



Southern Company

Alabama Power Company
Georgia Power Company
Mississippi Power Company

Operation of Distributed Energy Resources (DER) in Parallel with the Distribution System Policy

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Operation of DERs in Parallel with Distribution System Policy

- 1.0 Introduction.** This Policy sets forth the minimum interconnection requirements and process for connection and safe parallel operation of a Distributed Energy Resource (DER) with Company's Distribution System. A DER Owner may incur costs associated with any corresponding facilities, improvements and upgrades needed for interconnection or the delivery of energy to the load of Company. This Policy identifies certain types of such costs; however, DER Owners should consult the applicable rules, regulations, requirements and rate schedules of the particular Company impacted by interconnection, as additional jurisdiction-specific information may exist that supplements or supplants the provisions set forth in this Policy.
- 2.0 Scope.** This Policy applies to a DER that is designed to operate in parallel with and export electric power to Company's Distribution System for more than 100 milliseconds. It does not apply to end-use Customer-owned emergency or standby generators that use open- or closed-transition schemes that create momentary parallel operation with Company's Distribution System for no more than 100 milliseconds. It also does not apply to generation resources that connect directly to the Company Transmission System, including a distribution substation.
- 3.0 Definitions.** Capitalized terms used in this Policy are defined below. Also, "**including**" means "including, but not limited to,"; "**include(s)**" means "include(s), without limitation,"; "**or**" means "either or both" ("A or B" means "either or both" ("A or B" means "A or B or both A and B"); and "**e.g.**" means "for example, including, without limitation."

Abnormal Operating Condition – A situation in which Company is operating the Distribution System in other than normal configuration, or under conditions that do not normally exist.

Application – See Interconnection Request Application below.

Company – One of the following Southern Company operating subsidiaries: Alabama Power Company, Georgia Power Company, or Mississippi Power Company, which provides interconnection service to a DER.

Customer – An entity that receives electric service from Company.

Distributed Energy Resource (DER) – A source of electric power that is directly connected to Company's Distribution System. DER sources include Energy Storage Systems, fuel cells, solar photovoltaic (PV), biomass, natural gas, wind, etc. DER conversion technology includes inverters, induction generators, and synchronous generators, including reciprocating or turbine-driven generators.

DER Impact Study – A technical analysis to determine whether adverse effects to the operation or reliability of the Distribution system would be created as a result of the DER under study operating in parallel with the system at the proposed POI.

DER Owner – The entity that is the counterparty to Company in the DER Interconnection Agreement.

Distribution System – Company's wires, equipment, and facilities that operate at a nominal operating alternating current (AC) voltage of 34.5 kV or below.

Energy Storage System – A system that captures energy produced at one time, stores that energy for a period of time, and delivers that energy as electricity at a future time.

Interconnection – The physical connection of a DER to Company's Distribution System.

Interconnection Agreement – The contract between Company and DER Owner that stipulates terms and conditions for DER Interconnection and Parallel Operation.

Interconnection Equipment – Company-owned facilities that are required for DER interconnection service.

Interconnection Request Application ("Application") – Formal application for approval to connect a DER to Company's Distribution System and for DER interconnection service, using Company's standard form.

Island – According to IEEE 1547-2018, a condition in which a portion of Company's Distribution System is energized solely by a DER while that portion is electrically separated from the rest of Company's electric system on all phases to which the DER is connected. IEEE defines both intentional and unintentional

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islands. Intentional islands may be desirable in some cases, such as in a microgrid that is planned to operate independently during a weather event or unforeseen outage. An unintentional island is not planned and is considered undesirable because line worker practices, protective equipment, and grid control systems are not designed for those conditions.

Letter of Credit – A standby letter of credit that is: (i) substantially in Company’s standard form; (ii) issued by a U.S. commercial bank or a U.S. branch of a foreign bank with total assets of at least \$10 billion, having a general long-term senior unsecured debt rating of A minus or higher as rated by S&P, or A3 or higher as rated by Moody’s, or A minus or higher as rated by Fitch; and (iii) otherwise acceptable to Company in Company’s sole discretion.

Meter – A device or sensor that measures the amount of electricity consumed or generated by a DER. It may also be used to monitor the voltage, current, or other electrical characteristics of the electricity generated by a DER.

Network Secondary Distribution System – A Distribution System in which the secondary of multiple distribution transformers are connected to a common network for supplying electric power to customers.

Parallel Operation – Operation of a DER connected to Company’s Distribution System.

Parent Guaranty – Guarantee by a parent company of an entity’s performance under its contract with another party, where the entity is a subsidiary of the parent company.

Point of Interconnection (POI) – The point of connection of the DER to Company’s Distribution System.

Power Delivered – Electricity supplied by Company to the DER facility.

Power Received – Electricity supplied by the DER to Company’s Distribution System.

Technical Requirements – Company’s *Technical Requirements for Distribution Interconnection*, attached as Attachment A, as updated and then-current, as well as the technical standards listed in Section 7.0 (*DER Design and Installation*).

Telemetry – Communications equipment used to obtain information from the DER or to control the DER, including a transmitter, antenna, pole for the antenna, telephone, etc.

Term – Time period during which terms and conditions of an Interconnection Agreement are binding.

Witness Testing – Live testing of the DER while operating in parallel with Company’s Distribution System.

- 4.0 Limitations.** Where necessary, Company may limit the capacity and operating characteristics of the DER to avoid the potential of causing service or other reliability issues to other Customers. If Company concludes that an Application describes facilities that may require additional devices and operating schemes, Company will make those additional requirements and costs known to the DER Owner before the Application is approved and before Interconnection is allowed.
- 5.0 Energy Storage.** Energy Storage Systems are controllable and capable of both injecting and withdrawing electricity from the Distribution System, as well as near-instantaneous ramp to full capacity in either charge or discharge mode. The incorporation of Energy Storage Systems onto the Distribution System may require additional study.
- 6.0 Insurance and Security.** Adequate insurance, as deemed by Company, may be required as part of the Interconnection Agreement. DER Owner must use reasonable care not to damage Company’s electrical equipment and must reimburse Company for damage to any Company property resulting from defects in the operation or maintenance of DER Owner’s electrical equipment or resulting from DER Owner’s negligence or that of its employees, contractors, representatives, or agents. DER Owner also must indemnify Company against liability for injury or damage suffered by any third party arising from any such defect or negligence.
- 7.0 DER Design and Installation.** DER Owner is responsible for ensuring that DER design and installation meet technical requirements of Attachment A (Southern Company’s *Technical Requirements for Distribution Interconnection*) and comply with, as applicable, the National Electrical Code (NEC), the National Electrical Safety Code (NESC), Institute of Electrical and Electronic Engineers (IEEE), National Electrical Manufacturers Association (NEMA), American National Standards Institute (ANSI), National Fire

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Protection Association (NFPA), Underwriters Laboratories (UL), Federal Aviation Administration (FAA), Federal Communications Commission (FCC), other national codes, standards, local codes, and any jurisdictional requirements pertaining to electrical facility design, construction, or safety.

Company reserves the right to field verify (or have an independent, qualified third party verify) the DER installed equipment against the equipment specified in the Application. Company's review of the Application, submitted design or equipment documents, or specifications; on-site verification or testing by Company; or Company's observation of tests by others are for the sole benefit of Company and are not an endorsement of the fitness of design, installation, or operation of the DER system or related equipment.

8.0 Interconnection Process. The DER interconnection process begins with formal submission of an Application by DER Owner and ends formally with either Company's express written consent or denial to DER parallel operation or DER Owner's express written withdrawal of the Application. The duration of the interconnection process can vary significantly, depending on several factors, including complexity of studies; timeliness and accuracy of data submission and the engineering design of the DER; and the engineering and construction of any Distribution System upgrade or modification identified during the study process. DER Owner is encouraged to consider a pre-application (per Section 8.1) and must recognize the interconnection process timeline in its project schedule.

8.1 Pre-Application Request. To assist DER Owners with DER sizing and site selection, DER Owners are encouraged to submit a pre-application request to Company, using the pre-application form in Attachment B and including the applicable non-refundable fee, to obtain readily available Company Distribution System data.

8.1.1 Pre-Application Report. If DER Owner elects to submit a pre-application request, Company will provide the following data within 15 business days after Company's receipt of the complete pre-application request:

- Nominal operating primary voltage, conductor rating and number of phases for the line section at the proposed POI; if single phase, distance to nearest three phase line;
- Approximate distance between proposed DER POI and the source substation from which circuit likely to serve the proposed DER originates; and
- Rating of protective devices and type of voltage regulating devices between the proposed POI and the head of circuit likely to serve the proposed DER.

Pre-application data is non-binding. Due to the dynamic nature of Company's Distribution System, Company will not be liable if information in the report changes before DER Owner formally applies for interconnection service. The circuit identified in the pre-application report also may not be the circuit to which the DER may ultimately connect.

8.2 Application. Company will process Interconnection Request Applications on a first-come, first-served basis.

8.2.1 Application Package & Cost. Interconnection studies will be conducted only after all Application forms and related fees are submitted and determined to be complete. To avoid project delay, DER Owner must complete Application forms and submit to the appropriate Company contact, along with all supporting documents and non-refundable processing fee, as applicable. All checks must be made payable to Company. All Application and pre-application fees are non-refundable.

Application Supporting Documents:

- DER site plan showing proposed POI;
- DER one-line electrical diagram;
- DER relay and Metering one-line; and
- Proof of DER site control in the form of a property tax bill, lease agreement, or other legally binding document.

A registered Professional Engineer must stamp all drawings for DER above 100 kW. The relay and Metering one-line must show all interconnection protection functions specified in Attachment A

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(Southern Company's *Technical Requirements for Distribution Interconnection*). DER drawings must show only DER Owner equipment and a note indicating the POI.

8.2.2 Application Processing & Review. Upon receipt of the Application package, Company will acknowledge receipt, review the package for completeness, and determine if additional data is required. Timely response to an additional data request is necessary to avoid delay in Application processing. Failure of DER Owner to timely respond to an additional data request may lead to cancelation of the Application and forfeiture of the non-refundable Application fee.

8.2.3 DER Design Review. After determining the Application package to be complete, Company will review the Application package for compliance with the design requirements stipulated in Attachment A. Company may request a face-to-face meeting to review the one-lines with the DER Design Engineer. After reviewing the Application package, Company will advise DER Owner of any deficiency in meeting Company's Technical Requirements.

8.2.4 DER Site Visit. A site visit is intended for Company and DER Owner to jointly decide POI, proposed route for Company intertie line location, and location of Company's Interconnection Equipment in relation to DER equipment location. Since POI and DER size are material to the system impact studies, DER Owner should not change POI or DER size after the site visit. Any change in these items may result in Company's requirement for DER Owner to submit a revised Application.

8.3 Studies.

8.3.1 DER Impact Study & Cost. After the DER site visit, Company and DER Owner will jointly determine scope of all necessary DER Impact Studies. Studies will include assessment of parallel operation concerns described in Attachment A. For Company Distribution System circuits with normal open ties with other distribution circuits, DER Owner must decide if the adjacent circuit(s) should be included in the scope of DER impact studies. Once scope is agreed to, Company will prepare a DER system impact study proposal, including study cost, and provide to DER Owner for upfront payment prior to beginning the study. The study proposal will state the estimated time for Company to complete the study after receipt of payment and identify the applicable studies.

8.3.1.1 Affected System Study. An Affected System Study is analysis by another entity that may be affected by interconnection of the DER.

8.3.1.2 Protection System Study. Protection System Study is an engineering analysis that determines whether DER Interconnection and Parallel Operation would adversely impact coordination or reliability of Company's existing protection system(s) and scheme(s). It also includes a review of the fault current contribution by the DER and its effects on these protection system(s) and scheme(s).

8.3.1.3 Distribution System Study. Distribution System Study is an engineering analysis that determines whether DER Interconnection and Parallel Operation will adversely impact ability of the interconnecting distribution circuit to continue to provide reliable and adequate service to existing end-use Customers. This study includes a review of the DER contribution to power flow on the interconnecting circuit and effects on the magnitude and quality of the circuit voltage.

8.3.1.4 Network Study. Network Study is an engineering analysis that determines the amount of DER that can be added to a Network Secondary Distribution System.

8.3.1.5 Transmission System Study. Transmission System Study is an engineering analysis that models the DER impact to the transmission system.

8.3.2 Study Refund Policy. Payment by the DER Owner for Impact Study cost should be paid prior to beginning the study and is non-refundable.

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8.3.3 System Impact Study Report. Upon completion of DER Impact Study, Company will provide a system study report to the DER Owner. The report will describe study results, including any Company electric system modifications or upgrades upstream of proposed DER POI that are necessary to accommodate DER Interconnection and Parallel Operation. At the request of DER Owner, Company and DER Owner may meet to jointly review results of system study.

8.3.4 Commencement of DER Construction. At DER Owner's sole risk and discretion, DER Owner may commence DER equipment procurement, site preparation, and construction once the system impact study is completed.

8.4 Interconnection Equipment Study and Cost.

8.4.1 Interconnection Equipment Study. If DER Owner decides to proceed with DER construction project after review and acceptance of the system study report, and it is determined that Interconnection Equipment (including on-site facilities or upstream system upgrades) are needed for interconnection service, Company will estimate the cost to conduct an Interconnection Equipment study. Company will provide an Interconnection Equipment study cost proposal (including invoice) to DER Owner. The study cost proposal will include estimated time for Company to complete study after receipt of payment. DER Owner must pay within 20 business days of study cost invoice date to avoid delay. The refund policy of section 8.3.2 (*Study Refund Policy*) applies.

8.4.2 Interconnection Proposal. Upon completion of the Interconnection Equipment study, Company will provide a study report to the DER Owner. This report and interconnection proposal will provide estimated installation cost of the necessary Interconnection Equipment. Other costs, including tax impact and ongoing operations and maintenance, will also be provided, along with estimated number of business days required to complete installation and commissioning of Interconnection Equipment after receipt of DER Owner's Interconnection Equipment cost payment equipment procurement, and Company's acquisition of all permits, easements, and rights-of-way.

Due to time sensitivity of labor and equipment costs, Company's interconnection proposal will be valid for 90 calendar days. During this time, the DER Owner must review the proposal and notify Company in writing of its acceptance, to avoid delay.

8.4.3 Interconnection Costs. The DER Owner must pay Company for all costs reasonably incurred by or on behalf of Company, including required system upgrades or Metering modifications in connection with Company's Interconnection Equipment required for interconnection service to the DER. In addition, the DER Owner may be required to provide financial security through a Letter of Credit, Parent Guaranty, or other form of security that is acceptable to Company, at its sole discretion.

8.5 Interconnection Agreement and Installation

8.5.1 Interconnection Agreement. If required, Company will prepare a draft Interconnection Agreement for DER Owner's review within three business days after receipt of DER Owner's acceptance of the interconnection proposal. DER Owner must also supply needed information required for preparation of the execution version of Interconnection Agreement. Once finalized, Company and DER Owner will sign the execution version of the Interconnection Agreement.

8.5.1 Interconnection Equipment Installation Cost Invoice. After notification of customer agreement to proceed, the Company will prepare and submit the invoice for Interconnection Equipment installation project cost to DER Owner. If DER Owner does not pay the invoice cost within 20 business days, Company will deem the interconnection request to be withdrawn.

8.5.2 Interconnection Equipment Installation Project. After receipt of payment of Interconnection Equipment installation cost, Company will begin procurement and installation of Interconnection Equipment and, if necessary, acquire permits (including railroad), easements, and rights-of-way for Interconnection Equipment installation. DER Owner must cooperate with Company in acquisition of easement, clearing, and preparation of route for Company tie line and Interconnection Equipment on the DER site. Company will install all sole use Interconnection Equipment.

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8.6 DER Construction and Initial Synchronization

8.6.1 Commencement of DER Construction. If DER Owner has not previously commenced DER equipment procurement and construction, it may do so at any time after execution of the Interconnection Agreement.

8.6.2 Completion of DER Construction. Within 60 calendar days after completion of DER construction, DER Owner must provide the following DER data to Company:

- Manufacturer's certified test reports for each DER generator, each generator step-up transformer, and the DER interconnection transformers;
- DER one-line electrical & relay and Metering diagrams;
- DER AC three-line diagram showing the current and voltage circuits for all interconnection protection relay(s);
- DER interconnection power circuit breaker DC elementary, showing trip and close circuits; and
- Written description of various modes of operations of DER generators.

Company will compare this data to the original data DER Owner provided for the system impact study. If material differences are identified, DER Owner and Company will cooperate on revisions to the system study. DER Owner may incur additional cost for revisions to the system study.

8.6.3 DER Interconnection Protection Settings. If required, DER Owner and Company will cooperate in determining DER Interconnection protection settings. DER Owner will calculate these settings and provide to Company for review and acceptance.

8.6.4 Changes to DER. DER Owner must contact Company to obtain approval prior to any proposed modifications to the DER. Any proposed change will be subject to Company review and approval.

8.6.5 Testing of Interconnection Protection & Control Schemes. After finalization of interconnection protection settings, Company may require the DER Owner to arrange for all settings (including logic to control interconnection breaker tripping and closing) to be applied to the interconnection protection and control devices and notify Company of completion of this activity. DER Facility Owner and Company will then select a date and time during which Company personnel can observe the testing (including application of test voltage and current) of the interconnection protection and control devices. Testing will include injection of test voltage and current to the interconnection protection and control devices and tripping and closing (including automatic reclosing, if applicable) of the interconnection breaker.

8.6.6 DER Initial Synchronization. Following: (i) successful testing of the interconnection protection and control schemes; (ii) DER Owner's establishment or confirmation of a Company account; (iii) inspection of the DER Facility by Authority Having Jurisdiction (AHJ); (iv) Company's receipt of a copy of the inspection certificate; and (v) if applicable, completion of another entity's necessary modifications, DER Owner will notify Company, at least 10 business days in advance, of the date and time of initial synchronization of the DER Facility. If no AHJ exists for the DER location, the DER must be inspected by a qualified licensed electrician, registered Professional Engineer, or other person deemed qualified by Company.

8.6.7 DER Witness Testing. Following confirmation by DER Owner that the DER initial synchronization, including proper configurations of controls (e.g., excitation, ride-through, start and stop permissive, etc.) for all DER generators are complete, Company and DER Owner will jointly decide date and time of DER Witness Testing in accordance with the Company Test Policy and any other unique test requirements developed for the DER.

8.6.8 DER Parallel Operation Permission. After successful Witness Testing, Company will issue a final permission of DER Parallel Operation. If required, DER Owner and Company will jointly develop DER Operating Procedures and any amendment to the Interconnection Agreement.

9.0 DER Operations and Maintenance. The DER Owner is solely responsible for proper operation of the DER. The DER Owner may be required to maintain records of operation and maintenance activities, which

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Company may review at reasonable times. Maintenance records should be made available for Company's inspection upon request. Company reserves the right to inspect the records, but has no responsibility for maintenance, either actual or implied. The DER Owner may not make a change to the DER without Company's prior written consent.

10.0 DER Periodic Witness Testing. Throughout the Term of the Interconnection Agreement (IA), the Company reserves the right to periodically assess the DER or conduct Witness Testing of the DER for compliance with the Interconnection Agreement. DER Owner must cooperate with the Company in the scheduling and performance of any periodic or other assessment or Witness Testing.

11.0 Disconnection and Curtailment

11.1 Temporary Disconnection. On a non-discriminatory basis, Company may temporarily disconnect the DER from Company's Distribution System:

- (i) During the DER Initial Synchronization, if the period of Initial Synchronization exceeds seven consecutive days or after Initial Synchronization if DER testing is not successfully completed; or
- (ii) During an emergency (e.g., a situation imminently likely to endanger life or property); or
- (iii) On occurrence of one of the following, if the Company could reasonably expect that the event/condition could materially and adversely affect Company's Distribution System equipment or the safe and reliable operation of the Distribution System:
 - (iv) Noncompliant DER operation or output; or
 - (v) Hazardous condition, lack of scheduled maintenance or testing, or an operating characteristic revealed by DER assessment; or
 - (vi) Modification of DER equipment or interconnection protection and control device or scheme without Company approval; or
 - (vii) Tampering with, or unauthorized use of Company's Distribution System equipment; or
 - (viii) Failure of Distribution System equipment; or
 - (ix) Failure of DER, after reasonable notice, to curtail per section 11.2 (*Curtailment*)
- (x) For routine or emergency maintenance, repair, testing, modification, or replacement of the Distribution System, including manual or automatic Company Distribution System re-configuration that could result in the DER's interconnection with parts of the Distribution System that were not studied for parallel operation with the DER; or
- (xi) For DER Owner's failure to fulfill its payment or security obligations or for any other default under the Interconnection Agreement; or
- (xii) Under normal operation of protection and control devices or schemes.

11.2 Curtailment. If Company determines that the DER's continued operation at then-existing power output levels could affect Company's ability to safely and reliably operate and maintain Company's electric system, Company may require DER Owner to reduce DER power export to Company Distribution System.

11.3 Disconnection/Curtailment Notice. If a condition described in subparts (i) through (vi) of section 11.1 (*Temporary Disconnection*) or in Section 11.2 (*Curtailment*) occurs, and to the extent reasonably practicable under the circumstances, Company will notify DER Owner regarding the need to disconnect. DER Owner must disconnect or curtail immediately upon receipt of the notice. If circumstances do not permit advanced notice, Company may disconnect the DER without notice. Company will reconnect as soon as reasonably practicable after cure or termination of the event or condition. If applicable, Company and DER Owner will cooperate and coordinate to the extent necessary to restore the DER, Interconnection Equipment, and Company's Distribution System to the normal operating state.

11.4 Disconnection Expense. DER Owner will reimburse (upon invoice) any costs Company incurs in connection with disconnection or reconnection arising from DER Owner's negligence (by act or omission), intentional wrongdoing, or default pursuant to the Interconnection Agreement.

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- 12.0 Changes to Company Distribution System.** The Company Distribution System is a dynamic and changing system. Company reserves the right to modify or reconfigure the Distribution System as necessary to ensure safe and reliable operation of the System. The DER Owner will be responsible for paying for modifications required for reconnecting the DER to the Company's reconfigured Distribution System.
- 13.0 Energizing Dead Circuits.** The DER must not, in any circumstance, energize a de-energized Company Distribution Circuit without prior written permission from Company.

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Attachment A - Company Interconnection Requirements

Attachment B – DER Interconnection Pre-Application

Attachment C – DER Technical Data

Attachment D – Metering Arrangements