility is single-phase and is to be connected to a transformer center tap neutral of a 240 volt service, the addition of the Customer-Generating Facility shall not create an imbalance between the two sides of the 240 volt service, which is greater than 20% of the nameplate rating of the service transformer.

(i) A Customer-Generating Facility's point of common coupling shall not be on a transmission line.

(k) A Customer shall submit an application for level 2 interconnection review on a standard form, available from the City and posted on the City's website at www.sgcity.org. A Customer may choose to simultaneously submit the City's standard form Net Metering Agreement executed by the customer.

(l) Within five business days after receiving an application for level 2 interconnection review, the City will provide written or e-mail notice to the customer that it received the application and whether the application is complete. If the application is incomplete, the written notice will include a list of all of the information needed to complete the application.

(m) Within twenty business days after the City notifies the Customer that the application is complete under (l) above, the City will perform an initial review of the proposed interconnection to determine whether the interconnection meets the applicable requirements at (c) through (i) above. During this initial review, the City may, at the Customer's expense, conduct any studies or tests it deems necessary to evaluate the proposed interconnection. The initial review will result in one of the following determinations:

- 1 The Customer-Generating Facility meets the applicable requirements in (c) through (i) above. In this case, the City will notify the customer that the interconnection will be finally approved upon completion of the process set forth at (o) through (q) below. Within five business days after this notice, the City will provide the customer with an executable Net Metering agreement;
- 2 The Customer-Generating Facility has failed to meet one or more of the applicable requirements the City will identify the requirements the Customer-Generating Facility failed to meet. The Customer may resubmit the application with changes along with any estimated costs for additional reviews.

(o) A Customer that receives an interconnection agreement under (m) (1) or (2) above shall:

- 1 Execute the agreement and return it to the City at least ten business days prior to starting operation of the Customer-Generating Facility; and
- 2 Indicate to the City the anticipated start date for operation of the Customer-Generator Facility.

(p) The City will require a City building inspection and utility verification of a Customer-Generating Facility for compliance with this policy prior to operation, and may require and arrange for witness of commissioning tests as set forth in IEEE standard 1547 (Latest revision), as amended and supplemented, which is incorporated by reference herein. The City will schedule any inspections or tests

under this section promptly and within a reasonable time after submittal of the application. The customer will not begin operating the Customer-Generating Facility until after the inspection and testing is completed.

(q) For a Customer that receives an interconnection agreement under (m) (1) or (2) above, approval of interconnected operation of the Customer-Generating Facility will be conditioned on all of the following occurring:

- 1 The interconnection has been approved by the electrical code official with jurisdiction over the interconnection;
- 2 Any City verification and/or witnessing of commissioning tests arranged under (p) above are successfully completed; and
- 3 The planned start date provided by the Customer under (o) above has passed(s). If an application for level 2 interconnection review is denied because it does not meet one or more of the requirements in this section, the Customer may resubmit the application under the level 3 interconnection review procedure.

8. LEVEL 3 INTERCONNECTION REVIEW

(a) The City will adopt a level 3 interconnection review procedure. The City will use the level 3 review procedure for an application to interconnect a Customer-Generating Facility that has a capacity greater than 2 MW and less than 10 MW and does not qualify for the level 1 or level 2 interconnection review procedures.

(b) The City will conduct an initial review of the application and will offer the Customer an opportunity to meet with City staff to discuss the application. At the meeting, the City will provide pertinent information to the Customer, such as the available fault current at the proposed interconnection location, the existing peak loading on the lines in the general vicinity of the Customer-Generating Facility, and the configuration of the distribution lines at the proposed point of common coupling.

(c) The City will provide an impact study agreement to the customer, which will include a good faith cost estimate for an impact study to be performed by the City. An impact study is an engineering analysis of the probable impact of a Customer-Generating Facility on the safety and reliability of the City's electric distribution system. An impact study will be conducted in accordance with good utility practice and will:

- 1 Detail the impacts to the electric distribution system that would result if the Customer-Generating Facility were interconnected without modifications to either the Customer-Generating Facility or to the electric distribution system;

- 2 Identify any modifications to the City's electric distribution system that would be necessary to accommodate the proposed interconnection; and
- 3 Focus on power flows and utility protective devices, including control requirements.

(d) If the proposed interconnection may affect electric transmission or delivery systems other than that controlled by the City, operators of these other systems may require additional studies to determine the potential impact of the interconnection on these systems. If such additional studies are required, the City will coordinate the studies but shall not be responsible for their timing. The Customer shall be responsible for the costs of any such additional studies required by another affected system. Such studies shall be conducted only after the Customer has provided written authorization.

(e) After the Customer has executed the impact study agreement and has paid the City the amount of the good faith estimate required under (c) above, the City will conduct the impact study and will notify the customer of the results as follows:

- 1 If the impact study indicates that only insubstantial modifications to the City's electric distribution system are necessary to accommodate the proposed interconnection, the City will send the customer a Net Metering Agreement that details the scope of the necessary modifications and an estimate of their cost; or
- 2 If the impact study indicates that substantial modifications to the City's electric distribution system are necessary to accommodate the proposed interconnection, the City will provide an estimate of the cost of the modifications. In addition, the City will offer to conduct a facilities study at the Customer's expense, which will identify the types and cost of equipment needed to safely interconnect the customer's Customer-Generating Facility. The City has sole discretion on whether to allow or deny the modifications required. All allowed modifications will be made at the Customer's expense.

(f) If a Customer requests a facilities study under (e) (2) above, the City will provide a facilities study agreement. The facilities study agreement will describe the work to be undertaken in the facilities study and will include a good faith estimate of the cost to the Customer for completion of the study. Upon the execution by the customer of the facilities study agreement, the City will conduct a facilities study, which will identify the facilities necessary to safely interconnect the Customer-Generating Facility with the City's electric distribution system, the cost of those facilities, and the time required to build and install those facilities.

(g) Upon completion of a facilities study, the City will provide the Customer with the results of the study and an executable Net Metering Agreement. The agreement will list the conditions and facilities necessary for the Customer-Generating Facility to safely interconnect with the City's electric distribution system, the cost of those facilities, and the estimated time required to build and install those facilities.

(h) If the customer wishes to interconnect, it shall execute the Net Metering Agreement, provide a deposit of not more than 50% of the cost of the facilities identified in the facilities study, complete installation of the Customer-Generating Facility, and agree to pay the City the amount required for the facilities needed to interconnect as identified in the facilities study.

(i) Within twenty business days after notice from the Customer that the Customer-Generating Facility has been installed, the City will inspect the Customer-Generating Facility and will arrange to witness any commissioning tests required under IEEE Standard 1547. The City and the Customer will select a date by mutual agreement for the City to witness commissioning tests.

(j) Provided that the Customer-Generating Facility passes any required commissioning tests satisfactorily, the City will notify the customer in writing, within five business days after the tests, of one of the following:

- 1 The interconnection is approved and the Customer-Generating Facility may begin operation; or
- 2 The facilities study identified necessary construction that has not been completed, the date upon which the construction will be completed and the date when the Customer-Generating Facility may begin operation.

9. CUSTOMER AND CITY REQUIREMENTS

(a) Once a net metering interconnection has been approved under this policy, the City will not require a Customer to test or perform maintenance on its facility except for the following:

- 1 An annual test in which the Customer-Generating Facility is disconnected from the City's distribution equipment to ensure that the inverter stops delivering power to the grid;
- 2 Any manufacturer-recommended testing or maintenance; and
- 3 Any post-installation testing necessary to ensure compliance with IEEE 1547 or to ensure safety.

(d) When a Customer-Generating Facility approved through a level 2 or level 3 review undergoes maintenance or testing in accordance with the requirements of

this policy, the Customer will retain written records documenting the maintenance and the results of testing. No recordkeeping is required for maintenance or testing performed on a Customer-Generating Facility approved through a level 1 review.

(e) The City shall have the right to inspect a Customer-Generating Facility after interconnection approval is granted, at reasonable hours and with reasonable prior notice to the Customer. If the City discovers that the Customer-Generating Facility is not in compliance with the requirements of this policy, and the noncompliance adversely affects the safety or reliability of the electric distribution system, the City may require the Customer to disconnect the Customer-Generating Facility until compliance is achieved.

(f) The City shall have the right to disconnect the customer generating facility in the event it causes system problems. The Customer will have the option of correcting the problem, at which time the system will be re-inspected before beginning operation again.

(g) The Customer shall be required to install a manual disconnect located within 10 feet of the meter and be readily assessable by utility personal.

Tariff:

If, in a given monthly billing period, a customer supplies more electricity to the electric distribution system than the City delivers to the customer, the City will credit the customer for the excess by reducing the customer's bill for the next monthly billing period.

If in any consecutive twelve (12) month period a customer supplies more electricity to the electric distribution system than the City delivers to the customer, the City will issue a check for the amount of kWh credit at a rate of four cents (\$.04) per kWh.

Fees for studies deemed necessary in this policy will be charged at \$65 per hour in compliance with Energy Services Department billing codes set in Policy 10.87. Some examples of studies that will be conducted at the expense of the customer are:

- ✦ Impact Study Fee as proposed in Level 2 and 3.
- ✦ Studies to evaluate proposed interconnection as discussed in Level 2.

Exhibit A

Sample Drawing
Courtesy Gardner Engineering