

IGP TAP Distribution Subgroup

Feedback on Non-Wires Opportunity Evaluation Methodology

10/11/2021

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TAP feedback and comments are divided into three categories:

1. Informational – no action needed.
2. Suggest revising study before finalizing.
3. Consider feedback for future portions of the IGP process.

High level comments.

- The Distribution Planning Methodology document was very detailed in how decisions were made. The NWA document seems to be more of a general guideline, lacking the rigor of the previous document.
- A significant comment is that the first half of this document makes the case that NWA's should include procurements, programs and prices (which is backed up by lessons learned across the country) and the second half of the document only talks about procurements. How would you compare pricing solutions to program solutions to procurement solutions? I imagine it is based on timing and cost but it's not clearly outlined. What's an example of pricing or programmatic solutions? Would you really have for example some critical peak pricing program on a specific feeder to avoid an upgrade that neighbors on another feeder would not be able to qualify for (not that there is anything wrong with that, I am just curious). I note that APS reportedly did targeted free water heaters for specific feeders so there are others doing things like this.
- Protection is only mentioned once as part of a use-case. Since this is an essential aspect of distribution systems, and will play into NWAs, it might be worth mentioning it. Especially considering the challenges that NWA can face with respect to protection, and who pays for that cost.

Technical comments

- Page 7 - I'd mention that HECO will explore smart inverter functionality that may provide cheaper solutions than power flow controllers, etc.
- Page 11 – It might be useful to tie T&D Capacity Deferral back to the capacity analysis and how this has traditionally been met with solutions in the Distribution Planning Methodology document.
- Page 15 - Define GO7.
- Page 17 – Forecasting certainty. There are a number of questions here:
 - It is stated that a quantitative metric is not feasible. If that is the case, then any estimate of certainty is uncertain.
 - What is the acceptable level of uncertainty for an NWA for something such as T&D deferral? This is a fundamental question to address the viability of an NWA vs. traditional upgrade.
- Page 23 – This is the only place that protective relaying is mentioned. Considering that protection ad the potential to be a recall challenge for some NWA's it should be addressed in more detail.