

-
-
-

25-12031

Public Utilities Commission of Nevada
Electronic Filing

Submitted: 5/15/2026 10:20:51 AM

Reference: d048e2f6-7f3d-4dfd-bbf2-8927a8b48bf8

Payment Reference: fd-bbf2-8927a8b48bf8

Filed For: Tesla Inc

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Dakota Councilman

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Tesla Inc

Davison Van Cleve PC

Attorneys at Law

TEL (725) 735-1718 • crl@dvclaw.com
4675 W. Teco Ave., Suite 230
Las Vegas, NV 89118

May 15, 2026

Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701

Re: Application of Nevada Power Company d/b/a NV Energy, filed under Advice Letter No. 562, to revise Tariff No. 1-B to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041.
Docket No. 25-12031

Application of Sierra Pacific Power Company d/b/a NV Energy, filed under Advice Letter No. 689-E, to revise Electric Tariff No. 1 to modify Generating Facility Interconnections Rule No. 15 pursuant to the Order issued in Docket No. 24-05041.
Docket No. 25-12032

Dear Ms. Osborne:

Please find enclosed for filing the Comments of Tesla, Inc. on Proposed Rule 15 in the above referenced dockets. Thank you for your assistance. If you have any questions regarding this filing, please do not hesitate to contact me.

Sincerely,

/s/ Curt R. Ledford

Curt R. Ledford, Esq.
Nevada State Bar No. 9101
Davison Van Cleve, PC
4675 W. Teco Ave., Suite 230
Las Vegas, NV 89118
Tel: 725.735.1718
crl@dvclaw.com

Of Attorneys for Tesla, Inc.

May 15, 2026

Docket Office
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701

Subject: Docket Nos. 25-12031 and 25-12032; Tesla, Inc. Comments on Proposed Rule 15

I. INTRODUCTION

Tesla appreciates the opportunity to submit comments regarding NV Energy's filing pursuant to which the utility seeks to update Rule 15. As a manufacturer and retailer of distributed energy resources (DERs), including battery storage system, solar energy systems and bidirectional capable EVs, Rule 15 plays a critical role in our ability to offer these solutions to customers in NV Energy's service areas. The value proposition of these solutions, both to customers (and to the utility itself to the degree there is interest in leveraging these technologies to provide grid services) is materially dependent on the ability to interconnect with and operate in parallel with NV Energy's electrical grid. As such, the interconnection review process is of fundamental importance. Tesla believes there are significant opportunities to improve the existing Rule 15 process to ensure that it reflects the current state of the market in terms of what distributed energy solutions are currently available, their capabilities and relevant technical standards in addition to making revisions to address existing challenges with the interconnection process and requirements given experiences to date with the existing Rule. Such reforms and updates are needed not only to ensure that the interconnection process itself does not pose an undue barrier to customers interested in deploying these technologies, but also in recognition of the growing interest from utilities and policy makers in leveraging customer-sited solutions to provide grid services.

Tesla was an active participant in the working group sessions that NV Energy convened in 2025 to help inform this filing. These sessions provided an opportunity for NV Energy to preview changes they were contemplating with stakeholders and solicit feedback. NV Energy should be commended for this collaborative approach which Tesla feels was helpful in narrowing, though not fully eliminating, areas of disagreement, and to identify additional opportunities for further refinement. As discussed in detail below, there are a number of areas where, notwithstanding the productive discussions held in advance of the instant filing, Tesla believes changes are needed to what NV Energy has proposed. Tesla's recommendations are made in the order in which the implicated sections appear in the proposed Rule. Attachment A, appended to these comments, provides a redlined version of the Rule reflecting the changes that Tesla

recommends making. Both in Tesla’s proposed edits to the Rule discussed below and in Attachment A, underlined text is used to indicate additional or new language while ~~strikethrough text~~ indicates deletions.

II. RECOMMENDED AMENDMENTS TO PROPOSED RULE

a. A.2

This section states, “The requirements of this Rule apply to any Generating Facility that is interconnected to the Utility’s Distribution System that will *or may [emphasis added]* operate in parallel with the Distribution System...”. The addition of “or may” to this section is problematic as it opens the possibility that systems that are capable of paralleling, but for which that capability has not been enabled, will be required to go through the Rule 15 interconnection process. Tesla is concerned that this will result in systems that are intended and commissioned to provide backup power only (via a break-before-make order of operation) being required to go through full interconnection review, adding additional cost and time to these deployments, even though such systems cannot and will not operate in parallel with the grid. The salient criterion for determining if Rule 15 applies to a given generating system or facility is whether its paralleling capability has been enabled, not whether that latent capability exists at all. This is of particular concern with respect to Tesla’s current vehicle-to-home (V2H) offering, Powershare Home Backup, pursuant to which a customer can use a Tesla Cybertruck to provide backup power to their home in the event of a grid outage. While the equipment needed to enable this functionality is the same equipment that would allow the system to operate in parallel with the grid, this paralleling feature set needs to be expressly enabled at system commissioning via a proprietary application that only Tesla or its certified installers have access to. Customers do not have the ability to unilaterally turn this feature on. These systems should not be subject to Rule 15 unless and until paralleling capability is enabled. To address this, Tesla recommends modifying the proposed language to eliminate “or may” to make clear that only those systems that are configured and intended to operate in parallel with the grid are subject to Rule 15. Proposed language changes to this section below.

“1. The requirements of this Rule apply to any Generating Facility that is interconnected to the Utility’s Distribution System that will ~~or may~~ operate in parallel with the Distribution System...”

b. A.2.c.

This section identifies “Vehicle-to-Grid Electric Vehicles and Electric Vehicle Supply Equipment” as among the type of equipment to which Rule 15 may apply. Tesla recommends changing this terminology to “Vehicle -to-Grid Capable EV Power Export Equipment” to be more consistent with the terminology used to refer to this equipment in the standards and certification space.

~~“c. Vehicle-to-Grid Electric Vehicles and Electric Vehicle Supply Equipment Vehicle-to-Grid Capable EV Power Export Equipment;”~~

c. A.5

As currently written, projects that have been deployed and interconnected prior to the effective date of an updated Rule 15 remain subject to the requirements of the Rule as those existed prior to any updates to the Rule. Thus, Tesla’s understanding is that any projects with pending applications that have yet to be installed and interconnected as of the effective date of the updated Rule would be subject to any new requirements. Tesla recommends modifying this section such that an updated Rule does not require projects that have already submitted their applications under the existing Rule, but which have not yet been approved or installed to submit a new application or otherwise make modifications to their projects to conform to any updated requirements. Retroactive application of the updated rule to already submitted applications would unreasonably subject pending applications to additional delay, review and potential costs. Tesla recommends updating the language as follows such that the updated Rule only applies to projects that submit interconnection application requests after the effective date of the new Rule.

~~“5. Generating Facilities that submitted interconnection applications ~~interconnected~~ prior to the effective date of this Rule shall be governed by the requirements of the Rule in effect at the time the Generating Facilities submitted their application ~~were installed and its existing IOA unless otherwise modified by mutual agreement of the Producer and Utility.~~”~~

To the degree the updated Rules are beneficial to in-flight applications, customers always have the option of withdrawing an existing application and resubmitting pursuant to an updated Rule.

d. B – Definition of “Parallel Operation”

Tesla submits that the proposed definition of Parallel Operation is overbroad insofar as specifically includes the idea that a battery system or EV that is merely drawing power from the grid constitutes parallel operation. This is inconsistent with what is more typically construed as parallel operation when viewed through the lens of the types of grid interactions that are studied under utility interconnection rules. Tesla strongly disagrees that for purposes of Rule 15 applicability that charging a battery system, whether a stationary system or on an EV, from the grid qualifies as parallel operation any more than drawing power from the grid for any other end use load constitutes parallel operation. As reflected in other parts of the proposed Rule that Tesla comments on below, this expansion of the definition of parallel operation provides a

pretext for the utility to subject systems that do not serve premise loads while grid-connected or export to the grid to Rule 15. Parallel operation, in the context of Rule 15, should be limited to circumstances where a generating system delivers power to a premise while that system and premise is grid-connected or exports power to the grid (which necessarily requires the system to be grid-connected). To address this, Tesla recommends that the definition of Parallel Operation be modified as follows:

“Parallel Operation: The ~~simultaneous operation~~ discharge of power by a Generating Unit or Generating Facility, to serve onsite loads or exporting to the Utility’s Distribution System ~~including power delivered to or received by the Utility’s Distribution System, power delivered from the Utility’s Distribution System (e.g., in the case of the charging of an ESD or Vehicle-to-Grid EV from the Utility’s Distribution System), or an idle state, while Interconnected.”~~

e. E.2.c – Table 1

This section codifies what costs that project seeking application pursuant to Rule 15 are subject to, with the table indicating that net metering systems and QMAHP projects are subject to a technical processing fee of \$119, but all other systems are subject to a fee that is based on actual costs incurred. Tesla recommends that an additional category be added to this table and entitled “Small-Scale Systems”, defined as “behind-the-meter non-NEM solar, battery storage, and vehicle-to-grid systems under 50 kW”, and a corresponding cost for technical processing of \$119, commensurate with the fee charged to review NEM systems. Similarly, Tesla recommends that these systems also not be subject to interconnection study fees, consistent with the treatment of NEM systems. Increasingly we anticipate a growing number of residential customers deploying non-NEM systems that, viewed from the perspective of the grid, are comparable to residential-scale NEM systems and as such should involve similar technical processing costs as NEM systems. Such projects include standalone storage systems and vehicle-to-grid systems. As a practical matter, subjecting these systems to project-specific costs introduces uncertainty that will be challenging for customers and contractors to navigate. Under this approach, the actual costs will be unknown presumably until after whatever work necessary for technical processing and conducting the interconnection study has been completed. Customers and contractors will be reluctant to pursue projects and adoption rates will suffer to the extent the costs are not known at the outset. Furthermore, Tesla is concerned that absent the establishment of a specific cost, benchmarked against comparable projects, NV Energy may choose to structure the work in a manner that is less efficient, and results in higher costs than is reasonable. For example, Tesla assumes that NV Energy established the \$119 cost as a reasonable amount that when collected across the cohort of NEM projects they anticipate seeking interconnection, is sufficient to cover those costs. There is no reason that they should not be able to achieve a similar cost target with the types of residential-scale non-NEM projects

that we anticipate customers deploying in the future. Per the above, this would be reflected in the proposed Rule as follows:

Type of Interconnection	Technical Processing Fee	Interconnection Study Fee
Net Metering Systems	\$119	None
QMAHP	\$119	Actual Costs Incurred
<u>Small-Scale Systems (non-NEM, <= 50 kW)</u>	<u>\$119</u>	<u>None</u>
All Others	Actual Costs Incurred	Actual Costs Incurred

Beyond the specifics of this section and Tesla's recommended changes, we believe that there is a more general opportunity for NV Energy to incorporate artificial intelligence (AI) into its review process that merits further consideration. Advanced grid modeling enabled with and/or combined with AI appears to present new opportunities to dramatically reduce the costs involved in processing and reviewing applications. Whether or not an interrogation of the potential role of AI in reducing the costs and timelines of the interconnection process is within the scope of this proceeding, Tesla encourages the PUC to direct NV Energy, whether as part of this forum or another, to undertake efforts to evaluate the potential of AI to streamline and accelerate interconnection review.

f. E.2.i.e – Table 2, #2

Table 2 describes what high level interconnection review various project configurations are subject to, in terms of whether the utility needs to be notified, whether a new application is required, whether the project can move forward without utility approval and whether an updated interconnection agreement is required. Pursuant to this table, the utility indicates that the addition of a non-exporting system of <= 50 kW that does not increase the export capability at the point of common coupling does require utility notification, a new interconnection application to be submitted and approved by the utility and an updated agreement. Provided the specific system being discussed is one that operates in parallel with the grid, Tesla does not have concerns with the Rule 15 requirements this system would be subject to as described in this table. To avoid any confusion that the system being described might be one that does not operate in parallel with the grid, Tesla recommends modifying the language describing this system as follows:

///

///

ID	Modification to Applications or Existing Generating Facilities	Notification Required?	New Application required?	Proceed without Utility approval?	Updated agreement required?
2.	Addition of a <u>Parallel Operating</u> , ≤ 50 kW Net Nameplate Rating Non-Exporting resources (such as an ESD or V2G EV Charger configured for Non-Export that does not increase Export capability at the PCC.	Yes	Yes	No	Yes

g. E.2.i.e – Table 2, #3.a

Tesla recommends some minor edits to the language characterizing the scenario that this item in Table 2 describes to ensure there isn't conflation between the circumstance described in #1, like-for-like replacements of existing equipment. To address this, Tesla suggests the following edits:

ID	Modification to Applications or Existing Generating Facilities	Notification Required?	New Application required?	Proceed without Utility approval?	Updated agreement required?
3.	Modifications where system capacity or output increases at the PCC and no inverter power or PCS controls are used to limit the active power as stated in the original agreement size, including:	Yes	Yes	No	Yes
a)	Replacement of existing equipment <u>except for replacements that qualify as "like-for-like" pursuant to #1 in this Table above.</u>	Yes	Yes	No	Yes

h. E.2.i.e – Table 2, #3.d

The use of the phrase “operating mode” in this section could be problematic if not further defined, given that “operating modes” can be interpreted as applying to the various modes that customers with a Powerwall system have access to via the Tesla App and through which they can alter how their system operates. For example, customers can choose between “Self-Powered” mode and “Advanced Time-Based Control” mode. For some customers, a system that under Self-Powered mode would not export (since this mode seeks to maximize the extent to which any solar generation is used directly to serve onsite loads) would export when switched to Advanced Time-Based Control (in order to maximize bill savings). If the term “operating mode” is interpreted as referring to these modes, it could literally mean that before a customer could use the Tesla App to switch between these modes, they would have to file a new interconnection application. We don’t believe this is NV Energy’s intention. Instead, Tesla’s understanding is that NV Energy seeks to ensure that customers can’t alter the overarching operational envelope of the system from what was assumed for purposes of the interconnection review and approval of the project. Tesla supports the notion that if a system was studied as a non-exporting system, then it should not (and pursuant to our commissioning practices would not) be allowed to export without undergoing additional review by the utility, which would entail submission of a new interconnection application and utility approval. Allowing a system to do so would violate the operational envelope pursuant to which permission to operate was granted. However, customers should have the ability to change the operational mode of the system however they want provided that doing so does not allow the system to operate in a manner that violates the operational envelope that was studied. So, for example, if a system was studied as exporting, then there should be no limitations on the customer’s ability to switch between exporting and non-exporting modes and vice versa as these modes all stay within the operational envelope that was assumed when the system was studied pursuant to Rule 15. To address this Tesla recommends adding a footnote to the term operating mode to indicate the following.

“#Operating mode does not refer to changes that customers can select via a vendor app or other means and which do not alter the relevant parameters of the systems and how it interacts with the grid as reflected in the interconnection application and agreement.”

i. E.2.i.e – Table 2, #4

Tesla disagrees with categorically requiring a new application in all cases where the POI or PCC has changed. If the change to the POI or PCC does not result in the project being connected to a different feeder, it’s not clear why, electrically, altering the POI or PCC would necessitate a new application or review. To address this, Tesla recommends the following change to this section of the table.

ID	Modification to Applications or Existing Generating Facilities	Notification Required?	New Application required?	Proceed without Utility approval?	Updated agreement required?
2.	Change to a different POI or PCC <u>that is located on a different feeder than reflected stated</u> in the current agreement.	Yes	Yes	No	Yes

j. F.5.c.(1)

Given the serious repercussions for failing to submit an amended application to redress a failed technical review screen, specifically that the project application will be deemed to have been withdrawn, Tesla asks that more latitude be provided to submit the redesigned project. Rather than providing only 10 business days, Tesla asks that 15 business days be provided.

“(1) The Applicant shall submit to the Utility an amended Application demonstrating the redesign within ~~ten-fifteen~~ (1015) business days after the Applicant options meeting. If the amended Application is not received by the Utility within ~~ten-fifteen~~ (1015) business days, the Utility shall consider the Application withdrawn;”

k. F.5.d

As with the prior recommendation, Tesla asks that additional latitude be provided to applicants than what is provided in this section where, as proposed, applicants would only be afforded one opportunity to submit an amended application to address failure of a technical screen or screens. We appreciate that applicants shouldn’t be given an open-ended number of opportunities to amend a project application that has failed technical review, but we are concerned that only providing one “bite at the apple” could result in projects being forced to reapply in instances where perhaps the communication of the deficiency and what would be needed to cure was unclear, or other reasons that do not reflect recalcitrance, incompetence or bad faith by the project developer. To that end, Tesla feels that applicants should have two opportunities to amend an application to cure technical screen failures before they are forced to submit a new application.

“d. The Applicant's option to mitigate the failure of a technical review Screen(s) and submit an amended Application shall only be available ~~once~~ twice during the technical review process. Subsequent amending of the Application shall result in the Utility considering it

as a new Application and reinitiating the technical review process from its beginning in accordance with Section E.2.”

l. G.7.a.(3)

For Energy Storage Systems (ESS) paired with a NEM system, the proposed Rule establishes a number of operational pathways that the ESS must choose from as established pursuant to Sections G.7.a.(1). If a restriction is selected, that selection must be stated in the Interconnection Application as well as the Interconnection Operating Agreement. Additionally, the rule requires an attestation of the operating restriction - or lack of an operating restriction - to be provided by the customer and the Energy Storage Device manufacturer. Tesla requests clarification on when the attestation needs to be provided (e.g. is it part of the initial application package or submitted later in the process?) as well as additional detail on what the customer and manufacturer are specifically attesting to. We ask that NV Energy provide the language they specifically envision being included in the attestation for further review by stakeholders.

m. G.7.b.

Tesla finds the language in this section confusing and seeks additional clarification on the intent. Specifically, Tesla seeks confirmation that the intent of this language is to establish that standalone storage systems that are deployed exclusively for purposes of providing backup power, will operate pursuant to a “break-before-make” order of operation in response to an outage. If that is correct, further clarification regarding the need for inclusion of this language in Rule 15 would be helpful. Tesla does not believe a system designed solely for the provision of backup power and which operates pursuant a “break-before-make” order of operation should be subject to Rule 15 at all. Such systems should be subject to the same rules and requirements applicable to more conventional backup generators. The inclusion of this language/configuration within Rule 15 appears to imply that these projects would be required to go through Rule 15, which Tesla does not think is appropriate given that these systems never operate in parallel with the grid. If this language/configuration is retained, Tesla recommends adding language that states that such systems are not subject to Rule 15.

“A stand-alone ESD Interconnected to the Utility's Distribution System that is not paired with a Generator, will charge solely from the Utility's Distribution System, and will discharge solely for the purpose of providing back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System. These systems are not subject to Rule 15.”

Tesla observes that such a configuration, where a customer has deployed a standalone battery system that just provides backup is not currently very common, as most systems, even if deployed on a standalone basis, are configured to operate in parallel with the grid in addition to providing backup power. If this configuration is to be included in the Rule, then it should also be included in the Table that is included as part of Attachment 1 under “Part 1 – Core Generator and Energy Storage Device Configurations” as follows:

Configuration or Use Case	Parallel with Utility?	Export to Grid?	Subject to Rule 15?	Application or Notification?
<u>Stand-Alone, Non-Exporting, BTM Energy Storage Device (ESD), charging from Utility grid, discharging to provide backup power only after disconnecting from Utility Grid.</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No Rule 15 Application Required, Subject to Rule 19.</u>

Similarly, one could envision a configuration that involves a stationary storage system that can charge from onsite generation or the utility grid, but only discharges to provide backup power via “break-before-make.” Tesla is not necessarily advocating for explicitly including such a configuration in the Rule, as we do not anticipate such configurations being particularly common, but if the goal is for the Rule to be comprehensive of all potential configurations, then NV Energy might consider adding it. We do note that such a configuration is likely in the case of bidirectional EV systems, at least in the initial roll out of bidirectional vehicles and EVSE where home backup will be among the first applications. Under this configuration the vehicle would be able to charge from both onsite solar and the grid but would only discharge to serve home loads in the event of an outage. This is the configuration and operational approach that Tesla currently offers with the Tesla Cybertruck via our Powershare Backup solution¹. This is further discussed in Section II.t of these comments below.

n. G.7.c

Tesla has significant concerns with the language in this section, which as drafted would appear to render the Tesla Powerwall ineligible for interconnection, or at a minimum disallowed

¹ See <https://www.tesla.com/support/powershare>

from being able to provide backup power, one of the primary reasons motivating customer interest in this solution. As Tesla understands the it, the language in this section, would require a solar-plus-storage system that is configured to operate in parallel with the grid, but that is also intended to provide back-up power, to, in the event of an outage, for purposes of providing backup power, operate pursuant to a “break-before-make” order of operation. The specific language of concern states that the system “shall first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System”. Tesla’s system relies on a multi-mode inverter that provides a seamless transition, something it is expressly certified to do safely pursuant to UL’s 1741 Multimode CRD both for purposes of providing backup power as well as transitioning back to normal operation when the grid is restored. Tesla's Multimode inverter systems are designed to seamlessly transition from grid-following inverter mode when connected to the area EPS to a Grid following inverter providing backup to load during the loss of the Area EPS. This seamless transition is achieved using a grid isolation device/MID that provides backfeed protection, ground bond switching and synchronization. All of these capabilities are verified and certified via UL 1741 Multimode (MM) CRD certification. Tesla notes that to date, the Powerwalls installed in NV Energy’s service area have been installed to provide seamless transition to backup power utilizing a certified multi-mode inverter. To ensure the Rule does not inappropriately limit the type of solution that can be used to provide backup power and how those function, the language should be amended as follows:

“c. An ESD paired with a Generator Interconnected to the Utility's Distribution System that, in addition to its normal operation, will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:

- (1) first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System, after which it may discharge according to its normal operation; or
- (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.

Tesla further observes that this language combined with section G.7.b. also seems to imply that NV Energy does not contemplate standalone ESD systems that can operate in parallel with the grid as well as provide backup power. While not nearly as common as storage paired with solar, Tesla anticipates more customers deploying these types of systems for purposes of helping manage time-of-use or other more dynamic rate structures, participate in virtual power plants or other event-based dispatch programs, in addition to providing backup power.

Customers who may not have the space, budget or interest in deploying solar should not be foreclosed from deploying a standalone storage system which can operate in parallel with the grid as well as provide backup power via the seamless transition enabled by a UL 1741 CRD-certified multi-mode inverter. Again, if seamless transition enabled UL 1741 CRD-certified multi-mode inverters is not allowed, it would foreclose Tesla's ability to offer Powerwall to NV Energy customers. Tesla recommends that NV Energy include a new subsection 8.7.d to capture these systems as well. As with the discussion regarding 8.7.c above, Tesla recommends ensuring that the language recognize more than just the break-before-make means of providing backup power and confirming that a UL 1741 CRD-certified multimode inverter is authorized under the proposed Rule. Proposed language below:

"8.7.d A stand-alone ESD Interconnected to the Utility's Distribution System that is not paired with a Generator, will charge solely from the Utility's Distribution System, and that in addition to normal operation will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:

- i. first disconnect from the Utility's Distribution System before beginning to discharge backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System; or
- ii. utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.

o. G.7.h

Tesla appreciates NV Energy's proactive recognition of vehicle-to-grid solutions and the incorporation of specific national standards that are under development or that have been published into its proposal that can be utilized to ensure V2G systems interact safely with the grid. Explicit inclusion of these national standards in the Rule ensures an objective approach that obviates the need for utilities to establish their own bespoke testing frameworks for these systems, consistent with the rationale and benefits that national standards offer. Tesla recommends that the language in the cited section be modified to more accurately refer to the relevant standards applicable to V2G systems. Specifically, Tesla recommends modifying the language in this section as follows:

"h. ~~V2G EVs~~ Vehicle to Grid Capable EV Power Export Equipment, configured as an AC bidirectional charging system, wherein inverter capabilities are onboard the vehicle, shall either
~~adhere~~ meet one of the following grid-performance requirements:

- (1) UL 1741 SC (when published and accepted by the Utility for use in this Rule) and SAE J3072; or Supplement SB for Grid Support Utility-Interactive Inverters and Converters Based upon IEEE 1547-2018 and IEEE 1547.1-2020 and/or

Note: UL 1741 SB for AC V2G systems can be evaluated as Grid Support DER systems in accordance with UL 1741 CRD “Addition of grid support DER system definitions and requirements for multipiece DERs” published 2026-04-08.

- (2) ~~as a matched pair bidirectional system under UL 1741 SB, in conjunction with UL 97-41, or other equivalent system level certification recognized by the Utility~~ Supplement SC for AC bidirectional electric vehicle supply equipment (BEVSE)/interconnection system equipment (ISE) for EVs with SAE j3072 bidirectional onboard inverters.”

p. G.8.i

Consistent with our comments above regarding Section. G.7.b, Tesla feels the inclusion of the language in this section implies that “break-before-make” systems that are intended solely for the provision of back-up power, including V2H backup-only systems are subject to Rule 15, which Tesla does not think is reasonable as these systems do not parallel with the grid. As such we would recommend either removing this language or clarifying that such systems are not required to go through Rule 15 as follows:

“d. A V2G EV, EV charger, charging station, or EVSE connected to the Utility's Distribution System that shall discharge solely for the purpose of providing back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System. These systems are not subject to Rule 15.”

Also consistent with this, Tesla recommends making modifications to the table included in Attachment 1, specifically to the row in that table that describes this configuration and the associated Rule 15 requirements. We discuss this in more detail further below.

q. G.8.j and G.8.k changes

Given the emergence of V2G capable systems that would be designed to operate in parallel with the grid during normal conditions as well as provide backup power during grid outages, Tesla recommends augmenting the material in Section G to more comprehensively addresses the various V2G configurations that we anticipate being deployed, inclusive of those that are deployed with NEM-eligible generation and standalone V2G systems. These configurations are

intended to largely mirror the configurations that the Rule currently includes for stationary storage systems, recognizing that V2G system will be used in similar ways and thus should be similarly reflected in Rule 15. To that end, we recommend adding the following material to the proposed Rule.

“j. Vehicle to Grid Capable EV Power Export Equipment connected to the Utility’s Distribution System that is not paired with a Generator, will, while at the location where it has been approved for interconnection, charge solely from the Utility’s Distribution System, and that in addition to normal operation will discharge to provide back-up service to all or part of a Customer’s load during an interruption of electric service from the Utility shall either:

- (1) (1) first disconnect from the Utility’s Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility’s Distribution System; or
- (2) (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.

“k. Vehicle to Grid Capable EV Power Export Equipment paired with a Generator Interconnected to the Utility’s Distribution System that, in addition to its normal operation, will discharge to provide back-up service to all or part of a Customer’s load during an interruption of electric service from the Utility shall either:

- (1) first disconnect from the Utility’s Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility’s Distribution System, after which it may discharge according to its normal operation; or.
- (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.

r. G.12.c and G.12.d

Tesla has serious reservations regarding the requirements of this section which would require enabling the utility to directly communicate and control advanced inverters, energy management systems or Master Microgrid Controllers for purposes of addressing emergency circumstances or unsafe operating conditions or to enable customer participation in voluntary program or tariffs. Tesla believes this requirement is overly invasive. With respect to the first rationale, specifically to enable the utility to communicate and control these systems to address emergency circumstances or unsafe operating conditions, Tesla does not believe the utility has justified why the existing set of standards that systems are certified to and how they already or can be set to respond to system conditions such as grid outages and other contingencies are insufficient and therefore requires imposing this direct communication and control requirement. The standard for the safe interconnection of smart inverters to the distribution

grid is to make use of available static smart inverter settings. The following functions are already available and could be used by NV Energy to manage inverter-based resources during emergency grid conditions. In the table below, Tesla provides an overview of the various capabilities that smart inverters are certified to provide today.

<u>Functionality</u>	<u>Description</u>
Power limiting functions	
Inverter operating limits	The max charge and discharge power of an inverter can be limited. This can be useful to maintain the inverters operation within the safe limits of the distribution system
Voltage functions	
Voltage ride-through	In the event of a transient voltage disruption, inverters intelligently operate through the disruption and do not trip offline and potentially exacerbate the problem
Voltage trip	In the event of a voltage disruption, inverters disconnect for safety
Autonomous voltage control	Inverters can be configured to modify their real/reactive power behavior when voltage starts to leave the ideal range. This can help regulate voltage, but used too aggressively it can be disruptive to system operation.
Frequency functions	
Frequency ride-through	In the event of a transient frequency disruption, inverters intelligently operate through the disruption and do not trip offline and potentially exacerbate the problem
Frequency trip	In the event of a frequency disruption, inverters disconnect for safety
Autonomous Frequency control	Inverters can be configured to modify their real power behavior when frequency starts to leave the ideal range. This can help regulate frequency, but used too aggressively it can be disruptive to system operation.
Anti-Islanding	Inverters are able to detect the grid outage and tell the difference between a live grid and an 'unintentional island' where voltage is present because of the inverters own operation. This is necessary to avoid energizing lines during emergency situations

To the degree these functions are not activated or being used currently, time should be taken to determine whether and how these functions could be utilized and the extent to which their use can eliminate the need for the more invasive forms of direct communication and control that NV Energy appears to be asking for in this section of the proposed Rule.

Tesla has a number of concerns with giving the utilities direct communication and control capabilities, including the direct costs associated with enabling this, as well as the potential it creates for utilities to utilize these capabilities in a manner that directly conflicts with customer interests, again without sufficient reasoning for what circumstances justify this control that isn't already addressed via the ability to automatically respond to grid conditions per the discussion above. As an analogy, consider a hypothetical where the Federal Highway Administration required vehicle owners to give them the ability to directly control their vehicles to address emergency situations. This would clearly violate basic conceptions of ownership, and drivers would reasonably have very serious concerns that the government may choose to exercise its ability to control vehicles in a way that may significantly undermine the agency of vehicle owners to use their vehicles as they see fit, within the bounds of already existing rules and requirements that, for example, require them to obey posted speed limits, and traffic laws, yield to police and emergency vehicles, etc. While this is an arguably extreme example, Tesla feels it is illustrative of the kind of encroachment that the utility appears to be asking for here. As explained above, importantly, in the case of electrical equipment interacting the grid, there is already existing built-in functionality that these systems are certified to that, unlike vehicles in the hypothetical above, already take the customer out of the equation by automatically responding to certain contingencies, thus begging the question as to why additional utility control would be necessary.

With respect to the second rationale presented, namely as a way to ensure customers can participate in opt-in program or tariffs, Tesla feels it would be appropriate to determine what communication and control requirements are needed when such programs are being established and to make such control requirements also opt-in, rather than mandating a general requirement within Rule 15. In Tesla's experience, which encompasses hundreds of thousands of systems enrolled in virtual power plant programs globally, direct communication to and control of individual devices is unnecessary, and program goals can be achieved via the aggregator model. Under an aggregator model approach, the utility communicates dispatch or other control signals to an entity like Tesla that has an existing control platform through which it then promulgates these signals to individual devices enrolled in a given grid-services program. If there are reasons why this model is insufficient for purposes of a specific program or tariff, those issues should be surfaced as part of the stakeholder process used to develop such programs or tariffs. The proposed control requirements are not only a significant departure from utility norms regarding DERs, they also could threaten to significantly complicate the aggregator model described above in a way that could result in fewer grid services available to

customer and ratepayers. For all of these reasons, Tesla recommend striking this language from the proposed Rule:

~~“c. Direct communications to Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers shall be made available (i.e., unlocked, functional, and capable of being provisioned to Utility systems) at the request of the Utility for use by the Utility when communications are required to prevent an Emergency or Unsafe Operating Conditions or to enable Customer participation in voluntary programs and/or tariffs when no alternative cost-effective communication pathway (e.g., via a vendor cloud service) can be established, via:~~

~~(1) Producer maintained wireless broadband internet and wireless communication capability of the Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers; or,~~

~~(2) Producer maintained wired broadband internet or Utility owned field area network communicating to local Utility gateway interfaced to a local DER communication interface on Advanced Inverters PCSs, energy management systems, or Master Microgrid Controllers.~~

~~d. The operational data and control capabilities required by the Utility to ensure the safe, reliable, and tariff compliant operation of the Distribution System, as defined in and limited to the data elements identified in IEEE 1547-2018 Clause 10, shall cost effectively be made available by the Producer or its vendors to the Utility~~

s. H.9

The metering requirements for battery storage systems are excessive and should be pared back and/or modified to provide alternatives to additional metering. To Tesla’s knowledge, NV Energy is the only utility in the country that has a requirement that all energy storage devices must have a separate utility meter. This requirement adds cost, time, and complexity that is not justified in terms of the benefits, particularly to the degree that alternative approaches, in particular leveraging power control systems, device-level measurement, or other means have not been fully explored as options or pathways that can serve in lieu of the metering requirement. Tesla estimates that the additional cost involved, despite the fact that per the requirement the utility meter is furnished and owned by the utility is ~\$130 in material costs per residential installation and increases the amount of time to prep, plan and perform the installation by 1-2 hours. It also necessarily means more equipment deployed on a customer’s walls, which aesthetically and practically can create issues for customers, depending on available wall space.

Tesla appreciates that the deployment of a storage system by a customer who is also participating in net-energy metering (NEM) introduces some complications to NEM settlement to the extent a storage system can charge from the grid as well as export to the grid, which in turn requires utilities to develop some means of ensuring that any NEM credits are only provided to energy that was sourced from the onsite solar or other NEM-eligible system. One alternative to requiring additional metering is to recognize certified Power Control Systems, which can be employed to ensure the storage system either charges exclusive from the NEM eligible resource or to prevent the storage system from ever exporting to the grid. If one of these conditions is met, it resolves the NEM-integrity concern. If the storage system only charges from the on-site NEM eligible system, then any exports from the site have been sourced from an eligible resource. If the storage system never exports to the grid, this also resolves any NEM integrity issues since, by not exporting, there is no need to discern whether any exported energy was derived from the NEM-eligible resource or from the grid – the only resource that would export would be the NEM-eligible resource. Tesla’s systems incorporate certified PCS, specifically certified to UL 1741 PCS and UL 3141. The use of certified PCS to address NEM integrity issues is not novel. Notably, this approach has been codified into the interconnection rule of the California Investor-Owned Utilities, Rule 21. Below Tesla offers amendments to this section to recognize PCS as an alternative to the current metering requirement.

“ 9. ESD Metering Equipment, including an appropriate Utility-owned, bi-directional, Interval Meter, as defined in Rule 1, shall be installed for all ESD installations per applicable published Utility manuals and standards dealing with Metering specifications.

- a. If the ESD is paired with a NEM-eligible generating resource, a meter shall not be required if the ESD utilizes a Certified Power Control System to either prevent the ESD from exporting to the grid or ensures that the ESD only charges from any NEM-eligible generating resource with which the ESD is paired.

Additionally, for smaller systems, NV Energy might also consider other options to address NEM-integrity concerns that go beyond equipment or software-based solutions. For example, also in California, pursuant to Rule 21, to address NEM integrity concerns arising from the deployment of battery-paired solar systems, in the case of smaller systems, where the storage system is 10 kW in size or less, the utilities simply cap the total monthly NEM credits that these systems can receive to an estimate of the solar systems maximum production.

In addition to using PCS to address the NEM-integrity issue moot, Tesla also encourages NV Energy to consider opportunities to utilize device-level measurement as an alternative to utility metering both for purposes of ensuring NEM integrity as well as to address any other issues for

which the utility currently utilizes the ESD meter. Tesla is particularly concerned that with respect to the NEM integrity issue, the PCS-enabled pathways discussed above are impractical for V2G systems, in particular where preventing exports would confound opportunities to utilize these systems to provide grid services and solar only charging is effectively impossible to police given that the storage in this case is inherently mobile and will be charged based on where customers elect to charge their vehicles. Tesla does not have a specific proposal at this time regarding how device-level measurement could be used but believes that as part of this proceeding NV Energy should dedicate some time working with stakeholders to determine if device level measurement or other approaches, like capping NEM credits based on estimated solar production, could be utilized as yet another path that customers could avail themselves of in lieu of having to deploy additional meter.

t. Attachment 1 – Table “Part 2 – EVSE and V2G EV Configurations”.

Attachment 1 of the proposed Rule includes a table that is broken into two parts with “Part 2” describing various EVSE and V2G configurations and corresponding rows indicating whether, each configuration operates in parallel with the utility, whether it exports to the grid, whether Rule 15 applies, and whether an application or notification only is required. Throughout this part of the table, system configurations where the system is explicitly described as one that will not discharge are characterized as parallel operating. As reflected in our concerns with how the proposed Rule defines Parallel Operation in an overbroad manner, Tesla does not believe such systems can be reasonably characterized as operating in parallel. The table should be amended to conform with Tesla’s proposed definition of “Parallel Operation”, pursuant to which charging the vehicle from the grid does not qualify as parallel operation.

A similar concern applies to the fifth row of the portion of the table where it describes the following system: “Bidirectional EVSE or V2G EV configured for V2G operation, discharging will not occur while connected to the grid, but discharging will occur during Islanded Microgrid or backup mode following Break-before-Make”. For this system, the table indicates that such a system: 1.) is deemed as operating in parallel with the grid, 2.) does not export to the grid while it is connected to the grid, 3.) is subject to Rule 15, and 4.) required a Rule 15 application. Tesla does not agree that the described system operates in parallel with the grid for purposes of determining whether it should be subject to the Rule 15 interconnection process. There is a distinction to be made between a system that is capable of discharging in parallel with the grid, and one where that capability has actually been enabled or turned on. A bidirectional capable EV system that will only discharge when it has disconnected from the grid via “break-before-make” is not operating in parallel with the grid for Rule 15 purposes any more than any other load. Reiterating our position regarding the definition of “Parallel Operation” above, Tesla does not agree that drawing power from the grid is a sufficient basis for the utility to require a system to undergo interconnection review pursuant to Rule 15. Were that the case, other loads, like

those associated with common appliances including refrigerators, electric HVAC systems, electric dryers, etc. would then also be subject to the Rule. The mere fact that an EV and/or EVSE is bidirectional-capable should therefore not serve as a pretext for requiring a system to go through the Rule 15 interconnection process. The salient question for purposes of determining if Rule 15 applies is whether the system has been set up and commissioned to allow discharge in parallel with the grid or not. For example, Tesla currently offers Tesla Powershare Home Backup as an optional feature that customers can purchase with the Tesla Cybertruck that adheres to the “break-before-make” order of operation to provide backup power in the event of a grid outage. Although this system is configured such that it is technically capable of operating in parallel with the grid, whether that capability is enabled is determined at system commissioning using a proprietary app that only Tesla-certified installers or Tesla itself have access to. Customers do not have the ability to unilaterally alter the operational envelope of this system to allow parallel operation if the system has been commissioned for back-up only. Given this, it’s unclear what purpose Rule 15 review would serve for this type of system. These systems should be treated in the same manner as other backup only generators, pursuant to which the customer is required to notify the utility that such system is being installed and with the clear understanding that if, at some point a customer wishes to enable this system to discharge in parallel with the grid, they would need to go through the Rule 15 interconnection process and receive approval from the utility before that paralleling capability could be enabled. Below Tesla offers recommended edits to the relevant portion of the table included in Attachment 1 to address these concerns.

Configuration or Use Case	Parallel with Utility?	Export to grid?	Rule 15 applies?	Application or Notification.
EVSE (Level 1, 2, or DCFC) serving EVs as load only, no bidirectional (V2G) capability	Yes, Interconnected and Parallel Operation but EVSE and EV act solely as load when charging <u>No</u>	No	No	Rule 3 application, treated under normal Utility service rules
EVs under Utility programs or tariffs, no bidirectional (V2G) capability	Yes, Interconnected and Parallel Operation, but EV acts solely as load when charging <u>No</u>	No	No	Utility program enrollment and normal Utility service rules
Bidirectional EVSE or V2G EV, not configured	Yes, Interconnected and Parallel	No	No	None

for V2G operation so that the V2G EV is not capable of discharging and acts only as a load while connected to the grid	Operation but V2G-EV acts solely as load when charging <u>No</u>			
Bidirectional EVSE or V2G EV under Utility programs or tariffs, not configured for V2G operation so that the V2G EV is not capable of discharging and acts only as a load while connected to the grid	Yes, Interconnected and Parallel Operation but V2G-EV acts solely as load when charging <u>No</u>	No	No	Utility program enrollment and normal Utility service rules
Bidirectional EVSE or V2G-EV configured <u>V2G-EV configuration capable of for V2G operation, commissioned such that</u> discharging will not occur while connected to the grid, but discharging will occur during Islanded Microgrid or backup mode	Yes, No, Interconnected and Parallel Operation but <u>V2G-EV acts solely as load when charging</u>	No Export while grid-connected (discharging only in Islanded Microgrid or backup mode)	Yes <u>No</u>	<u>No Rule 15 Application. Subject to Rule 19.</u>

following Break-before-Make				
-----------------------------	--	--	--	--

III. Conclusion

Tesla looks forward to engaging with NV Energy, other stakeholders and the Commission as we collectively work to update Rule 15, recognizing opportunities to streamline the Rule and ensure it does not pose an undue barrier to customers and the utility from deploying and utilizing DERs, while preserving its core function of ensuring safe and reliable interconnection.

Respectfully Submitted,

/s/ Andy Schwartz

Andy Schwartz
Senior Managing Policy Advisor
Tesla, Inc.
510-410-0882
anschwartz@tesla.com

ATTACHMENT A – SUGGESTED AMENDMENTS TO PROPOSED RULE 15

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

A. APPLICABILITY

1. This Rule describes the Interconnection, operating and Metering requirements for Generating Facilities intended to be connected to the Utility's electric Distribution System over which the Commission has jurisdiction. This Rule applies only to Generating Facilities with a Maximum Generating Capacity of 20 MW or less at the Point of Interconnection unless otherwise required in federal or state law. Subject to the provisions of this Rule, the Utility shall allow the Interconnection of Generating Facilities with its electric Distribution System.
2. The requirements of this Rule apply to any Generating Facility Interconnected to the Utility's Distribution System that will, ~~or may,~~ operate in parallel with the Distribution System such that a continuous electrical path will be established between the Generating Unit(s) and the Utility's Distribution System at any time for any length of time, regardless of Non-Export or Export designation, except as identified in Section A.3 and as determined in Attachment 1 including:
 - a. Retail Net Metering Systems (except for certain requirements as otherwise specified in this Rule);
 - b. Energy Storage Devices;
 - c. ~~Vehicle-to-Grid Electric Vehicles and Electric Vehicle Supply Equipment~~ Vehicle-to-Grid Capable EV Power Export Equipment;
 - d. Other retail behind-the-Meter Generating Facilities; and
 - e. Momentary Parallel backup Generators with Make-before-Break operation (such Generators shall only require notification to the Utility under this Rule).
3. The Generating Facilities described below are not subject to Rule 15:
 - a. Generating Facilities seeking to Interconnect to the Utility's Distribution System and sell a portion of or all their electrical output to the Utility or a third party (i.e., wholesale electrical sales) shall be addressed through the Utility's Small Generator Interconnection Agreement, Large Generator Interconnection Agreement, Qualified Facility, or other appropriate process, as applicable; and
 - b. Generating Facilities that are intended solely for electrically isolated operation and not in Parallel Operation with the Utility's Distribution System. The Interconnection of such Generating Facilities shall be subject to Rule 19.

(D,N)

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

A. APPLICABILITY, (Continued)

4. Any modification of the Utility's Distribution System that is required as a result of a Producer's Application for Interconnection under this Rule, including Interconnection Facilities and any Distribution System improvements necessitated by the Generating Facility's load (e.g., load to charge an Energy Storage Device), generation characteristics, or auxiliary load, shall be governed by Rule 9. In such cases, no separate application under Rule 3 shall be required.
5. Generating Facilities that submitted interconnection applications ~~Interconnected~~ prior to the effective date of this Rule shall be governed by the requirements of this Rule in effect at the time the Generating Facilities submitted their application ~~were installed and its existing IOA unless otherwise modified by mutual agreement of the Producer and Utility.~~
6. Capitalized terms used in this Rule, and not defined in the Utility's other tariffs, shall have the meaning ascribed to such terms in Section B of this Rule. The definitions set forth in this Rule shall apply only to this Rule and related tariff riders for Standby Service and may not apply to the Utility's other Rules.

B. DEFINITIONS AND ACRONYMS

The definitions set forth in this Section B are applicable only to this Rule, its corresponding agreements and rate schedules that apply to Standby Service.

AC: Alternating Current.

Active Anti-Islanding Scheme: A control scheme installed with the Generating Facility that senses and prevents the formation of an Unintentional Island.

Active Affordability Covenant: A covenant, condition, or restriction contained in a deed, contract, or other legal instrument which establishes a period of affordability and limits rent and Utility charges for low-income households.

Advanced Inverter (a.k.a., Smart Inverter): A Generating Facility's inverter capable of performing functions that when activated can autonomously contribute to grid support during excursions from normal operating voltage and frequency system conditions by providing dynamic reactive/real power support, voltage and frequency ride-through, ramp rate controls, and communication systems with ability to accept external commands and other functions. Such inverters can either be Grid Following or Grid Forming but must be grid interactive.

ANSI: American National Standards Institute.

Applicant: The entity applying for Interconnection under the provisions of this Rule. The Applicant may or may not be the Producer or Customer.

(Continued)

(D,N)

(D,N)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Application: Documentation submitted to the Utility by the Applicant that contains sufficient information necessary to begin the Interconnection process. This also includes instances where a modification(s) to an existing Interconnection's equipment or operation take place necessitating the Utility to examine the potential effect(s) of the modification(s).

AHJ: Authority Having Jurisdiction.

ATS: Automatic Transfer Switch

Break-before-Make: A type of electrical transfer method where the connection to one power source is completely disconnected before a new connection to another source is established.

Certification; Certified; Certificate: The documented results of a successful Certification Testing.

Certification Test(ing)(s): A test(ing) adopted by the Utility that verifies conformance of certain equipment with Commission-approved performance standards in order to be classified as Certified Equipment. Certification Tests are normally performed by a Nationally Recognized Testing Laboratory such as the Underwriter's Laboratory. Attachment 3 to this Rule outlines such Certification Testing.

Certified Equipment: Equipment used in a Generating Facility that has passed the Certification Test.

Commission: The Public Utilities Commission of Nevada.

Commissioning Test(ing)(s): A test performed during the commissioning of all or part of a Generating Facility system to achieve one or more of the following: verify specific aspects of its performance; calibrate its instrumentation; and establish instrument or Protective Function set-points.

Customer(s): is defined in Rule 1.

Customer Microgrid: A Microgrid that uses only non-Utility infrastructure on the customer side of the Point of Common Coupling, including distribution lines, Generating Facilities, and related equipment, to meet its interconnected loads.

DC: Direct Current.

DCFC: Direct Current Fast Charger

Dedicated Transformer; Dedicated Distribution Transformer: A transformer that provides electric Service to a single Customer. The Customer may or may not have a Generating Facility.

(Continued)

(D,N)

(D,N)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Detailed Review: Part of the technical review process as determined by Section F.6 of this Rule. If required, Detailed Review includes the Utility's performance of an Interconnection Study that establishes the requirements for Interconnection of a Generator or Generating Facility and may be performed as a result of unremedied failure of any of the technical review Screens or by request of the Applicant.

Distributed Energy Resource(s)(DER)(s): Distributed generation systems, energy efficiency, energy storage (including Energy Storage Devices), Electric Vehicles (including Vehicle-to-Grid Electric Vehicles) and demand-response technologies, which may be located on the Utility side or the Customer side of the Meter of a Utility Customer. This definition conforms to the definition of distributed resources in Nevada Administrative Code 704.90583 and shall be interpreted as meant to conform to future versions of that regulation unless otherwise stated in this Rule.

Distribution System: The Utility's electrical system consisting of all electrical wires, equipment, and other facilities owned or provided by the Utility by which the Utility provides distribution Service, including High Voltage Distribution Service as defined in Rule 9, to its Customers.

Electric Vehicle Supply Equipment (EVSE): The physical and electrical equipment, components and software associated with an Electric Vehicle or Vehicle-to Grid Electric Vehicle charger or charging station that facilitates the charging or discharging of such vehicles.

Emergency: An actual or imminent condition or situation, which jeopardizes the Utility's Distribution System integrity.

Energy Storage Device (ESD): A device that captures energy produced at one time, stores that energy for a period of time, and delivers that energy as electricity for use at a future time. For purposes of this Rule only and only where applicable within this Rule, an ESD can be considered a Generator. While an ESD may be paired with a Net Metering System, it does not qualify to be considered as a Net Metering System, either as a stand-alone installation or when paired with a Net Metering System. For purposes of this Rule only and only where applicable within this Rule, a Vehicle-to-Grid Electric Vehicle, including its EVSE, can be considered an ESD.

Enter Service: The beginning of Parallel Operation of a Generator with the Utility's energized Distribution System.

EV: Electric Vehicle. For the purposes of this Rule, an EV is defined as solely being capable of being operated in a charging only (load-only) mode. EVs that are to be operated in a discharging (Vehicle-to-Grid) mode are defined below.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Export; Exported; Exporting: The transfer of electricity from a Generating Unit or Generating Facility to the Utility across the Point of Common Coupling. This may include scenarios where Limited Export or Inadvertent Export could occur, or in association with Limited Generation Profile operation.

Fast Track Review: Part of the technical review process as determined by Section F.3 of this Rule. The Fast Track Review may result in approval of the Interconnection, the Utility performing Supplemental Review, or a meeting requested by the Applicant to discuss any failed Screens.

FERC: Federal Energy Regulatory Commission.

Field Testing: Testing performed in the field to determine whether equipment meets the Utility's requirements for safe and reliable Interconnection.

Generating Facility: All Generating Units that are included in a Generating Facility IOA.

Generator or Generating Unit: A device that converts mechanical, chemical or solar energy into electrical energy, including all of its protective and control functions and structural appurtenances. One or more Generators comprise a Generating Facility.

Grid Following Inverter: A type of Advanced Inverter that can synchronize its output voltage and frequency with the existing grid voltage and frequency.

Grid Forming Inverter: A type of Advanced Inverter that can create and regulate grid voltage and frequency and can operate independently or in coordination with other sources.

Gross Nameplate Rating: The gross generating AC capacity (kW) of a Generating Unit or the total of the gross generating capacities (kW) of the Generating Units comprising a Generating Facility as designated by the manufacturer(s) of the Generating Facility(s). For an EV or Vehicle-to-Grid EV, the gross nameplate rating shall be determined by the gross nameplate discharge power of the inverter (kW), and not the battery energy capacity (kWh).

Host Load: Electrical power that is consumed by the Customer at the property on which the Generating Facility is located. This includes the consumption of electrical power of the Generating Unit(s) comprising the Generating Facility.

Hosting Capacity: The incremental amount of DER Maximum Generating Capacity or load that can be accommodated (i.e., is available) on a particular feeder section of the Utility's Distribution System at a given time under existing or forecasted grid conditions and operations without adversely impacting safety, power quality, reliability, or other operational criteria. Such capacity may be in terms of generation hosting capacity, photovoltaic hosting capacity, or load hosting capacity.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Hybrid Microgrid: A Microgrid that uses Utility and non-Utility infrastructure on the Microgrid's side of the Microgrid Interconnection Device, including distribution lines, Generating Facilities, and related equipment, to meet its interconnected loads.

IEEE: Institute of Electrical and Electronics Engineers.

Inadvertent Export: The unplanned, uncompensated transfer of active power from a Generator or Generating Facility to the Utility's Distribution System across the Point of Common Coupling, limited as established in this Rule.

In-rush Current: The current drawn by the Generating Facility during startup.

Intentional Island: The planned creation of an Island, usually following a loss of a portion of the Utility's Distribution System, with the knowledge and approval of the Utility.

Interconnection and Operating Agreement (IOA): An agreement between the Utility and the Producer that gives each certain rights and obligations to effect, operate, modify, or end interconnection.

Interconnection; (Interconnect(ed)): The physical connection of a Generating Facility whereby a continuous electrical path is established between the Generating Unit(s) and the Utility's Distribution System for more than fifteen (15) seconds at any time and during any planned operating mode of the Generating Unit(s), including an idle mode, in accordance with the requirements of this Rule so that Parallel Operation with the Utility's Distribution System can occur (or has occurred if Temporary Interconnection Authorization (if applicable) and/or Permission to Operate has been provided by the Utility).

Interconnection Facilities: The electrical wires, switches and related equipment that Interconnect a Generating Facility to the Utility's Distribution System.

Interconnection Study: A study to establish the requirements for Interconnection of a Generator or Generating Facility.

Interconnection Study Agreement: An agreement between the Utility and the Applicant that gives each certain rights and obligations regarding the Utility's performance of an Interconnection Study.

Interval Meter: is defined in Rule 1.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Island; Islanded; Islanding: A condition on the Utility's Distribution System in which one or more Generating Facilities deliver power to Customers using a portion of the Utility's Distribution System that is electrically isolated from the remainder of the Utility's Distribution System. A Hybrid Microgrid is a form of an Island.

kVA: Kilovolt-ampere.

kVAR: Kilovolt-ampere reactive.

kW: Kilowatt(s).

kWh: Kilowatt-hour(s).

Limited Export(ing): The limiting of the transfer of electrical energy from a Generating Unit or Generating Facility to the Utility across the Point of Common Coupling by the use of the appropriate methods or operating modes noted in Section G.2. A Limited Export value is fixed, does not vary with time, and is distinct from Limited Generation Profile. This may include scenarios where Inadvertent Export could occur, or in association with Limited Generation Profile operation.

Limited Generation Profile: An energy generation schedule or control profile implemented by a system or equipment configuration that specifies the maximum amount of electricity a Generator may produce, or an ESD or Vehicle-to-Grid EV may discharge, at specific times of the day and/or different times of the year. A Limited Generation Profile may be executed by a Certified Power Control System or energy management system with autonomous operational capabilities, or other control architectures (e.g., relay-based schemes) deemed acceptable and approved by the Utility at its discretion to reliably enforce specified energy generation or discharge limits. A Limited Generation Profile is distinct from Limited Export, which is a single fixed limit.

Line Section: That portion of the Utility's Distribution System connected to a Customer bounded by automatic sectionalizing devices or the end of the line.

Master Microgrid Controller: An intelligent Power Control System designed to manage and automate the operation of a Microgrid and has the capability to monitor, control, and obtain dynamic feedback from all the individual components that make up a Microgrid. When the Master Microgrid Controller is used to enforce Limited Export, Non-Exporting operation, or Limited Generation Profiles under this Rule, it shall meet the requirements applicable to a Certified Power Control System.

(Continued)

(D,N)

(D,N)

Issued: 12-31-25

Effective:

Advice No.: 562

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Material Modification(s): A change(s) or replacement of generating equipment, that is not a like-kind substitution in size, ratings, impedances, efficiencies, or capabilities of the equipment specified in the original Application, IOA. Table 2 in Section E.3 of this Rule provides guidance regarding what changes to the existing circumstances of a Generating Unit's or Generating Facility's equipment or operation constitute a Material Modification.

Maximum Generating Capacity: The maximum electrical power output that a Generating Facility is capable of producing that is equal to the total Net Nameplate Rating of a Generating Facility when no limiting of its generating capacity is employed or is an amount less than the total Net Nameplate Rating when the generating capacity of a Generator or Generating Facility is limited (e.g., through the use of a Certified Power Control System, power relay(s), Protective Function(s), Limited Generation Profile operation, or as determined by other similar device settings or adjustments), as determined by the limiting method. This capacity may be specified by the Applicant in the Application but shall be specified in the IOA and may reflect the total amount of generation output including ESD or Vehicle-to-Grid EV discharge, if applicable. For Non-Exporting systems, Inadvertent Export is not included.

Meter: is defined in Rule 1.

Metering Equipment: All equipment, hardware, software including Meter cabinets, conduit, etc. that is necessary for Metering.

Metering (Metered): The measurement of electrical power flow in kW and/or kWh, and, if necessary, kVAR, at a point, and its display to the Utility, as required by this Rule.

Microgrid: A self-sufficient energy system that serves a discrete geographic footprint, is comprised of a group of Interconnected loads and DERs that acts as a single controllable entity with respect to the grid, can operate either in Parallel Operation or Islanded, and has the defining characteristics as noted in Section G.10 of this Rule.

Microgrid Interconnection Device: A device that facilitates electrical separation of a Microgrid from the Utility's Distribution System. This device may provide the function of a normal paralleling device to reconnect the Microgrid with the Utility's Distribution System.

Momentary Parallel Operation: The physical and electrical connection of a Generating Facility to the Utility's Distribution System that established a continuous electrical path between them for fifteen seconds (900 cycles) or less.

MW: Megawatt(s).

(Continued)

(D,N)

(D,N)

Issued: 12-31-25

Effective:

Advice No.: 562

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

NAC: Nevada Administrative Code.

Nationally Recognized Testing Laboratory (NRTL): A laboratory accredited to perform the Certification Testing requirements under this Rule.

NEC: The National Electric Code.

Net Energy Metering: Metering for the receipt and delivery of electricity between the Producer and the Utility pursuant to Nevada Revised Statutes (NRS) 704.769 and the Utility's Net Energy Metering Tariff Schedules, as may be amended from time to time.

Net Generation Metering: The Metering of the net electrical energy output in kW and kWh from a given Generating Facility. This may also be the measurement of the difference between the total electrical energy produced by a Generating Unit and the electrical energy consumed by the auxiliary equipment necessary to operate the Generating Unit. For a Generating Unit with no Host Load, this is the Metering that is located at the Point of Common Coupling. For a Generating Unit with Host Load, this is the Metering that is located at the Generating Unit bus after the point of auxiliary load(s) and prior to serving Host Load.

Net Metering Systems: Those systems operating in Parallel Operation with the Utility's Distribution System as set forth in NRS 704.766 to 704.775 and the Utility's Net Energy Metering Tariff Schedules, as may be amended from time to time. A Net Metering System is defined in NRS 704.771. The addition of an ESD must not result in a violation of any limitations placed on Net Metering Systems in NRS 704.771.

Net Nameplate Rating: The gross AC generating capacity (kW) of a Generating Unit or the total of the gross AC generating capacity (kW) of the Generating Units comprising a Generating Facility as designated by the manufacturer(s) of the Generating Unit(s) minus the consumption of electrical power of the Generating Unit(s). The Net Nameplate Rating shall be specified in the IOA.

Network Service: More than one electrical feeder providing distribution service at a Point of Common Coupling.

NFPA: National Fire Protection Association.

Non-Export(ing): Designed to prevent or limit the transfer of electrical energy from a Generating Unit or Generating Facility across the Point of Common Coupling to the Utility through use of any of the appropriate options in Section G.2. of this Rule. Non-Exporting includes scenarios where Inadvertent Export could occur.

(D,N)

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Non-Islanding: Designed to detect and disconnect from a stable Unintentional Island with matched load and generation. Reliance solely on under/over voltage and frequency trip is not considered sufficient to qualify as Non-Islanding.

NRS: Nevada Revised Statutes.

Optional Pre-application Report: A Utility-provided report that potential Applicants have the option to request to acquire certain information about the Utility's Distribution System conditions at their proposed Point of Interconnection prior to submitting an Application for Interconnection.

Optional Pre-application Report Request Form: The form that must be completed by a potential Applicant to request that the Utility provide an Optional Pre-application Report containing information about the Utility's Distribution System conditions at their proposed Point of Interconnection.

Parallel Operation: The ~~simultaneous operation~~ discharge of power by a Generating Unit or Generating Facility, to serve onsite loads or exporting to the Utility's Distribution System ~~including power delivered to or received by the Utility's Distribution System, power delivered from the Utility's Distribution System (e.g., in the case of the charging of an ESD or Vehicle-to-Grid EV from the Utility's Distribution System), or an idle state,~~ while Interconnected.

Periodic Test(ing): A test performed on part or all of a Generating Facility at pre-determined time or operational intervals to achieve one or more of the following: 1) Verify specific aspects of its performance, or 2) Calibrate instrumentation, or 3) Verify and re-establish instrument or Protective Function set-points.

Permission to Operate (PTO): The Utility's express written permission authorizing the Generating Unit or Generating Facility to commence Parallel Operation. This express written permission is separate from and shall occur following Temporary Interconnection Authorization if such authorization is first granted by the Utility.

Point of Common Coupling Metering: Metering located at the Point of Common Coupling. This is the same Metering as Net Generation Metering for Generating Facilities with no Host Load.

Point of Common Coupling (PCC): The transfer point for electricity between the electrical conductors of the Utility and the electrical conductors of the Producer.

(Continued)

(D,N)

Issued: 12-31-25

Effective:

Advice No.: 562

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

B. DEFINITIONS AND ACRONYMS, (Continued)

Point of Interconnection (POI): The electrical transfer point between a Generating Facility and the Utility’s existing or planned Distribution System. This may or may not be coincident with the PCC.

Power Control System (PCS): A system that limits or controls the generation output of Generators or a Generating Facility, including ESDs or Vehicle-to-Grid EVs, or the load requirement of such technologies to enforce Limited Export amounts, Non-Exporting operation, Limited Generation Profiles, ESD or Vehicle-to-Grid EV charge/discharge limits, or other allowable operating characteristics. Such a system may be Advanced Inverter-based or based upon other Certified technologies as approved by the Utility on a case-by-case basis at its discretion and may establish or manage a Limited Generation Profile or Limited Export amount. A Certified PCS shall conform to Underwriters Laboratory (UL) 3141 only if and when such standard is fully approved, and then, only after its implementation date and acceptance by the Utility for use in this Rule.

Producer: The entity that executes an IOA with the Utility. The Producer may or may not own and operate the Generating Facility but is responsible for the rights and obligations related to the IOA.

Production Test(ing): A test performed on each device coming off the production line to verify certain aspects of its performance.

Protective Function(s): The equipment, hardware and/or software in a Generating Facility (whether discrete or integrated with other functions) or on the Utility’s Distribution System the purpose of which is to protect against Unsafe Operating Conditions.

Prudent Electrical Practices: Those practices, methods, and equipment, as changed from time to time, that are commonly used in prudent electrical engineering and operations to design and operate electric equipment lawfully and safely, and with dependability, efficiency, and economy.

Qualified Low-Income Residential Building: As defined in Nevada Assembly Bill 458 (2025), referenced in this Rule only to establish eligibility for Interconnection.

Qualifying Facility: As defined in Rule 1.

Qualified Multifamily Affordable Housing Property (QMAHP): As defined in Nevada Assembly Bill 458 (2025), referenced in this Rule only to establish eligibility for Interconnection.

(Continued)

(D,N)

Issued: 12-31-25
Effective:
Advice No.: 562

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Reference Point of Applicability (RPA): A location proximate to the Generating Facility where the Interconnection and interoperability performance requirements as specified in IEEE 1547-2018 apply. This location shall be specified by the Applicant in the Application and determined by mutual agreement between the Applicant and the Utility.

Relevant Minimum Load: The lowest Line Section or substation load either measured or reasonably estimated by the Utility coincident with the Generating Facility's production (i.e., when the Generating Facility is producing). For inverter-based solar photovoltaic Generators with no paired ESD, the daytime minimum load shall be used (i.e., 10 AM Pacific Time to 4 PM Pacific Time for fixed panel systems and 8 AM Pacific Time to 6 PM Pacific Time for systems utilizing tracking).

Rule: As defined in Rule 1.

Scheduled Operation Date: The date specified in the Generating Facility's IOA when the Generating Facility is, by the Producer's estimate, expected to begin initial operation.

Screen(s): The aspects of the technical review process that gauge a Generator's or Generating Facility's impact on the Utility's Distribution System, adherence to certain technical requirements, and determine if a Generator or Generating Facility Application passes or fails Simplified Review, Fast Track Review, Supplemental Review, or if Detailed Review is required.

Secondary Network: A network supplied by several primary feeders suitably interlaced through the area in order to achieve acceptable loading of the transformers under emergency conditions and to provide a system of extremely high service reliability. Secondary networks usually operate at 600 volts or lower.

Service(s): As defined in Rule 1.

Section: Refers to a particular part of this Rule.

Simplified Review: Part of the technical review process as determined by Section F.2 of this Rule. The Simplified Review may result in approval of the Interconnection or an Applicant's options meeting to discuss any failed Screens.

Single Line Diagram; Single Line Drawing: A schematic drawing, showing the major electric switchgear, Protective Function devices, wires, Generators, transformers and other devices, providing sufficient detail to communicate to a qualified engineer the essential design and safety of the system being considered.

(Continued)

(D,N)

(D,N)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS, (Continued)

Short Circuit Contribution Ratio (SCCR): The ratio of the Generating Facility's short circuit contribution to the Utility's short circuit contribution for a three-phase fault at the high voltage side of the distribution transformer connecting the Generating Facility to the Utility's Distribution System.

Short Circuit Interrupting Capability: The maximum fault current that can be safely interrupted by a protective device.

Solar-Powered Affordable Housing System: As defined in Assembly Bill 458 (2025). For purposes of this Rule, such systems are treated as Net Metering Systems.

Special Facilities: Facilities that are: (a) requested by the Producer which are in addition to or in substitution for standard facilities which the Utility would normally provide for delivery of service at one point, through one Meter, at one voltage class under its Tariff Schedules, or (b) a pro rata portion of the facilities requested by an Applicant, allocated for the sole use of such Applicant, which would not normally be allocated for such sole use. Unless otherwise provided by the Utility's filed Tariff Schedules, Special Facilities will be installed, owned and maintained or allocated by the Utility as an accommodation to the Producer only if acceptable for operation by the Utility and the reliability of service to the Utility's other customers is not impaired.

Stability: The return to normalcy of the Utility's Distribution System following a disturbance. Stabilization is usually measured as a time period during which voltage and frequency are within acceptable ranges.

Standby Service: As defined in Rule 1.

Starting Voltage Drop: The percentage voltage drop at a specified point resulting from In-rush Current. It can also be expressed in volts on a particular base voltage (e.g., 6 volts on a 120-volt base, yielding a 5 percent drop).

Supplemental Review: Part of the technical review process as determined by Section F.4 of this Rule. The Supplemental Review may result in approval of the Interconnection or a meeting between the Utility and the Applicant to discuss the Applicant's options.

Synchronization (Synchronizing)(Synchronize): The requirement at the time of Interconnection of a Generator that it shall Synchronize with the Utility's Distribution System in accordance with the Synchronization performance requirements of IEEE 1547-2018, Clause 4.10.4 and Table 5.

System Integrity: The condition under which a Distribution System is deemed safe and can reliably perform its intended functions in accordance with the safety and reliability rules of the Utility.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

B. DEFINITIONS AND ACRONYMS. (Continued)

Tariff Schedule(s): As defined in Rule 1.

TCP/IP: Transmission Control Protocol/Internet Protocol, which is a suite of communication protocols used to interconnect network devices on the internet.

Telemetry, Telemetry: The electrical or electronic transmittal of Metering data on a real-time basis to the Utility.

Temporary Interconnection Authorization (TIA): If required by the Utility for certain Interconnections, the express written permission by the Utility authorizing the Interconnection of a Generating Facility for the limited purposes of inspection, testing, coordination, and commissioning. TIA shall specify any Non-Export limits, test windows, and witness requirements. TIA is not PTO, which authorizes Parallel Operation, and may be issued prior to the Utility's issuance of PTO.

Transfer Trip (Capability): A Protective Function that trips a Generating Facility remotely by means of an automated communications link controlled by Utility.

Type Test(ing): A test performed on a sample of a particular model of a device to verify specific aspects of its design, construction and performance.

UL: Underwriters Laboratory, Inc.

Unauthorized Interconnection: The physical Interconnection of a Generating Facility to the Utility's Distribution System, or the commencement of Parallel Operation, without first obtaining written TIA (if required) or PTO from the Utility in accordance with this Rule. An Unauthorized Interconnection also includes any circumstance in which a Generating Facility is energized and capable of Exporting power to the Utility's Distribution System prior to the Utility's express written authorization.

Unintentional Island: The unplanned creation of an Island, usually following a loss of a portion of the Utility's Distribution System, without the knowledge and approval of the Utility.

Unsafe Operating Conditions: Conditions that, if left uncorrected, could result in harm to personnel, damage to equipment, loss of System Integrity or operation outside pre-established parameters required by the IOA.

Visible-Break Isolation Device: An electrical switching device that can separate the Generating Facility from Utility's Distribution System and is designed to allow visible verification that separation has been accomplished. This requirement can be met by opening the enclosure to observe the contact separation.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

B. DEFINITIONS AND ACRONYMS, (Continued)

Vehicle-to-Grid (V2G) EV: An EV that has the bidirectional transfer of electricity between it and the Utility's Distribution System enabled through Certified bidirectional EVSE for V2G-AC, or an onboard inverter for V2G-DC, and that operates in Parallel Operation with the Utility's Distribution System. V2G operation may include charging from the Utility's Distribution System, discharging to serve all or a portion of onsite Host Load, and/or Exporting to the Utility's Distribution System. For purposes of this Rule, a V2G EV (meaning that its V2G operational mode is enabled) is considered an ESD.

C. APPLICABLE CODES AND STANDARDS

As applicable, Interconnections shall conform to the most recent approved versions of the codes and standards listed below (which may be a more recent year than indicated below) on the date the Application is accepted as complete and correct by the Utility, or successor standards:

IEEE Std 1453™-2022: IEEE Standard for Measurement and Limits of Voltage Fluctuations and Associated Light Flicker on AC Power Systems.

IEEE Std 1547™-2018: IEEE Standard for Interconnection and Interoperability of Distributed Energy Resources with Associated Electric Power Systems Interfaces, as amended by IEEE 1547a™-2020, including use of IEEE 1547.1™-2020 testing protocols to establish conformity.

IEEE Std 1547.1™-2020: IEEE Standard Conformance Test Procedures for Equipment Interconnecting Distributed Energy Resources with Electric Power Systems and Associated Interfaces.

IEEE Std 1547.3™-2023: IEEE Guide for Cybersecurity of Distributed Energy Resources Interconnected with Electric Power Systems.

IEEE Std 1815™-2012: IEEE Standard for Electric Power Systems Communications—Distributed Network Protocol (DNP3).

IEEE Std 2030.5™-2023: IEEE Standard for Smart Energy Profile 2.0 Application Protocol (SEP 2.0).

NFPA 70®: National Electric Code® 2017 Edition (as modified by any local code amendments).

SAE J3072: Interconnection Requirements for Onboard, Grid Support Inverter Systems.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

C. APPLICABLE CODES AND STANDARDS, (Continued)

UL 1741: STANDARD FOR SAFETY Inverters, Converters, Controllers and Interconnection System Equipment for Use with Distributed Energy Resources, including Supplements SA, SB, SC (when published and accepted by the Utility for use in this Rule), and applicable Certification Requirement Decisions (CRD).

UL 3141: Outline of Investigation for Power Control Systems (only following this standard's full approval, implementation date, and acceptance by the Utility for use in this Rule).

UL 9741: STANDARD FOR SAFETY Electric Vehicle Power Export Equipment (EVPE).

D. RIGHTS AND OBLIGATIONS

1. A Producer shall execute an IOA with the Utility governing the Interconnection and operation of Generating Facilities.
 - a. Pro forma agreements establishing the terms and conditions for Interconnections and operation with the Utility's Distribution System facilities for each applicable class shall be provided to the Producer by the Utility. Such agreements may be modified by mutual agreement as necessary to address specific Interconnection requirements that may exist at the time of the execution of the agreement.
 - b. Producers having agreements executed prior to the effective date of this Rule that govern Interconnection and Parallel Operation with the Utility's Distribution System facilities shall be governed by the provisions of those existing agreements.
 - c. The agreement shall include any necessary requirements for communications and communications facilities between the Utility and the Producer.
2. A Producer requiring other Services not addressed in this Rule may acquire such Services in accordance with the Utility's Tariff Schedules governing the provision of such Services. Specific examples of other such Services include but are not limited to: Supplemental Service for Customer load in excess of what is normally produced by the generating equipment, Backup Service for unscheduled outages of Generating Facilities, and Maintenance Backup Service for scheduled maintenance outages of Generating Facilities. Such Services are outside of the scope of this Rule.

(Continued)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

D. RIGHTS AND OBLIGATIONS. (Continued)

3. Interconnection described hereunder does not provide a Producer with any rights to use the Utility's system for the transmission, distribution, or wheeling of electric power, nor does Interconnection described hereunder limit those rights. Such rights to the use of the Utility's system must be addressed in separate agreements.
4. Interconnection described hereunder does not require the Utility to purchase the output of a Generating Facility. Such purchase arrangements must be addressed in separate agreements.
5. A Producer shall ascertain and comply with all applicable Commission-approved tariffs of the Utility, applicable FERC-approved rules, tariffs, and regulations, and any local, state or federal law, statute or regulation that applies to the design, siting, construction, installation, operation, or any other aspect of the Generating Facilities and Interconnection Facilities.
6. The Utility shall have the right to review the design of a Producer's Generating Facility and Interconnection Facilities and to inspect a Producer's Generating and/or Interconnection Facilities prior to the provision of TIA (if applicable), PTO and the commencement of Parallel Operation with the Utility's Distribution System. The Utility may require a Producer to make modifications as necessary to comply with the requirements of this Rule. The Utility's review and provision of TIA (if applicable) and/or PTO authorizing Parallel Operation shall not be construed as confirming or endorsing the Producer's design or warranting the Generating and/or Interconnection Facilities' safety, durability or reliability. The Utility shall not, by reason of such review or lack of review, be responsible for the strength, adequacy, or capacity of such equipment.
7. Producers shall not begin Parallel Operation with the Utility's Distribution System, with the exception of the provisions allowable under Section E.2 and any operation solely required to facilitate proper testing and inspection of the Generating Facility in accordance with Section J, until their Interconnection Facilities have been inspected by the Utility and PTO is provided by the Utility to the Producer. Such approval may be withheld for noncompliance with the requirements of this Rule or any of the Utility's applicable tariffs.
8. A Producer's Generating Facility and Interconnection Facilities shall be reasonably accessible to Utility personnel as necessary for the Utility to perform its duties and exercise its rights under its tariffs filed with and approved by the Commission, and any agreement between the Utility and the Producer.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

D. RIGHTS AND OBLIGATIONS, (Continued)

9. Any information pertaining to Generating and/or Interconnection Facilities provided to the Utility by a Producer shall be treated by the Utility in a confidential manner.
10. A Producer shall operate and maintain its Generating Facility and Interconnection Facilities in accordance with Prudent Electrical Practices and shall maintain compliance with Commission adopted standards for the Producer's particular Generating Facility and Interconnection Facilities. Said standards shall be those in effect at the time a Producer executes the IOA with the Utility.
11. The Utility may limit the operation and/or disconnect or require the disconnection of a Producer's Generating Facility from Utility's Distribution System at any time, with or without notice, in the event of an Emergency, to correct Unsafe Operating Conditions, or in the event that the Utility determines that the Generating Facility is an Unauthorized Interconnection. The Utility may also limit the operation and/or disconnect or require the disconnection of a Producer's Generating Facility from the Utility's Distribution System upon the provision of reasonable notice:
 - a. to allow for routine maintenance, repairs or modifications to the Utility's Distribution System;
 - b. for cybersecurity-related concerns;
 - c. upon the Utility's determination that a Producer's Generating Facility is not in compliance with this Rule; or
 - d. upon termination of the IOA.

The Producer and the Utility shall make good faith efforts to restore the Interconnection of the Generating Facility in a timely manner following a temporary limiting of operation or disconnection. The Producer may also be subject to additional charges, corrective requirements, or other remedies as may be contained in the IOA or as authorized by the Commission.

12. During Parallel Operation, the Producer shall comply with all operational direction of the Utility at the time given with such direction subject to any conditions that the Producer and the Utility may mutually agree to incorporate in the IOA. Any dispute regarding such direction shall be handled after the fact in accordance with the dispute resolution procedures in Section K.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

D. RIGHTS AND OBLIGATIONS, (Continued)

13. The operation of the Generating Facility shall not reduce the quality of service described in Rule 2 to other Customers and shall conform with the Utility's applicable design standards. If the Generating Facility causes service interference, the Utility shall give notice and provide reasonable time for the Producer to take corrective action.
14. When an Interconnection Study is required pursuant to Section F.6, the Producer shall be responsible for paying to the Utility all reasonable costs incurred by the Utility in performing such a study unless such Parallel Operation has been requested by the Utility.

E. APPLICATION FOR INTERCONNECTION

1. Optional Pre-application Report

- a. A potential Applicant may request an Optional Pre-application Report for a specific site to obtain information about the Utility's Distribution System conditions at the proposed POI prior to submitting an Application for Interconnection by completing and submitting to the Utility an Optional Pre-application Report Request Form and a non-refundable fee of \$300.
- b. The Utility shall make the Optional Pre-application Report Request Form publicly accessible either as an online form, electronic document transferable through e-mail, or other format convenient to potential Applicants.
- c. Upon receipt of a completed Optional Pre-application Report Request Form and the non-refundable fee of \$300, the Utility shall provide the requested data to the potential Applicant within ten (10) business days, making reasonable and good faith efforts to provide all available data requested. However, the Utility shall only be obligated to provide existing data relevant to the request and shall not be obligated to provide data it does not possess at the time of the request nor to conduct a study or other analysis to generate such data. The Utility shall indicate on the form which data it cannot provide at the time of the request.
- d. None of the data provided by the Utility in an Optional Pre-application Report shall in any way imply or guarantee that a potential Applicant's Interconnection can be completed without impact(s) to the Distribution System or the need for Distribution System improvements.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

E. APPLICATION FOR INTERCONNECTION, (Continued)

2. Application Process

- a. Prior to receiving an Application, if requested by a potential Applicant and upon such request, the Utility shall provide information and documents (e.g., the pro forma IOA and the Application, technical requirements, specifications, listing of Certified Equipment, application fee information, applicable rate schedules and Metering requirements). Unless otherwise agreed upon, the Utility shall normally send all such information to an Applicant within five (5) business days following the initial request from the potential Applicant.

(1) For Net Metering Systems, the Utility shall send a description of the procedures by which a Customer may Interconnect to the Utility's Distribution System under its Net Energy Metering Tariff Schedules and a copy of the standard IOA and Application form.
- b. All Applicants shall be required to complete and submit an Application for Interconnection to the Utility. The submission must include the completed Application and any applicable fee for processing the Application and performing any applicable technical review to be completed by the Utility pursuant to Section F.

(1) An Application for Interconnection of a Solar-Powered Affordable Housing System must include supporting documentation demonstrating that the system is located on a QMAHP, including a declaration of Active Affordability Covenants or a verification letter from a funding authority.
- c. The Application processing fee shall vary based on the proposed Generating Facility that will be Interconnected as indicated in Table 1 below:

TABLE 1

Type of Interconnection	Technical Processing Fee	Interconnection Study Fee
Net Metering Systems	\$119*	None
QMAHP	\$119*	Actual Costs Incurred
Small-Scale Systems (behind the meter, non-NEM, ≤ 50 kW)	\$119	None
All Others	Actual Costs Incurred	Actual Costs Incurred

* One fee for Simplified, Fast Track, and Supplemental Reviews.

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
---	---	--

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

E. APPLICATION FOR INTERCONNECTION, (Continued)

- d. The Applicant may propose, and the Utility may negotiate specific costs for processing non-standard installations such as multi-units, multi-sites, or otherwise as conditions warrant. The costs in Table 1 may not apply under such circumstances.
- e. An Application for Interconnection of a Solar-Powered Affordable Housing System may include:
 - (1) A one-time allocation initiation fee, chargeable to the Applicant once, capped at the lesser of 25 dollars per user or 500 dollars per system.
 - (2) An occupancy change fee may be charged to the Producer for the second and subsequent occupancy change of the same unit within twelve (12) months. There is no fee for the first occupancy change in that period.
- f. The Utility shall establish an individual representative as the single point of contact for the Applicant but may allocate responsibilities among its staff to best coordinate the Interconnection of an Applicant's Generating Facility.
- g. The Utility shall record the date and time it first receives an Application.
- h. Within ten (10) business days of first receiving an Application, the Utility shall acknowledge its receipt, complete its first review of the Application, and inform the Applicant if the Application has been completed adequately and has been accepted by the Utility. If the Application has been completed adequately, the Utility shall also determine the appropriate technical review level, pursuant to Section F.1.b, and inform the Applicant of its determination.
 - (1) For Net Metering Systems, the Utility shall send a standard IOA to the Applicant for signature (if the Applicant has not already been sent such agreement) if the data provided in the Application is complete and complies with the technical requirements of NRS 704.774.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

E. APPLICATION FOR INTERCONNECTION, (Continued)

i. Applications Containing Defects

- (1) If the Utility identifies that the initial Application is not complete and contains deficiencies, errors, or omissions (collectively, "defects"), the Utility shall identify all such defects and shall return the Application to the Applicant within the ten (10) business days as indicated in Section E.2.h, specifying all such defects in sufficient detail to enable the Applicant to correct the Application for resubmission.
 - (a) For Net Metering Systems, such Utility identification of defects shall additionally include adherence to the technical requirements of NRS 704.774.
- (2) Any Application containing defects that are not fully corrected by the Applicant after two subsequent Utility reviews of the Application in addition to the Utility's first review may be rejected at the Utility's discretion, provided the Utility and the Applicant have worked in good faith, and in a timely manner, to assist the Applicant in submitting a correct and complete Application.
- (3) An Application that, in the Utility's reasonable judgment and discretion, is materially incomplete, lacks substantial required information, or was submitted solely to obtain queue position without a good-faith effort to provide a correct and complete submission, shall be rejected. In such cases, the Applicant shall submit a new Application with all applicable fees. The new Application will be treated as an initial submission for purposes of queue position and Utility review.
- (4) Any defect(s) present in an Application that is(are) identified by the Utility in one of its subsequent reviews of the Application following its initial review that the Utility failed to identify in any of its previous reviews of the Application shall reset the iterative review process begun in Section E.2.i.(1).

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

E. APPLICATION FOR INTERCONNECTION, (Continued)

- (5) Any additional defect(s) in a subsequent submission of an Application identified by the Utility that was(were) not present in the initial submitted Application and which occurred in one of the subsequent submissions of the Application shall not reset the iterative review process begun in Section E.2.i.(1).
- (6) If the Utility rejects an Application in accordance with and following completion of the iterative review process described in this Section, the Applicant shall submit a new Application and remit a new Application fee if the Applicant wishes to continue the application process. The Utility shall review the new Application for completeness and correctness as if it is an initial submission of the Application in accordance with Section E.2.h.
- (7) An Applicant may dispute the Utility's adherence to the iterative review process described in this Section and correctness in identifying defects in its initial or subsequently submitted Applications in accordance with Section K.
- j. The Utility shall record the date and time it accepts the Application as complete and correct and inform the Applicant of such date in a timely manner.
- 3. Modifications to Applications or Existing Generating Facility Installations
 - a. The Applicant or the Producer shall notify the Utility of a modification to an Application or the equipment or operation of an existing Generating Facility in a timely manner or as required by the IOA.
 - b. When notifying the Utility of a modification to an Application or the equipment or operation of an existing Generating Facility, the Applicant or the Producer shall include the relevant Generating Facility information (e.g., system rating, Advanced Inverter/PCS specifications, POI, as applicable) either originally approved or within the Application, together with the proposed changes and the elements to be modified clearly identified.
 - c. A modification to an accepted Application before execution of the IOA, or issuance of PTO, and modifications to the equipment or operation of an existing Generating Facility, shall be reviewed by the Utility in accordance with Table 2 to determine whether such modification constitutes a Material Modification and the corresponding actions required of the Applicant or Producer.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

E. APPLICATION FOR INTERCONNECTION, (Continued)

- d. Any modification that does not reasonably fall within the descriptions in Table 2 shall be addressed by the Utility on a case-by-case basis. The Applicant or the Producer and the Utility shall make good faith efforts to determine if a modification constitutes a Material Modification and agree upon the resulting course of action in a timely manner, at the Utility's discretion.
- e. If it is determined by the Utility, either at its discretion or through the application of Table 2, that a new Application is required as a result of a Material Modification, the applicable provisions of Section E.2 and the technical review process in Section F shall apply.

TABLE 2

ID	Modification to Applications or Existing Generating Facilities	Notification Required?	New Application required?	Proceed without Utility approval?	Updated agreement required?
1.	Like-for-like replacement of existing equipment that does not constitute Material Modification, with no increase in system output (vs. original agreement) and no change to generator operating modes.	No	No	Yes	No
2.	Addition of a <u>Parallel Operating</u> , ≤ 50 kW Net Nameplate Rating, Non-Exporting resource (such as an ESD or V2G EV Charger configured for Non-Export) that does not increase Export capability at the PCC.	Yes	Yes	No	Yes

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

E. APPLICATION FOR INTERCONNECTION, (Continued)

3.	Modifications where system capacity or output increases at the PCC and no inverter power or PCS controls are used to limit the active power as stated in the original agreement size, including:	Yes	Yes	No	Yes
a)	Replacement of existing equipment <u>except for replacements that qualify as "like-for-like" pursuant to #1 in this Table above.</u>	Yes	Yes	No	Yes
b)	Inverter firmware upgrade materially affecting grid interaction	Yes	Yes	No	Yes
c)	Change(s) to inverter characteristics that affect grid interaction	Yes	Yes	No	Yes
d)	Modifications to the operating mode [#] of the Generator(s) (Export or Non-Exporting),	Yes	Yes	No	Yes
4.	Change to a different POI or PCC <u>that is located on a different feeder than reflected stated in the current agreement</u>	Yes	Yes	No	Yes
5.	Sole change in ownership or Producer	Yes	No	No	Yes
6.	Permanent removal, retirement, or decommissioning of the Generating Facility	Yes	No	No	No

[#] Operating mode does not refer to changes that customers can select via a vendor app or other means which do not alter the relevant parameters of the systems and how it interacts with the grid as reflected in the interconnection application and agreement."

- f. An Applicant or a Producer may dispute the Utility's determination of whether a modification constitutes a Material Modification or the actions required as a result of a modification in accordance with Section K, subject to and in accordance with the IOA.

F. TECHNICAL REVIEW PROCESS

1. Technical Review Level Determination and Process

- a. Upon the Utility's acceptance of a satisfactorily-completed Application including proposed Net Metering Systems, and receipt by the Utility of any applicable processing fee, the Utility shall determine the appropriate level of technical review required, inform the Applicant of such, and begin performing technical review in accordance with the flowchart in Attachment 2. The business day response times for the Utility's completion of Simplified Review, Fast Track Review, Supplemental Review, and review of the proposed RPA begin only after the Utility has confirmed with the Applicant that all the applicable information and fees in this Section have been submitted.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen, Vice President, Regulatory	
Effective:		

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- b. The Utility shall determine which level of technical review is required as follows:
- (1) If the proposed Generating Facility is a Certified inverter-based resource, has a Net Nameplate Rating of 50 kW or less, and has a Maximum Generating Capacity of 30 kW or less, then the Application qualifies to begin the technical review process with Simplified Review. Otherwise, the technical review process for the Application shall begin with either Fast Track Review or Supplemental Review.
 - (2) If the Application does not qualify for Simplified Review, based upon the proposed POI for the Generating Facility and its Maximum Generating Capacity, the Utility shall apply Table 3 to determine whether the Application may begin the technical review process with Fast Track Review or Supplemental Review.

TABLE 3

LINE VOLTAGE	FAST TRACK ELIGIBILITY	
	Regardless of location	On $\geq$ 600-amp line and < 2.5 miles from substation
< 5 kV	< 1 MW	< 2 MW
5 kV – < 15 kV	< 2 MW	< 3 MW
15 kV – < 30 kV	< 3 MW	< 4 MW
30 kV – 69 kV	< 4 MW	< 5 MW

- (3) If the Maximum Generating Capacity of the proposed Generating Facility meets the criteria in Table 3 based upon the line voltage at the proposed POI, then the Application qualifies to begin the technical review process with Fast Track Review. Otherwise, the technical review process for the Application shall begin with Supplemental Review.
- c. At any time during the Application or technical review process, an Applicant may request the Utility to proceed to Detailed Review in lieu of performing Simplified Review, Fast Track Review, or Supplemental Review.
- d. Concurrently with the Utility's application of the appropriate technical review level, the following shall occur to review and confirm the RPA:

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen,
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- (1) The Applicant shall provide a proposed RPA on the Application. Unless otherwise approved, the default RPA shall be the PCC.
 - (2) The Utility shall complete its review of the proposed RPA within five (5) business days, shall determine if the proposed RPA is appropriate, and shall inform the Applicant of such determination in a timely manner.
 - (3) If the Utility determines the proposed RPA to be inappropriate, the Utility shall notify the Applicant with an explanation as to why it requires correction. The Utility and the Applicant shall make good faith efforts to expeditiously meet and agree upon the RPA so as to not materially delay the technical review process.
- e. The Utility shall perform its technical review and determine the Interconnection requirements for each phase of a multi-phased Generator or Generating Facility Application at a single PCC (or RPA, if not the PCC) with consideration of previous phases but not future planned phases. Based on the requirements of future phases, (i) amendments to existing agreements may be required, including IOA, or (ii) existing agreements may be terminated by the Utility or the Producer, and new agreements may be required.
2. Simplified Review
- a. The Utility shall complete its Simplified Review, within ten (10) business days if the Application qualifies for Simplified Review and shall notify the Applicant if the Generating Facility meets all the applicable Simplified Review screens.
 - b. The Utility's Simplified Review and shall consist of the following Screens:
 - (1) Screen A: Networked Secondary System
 - (a) The Utility shall determine whether the proposed Generating Facility would Interconnect to a networked secondary system.
 - (b) If the proposed Generating Facility would not Interconnect to a networked secondary system, then the Application passes this Screen. If it does interconnect to a networked secondary system, the Application fails this Screen.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

(2) Screen B: Certified Equipment

- (a) On the basis of the information provided in the Application or any additional information provided to the Utility by the Applicant or the Producer either at the Utility's request or subsequent to the original Application, the Utility shall determine to the best of its ability if all of the equipment proposed for the Generating Facility is Certified Equipment per the requirements set forth in this Rule or if it will temporarily approve certain equipment that is not Certified.
- (b) If all the equipment proposed for the Generating Facility is Certified Equipment or if the Utility has granted, at its discretion on a case-by-case basis, interim approval of certain equipment that is not Certified, then the Application passes this Screen. Otherwise, if all the equipment is not Certified Equipment and does not have interim approval by the Utility, then the Application fails this Screen.

(3) Screen C: Transformer and Conductor Rating

- (a) This Screen is not applicable to Interconnections on the primary side of a service transformer or Non-Export Generators that do not impose additional load on the Distribution System. Such Interconnections automatically pass this Screen.
- (b) If the proposed Generating Facility is to Interconnect on the secondary side of a service transformer, the Utility shall determine if the addition of the Generating Facility would cause the normal continuous rating of either the service transformer or secondary conductor to which the Generating Facility would be Interconnected to be exceeded.

(Continued)

(D,N)

(D,N)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

(c) For a Generating Facility proposed to Interconnect to a service transformer, if the addition of the proposed Generating Facility, when considering the total aggregate Maximum Generating Capacity of all existing Generating Facilities Interconnected to the service transformer or secondary conductor and that of the proposed Generating Facility, would not exceed the normal continuous ratings of both the service transformer and secondary conductor, then the Application passes this Screen. Otherwise, if it would exceed either the normal continuous ratings of the service transformer or secondary conductor, or both, then the Application fails this Screen.

(4) Screen D: Service Imbalance

(a) If the proposed Generating Facility is single-phase and is to Interconnect on a center tap neutral of a 240 volt service, the Utility shall determine whether the addition of the Generating Facility would cause excessive imbalance between the two sides of the 240 volt service.

(b) If the addition of the proposed Generating Facility would create an imbalance of twenty (20) percent or less of the normal continuous nameplate rating of the service transformer, then the Application passes this Screen. Otherwise, if it would create an imbalance of more than twenty (20) percent of the normal continuous nameplate rating of the service transformer, then the Application fails this Screen.

(5) Screen E: Hosting Capacity or Line Section Load

(a) If Hosting Capacity values are available at the Generating Facility's POI, the Utility shall compare those values to the Generating Facility's Maximum Generating Capacity.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- i. If the Maximum Generating Capacity of the Generating Facility imposed on the Utility's Distribution System by the Generating Facility is less than or equal to ninety (90) percent of the appropriate Hosting Capacity value, then the Application passes this Screen. Otherwise, if it is greater than ninety (90) percent of the appropriate Hosting Capacity value, then the Application fails this part of this Screen. In the case of the Generating Facility imposing load on the Utility's Distribution System, the Utility shall also ensure that no planning or operational criteria are exceeded, which may not be adequately reflected in the Hosting Capacity value.
 - ii. If the Application fails this part of this Screen, then the Utility shall apply the next part of this Screen. If the Application passes the Screen in Section F.2.B.(5)(b), then the Application passes this Screen despite failing the Hosting Capacity part of this Screen.
- (b) If Hosting Capacity values are not available and cannot be reasonably estimated or calculated at the Generating Facility's POI or if Section F.2.b.(5)(a)(i) has been failed, and where twelve (12) months of Line Section minimum load data (including onsite load but not station service load served by the proposed Generating Facility) are available or can be estimated or calculated from existing data or from a power flow model, the Utility shall determine the Relevant Minimum Load and compare that value to the total aggregate Generating Facility Maximum Generating Capacity on the Line Section (existing plus the proposed Generating Facility) that the Generating Facility will Interconnect to and to all Line Sections bounded by automatic sectionalizing devices upstream of the proposed Generating Facility. If adequate load data is not available and the Utility is unable to reasonably estimate or calculate the Line Section Relevant Minimum load, the Utility shall include the reason(s) that it is unable to do so in its technical review results.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

F. TECHNICAL REVIEW PROCESS, (Continued)

- i. If the Utility's comparison yields a one hundred (100) percent or less result(s), then the Application passes this Screen. Otherwise, if it yields a greater than a one hundred (100) percent result(s), then the Application fails this Screen. However, for this part of this Screen, if the Generating Facility has been designated as Non-Exporting, then it automatically passes this part of this Screen.
- (c) If both Hosting Capacity and Relevant Minimum Load values are not available and cannot be reasonably estimated or calculated at the Generating Facility's POI, the Utility shall compare the total aggregate Generating Facility Maximum Generating Capacity on the Line Section (existing plus the proposed Generating Facility) to fifteen (15) percent of the peak (maximum) load of the Line Section to which the Generating Facility will Interconnect. If adequate load data is not available and the Utility is unable to reasonably estimate or calculate the Line Section peak load, the Utility shall include the reason(s) that it is unable to do so in its technical review results.
 - i. If the Utility's comparison yields a fifteen (15) percent or less result, then the Application passes this Screen. Otherwise, if it yields a greater than fifteen (15) percent result, then the Application fails this Screen. However, for this part of this Screen, if the Generating Facility has been designated as Non-Exporting, then it automatically passes this part of this Screen.
- c. If any of the Simplified Review Screens are failed, the Utility at its discretion may approve the Interconnection provided such approval shall not impact the safety and reliability of its Distribution System. Otherwise, if the Utility does not approve the Interconnection, the Application shall proceed to the Applicant's options process pursuant to Section F.5.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- d. If all Simplified Review Screens are passed, then the proposed Generating Facility may be Interconnected without further technical review. The Utility shall provide the Applicant with a written description of the requirements for Interconnection and the IOA pursuant to Section E.2. in a timely manner if it has not already provided such agreement to the Applicant.

3. Fast Track Review

- a. The Utility shall begin Fast Track Review upon its determination that this review level is required to determine the Interconnection requirements for the Application based upon its technical review level determination, unless the Applicant requests that the Utility perform either Supplemental or Detailed Review in lieu of performing Fast Track Review. If the Utility determines that additional information is required to perform Fast Track Review, the Applicant and the Utility shall make good faith efforts to request and provide such information in a timely manner.
- b. The Utility shall complete its Fast Track Review within fifteen (15) business days if the Application qualifies for Fast Track Review and shall notify the Applicant in a timely manner if the Generating Facility meets all the applicable Fast Track Review Screens.
- c. The Utility's Fast Track Review shall include the Simplified Review Screens A through E in addition to the following Screens F through J below:

(1) Screen F: Short Circuit Current Contribution

- (a) Inverter-based Generating Facilities with a Net Nameplate Rating of less than 50 kW automatically pass this Screen.
- (b) The Utility shall determine if the addition of the Generating Facility would cause allowable Short Circuit Contribution Ratio limits to be exceeded by ensuring that both of the following criteria are met (when applicable):

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS. (Continued)

- i. When measured at primary side (high side) of a Dedicated Distribution Transformer serving a Generating Facility, the sum of the Short Circuit Contribution Ratios of all Generating Facilities connected to the particular Distribution System feeder that serves the Generating Facility must be less than or equal to 0.1; and
 - ii. When measured at the secondary side (low side) of a shared distribution service transformer, the short circuit contribution of the proposed Generating Facility must be less than or equal to 2.5 percent of the interrupting rating of the Producer's service equipment.
 - (c) If the addition of the proposed Generating Facility, when considering the total aggregate Net Nameplate Ratings of all existing Generating Facilities Interconnected to the particular Distribution System feeder and the proposed Generating Facility meets both of the above criteria, then the Application passes this Screen. Otherwise, if it does not meet one or both of the above criteria, then the Application fails this Screen.
- (2) Screen G: Short Circuit Interrupting Capability
- (a) The Utility shall determine if the addition of the Generating Facility would cause the allowable Short Circuit Interrupting Capability of the Utility's protective devices or equipment on the Distribution System feeder or the Producer's protective devices or equipment to be exceeded.
 - (b) If the addition of the proposed Generating Facility, when considered in aggregate with the Net Nameplate Ratings of all existing Generating Facilities on the Distribution System feeder, would not cause the Utility's protective devices or equipment on the Distribution System feeder or the Producer's protective devices or equipment to exceed 87.5 percent of their Short

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

F. TECHNICAL REVIEW PROCESS. (Continued)

Circuit Interrupting Capability, then the Application passes this Screen. Otherwise, if it would cause the Utility's protective devices or equipment on the Distribution System feeder or the Producer's protective devices or equipment to exceed 87.5 percent of their Short Circuit Interrupting Capability, then the Application fails this Screen.

(3) Screen H: Line Configuration

- (a) Single-phase inverter-based Generating Facilities automatically pass this Screen when Interconnecting to a single-phase lateral or single-phase service transformer, or when Interconnecting line-to-neutral on a three-phase, four-wire primary Distribution System Line.
- (b) The Utility shall determine if the Interconnection of the proposed Generating Facility passes this Screen in accordance with the following:
 - i. If the primary Distribution System line configuration is three-phase, three-wire, then this Screen is passed for any single-phase Generating Facility Interconnecting to a single-phase lateral or single-phase service transformer, and any three-phase Generating Facility that is effectively grounded at the RPA; or
 - ii. If the primary Distribution System line configuration is three-phase, four wire, then this Screen is passed if the Interconnection to the primary Distribution System line is single-phase, line-to-neutral; or three-phase, four wire and effectively grounded at the RPA.
 - iii. Otherwise, the Application fails this Screen.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS. (Continued)

(4) Screen I: Inadvertent Export

- (a) This Screen only applies when the Net Nameplate Capacity of the Generating Facility minus its Maximum Generating Capacity is greater than 250 kW for a Generating Facility that can introduce Inadvertent Export. Otherwise, if that difference is 250 kW or less, then this Screen is automatically passed.
- (b) The Utility shall determine if the change in voltage at the point on the Utility's primary Distribution System nearest the POI due to Inadvertent Export of the Generating Facility does not exceed three (3) percent. The voltage change shall be estimated by applying the formula:

$$\frac{(R_{\text{source}} \times \Delta P) - (X_{\text{source}} \times \Delta Q)}{V^2}, \text{ where:}$$

- i. R_{source} equals the grid resistance;
 - ii. ΔP equals (Net Nameplate Rating - the Maximum Generating Capacity) x power factor;
 - iii. X_{source} equals the grid reactance;
 - iv. ΔQ equals (Net Nameplate Rating - the Maximum Generating Capacity) x $\sqrt{(1 - \text{power factor}^2)}$; and
 - v. V equals the primary Distribution System voltage.
- (c) If the result of the above formula is three (3) percent or less, then the Application passes this Screen. Otherwise, if it is greater than three (3) percent, then the Application fails this Screen.

(5) Screen J: Starting Voltage Dip

- (a) This Screen only applies to Generating Facilities that start by motoring the Generator(s). Inverter-based Generators automatically pass this Screen.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- (b) The Utility shall determine if the starting of the Generator(s) associated with a proposed Generating Facility would exceed the maximum allowable voltage dip on its Distribution System by using either of the following two options at its discretion:
 - i. Determining that the Generating Facility's starting In-rush Current is equal to or less than the continuous ampere rating of the Producer's service equipment; or
 - ii. Determining the impedances of the distribution service transformer (if present) and the secondary conductors to the Producer's service equipment and performing a voltage dip calculation. Alternatively, the Utility may use tables or nomographs to determine the voltage dip. Voltage dips caused by starting a Generator as a motor must be less than two and one-half (2.5) percent for primary Distribution System Interconnections and five (5) percent for secondary Distribution System Interconnections.
- (c) If, by employing either of the above two options, the Utility determines that the starting voltage dip of the Generator(s) associated with a proposed Generating Facility would not exceed the maximum allowable voltage dip on its Distribution System, then the Application passes this Screen. Otherwise, if it would exceed the maximum allowable voltage dip on its Distribution System, then the Application fails this Screen.
- (d) Passing this Screen still requires the Producer to ensure that its Generating Facility complies with the flicker requirements of Section G.3.f.
- d. If any of the Fast Track Review Screens are failed, the Utility at its discretion may approve the Interconnection provided such approval shall not impact the safety and reliability of its Distribution System. Otherwise, the Utility shall begin Supplemental Review unless the Applicant requests an Applicant's options meeting pursuant to Section F.5 in lieu of the Utility performing Supplemental Review.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- e. If all Screens A through J are passed, the proposed Generating Facility may be Interconnected without further technical review. The Utility shall provide the Applicant with a written description of the requirements for Interconnection and the IOA pursuant to Section E.2 in a timely manner if it has not already provided such agreement to the Applicant.
- 4. Supplemental Review
 - a. The Utility shall begin Supplemental Review upon its determination, based upon its review of the Application, that this review level is required to determine the Interconnection requirements, or if the Application has failed Fast Track review, unless the Applicant requests that the Utility perform Detailed Review in lieu of performing Supplemental Review. If the Utility determines that additional information is required to perform Supplemental Review, the Applicant and the Utility shall make good faith efforts to request and provide such information in a timely manner.
 - b. The Utility shall complete its Supplemental Review within twenty (20) business days after the Applicant provides all the required information and if the Application qualifies for Supplemental Review. The Utility shall notify the Applicant if the Generating Facility meets all the applicable Supplemental Review Screens in a timely manner after the Supplemental Review has been completed.
 - c. The Utility's Supplemental Review shall consist of Screens A through J (if not already performed as part of Fast Track Review) in addition to the following Screens K through M below:
 - (1) Screen K: Supplemental Grounding
 - (a) If Screen H was failed, then the Utility shall apply this Screen. If Screen H was passed, then this Screen is automatically passed.
 - (b) If the Generator is rotating machine-based, then effective grounding must be maintained for this Screen to be passed. Otherwise, this Screen is failed.
 - (c) If the Generator is inverter-based, then the Utility shall apply one of the following to evaluate if it is effectively grounded:

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice **562**
No.:

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- i. If the line-to-neutral connected load on the Distribution System feeder or Line Section is greater than thirty-three (33) percent of the peak load on the Distribution System feeder or Line Section, then this Screen is passed; or
- ii. If a supplemental grounding software tool is used and it determines that supplemental grounding is not required to maintain effective grounding, then this Screen is passed; or
- iii. If a supplemental grounding software tool is used and it determines that supplemental grounding is required, and the Applicant agrees to modify its system to include supplemental grounding, then this Screen is passed; or
- iv. If a detailed Hosting Capacity analysis is used that incorporates evaluation of temporary overvoltage risk for inverters and if the Maximum Generating Capacity of the Generator is below the available Hosting Capacity at the POI, then this Screen is passed.
- v. Otherwise, if none of the above four criteria are met, then the Application fails this Screen.

(2) Screen L: Voltage and Power Quality

- (a) The Utility shall determine if the addition of the Generating Facility would cause voltage fluctuation or harmonic levels on the Line Section to be exceeded.
- (b) The Utility shall consider the total aggregate Generating Facility Maximum Generating Capacity on the Line Section (existing plus the proposed Generating Facility):
 - i. The voltage fluctuation shall be within acceptable limits as defined by IEEE 1547-2018; and
 - ii. The harmonic levels shall meet IEEE 1547-2018 limits at the RPA.
- (c) If both of the above two criteria are met, then the Application passes this Screen. Otherwise, if either or both of the above two criteria are not met, then the Application fails this Screen.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice **562**
No.:

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

(3) Screen M: Safety and Reliability

- (a) The Utility shall consider the following factors to determine if the Generating Facility may potentially impact safety and reliability on its Distribution System:
- i. If the Line Section has significant minimum loading levels dominated by a small number of customers (i.e., several large commercial customers);
 - ii. If the loading along the Line Section is uniform or evenly distributed;
 - iii. If the proposed Generating Facility is located in close proximity to the substation (i.e., less than two and one-half (2.5) electrical circuit miles), and if the Line Section from the substation to the PCC is a main backbone section of the Distribution System feeder rated for normal and emergency ampacity;
 - iv. If the proposed Generating Facility incorporates a time delay function to prevent reconnection of the Generator(s) to the electrical Distribution System until system voltage and frequency are within normal limits for a prescribed time;
 - v. If operational flexibility is reduced by the proposed Generating Facility, such that transfer of the Line Section(s) to which the Generating Facility is Interconnected to a neighboring distribution feeder/substation may trigger overloads or voltage issues; and
 - vi. If the proposed Generating Facility employs equipment or systems Certified by a recognized standards organization or NRTL to address technical issues such as, but not limited to, Islanding, reverse power flow, or voltage quality.
- (b) If all of the above six conditions are met, then the Application passes this Screen. Otherwise, if any of the above six conditions are not met, then the Application fails this Screen.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice **562**
No.:

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- d. If any of Screens A through M are failed, the Utility at its discretion may approve the Interconnection provided such approval shall not impact the safety and reliability of its Distribution System. Otherwise, the Application shall proceed to the Applicant's options process pursuant to Section F.5.
- e. If all Screens A through M are passed, the proposed Generating Facility may be Interconnected without further technical review. The Utility shall provide the Applicant with a written description of the requirements for Interconnection and the IOA pursuant to Section E.2. in a timely manner if it has not already provided such agreement to the Applicant.

5. Applicant's Options Meeting

- a. When the Utility determines that the Application does not pass Simplified Review, Fast Track Review, or Supplemental Review, it shall notify the Applicant of such determination and inform the Applicant of the basis of failure of each Screen(s) . In this instance, upon Applicant's notice to the Utility to participate in a meeting to discuss Applicant's options, the Utility and the Applicant shall make good faith efforts to expeditiously schedule and hold a meeting to discuss the Applicant's options. Additionally, the Applicant may request that the Utility schedule an Applicant options meeting at any time during the technical review process and the Utility shall be required to respond within twenty (20) business days of such request.
- b. In addition to any other option mutually agreed upon between the Utility and the Applicant, the Applicant shall have the following options:
 - (1) Withdraw the Application;
 - (2) Amend the Application and request the Utility to re-perform the specific failed technical review Screen(s); or
 - (3) Request the Utility to begin the Detailed Review process.
- c. If the Applicant chooses to amend the Application to address the specific failed technical review Screen(s):
 - (1) the Applicant shall submit to the Utility an amended Application demonstrating the redesign within ~~ten~~ fifteen (4015) business days after the Applicant options meeting. If the amended Application is not received by the Utility within ~~ten~~ fifteen (4015) business days, the Utility shall consider the Application withdrawn;

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(D,N)

(D,N)

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, (Continued)

- (2) an amended Application shall only include changes to address the specific failed technical review Screen(s) and only those other changes agreed to by the Utility at its discretion. Any other modifications to the Application shall be addressed in accordance with Section E.3; and
- (3) the Utility shall review the amended Application, apply the failed technical review Screen(s), determine if the amended Application addresses the technical review Screen(s) failure(s), and shall notify the Applicant of the results of this review within ten (10) business days of receiving the amended Application.
- d. The Applicant's option to mitigate the failure of a technical review Screen(s) and submit an amended Application shall only be available ~~once~~ twice during the technical review process. Subsequent amending of the Application shall result in the Utility considering it as a new Application and reinitiating the technical review process from its beginning in accordance with Section E.2.
- e. If the Applicant chooses to request the Utility begin Detailed Review, the Applicant shall submit to the Utility such request within ten (10) business days after it is notified by the Utility that the Application has been determined to not pass Simplified Review, Fast Track Review, or Supplemental Review, or after the Applicant's options meeting if one was conducted. If such notification is not received by the Utility within ten (10) business days, the Utility shall consider the Application withdrawn.
- 6. Detailed Review
 - a. If the Utility's technical review process determines that the proposed Generating Facility Application does not pass all applicable technical review Screens and the Applicant is unable to amend the Application adequately, or if the Applicant requests the Utility to begin Detailed Review at any time during the technical review process, the Utility shall conduct an Interconnection Study. An Interconnection Study determines if any significant Utility Interconnection Facilities or Distribution System improvements must be installed or be made to the Utility's Distribution System to accommodate the Interconnection of an Applicant's Generating Facility.
 - b. The Utility and the Applicant shall enter into an Interconnection Study Agreement which allows the Utility to perform an Interconnection Study, facility design and engineering, and to provide detailed cost estimates for actual cost billing to the Applicant at the Applicant's expense. The Interconnection Study Agreement shall set forth the Utility's schedule for completing such work and the estimated or fixed price costs of such studies and engineering.

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

F. TECHNICAL REVIEW PROCESS, Continued)

- c. Upon completion of an Interconnection Study conducted pursuant to the Interconnection Study Agreement, the Utility shall provide, in a timely manner, the Applicant with the specific Interconnection requirements and study results in a timely manner, including:
- (1) details of any identified violations of applicable design, planning, or operating criteria or standards including the estimated magnitude, duration, and/or frequency;
 - (2) estimated costs of any required Interconnection Facilities and/or Distribution System improvements; and
 - (3) the estimated schedule for Interconnecting the Generating Facility to accommodate execution of the agreements pursuant to Section E.2.

Within the Interconnection Study, the Utility may also identify potential modifications to the Applicant's proposed Generating Facility or operating characteristics that could avoid or reduce required Interconnection Facilities and/or Distribution System improvements and/or costs.

- d. Following receipt of the Interconnection Study results, the Applicant may consider any potential modifications to the Generating Facility that may have been identified by the Utility. If the Applicant elects to proceed with modifications to the proposed Generating Facility design, planning and/or operating characteristics (e.g., through the use of a PCS or Limited Generation Profile operation), the Applicant may submit such modifications to the Utility in an updated Application and request an updated Interconnection study within ten (10) business days, otherwise, the Interconnection Study results shall be considered final.
- e. Upon receipt of the Applicant's modifications, the Utility shall, within ten (10) business days, either (1) provide the Applicant with updated Interconnection Study results based on the revised Generating Facility design, planning, and/or operating characteristics, or (2) inform the Applicant of the time frame require to provide such updated Interconnection Study results. Submission of an updated Application under this Section shall not require submission of a new Application and shall not incur an additional study fee.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS

1. General Interconnection Requirements

- a. Where there is a conflict between the technical requirements of IEEE 1547-2018 and this Rule, the technical requirements of IEEE 1547-2018 shall apply.
- b. Enter Service requirements shall conform to IEEE 1547-2018 Table 4 with the intentional adjustable minimum delay, the Enter Service period (ramp duration), and the randomized time delay maximum interval each set to 300 seconds as a default. For Generators with a Net Nameplate Rating of less than 500 kVA, individual Generators may use the randomized time delay as an alternative to the Enter Service period (ramp duration).
- c. The protective functions and requirements of this Rule are designed to protect the Utility's electrical Distribution System and not the Generating Facility. A Producer shall be solely responsible for providing adequate protection for its Generating Facility and Interconnection Facilities. The Producer's protective devices shall not impact the operation of other protective devices used on the Utility's Distribution System in a manner that would affect the Utility's capability to provide reliable service to its Customers.
- d. Prior to Parallel Operation or Momentary Parallel Operation of the Generating Facility, the Utility shall approve the Producer's Protective Function and control diagrams. Generating Facilities equipped with a Protective Function and control scheme previously approved by the Utility for system-wide application or only Certified Equipment may satisfy this requirement by reference to previously approved drawings and diagrams.
- e. In the event that this Section of the Rule does not address the Interconnection requirements for a particular Generating Facility, the Utility shall specify the technical requirements to Interconnect the Generating Facility.

2. Non-Exporting and Limited Export Generating Facilities

- a. Inadvertent Export from a Generating Facility shall comply with the limits identified in this Section for a Generating Facility to be designated as Non-Exporting or Limited Export.
- b. If a Generating Facility uses any configuration or operating mode to limit the Export of power across the PCC, then the Maximum Generating Capacity shall be only the amount capable of being Exported (not including any Inadvertent Export).

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- c. A Generating Facility shall incorporate one of the following options to be designated as Non-Exporting and shall inform the Utility of which option it will employ to be designated as Non-Exporting:
- (1) Option 1 ("Reverse Power Protection"): To ensure power is never Exported, a reverse power Protective Function shall be implemented at the PCC. The default setting for this Protective Function, when used, shall be 0.1 percent (Export) of the service transformer's rating, with a maximum two (2.0) second time delay.
 - (2) Option 2 ("Minimum Power Protection"): To ensure at least a minimum amount of power is imported at all times (and, therefore, that power is not Exported), an under-power Protective Function shall be implemented at the PCC. The default setting for this Protective Function, when used, shall be five (5) percent (import) of the Generating Facility's total Gross Nameplate Rating, with a maximum two (2.0) second time delay.
 - (3) Option 3 ("Certified Non-Islanding Protection"): To ensure that Inadvertent Export is limited to acceptable levels, this option, when used, requires that all the following conditions be met:
 - (a) The total Gross Nameplate Rating of the Generating Facility shall be no more than twenty-five (25) percent of the nominal ampere rating of the Producer's service equipment;
 - (b) The total Gross Nameplate Rating of the Generating Facility shall be no more than fifty (50) percent of the Producer's service transformer capacity rating (this capacity requirement does not apply to Customers taking primary service without an intervening transformer); and
 - (c) The Generating Facility shall be Certified as Non-Islanding.
 - (4) Option 4 ("Relative Unit Size"): This option, when used, requires the Net Nameplate Rating of the Generating Facility to be so small in comparison to its host facility's minimum Host Load, that the use of additional Protective Functions is not required to ensure that power will not be Exported to the Utility's Distribution System. The Generating Facility's Net Nameplate Rating shall be no greater than fifty (50) percent of the Producer's verifiable minimum Host Load over the past twelve (12) months.
- d. A Generating Facility shall incorporate one of the following options to be designated as Limited Export and shall inform the Utility of which option it will employ to be designated as Limited Export:

(D,N)

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- (1) Option 1 ("Directional Power Protection"): This option, when used, requires the use of a power Protective Function at the PCC. The default setting for this Protective Function shall be the Maximum Generating Capacity value with a maximum two (2.0) second time delay.
- (2) Option 2 ("Configured Power Rating"): A reduced output rating utilizing the power rating configuration setting of a Generator (if available) may be used to ensure that the Generator or Generating Facility does not generate electric power beyond a certain value that may be lower than the Gross Nameplate Rating or Net Nameplate Rating. The configuration setting corresponds to the active or apparent power ratings in Table 28 of IEEE Std 1547-2018, as described in Clause 10.4. A local DER communication interface is not required to utilize the configuration setting if it can be set by other Certified means. The reduced power rating may be indicated by means of a Gross Nameplate Rating or Net Nameplate Rating replacement, or a supplemental adhesive de-rating tag to indicate the reduced power rating. This option, when used, shall be Certified to IEEE 1547.1-2020. Use of a configured power rating not applied to individual Generator(s) shall require evaluation by mutual agreement between the Utility and the Producer.
- e. A Generating Facility may incorporate one of the following options to be designated as either Non-Exporting or Limited Export:
- (1) Option 1 (Certified PCS): This option requires a Generating Facility to be designed with a Certified PCS, and the Generating Facility shall use the Certified PCS and Certified Advanced Inverter(s) to ensure either Non-Exporting designation or agreed-upon levels of Limited Export. This option, when used, shall have a maximum open loop response time of no more than thirty (30) seconds to ensure that Inadvertent Export is limited to acceptable levels.
- (2) Option 2 (Agreed-upon Means): This option requires a Generating Facility to be designed with other control systems and/or Protective Functions mutually agreed upon between the Utility and the Producer to ensure either Non-Exporting designation or agreed-upon levels of Limited Export. The limits may be based on technical limitations of the Interconnection Customer's equipment or the Utility's Distribution System equipment. To ensure that Limited Export and Inadvertent Export levels remain within mutually agreed-upon limits, the Interconnection Customer may use an uncertified PCS, an internal transfer relay, energy management system, or other Customer facility hardware or software if approved by the Utility on a case-by-case basis at its discretion.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(D,N)

(D,N)

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

3. Protective Functions and Safety Equipment Requirements

- a. The Protective Functions for Generating Facilities operating in Parallel Operation with the Utility's Distribution System shall consist of an effective means of quickly detecting and protecting against the formation of an Unintentional Island on the Utility's Distribution System. Such Protective Functions shall trip and disconnect the Generating Facilities from the Utility's Distribution System and shall be able to sense and prevent reconnection when the Utility's Distribution System is de-energized. Protective Functions shall be subject to Utility approval and may include, but are not limited to:
 - (1) Definite-time and/or inverse-time under-/over-voltage element(s);
 - (2) Definite-time under-/over-frequency element(s);
 - (3) Rate-of-change of frequency element(s);
 - (4) Directional power and/or over-/under-power element(s);
 - (5) Transfer Trip Capability (meaning to receive a direct transfer trip from the Utility's electrical system protective devices); and
 - (6) Disconnecting Means Status (meaning to communicate the Generating Facility's Disconnecting Means status to the Utility's electrical system protective devices using "b-form" contacts).
- b. Circuit breakers or other interrupting devices located at the PCC must be Certified or "Listed" (as defined in Article 100, the Definitions Section of the National Electrical Code) as suitable for their intended application. This includes being capable of interrupting the maximum available fault current expected at their location. The Producer's Generating Facility and Interconnection Facilities shall be designed so that the failure of any one device shall not potentially compromise the safety and reliability of Utility's Distribution System.
- c. The Producer shall furnish and install a manual Visible-Break Isolation Device that has a visible disconnect to isolate the Generating Facility from the Utility's Distribution System. The device shall be accessible to Utility personnel at all times and be capable of being locked in the open position. Generating Facilities with Non-Islanding inverters totaling one (1) kVA or less are exempt from this requirement.

(Continued)

(D,N)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

4. Additional Requirements to Preclude Interference with Utility Operations

- a. The Producer shall not operate Generating or Interconnection Facilities that superimpose a voltage or current upon the Utility's Distribution System that interferes with Utility operations, service to Utility Customers, or communication facilities. If such interference occurs, the Producer must diligently pursue and take corrective action at its own expense after being given notice and reasonable time to do so by the Utility. If the Producer does not take corrective action in a timely manner or continues to operate the facilities causing interference without restriction or limit, the Utility may, without liability, disconnect the Producer's facilities from the Utility's Distribution System, in accordance with Section D.11 of this Rule. All operation shall conform to the power-quality performance requirements of IEEE 1547-2018 Clause 7, the Utility's adopted default Advanced Inverter settings, and any specific Advanced Inverter settings required by the Utility on a case-by-case basis.
- b. Voltage interference causing a modulation of the light level of lamps sufficient to be irritating to humans, or which causes equipment mis-operation to occur shall be corrected by the Producer. Unacceptable interference shall be as defined in accordance with IEEE 1453-2022, as referenced by IEEE 1547-2018 Clause 7.2.3 and Annex B. Inverters Certified to IEEE 1547-2018 and operated using the Utility's default Advanced Inverter settings shall be deemed compliant unless demonstrated otherwise.
- c. When the Producer is serving balanced linear loads, harmonic distortion shall be within the maximum harmonic current distortion percentages given in IEEE 1547-2018 Clause 7.3 and Table 26 and 27, evaluated at the RPA. Exception: The harmonic distortion of a Generating Facility located at a Customer's site shall be evaluated using the same criteria as the loads at that site.
- d. Generating Facilities should not inject DC current greater than 0.5 percent of rated output current into the Utility's Distribution System, consistent with IEEE 1547-2018 Clause 7.1.
- e. Generating Facilities shall not contribute to an Unintentional Island. This can be accomplished by one of the following options:
 - (1) Incorporating Certified Non-Islanding control functions into the Protective Functions;
or

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

(2) Verifying that local loads sufficiently exceed the load carrying capability, including that the reactive power requirements of the local loads sufficiently exceed the reactive power capability of the Generating Facility; or

(3) Incorporating Transfer Trip or an equivalent function in the Protective Functions.

5. Certain Technology Specific Requirements

- a. For three-phase Generators, the Generating Facility circuit breakers shall be three-phase devices with electronic or electromechanical control. The Producer shall be responsible for properly Synchronizing its Generating Facility with the Utility's Distribution System by means of either a manual or automatic Synchronizing device. Automatic Synchronizing is required for all synchronous Generators that have a SCCR exceeding 0.05. A Generator whose SCCR exceeds 0.05 shall be equipped with Protective Functions suitable for detecting loss of Synchronization and rapidly disconnecting the Generator from the Utility's Distribution System. As agreed upon by the Producer and the Utility, synchronous Generators may automatically regulate power factor or voltage while in Parallel Operation with the Utility's Distribution System. Power system stabilization is specifically not required for Generating Facilities under 10 MW Net Nameplate Rating.
- b. A Generating Facility with an SCCR exceeding 0.1 or that does not meet any one of the options for detecting Unintentional Islands in Section G.4.e. shall be equipped with Protective Functions designed to detect Distribution System faults, both line- to-line and line-to-ground, and promptly remove the Generating Facility from the Utility's Distribution System in the event of a fault. For a Generating Facility that cannot detect these faults within 0.5 seconds, Transfer Trip or an equivalent function may be required. Reclose-blocking of the Utility's affected recloser(s) may also be required by the Utility where engineering review indicates a risk of reclosing onto an energized island or where protective coordination cannot otherwise be assured.
- c. Induction Generators do not require a Synchronizing function. Starting or rapid load fluctuations on induction generators can adversely impact the Utility's Distribution System's voltage. Corrective step-switched capacitors or other techniques may be necessary and may cause undesirable ferro-resonance. When these counter measures (e.g., additional capacitors) are installed on the Producer's side of the PCC, the Utility shall review these measures. Additional equipment may be required as determined as a result of Supplemental Review or an Interconnection Study.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

d. For inverter-based Generators, only Advanced Inverters shall be used for Parallel Operation with the Utility's Distribution System. Non-utility-interactive or "stand-alone" inverters shall not be used for Parallel Operation with the Utility's Distribution System.

e. Generating Facilities with Advanced Inverters do not require separate Synchronizing equipment.

6. Rotating Machine Generator Capabilities and Default Settings

a. Rotating machine-based Generators shall meet IEEE 1547-2018 Category A for normal operating performance and Category I for abnormal operating performance. Rotating machine-based Generators that cannot meet these requirements shall be reviewed on a case-by-case basis by the Utility and authorized for Interconnection or not at its discretion.

b. The default settings identified within this Section shall be used by all rotating machine-based Generators regardless of size.

c. Default Settings

(1) The Utility may specify alternate settings than those referenced in this Section on a case-by-case basis and shall inform the Applicant and Producer, allowing reasonable time for mutual agreement of the parties prior to execution of the IOA.

(2) Volt-VAR Settings

(a) This setting shall be enabled. All other reactive power control modes shall be disabled.

(b) Rotating machine-based Generators shall utilize a fixed reference voltage for this setting.

(c) Default settings shall conform to IEEE 1547-2018 Table 8.

(3) Voltage Trip and Ride-Through

(a) Voltage trip settings shall conform to IEEE 1547-2018 Table 11.

(b) Voltage ride-through performance shall conform to IEEE 1547-2018 Table 14.

(4) Frequency Trip and Ride-Through

(Continued)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(D,N)

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- (a) Frequency trip settings shall conform to IEEE 1547-2018 Table 18.
- (b) Frequency ride-through performance shall conform to IEEE 1547-2018 Table 19.
- (c) Frequency droop performance shall conform to IEEE 1547-2018 Table 24.

7. Specific ESD Requirements

a. ESD Operating Restrictions

- (1) When an ESD is paired with a Net Metering System, the ESD, at the election of the Customer and/or Producer, may be programmed with either one or both of the following two operating restrictions, or no operating restriction, as follows:
 - (a) Restricted from Exporting electricity to the Distribution System (beyond Inadvertent Export); and/or
 - (b) Restricted to being charged solely from the Producer's Net Metering System and not from the Utility's Distribution System; or
 - (c) No operating restrictions, only where expressly authorized under a Commission-approved tariff, Utility program, or IOA that governs the operating capabilities of the ESD.
- (2) If the Customer and/or Producer elects to operate an ESD with an operating restriction(s), such election shall be stated in the Application and IOA, including a description of the operating restriction(s).
- (3) An attestation of the operating restriction(s), or lack of an operating restriction(s), shall be provided by both the Customer and the ESD Producer, if different entities.
- (4) After the submission of an Application or following an ESD's initial acceptance by the Utility to Interconnect, the presence or absence of an operating restriction(s) may be modified, but not until after an updated attestation is provided to the Utility by both the Customer and the ESD Producer, if different entities, and the Utility consents in writing to the modification. The Utility's written approval shall not be unreasonably withheld or delayed. Such changes in any operating restriction(s) shall also be subject to the Material Modification determination in Table 2.

(Continued)

(D,N)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- b. A stand-alone ESD Interconnected to the Utility's Distribution System that is not paired with a Generator, will charge solely from the Utility's Distribution System, and will discharge solely for the purpose of providing back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System. These systems are not subject to Rule 15.
- c. An ESD paired with a Generator Interconnected to the Utility's Distribution System that, in addition to its normal operation, will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:
 - (1) first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System, after which it may discharge according to its normal operation; or,
 - (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.
- d. A stand-alone ESD Interconnected to the Utility's Distribution System that is not paired with a Generator, will charge solely from the Utility's Distribution System, and that in addition to normal operation will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:
 - (1) first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System; or
 - (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.
- e. Specific EV, V2G EV, Charger and Charging Station Requirements
- f. The Interconnection of a V2G EV and its EVSE to the Utility's Distribution System, or conversion of an EV charger, charging station, or EVSE to V2G, shall be subject to this Rule only when the V2G EV and its EVSE shall operate in a mode where discharging will occur when Interconnected and operating in Parallel Operation with the Utility's Distribution System.
- g. V2G EV chargers or charging station inverters shall adhere to UL 1741 SB or UL 9741 to ensure that V2G systems can safely Export power from V2G EVs to the Utility's Distribution System.
- h. Vehicle to Grid Capable EV Power Export Equipment, configured as an AC bidirectional charging system, wherein inverter capabilities are onboard the vehicle, shall ~~either adhere to meet one of the following grid-performance requirements:~~
 - (1) Supplement SB for Grid Support Utility-Interactive Inverters and Converters Based upon IEEE 1547-2018 and IEEE 1547.1-2020 — UL 1741 SC (when published and accepted by the Utility for use in this Rule) and SAE J3072; or
Note: UL 1741 SB for AC V2G systems can be evaluated as Grid Support DER systems in accordance with UL 1741 CRD "Addition of grid support DER system definitions and requirements for multipiece DERs" published 2026-04-08.
 - (2) Supplement SC for AC bidirectional electric vehicle supply equipment (BEVSE)/interconnection system equipment (ISE) for EVs with SAE J3072 bidirectional onboard inverters as a matched pair bidirectional system under UL 1741 SB, in conjunction with UL 9741, or other equivalent system level certification recognized by the Utility.

(D,N)

~~Until such time UL 1741 SC is published and accepted by the Utility for use in this Rule, compliance with UL 1741 including Supplement SB, is required, where applicable.~~

(Continued)

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS. (Continued)

- i. A V2G EV, EV charger, charging station, or EVSE connected to the Utility's Distribution System that shall discharge solely for the purpose of providing back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System. These systems are not subject to Rule 15.
- j. Vehicle to Grid Capable EV Power Export Equipment connected to the Utility's Distribution System that that is not paired with a Generator, will, while at the location where it has been approved for interconnection, charge solely from the Utility's Distribution System, and that in addition to normal operation will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:
 - (1) (1) first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System; or
 - (2) (2) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.
- k. Vehicle to Grid Capable EV Power Export Equipment paired with a Generator Interconnected to the Utility's Distribution System that, in addition to its normal operation, will discharge to provide back-up service to all or part of a Customer's load during an interruption of electric service from the Utility shall either:
 - (3) first disconnect from the Utility's Distribution System before beginning to discharge within backup operation and shall cease to discharge prior to returning to normal operation Interconnected with the Utility's Distribution System, after which it may discharge according to its normal operation; or
 - (4) utilize a multi-mode inverter certified to UL 1741 Multimode CRD to transition to the provision of backup power and for purposes of returning to normal operation.

9. Advanced Inverter Requirements

- a. Inverter-based Generators shall comply with IEEE 1547-2018 and UL 1741 SB requirements.
- b. All Advanced Inverters shall meet IEEE 1547-2018 Category B for normal operating performance and Category III for abnormal operating performance. Inverter-based Generators that cannot meet these requirements shall be reviewed on a case-by-case basis by the Utility and authorized for Interconnection or not at the Utility's discretion.
- c. The default settings identified within this section shall be used by all inverter-based systems regardless of size.
- d. The Utility may specify alternative site-specific settings on a case-by-case basis to preclude or reduce the Distribution System improvements that may be required as a direct result of the Interconnection or for other technical reasons unique to the location on the Utility's electric grid, and shall inform the Applicant and Producer, allowing reasonable time for mutual agreement of the parties prior to execution of the IOA.
- e. Default Settings
 - (1) Volt-VAR Settings
 - (a) This setting shall be enabled. All other reactive power control modes shall be disabled.
 - (b) Inverter-based Generators shall utilize a fixed reference voltage for this setting.
 - (c) Default settings shall conform to IEEE 1547-2018 Table 8.
 - (2) Volt-Watt Settings
 - (a) This setting shall be enabled.
 - (b) Default settings shall conform to IEEE 1547-2018 Table 10.

(D,N)

(Continued)

Issued: **12-31-25**

Effective:

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

(D,N)

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

(3) Voltage Trip and Ride-Through

(a) Voltage trip settings shall conform to IEEE 1547-2018 Table 13.

(b) Voltage ride-through performance shall conform to IEEE 1547-2018 Table 16.

(4) Frequency Trip and Ride-Through

(a) Frequency trip settings shall conform to IEEE 1547-2018 Table 18.

(b) Frequency ride-through performance shall conform to IEEE 1547-2018 Table 19.

(c) Frequency droop performance shall conform to IEEE 1547-2018 Table 24.

10. Microgrid Requirements

a. Requirements for a Microgrid shall be evaluated by the Utility on a case-by-case basis. The defining characteristics for a Microgrid on the Utility's Distribution System are:

(1) Is capable of Parallel Operation with the Utility's Distribution System or Islanded operation, and not solely as an emergency back-up resource;

(2) Is comprised of one or more Generator and/or ESD;

(3) Has clearly defined electrical boundaries;

(4) Utilizes a Microgrid Interconnection Device at the PCC; and

(5) Utilizes a control system (Master Microgrid Controller) to manage and dispatch resources as a single controllable entity.

b. For a Microgrid comprised solely of inverter-based Generator technologies, at least one of the inverter-based technologies within the Microgrid shall be capable of Grid Forming operation when Islanded.

c. Each Microgrid shall be designed to Interconnect to the Utility Distribution System, to operate without adversely affecting the operations of the electric grid and without presenting safety hazards to Utility personnel or Customers, and in the case of a Hybrid Microgrid, to operate without adversely affecting the operations of the Microgrid's participants.

d. The Microgrid facilities and the Interconnection systems shall be in compliance with all applicable safety, power quality, and performance codes and standards of NFPA 70, IEEE, and the Utility's interconnection standards and procedures provided in this Rule.

(Continued)

(D,N)

Issued: : 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- e. A Producer's Generating Facility may be part of a Customer Microgrid or be a participant in a Hybrid Microgrid and shall notify the Utility of its intention in the Interconnection Application.

11. Cybersecurity Requirements

- a. The Producer shall maintain good security practices regarding Generating Facility hardware and software in accordance with the IOA between the Producer and the Utility.
- b. Generating Facility hardware shall not be readily physically accessible to unauthorized persons (e.g., shall be locked or require some manner of authorized access) and strong passwords shall be assigned and maintained by the Producer for any device area network. Networked device default passwords and firmware reset shall be secured, abstracted, or made inaccessible.
- c. As applicable, equipment shall always be registered with the manufacturer.
- d. The Producer shall have and maintain security controls to protect the Utility's networks, systems, software, confidential information, and data. If the Generating Facility is interoperable with Utility's grid, the Producer shall, to the maximum extent possible, adhere to the guidance provided in the published version of IEEE 1547.3-2023.
- e. Generating Facilities with communication, Telemetry, and/or remote-control capability shall incorporate cybersecurity protections to prevent unauthorized access or disruption of the Utility's Distribution System. Such protections shall include cybersecurity policies, processes, and controls required for connectivity to the Utility systems, access to Utility data, or significant work affecting Utility systems.
- f. The Utility may establish and update its cybersecurity standards and procedures, which shall be incorporated into the IOA, and which may be updated from time to time and mutually agreed upon by the Producer and the Utility.

12. Communication Requirements

- a. The communication requirements in this Section apply to communication pathways and protocols that allow the Utility to remotely communicate with the individual Generating Facility's Advanced Inverter control, PCS, energy management system, or Master Microgrid Controller.

(Continued)

(D,N)

(D,N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

G. DESIGN, TECHNICAL AND OPERATING REQUIREMENTS, (Continued)

- b. Inverter-based Generators, including V2G EVs, shall adhere to all of the following communication protocol requirements:
- (1) shall be capable of remote communications and adhere to IEEE 1547-2018, Clause 10;
 - (2) software/firmware shall be capable of being updated locally or via remote communications;
 - (3) transport level protocol shall be TCP/IP; and
 - (4) shall be capable of supporting at least one of the following application-level protocols:
 - (a) IEEE 2030.5 (i.e., Smart Energy Profile 2.0 (SEP 2) CSIP or CSIP-AUS;
 - (b) IEEE 1815 (i.e., Distributed Network Protocol 3 (DNP3));
 - (c) SunSpec Modbus; or
 - (d) Other application-level protocols by mutual agreement of the Producer and the Utility.
- ~~c. Direct communications to Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers shall be made available (i.e., unlocked, functional, and capable of being provisioned to Utility systems) at the request of the Utility for use by the Utility when communications are required to prevent an Emergency or Unsafe Operating Conditions or to enable Customer participation in voluntary programs and/or tariffs when no alternative cost-effective communication pathway (e.g., via a vendor cloud service) can be established, via:~~
- ~~(1) Producer maintained wireless broadband internet and wireless communication capability of the Advanced Inverters, PCSs, energy management systems, or Master Microgrid Controllers; or~~
 - ~~(2) Producer maintained wired broadband internet or Utility-owned field area network communicating to local Utility gateway interfaced to a local DER communication interface on Advanced Inverters PCSs, energy management systems, or Master Microgrid Controllers.~~
- d. ~~The operational data and control capabilities required by the Utility to ensure the safe, reliable, and tariff-compliant operation of the Distribution System, as defined in and limited to the data elements identified in IEEE 1547-2018 Clause 10, shall cost effectively be made available by the Producer or its vendors to the Utility through the communication pathways and protocols established under this Section.~~

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

(D,N)

(D,N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

H. METERING, MONITORING AND TELEMETRY

1. All Generating Facilities shall be Metered in accordance with this Section and shall meet all applicable standards of the Utility contained in the Utility's applicable Tariff Schedules and published Utility manuals dealing with Metering specifications.
2. The requirements in this Section do not apply to Generating Facilities that are subject to separate Metering requirements under the Utility's currently effective Tariff Schedules, as approved by the Commission, including but not limited to those established pursuant to NRS 704.766 to 704.775 (Net Metering Systems). Such Tariff Schedules, as may be amended from time to time, shall govern the Metering for these Generating Facilities.
3. The ownership, installation, operation, reading, and testing of Metering for Generating Facilities shall be by the Utility.
4. Telemetry and Metering at the PCC may be required in cases where less intrusive or more cost-effective options for providing the necessary Generating Facility output data are unavailable. In exercising its discretion to require Net Generation Metering, the Utility shall consider all relevant factors, including but not limited to:
 - a. Data requirements in proportion to the need for information necessary to support relative Utility functions;
 - b. Producer election to install equipment that adequately addresses the Utility's operational requirements;
 - c. Accuracy and type of required Metering equipment to be equivalent and consistent (i.e., revenue grade) with purposes of collecting data;
 - d. The Generating Facility's size relative to the cost of the Metering/monitoring equipment;
 - e. Other means of obtaining the data (e.g. Generating Facility logs, proxy data etc.); and
 - f. Requirements under any IOA with the Producer.
5. PCC Metering
 - a. For purposes of assessing Utility charges for service, the PCC Metering shall be a bi-directional Meter so that power deliveries to and from the Producer's site can be separately recorded.
 - b. In order to accurately measure power flow in both directions, multiple Metering points may be required.
 - c. PCC Metering shall be equipped or designed to prevent reverse registration.

(Continued)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

H. METERING, MONITORING AND TELEMETRY, (Continued)

6. Telemetering

- a. If the Net Nameplate Rating of the Generating Facility is 1 MW or greater, Telemetering equipment at the Net Generation Metering location may be required at the Producer's expense to allow the Utility and the Customer's scheduling coordinator to monitor such large Generators for their impact upon the Distribution System.
- b. The costs for Telemetering, including equipment, installation, and any costs for leased telephone lines are separate and in addition to other Metering costs addressed in Section H.8.
- c. If the Generating Facility is Interconnected to a Distribution System operating at a voltage below 10 kV, then Telemetering equipment may be required on Generating Facilities with a Net Nameplate Rating of 250 kW or greater.
- d. The Utility shall only require Telemetering to the extent that less intrusive or more cost-effective options for providing the necessary data in real time are unavailable.
- e. Charges will be included in an applicable IOA.

7. If Utility-owned Metering is located on the Producer's Premises, the Producer shall provide, at no expense to the Utility, a suitable location for all such Metering.

8. Metering Equipment, including an appropriate revenue-quality Meter, as defined in Rule 1, shall be installed if required in the Producer's applicable standby rate schedule.

- a. All service switches, Meter sockets, Meter enclosures, cutouts and similar devices, irrespective of voltage, required in connection with Net Generation Metering shall be furnished, installed, maintained and owned by the Producer at no cost to the Utility.
- b. The Utility shall furnish, install and own the appropriate Meter or Meters used for Net Generation Metering. Such installation location shall be furnished by the Producer and approved by the Utility, and shall, at reasonable times, be accessible for reading, testing and maintaining the Meter.

9. ESD Metering Equipment, including an appropriate Utility-owned, bi-directional, Interval Meter, as defined in Rule 1, shall be installed for all ESD installations per applicable published Utility manuals and standards dealing with Metering specifications.

(Continued)

(N)

(N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

H. METERING, MONITORING AND TELEMETRY, (Continued)

- a. If the ESD is paired with a NEM-eligible generating resource, a meter shall not be required if the ESD utilizes a Certified Power Control System to either prevent the ESD from exporting to the grid or ensures that the ESD only charges from any NEM-eligible generating resource with which the ESD is paired.
- b. All service switches, Meter sockets, Meter enclosures, cutouts and similar devices, irrespective of voltage, required in connection with ESD Metering shall be furnished, installed, maintained and owned by the Producer at no cost to the Utility.
- c. The Utility shall furnish, install and own the appropriate Meter or Meters used for ESD Metering, at its cost. Such installation location shall be furnished by the Producer and approved by the Utility, and shall, at reasonable times, be accessible for reading, testing and maintaining the Meter.

I. FACILITY OWNERSHIP AND COST RESPONSIBILITY

1. Facility Ownership

- a. Parallel Operation of Generating Facilities may require the installation of Interconnection Facilities or Distribution System improvements, the type, extent and costs of which shall be consistent with this Rule and determined by the Utility through the technical review process and/or an Interconnection Study as described in Section F.
- b. Interconnection Facilities installed on the Producer's side of the PCC may be owned, operated and maintained by either the Producer or the Utility.
- c. Interconnection Facilities installed on Utility's side of the PCC and Distribution System improvements shall be owned, operated and maintained only by the Utility.

2. Facility Cost Responsibility

- a. A Producer shall be responsible for the reasonably incurred costs of the Optional Pre-application Report (if requested) pursuant to Section E.1, the Application fee pursuant to Section E.2.c (Table 1) related to any required technical reviews pursuant to Sections F.2, F.3., and F.4, and any Interconnection Studies conducted pursuant to Section F.6 of this Rule solely to explore the feasibility and determine the requirements of Interconnecting a Generating Facility with the Utility's Distribution System.
- b. The Producer shall be responsible for all costs associated with the Interconnection Facilities owned by the Producer.
- c. The Producer shall be responsible for any costs reasonably incurred by the Utility in providing, installing, operating, or maintaining the Interconnection Facilities and Distribution System improvements required solely for the Interconnection of the Producer's Generating Facility with the Utility's Distribution System.

(Continued)

Issued: **12-31-25**

Effective:

Issued By:
Timothy Clausen

Vice President, Regulatory

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

I. FACILITY OWNERSHIP AND COST RESPONSIBILITY, (Continued)

- d. The cost responsibility for any Interconnection Facilities and Distribution System improvements required solely due to the load requirements of an ESD (e.g., the ESD is charged by the Utility's Distribution System), EV or V2G EV charger, or EV or V2G EV charging station shall be as set forth in Rule 9.
- e. Should the Utility combine the installation of Interconnection Facilities or Distribution System improvements required for the Interconnection of a Generating Facility with improvements to the Utility's Distribution System to serve other Customers or Producers, the Utility shall not include the costs of such separate or incremental facilities in the amounts billed to the Producer.
- f. The costs for required Interconnection Facilities and Distribution System improvements shall be paid by the Producer pursuant to the provisions contained in the IOA. Where the type and extent of the Interconnection Facilities or Distribution System improvements warrant additional detail, the Producer and the Utility shall execute separate agreement(s) to more fully describe and allocate the parties' responsibilities for installing, owning, operating and maintaining the Interconnection Facilities or Distribution System improvements.
- g. Interconnection Facilities connected to the Utility's side of the PCC and Distribution System improvements shall be provided, installed, owned and maintained by the Utility at the Producer's expense.
- h. When a Producer wishes to reserve Utility-owned Interconnection Facilities or Distribution System improvements installed and financed as Special Facilities for the Producer but idled by a change in the operation of the Producer's Generating Facility or otherwise, the Producer may elect to abandon or reserve such facilities consistent with the terms of its IOA with the Utility. If the Producer elects to reserve idle Interconnection Facilities or Distribution System improvements, the Utility shall be entitled to continue to charge the Producer for the costs related to the ongoing operation and maintenance of the Special Facilities.

J. FACILITY INSTALLATION, INSPECTION, AND COMMISSIONING

1. Facility Installation

- a. After executing the applicable agreements, the Utility and/or the Producer shall commence construction and installation of the Distribution System improvements or Interconnection Facilities that have been identified in the agreements using good faith efforts to meet schedules and fixed or estimated costs as appropriate.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

J. FACILITY INSTALLATION, INSPECTION, AND COMMISSIONING. (Continued)

- b. Prior to construction, the Applicant may request, or the Utility may require, a pre-construction coordination meeting to review scope, switching or outage coordination, site access and safety controls. The parties shall use good faith efforts to coordinate schedules and minimize Customer impacts.
- c. The Producer shall obtain all required permits and any AHJ clearances applicable to Producer-owned facilities.
- d. Work on Utility-owned facilities shall be performed only by the Utility.
- e. The Utility and the Producer shall confirm, in writing, the RPA established pursuant to Section F.1.e. for testing and commissioning per IEEE 1547-2018 requirements upon determination of Application completeness. Commissioning verification shall be performed at the agreed-upon RPA.
- f. If required to complete the installation of a Generating Facility or associated Interconnection Facilities, the Utility, may be required to perform a temporary disconnect and reconnect to facilitate safe work on the Customer's service entrance equipment or to allow inspection, testing, or commissioning of the Generating Facility.
 - (1) If a temporary disconnect and reconnect is required solely for modification of service entrance equipment (including installation or replacement of service panels), such work shall be performed and charged in accordance with Rule 16 and Schedule MC.
 - (2) Temporary disconnections and reconnections performed solely for modifications to Customer service entrance equipment pursuant to Rule 16 and not this Rule, shall be coordinated by the Utility as part of the facility installation process under Section J.1.a. Such work shall not be deemed to initiate, extend, or toll any timeline required by statute or regulation for the Utility's review of an Interconnection Application or issuance of PTO.
 - (3) Only authorized employees of the utility will be permitted to connect a Customer's service to the Utility's electric lines, or disconnect the same.
- g. The Utility may issue a TIA solely to permit the physical connection of a Generating Facility to the Utility's Distribution System for limited purposes such as inspection, testing, coordination, and commissioning-only operation. A Temporary Interconnection Agreement shall not be construed as PTO and is valid only for a short, defined period necessary to complete commissioning.

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

J. FACILITY INSTALLATION, INSPECTION, AND COMMISSIONING. (Continued)

- (1) For Generating Facilities less than or equal to 25 kW Net Nameplate Rating, TIA shall be issued automatically by the Utility and shall allow commissioning-only Non-Export operation for the minimum duration necessary to complete commissioning.
- (2) For Generating Facilities greater than 25 kW Net Nameplate Rating, the Utility shall specifically issue a TIA. The Producer shall notify the Utility prior to commissioning, and commissioning-only operation shall be authorized by the Utility within a reasonable timeframe and performed under coordinated conditions.
- (3) A TIA automatically expires upon the earlier of:
 - (a) issuance of PTO; or
 - (b) Utility revocation.
- (4) Operation under a TIA remains subject to all safety and protection requirements of this Rule and all applicable permits required by the AHJ.

2. Facility Inspection

- a. Upon completion of installation and prior to Interconnection, the Producer shall notify the Utility and provide documentation including but not limited to:
 - (1) site plans and as-built one-line and/or three-line diagrams, clearly identifying the RPA;
 - (2) commissioning reports and documentation that may include verification of protection settings, Advanced Inverter testing consistent with IEEE 1547-2018 and UL 1741 requirements, Advanced Inverter functions and settings consistent with Section G.9.e, rotating machine settings consistent with Section G.6.c, and any Limited Generation Profile or Limited Export parameters, as applicable. If Telemetry or remote update capability is required, the Producer shall provide communications test results evidencing settings retrieval/control. For Generating Facilities less than or equal to 1 MW Net Nameplate Rating, such reports shall consist of paperwork only;
 - (3) for Generating Facilities greater than 1 MW Net Nameplate Rating, functional Commissioning Testing and temporary energization in accordance with this Rule;
 - (4) verification of the Visible Break Isolation Device including documentation (including photos) confirming that the lockable, accessible, visible-open disconnect switch is installed in accordance with this Rule, Utility standards, and NEC;

(Continued)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

J. FACILITY INSTALLATION, INSPECTION, AND COMMISSIONING. (Continued)

- (5) Certification of equipment including evidence that major components (e.g., inverters) are Certified under UL 1741 SB/IEEE 1547-2018; and
- (6) evidence of any relevant AHJ final inspection for Producer-owned facilities.
- b. Following receipt and review of the required documentation, the Utility shall perform a physical inspection of the facility that may include, but may not be limited to, verification of labeling, the Visible Break Isolation Device, protection wiring, Meter installation, and any other items necessary to confirm safe Interconnection consistent with applicable Utility standards.
- c. All inspections, testing, and verifications required under this Rule shall be performed at the RPA, as previously confirmed by the Utility and the Producer, to demonstrate compliance with any applicable technical and operational requirements, unless otherwise noted in this Rule.
3. Facility Testing
- a. The Producer shall be responsible for testing new Generating Facilities and associated Interconnection Facilities according to Attachment 3 and IEEE 1547.1-2020 to verify compliance with the safety and reliability provisions of this Rule prior to Parallel Operation with the Utility's Distribution System.
- b. The Producer's Generating Facility shall be authorized for Parallel Operation or Momentary Parallel Operation with the Utility's Distribution System only upon the issuance of PTO by the Utility.
- c. For non-Certified Equipment, the Producer shall develop a written testing plan to be submitted to the Utility for its review and acceptance prior to Interconnection. The testing plan shall, where applicable, incorporate the manufacturer's installation test procedures and conform to IEEE 1547.1-2020.
- d. The Utility may require a Utility-witnessed Commissioning Test. If required by the Utility, the Producer shall coordinate scheduling of such test with no less than five (5) business days' advanced notice and provide the Utility an opportunity to witness the test. Facility testing shall be conducted at a time mutually agreeable to the Producer and the Utility, with the party conducting the test providing the other party the opportunity to witness the tests.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

J. FACILITY INSTALLATION, INSPECTION, AND COMMISSIONING, (Continued)

4. Facility Certification and PTO

- a. The Producer shall be responsible for ensuring Certification of new Generating Facilities and associated Interconnection Facilities pursuant to Attachment 3, Section 2.
- b. For Net Metering Systems:
 - (1) within ten (10) business days of receipt of both written notice from the Applicant that the installation of the Net Metering System is complete and a copy of any required final inspection clearance from the AHJ, the Utility shall either:
 - (a) issue PTO; or
 - (b) provide to the Applicant a specific written description of the deficiencies that must be corrected prior to PTO.
 - (2) at the time the Utility issues PTO, the Utility shall provide to the Producer a copy of the fully executed IOA if it has not already done so.
- c. For non-Net Metering Systems, within ten (10) business days of receipt of notice from the Producer that installation of the Generating Facility is complete the Utility shall either:
 - (1) issue PTO; or
 - (2) provide the Producer with a written list of deficiencies to be corrected. Upon notice to the Utility by the Producer that all necessary corrections have been made, the parties shall use good faith efforts to schedule any required re-inspection in a timely manner.
- d. The Producer's Generating Facility shall be authorized for Parallel Operation or Momentary Parallel Operation with the Utility's Distribution System only upon the issuance of PTO by the Utility. Issuance of PTO shall be contingent upon satisfactory completion of the requirements under this Section, provision of all required documentation, and compliance with all applicable agreements.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

K. DISPUTE RESOLUTION

1. The Commission shall have initial jurisdiction to interpret, add, delete or modify any provision of this Rule or of any agreements entered into between the Utility and the Producer to implement this tariff ("the implementing agreements") and to resolve disputes regarding the Utility's performance of its obligations under its Tariff Schedules, the implementing agreements, and requirements related to the Interconnection of the Producer's Generating or Interconnection Facilities pursuant to this Rule.
2. Any dispute arising between the Utility and the Producer (individually "Party" and collectively "the Parties") regarding the Utility's performance of its obligations under its Tariff Schedules, the implementing agreements, and requirements related to the Interconnection of the Producer's facilities pursuant to this Rule shall be resolved according to the following procedures:
 - a. The dispute shall be reduced to writing by the aggrieved Party in a letter ("the dispute letter") to the other Party containing the relevant known facts pertaining to the dispute, the specific dispute and the relief sought, and express notice by the aggrieved Party that it is invoking the procedures under this Section.
 - b. Within forty-five (45) calendar days after the Utility receives the dispute letter, the Parties' authorized representatives shall meet and confer to try to resolve the dispute.
 - c. If the Parties do not resolve their dispute within forty-five (45) calendar days after the date of the dispute letter, the dispute shall, upon demand of either Party, be submitted to resolution before the Commission in accordance with the procedures outlined in NAC 703.616 to 703.651.
3. Pending resolution of any dispute under this Section, the Parties shall proceed diligently with the performance of their respective obligations under this Rule and the implementing agreements, unless the implementing agreements have been terminated. Disputes as to the application and implementation of this Section shall be subject to resolution pursuant to the procedures set forth in this Section.

(Continued)

(N)

(N)

Issued: **12-31-25**

Effective:

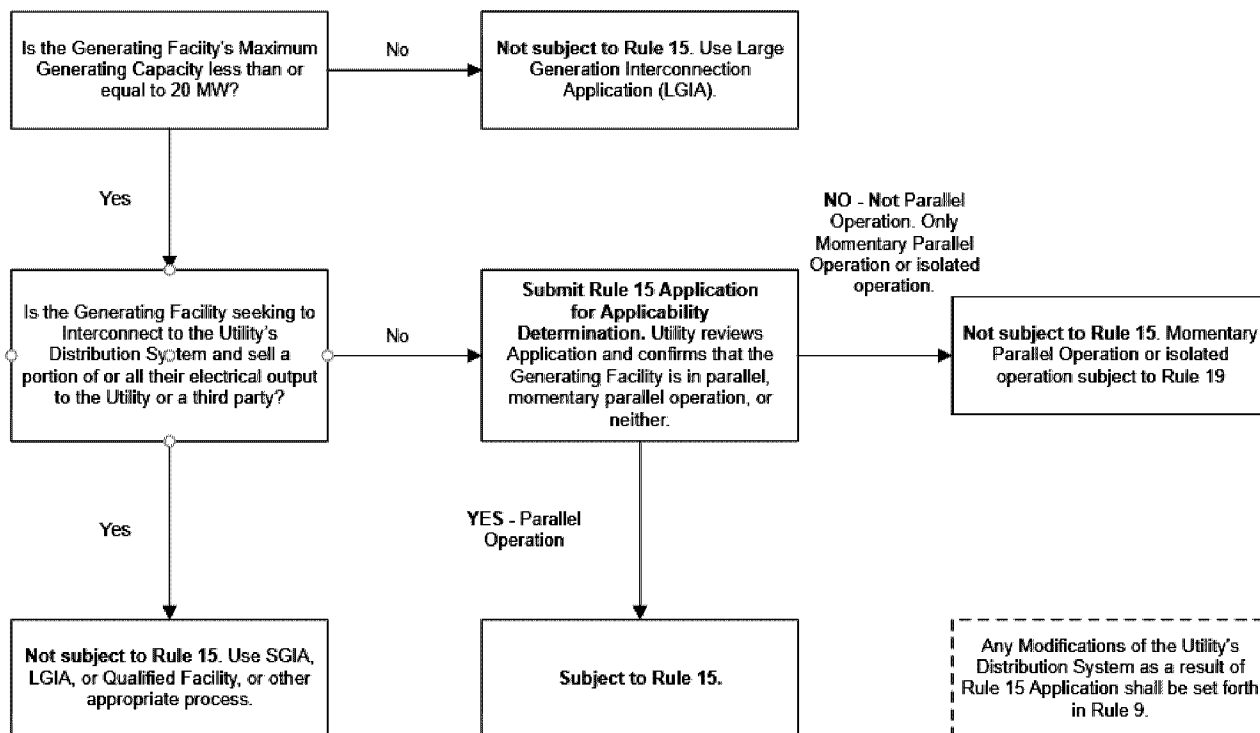
Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

Attachment 1: Applicability



(Continued)

(N)

(N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

Part 1 – Core Generator and Energy Storage Device Configurations

Configuration or Use Case	Parallel with Utility?	Export to grid?	Subject to Rule 15?	Application or Notification?
Break-before-Make backup Generator with open-transition ATS (isolated standby backup)	No. ATS mechanically and electrically prevents any closed transition.	No (Non-Exporting by design and sequence)	No	No Rule 15 Application required. Subject to Rule 19.
Momentary Parallel Operation standby backup Generator with closed-transition ATS (Make-before-Break)	Yes, connected, but only for ≤ 15 seconds to synchronize prior to serving isolated load	No (Non-Exporting by design and sequence)	No	No Rule 15 Application required. Subject to Rule 19.
Stand-Alone, Non-Exporting, BTM Energy Storage Device (ESD), charging from Utility grid, discharging to provide backup power only after disconnecting from Utility Grid	No	No	No	No Rule 15 Application required. Subject to Rule 19.
Stand-alone, Non-Exporting, behind-the-meter (BTM) Generator, using an option in Section G.2 for Non-Export status	Yes, Interconnected and Parallel Operation	No (Non-Exporting per an option in Section G.2)	Yes	Yes, Rule 15 Application
Stand-alone, Non-Exporting, BTM Energy Storage Device (ESD), charging from Utility grid, using an option in Section G.2 for Non-Export status, either discharging while parallel with Utility grid or after disconnecting from Utility grid	Yes, Interconnected and Parallel Operation	No (Non-Exporting per an option in Section G.2)	Yes	Yes, Rule 15 Application
Non-Exporting Generator paired with an ESD using an option in Section G.2 for Non-Export status	Yes, Interconnected and Parallel Operation	No (Non-Exporting per an option in Section G.2)	Yes	Yes, Rule 15 Application
NEM Systems: Generator only or Generator paired with ESD	Yes, Interconnected and Parallel Operation	Yes	Yes	Yes, NEM Application

(Continued)

NEVADA POWER COMPANY
P.O. Box 98910
Las Vegas, NV 89151
Tariff No. 1-B
cancels
Tariff No. 1-A (withdrawn)

Original
Cancelling

PUCN Sheet No. 93AZ(13)
PUCN Sheet No. _____

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(N)

Exporting Generator, Stand-alone or paired with ESD not selling any output to Utility	Yes, Interconnected and Parallel Operation	Yes	Yes	Yes, Rule 15 Application
Exporting Generator under a buy-all / sell-all or QF arrangement	Yes, Interconnected and Parallel Operation	Yes	No	FERC/QF processes depending on size and contract
Microgrid capable of Parallel Operation and Islanding	Yes, Interconnected and Parallel Operation when grid-connected	Can be Exporting or Non-Exporting depending upon design	Yes	Yes, Rule 15 Application
Stand-alone Generator or Microgrid serving a fully isolated load with no Utility connection (off-grid)	No	No	No	None

Part 2 – EVSE and V2G EV Configurations

Configuration or Use Case	Parallel with Utility?	Export to grid?	Rule 15 applies?	Application or Notification?
EVSE (Level 1, 2, or DCFC) serving EVs as load only, no bidirectional (V2G) capability	Yes, Interconnected and Parallel Operation but EVSE and EV act solely as load when charging <u>No</u>	No	No	Rule 3 application, treated under normal Utility service rules
EVs under Utility programs or tariffs, no bidirectional (V2G) capability	Yes, Interconnected and Parallel Operation but EV acts solely as load when charging <u>No</u>	No	No	Utility program enrollment and normal Utility service rules

(Continued)

(N)

Issued: 12-31-25 Effective: Advice No.: 562	Issued By: Timothy Clausen Vice President, Regulatory	
--	--	--

NEVADA POWER COMPANY
P.O. Box 98910
Las Vegas, NV 89151
Tariff No. 1-B
cancels
Tariff No. 1-A (withdrawn)

Original _____
Cancelling _____

PUCN Sheet No. 93AZ(14)
PUCN Sheet No. _____

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(N)

Bidirectional EVSE or V2G EV, not configured for V2G operation so that the V2G EV is not capable of discharging and acts only as a load while connected to the grid	Yes, Interconnected and Parallel Operation, but V2G EV acts solely as load when charging <u>No</u>	No	No	None
Bidirectional EVSE or V2G EV under Utility programs or tariffs, not configured for V2G operation so that the V2G EV is not capable of discharging and acts only as a load while connected to the grid	Yes, Interconnected and Parallel Operation, but V2G EV acts solely as load when charging <u>No</u>	No	No	Utility program enrollment and normal Utility service rules
Bidirectional EVSE or V2G EV configured <u>configuration capable of</u> for V2G operation, <u>commissioned such that</u> discharging will not occur while connected to the grid, but discharging will occur during Islanded Microgrid or backup mode following Break-before-Make	Yes, Interconnected and Parallel Operation but V2G EV acts solely as load when charging <u>No</u>	No Export while grid-connected (discharging only in Islanded Microgrid or backup mode)	Yes <u>No</u>	Rule 15 Application <u>No Rule 15 Application. Subject to Rule 19.</u>
Bidirectional EVSE or V2G EV configured for V2G operation with discharging to occur while connected to the grid	Yes, Interconnected and Parallel Operation	Can be Exporting or Non-Exporting depending upon design	Yes	Rule 15 Application

(N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

Attachment 3:
Testing and Certification Criteria

1. INTRODUCTION

This Attachment describes the test procedures and requirements for equipment used for the Interconnection of Generating Facilities to Utility's Distribution System. Equipment shall be subject to Type Testing, Production Testing, Commissioning Testing, and Periodic Testing consistent with IEEE 1547-2018, IEEE 1547.1-2020 and UL 1741 SB. These requirements ensure that the Generating Facilities will not adversely affect the Utility's Distribution System and that such facilities will cease to energize and provide power under abnormal conditions.

2. CERTIFICATION CRITERIA

- a. Equipment tested and approved (e.g. "Listed") by an accredited, nationally recognized testing laboratory (NRTL) as having met both the Type Testing and Production Testing requirements of IEEE 1547-2018 and UL 1741 SB shall be considered Certified Equipment.
- b. Proof of Certification shall consist of an NRTL-issued certificate including:
 1. Effective date of Certification and serial/model numbers;
 2. The software version (if applicable);
 3. Test procedures procedure and revision;
 4. Laboratory accreditation; and
 5. Technical ratings, trip settings, and designations for Non-Exporting and Non-Islanding capability.
- c. The Applicant shall ensure that Certification documentation is available from the manufacturer, NRTL, or an authorized third party.
- d. Use of non-Certified equipment requires a site-specific testing plan and Utility approval consistent with IEEE 1547.1-2020.

(Continued)

Issued: 12-31-25	Issued By: Timothy Clausen Vice President, Regulatory	
Effective:		
Advice No.: 562		

(N)

(N)

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

(N)

3. TYPE TESTING

Type Testing shall be conducted in accordance with IEEE 1547.1-2020 and UL 1741 SB to verify compliance with Interconnection performance requirements including voltage and frequency ride-through, protective trip functions, reactive power, interoperability, and communications.

4. PRODUCTION TESTING

Production Testing shall be performed in accordance with IEEE 1547.1-2020 and UL 1741 SB as part of routine factory testing to verify each unit's performance.

5. COMMISSION TESTING

- a. Commissioning Testing shall be performed onsite in accordance with IEEE 1547.1-2020 to verify protective settings and functional performance upon initial Parallel Operation, after modifications affecting Interconnection functions, or when otherwise required.
- b. Testing shall be performed by a qualified engineer, factory-certified technician, or licensed electrician.
- c. The Utility may witness Commissioning Testing or require Certification by the installer of test completion results.
- d. For Certified Equipment, testing may be limited to verification of protective settings, anti-Islanding, and Non-Export Functions.
- e. For non-Certified Equipment, full Commissioning Testing per IEEE 1547.1-2020 is required or as mutually agreed to by the Producer and the Utility.
- f. At the completion of testing, the Producer shall confirm all devices are set to Utility-approved settings and provide documentation of such.

6. PERIODIC TESTING

Periodic Testing shall be conducted in accordance with IEEE 1547.1-2020 and manufacturer's requirements at intervals not to exceed four (4) years. The Producer shall maintain test records for Utility inspection. Batteries used for Protective Functions shall be inspected monthly and replaced or subject to a discharge test at least once every four (4) years.

(Continued)

(N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

NEVADA POWER COMPANY
P.O. Box 98910
Las Vegas, NV 89151
Tariff No. 1-B
cancels
Tariff No. 1-A (withdrawn)

Original
Cancelling

PUCN Sheet No. 93AZ(18)
PUCN Sheet No. _____

RULE NO. 15

GENERATING FACILITY INTERCONNECTIONS

7. SUPPLEMENTAL TESTING PROCEDURES

Supplemental Testing shall be conducted as required by IEEE 1547.1-2020 and UL 1741 SB, including but not limited to verification of Non-Exporting capability, in-rush current, surge withstand, and Synchronization performance.

8. CLOSING PROVISIONS

Testing and Certification requirements under this Attachment shall be applied uniformly and consistent with IEEE 1547-2018, IEEE 1547.1-2020, and UL 1741 SB.

(N)

(N)

Issued: **12-31-25**

Effective:

Advice No.: **562**

Issued By:
Timothy Clausen
Vice President, Regulatory

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the enclosed **Tesla, Inc. Comments on Proposed Rule 15** upon the parties shown below via electronic mail.

DATED this 15th day of May 2026.

Davison Van Cleve, P.C.

/s/ Dakota Councilman
Dakota Councilman
Attorney

Staff Counsel Division
PUBLIC UTILITIES COMMISSION OF
NEVADA
9075 WEST DIABLO DRIVE, SUITE 250
LAS VEGAS, NV 89148
pucn.sc@puc.nv.gov

Aaron Schaar
Roman Borisov
NV Energy Regulatory
NV Energy
6100 Neil Rd.
Reno, NV 89511
Aaron.schaar@nvenergy.com
Roman.borisov@nvenergy.com
regulatory@nvenergy.com

Jennifer Fedinec
NV Energy
6226 W Sahara Ave
Las Vegas, NV 89146
jfedinec@nvenergy.com

Angel De Fazio
National Toxic Encephalopathy PDN
PO Box 29194
Las Vegas, NV 89126
angel@ntef-usa.org

Fred Voltz
1600 Broadmoor Cir
Boulder City, NV 89005
Zebedee_177@yahoo.com

Attorney General's Office
BUREAU OF CONSUMER PROTECTION
100 N. CARSON ST.
CARSON CITY, NV 89701
bcpserv@ag.nv.gov

Midhat Mafzy
IREC
125 Wolf Rd. Ste 100
Albany, NY 12205
midhatm@irecusa.org

SETH GOLDMAN
SHUTE MIHALY & WEINBERGER LLP
550 CALIFORNIA ST STE 1200
SAN FRANCISCO, CA 94104
sgoldman@smwlaw.com

YOCHANAN ZAKAI
SHUTE MIHALY & WEINBERGER LLP
550 CALIFORNIA ST STE 1200
SAN FRANCISCO, CA 94104
yzakai@smwlaw.com

AMANDA SANCHEZ
Lucas Foletta
Traci Cunningham
HOLLAND & HART LLP
5470 KIETZKE LN STE 100
RENO, NV 89511
alsanchez@hollandhart.com
lmfoletta@hollandhart.com
tncunningham@hollandhart.com

JOAN WHITE
Will Gehl
SOLAR ENERGY INDUSTRIES
ASSOCIATION
1425 K ST NW STE 1000
WASHINGTON, DC 20005
jwhite@seia.org
wgehl@seia.org

ANDREW SCHWARTZ
TESLA INC
3500 DEER CREEK RD
PALO ALTO, CA 94304
anschwartz@tesla.com

Zach Woogen
VEHICLE-GRID INTEGRATION COUNCIL
1401 21ST ST STE 5409
SACRAMENTO, CA 95811
zwoogen@vgicouncil.org
vgicregulatory@vgicouncil.org