All Distributed Resources requirements are subject to Company's Minimum Requirements for Interconnection Service and Ohio Administrative Code 4901:1-22 (OAC). These Technical Requirements by the Company shall not be in conflict with any requirements in the OAC. It is acknowledged that IEEE Standard 1547 "Standard for Interconnecting Distributed Resources with Electric Power Systems" (IEEE 1547)¹¹ is the basis for interconnection Technical Requirements for most jurisdictions. The intent is to utilize IEEE 1547 requirements and to supplement those with a minimal number of additional requirements where appropriate. The purpose of a minimal number of Company requirements not included in IEEE 1547 is to add clarity to some IEEE 1547 sections and to specify requirements for issues not addressed in IEEE 1547. These Technical Requirements apply to all Distributed Resource technologies including synchronous machines, induction machines, or static power inverters/converters.

The interconnection system hardware and software used by a Distributed Resource to meet these Technical Requirements do not have to be located at the Point of Common Coupling. However, the Technical Requirements shall be met at the Point of Common Coupling.

A table summarizing the Distributed Resource Technical Requirements is attached as Appendix 1. The pertinent IEEE 1547 clause number(s) are shown in this table.

Basic Technical Requirements:

The Technical Requirements in IEEE 1547 cover the following areas, Voltage Regulation, Voltage Disturbances, Harmonic Current Injection, Direct Current Injection, Grounding Scheme Compatibility, Inadvertent Energizing, Monitoring Operation, Isolation Device, Withstand Performance, Paralleling Device, Response to Area EPS Faults, Reclosing Coordination, Unintentional Islanding, Voltage and Frequency Detection, Abnormal Voltage or Frequency, Reconnection Following a Disturbance, Secondary Grid and Spot Network Systems, and Testing and Maintenance.

Testing:

A Distributed Resource proposing to interconnect with the Company's transmission and distribution systems (AEP Ohio System) must be tested as per IEEE 1547 Clause 5 to demonstrate that the interconnection system meets the requirements of IEEE 1547 Clause 4. Documentation of the results of the Design Test and Production Tests shall be provided to AEP Ohio at the time of application unless such tests are to be conducted as part of the Commissioning Tests.

When the interconnection system of the Distributed Resource uses an assembly of discrete components, documentation of testing must be provided to AEP Ohio at the time of application to confirm the compatibility of the discrete components to properly function together. Otherwise, AEP Ohio may require the Design Test to be conducted as part of the Commissioning Tests.

Written test procedures shall be approved by AEP Ohio for all tests to be performed as Commissioning Tests. To avoid delay, these test procedures should be submitted to AEP Ohio well in advance of the scheduled date of the Commissioning Tests.

Additional Technical Requirements:

Circuit Breaker - If a main circuit breaker (or circuit switcher) between the interconnection transformer and the AEP Ohio System is required, the device must comply with the applicable current ANSI Standard from the C37 series of standards that specifies the requirements for circuit breakers, reclosers and interrupting switches.

¹ IEEE publications are available from the Institute of Electrical and Electronics Engineers, 443 Hoes Lane, P.O. Box 1331, Piscataway, NJ 08855-1331 (http://standards.ieee.org/)

Main Disconnect Switch:

(Voltages less than 480 volts) - The disconnect switch itself must be readily accessible, lockable, visible-break isolation device such that AEP Ohio can lock the position of the switch in place using a padlock (a lockable cover on the switch does not meet this requirement), and plainly indicate whether it is in the open (off) or closed (on) position.

(Voltages exceeding 480 volts) –A gang operated disconnecting device must be located at the Point of Common Coupling for all three phase interconnections. In all cases the disconnecting device must be clearly labeled, readily accessible to AEP Ohio personnel for use at all times and suitable for use by AEP Ohio as a protective tagging location. The disconnecting device shall have a visible open gap when in the open position and be capable of being locked in the open position.

The disconnecting device must have a ground grid designed in accordance with specifications to be provided by AEP Ohio. Operation of the device must be restricted to AEP Ohio personnel and properly trained operators designated by the interconnection customer. The disconnecting device must comply with the applicable current ANSI Standard from the C37 series of standards that specifies the requirements for circuit breakers, reclosers and interrupting switches.

Terminating Structure – When a new interconnection line is required, the interconnection customer shall provide a suitable structure to terminate the interconnectionline. The customer is responsible for ensuring that terminating structure or substation structural material strengths are adequate for all requirements, incorporating appropriate safety factors. AEP Ohio will provide line tension information for maximum dead-end. The structure must be designed for the maximum line tension along with an adequate margin of safety.

Substation electrical clearances shall meet or exceed the requirements of the National Electrical Safety Code. Installation of disconnect switches, bus support insulators and other equipment shall comply with accepted industry practices.

Surge arresters shall be selected to coordinate with the BIL rating of major equipment components and shall comply with recommendations set forth in the applicable current ANSI Standard C62.2 that specifies the requirements for surge arresters and other surge protection devices.

Momentary Paralleling – For situations where the proposed Distributed Resource will only be operated in parallel with the AEP Ohio System for a short duration (less than 100 milliseconds), as in a make-before-break automatic transfer scheme, the requirements of IEEE 1547 do not apply except as noted in Clause 4.1.4. All make-before-break automatic transfer switch systems proposed by the interconnection customer must comply with UL 1008 and be listed by a nationally recognized testing laboratory.

Voltage Unbalance – The interconnection customer is responsible for operating the proposed Distributed Resource such that the voltage unbalance attributable to the Distributed Resource does not exceed 2.5% at the Point of Common Coupling.

Power Factor - Each Distributed Resource shall be capable of operating at some point within a power factor range from 0.9 leading to 0.9 lagging. Operation outside this range is acceptable provided the reactive power of the Distributed Resource is used to meet the reactive power needs of the electrical loads within the interconnection customer's facility or that reactive power is otherwise provided under tariff by AEP Ohio. The interconnection customer shall notify AEP Ohio if it is using the Distributed Resource for power factor correction.

System Stability – AEP Ohio may require a stability study for Distributed Resources if the aggregate generation is greater than 10 MW and in an area where there are known or posted stability limitations to generation located in the general electrical vicinity (e.g., three or four transmission voltage level busses from the transmission voltage bus serving the distribution circuit where the Distributed Resource proposes to interconnect.

Maintenance and Testing – The interconnection customer is responsible for the periodic scheduled maintenance on the interconnection system of the Distributed Resource (relays, interrupting devices, control schemes, and batteries that involve the protection of the AEP Ohio System). Unless the equipment manufacturer provides study results that demonstrate the need for less frequency, interconnection systems that depend upon a battery for proper function shall be checked and logged once per month for proper voltage. At least once every four years, the battery must be either replaced or a discharge test performed.

A periodic maintenance program is to be established in accordance with the requirements of IEEE-1547. AEP Ohio may examine copies of the periodic test reports or inspection logs associated with the periodic maintenance program. Upon request, AEP Ohio shall be informed of the next scheduled maintenance and be able to witness the maintenance performed and any associated testing.

Monitoring – AEP Ohio reserves the right, at AEP Ohio's initial expense, to install special test equipment as may be required to perform a disturbance analysis and monitor the operation and control of the Distributed Resource to evaluate the quality of power produced by the Distributed Resource.

Evaluation of System Impact:

A Distributed Resource proposing to interconnect to the AEP Ohio System may have significant impact on the safety and reliability of one or more of the following portions of the electrical power system; the AEP Ohio Distribution System, the AEP Ohio Transmission System, the Distribution or Transmission System of a third party (called an Affected System) and the electrical system where the Distributed Resource is to be connected. AEP Ohio shall not be responsible for the evaluation of the safety and reliability impacts on the electrical system where the Distributed Resource is to be connected. AEP Ohio approval of a Distributed Resource interconnection should not be construed as an endorsement, confirmation, warranty, guarantee, or representation concerning the safety, operating characteristics, durability, or reliability of the Distributed Resource facility and the electrical system where it is connected.

AEP Ohio Distribution System Impact —

AEP Ohio is responsible for evaluating the system impact of a proposed Distributed Resource interconnection based upon the information provided in the interconnection application once the application is considered complete.

A study to determine system impact will be performed based upon the interconnection request's position in the Queue and the applicable time limits established by the regulatory authority having jurisdiction. The study time limits and study scope vary depending upon the regulatory authority and the type, size and proposed use of the Distributed Resource.

AEP Ohio supports limited study and the use of a screening process to expeditiously identify and approve Distributed Resources that can be interconnected without significant system impact AEP Ohio screening criteria is based on the OAC.

Additional study time is generally required to evaluate Distributed Resources that are not precertified. The exception may be for Distributed Resources that have been evaluated previously by
AEP Ohio and were found to meet the Technical Requirements including the necessary testing.

The possible outcomes of the system impact study could include the following:

 The proposed Distributed Resource interconnection meets the Technical Requirements and there are no system impacts that would require modification or upgrade to either AEP Ohio facilities or the Distributed Resource installation;

- 2) The proposed Distributed Resource interconnection does not meet the Technical Requirements and modifications or changes are required to either AEP Ohio facilities or the Distributed Resource installation;
- 3) The proposed Distributed Resource interconnection would result in negative system impact and modifications or changes are required to either AEP Ohio facilities or the Distributed Resource installation;
- 4) The proposed Distributed Resource interconnection requires new AEP Ohio facilities.

The potential distribution system impacts listed in Appendix 2 may need to be examined as part of the system impact study.

AEP Ohio Transmission System Impact -

AEP Ohio will determine if there may be an impact to the AEP Ohio transmission system (including any transmission system stability impact) or an impact to a third party's system when the interconnection occurs on the AEP Ohio distribution system.

AEP Ohio will coordinate processing the interconnection request to assure the proper process is followed and all required milestones are met.

Affected System Impact -

AEP Ohio will review each request for interconnection to the AEP Ohio distribution system to determine if the potential exists for impact to a third party's system. For example, the distribution systems of several Rural Electric Cooperatives are interconnected to AEP Ohio distribution feeders.

If the potential exists for an impact to their system, AEP Ohio will notify the third party of the proposed interconnection request and coordinate processing the interconnection request to assure that the proper process is followed and all required milestones are met.

Appendix 1

Distributed Resource Technical Requirements

Attribute	Requirement
Voltage Regulation	IEEE 1547 - Clause 4.1.1
Voltage Disturbances	IEEE 1547 - Clause 4.3.2
Harmonic Current Injection	IEEE 1547 - Clause 4.3.3
Direct Current Injection	IEEE 1547 - Clause 4.3.1
Grounding Scheme Compatibility	IEEE 1547 - Clause 4.1.2
Inadvertent Energization	IEEE 1547 - Clause 4.1.5
Monitoring Provisions	IEEE 1547 - Clause 4.1.6
Isolation Device	IEEE 1547 - Clause 4.1.7
Withstand Performance	IEEE 1547 - Clause 4.1.8.1 and Clause 4.1.8.2
Paralleling Device	IEEE 1547 - Clause 4.1.8.3
Response to Area EPS Faults	IEEE 1547 - Clause 4.2.1
Reclosing Coordination	IEEE 1547 - Clause 4.2.2
Unintentional Islanding	IEEE 1547 - Clause 4.4.1
Abnormal Voltage	IEEE 1547 - Clause 4.2.3
Abnormal Frequency	IEEE 1547 - Clause 4.2.4
Reconnection Following a Disturbance	IEEE 1547 - Clause 4.2.6
Secondary Grid and Spot Network	IEEE 1547 - Clause 4.1.4
Systems	
Testing	IEEE 1547 - Clause 5
Periodic Interconnection Tests	IEEE 1547 - Clause 5.5
Circuit Breaker	Meet appropriate ANSI C37 standard
Disconnect Switch	Three phase unit gang operated at Point of Common Coupling
Terminating Structure	Adequate structural material strength suitable to terminate line
Surge Arresters	Meet applicable ANSI C62.2 standard
Momentary Paralleling	Comply with Underwriter's Laboratories Standard 1008 and IEEE 1547 – Clause 1.3
Voltage Unbalance	Unbalance attributable to Distributed Resource 2.5% or less
System Stability	Study required for units greater than 10 MW when limitations exist

Appendix 2

Potential Distribution System Impacts

Voltage Regulation - With the addition of the Distributed Resource, the voltage level on both the primary and secondary must be maintained within acceptable limits for both on peak and off peak conditions.

- 1) Reverse power flow through voltage regulators or load tap changers may cause the regulator or load tap changer to regulate the voltage incorrectly.
- 2) Improper settings of the Distributed Resource controls may result in the steady state voltage straying outside the + or 5% limits at the point of common coupling on a 120 volt basis.
- 3) Low voltage may be experienced after a temporary fault or when restoring service after a permanent fault if the presence of the Distributed Resource is essential to the maintenance of adequate voltage.
- 4) The loss of Distributed Resource synchronous machine exciters may cause excessive reactive power losses and low voltages on a circuit.
- 5) The presence of Distributed Resources with varying output (e.g. wind turbines, photovoltaic cells, etc.) may cause excessive switching of capacitor banks and/or an excessive number of regulator or load tap changer operations.
- 6) When line drop compensators are used on a circuit, the presence of Distributed Resources may significantly alter the intended regulation scheme.
- 7) The presence of Distributed Resources on a secondary system may cause the off peak voltage level to exceed its upper limit.
- 8) The Distributed Resource owner could experience periods when his unit(s) trips off line from overvoltage due to system voltage excursions.

Voltage Flicker - Several Distributed Resource technologies have the potential for creating objectionable voltage flicker. In extreme cases the size of the Distributed Resource may need to be limited to prevent objectionable flicker or system improvements may be necessary to limit the voltage flicker. Possible flicker sources include:

- 1) Wind turbines may produce rapidly varying output due to changes in wind speed, wind turbulence, intensity, tower shadowing effects and blade pitching.
- 2) Photovoltaic (PV) installations may produce rapidly varying output due to intermittent cloud cover over the cells.
- 3) Reciprocating engine Distributed Resources may produce rapid output fluctuations caused by engine misfiring due to low quality fuel.
- 4) Induction machine Distributed Resources may produce voltage flicker due to current inrush when they are connected.
- 5) Synchronous machine Distributed Resources may produce voltage flicker due to poor voltage matching and phase angle synchronization at contact closure.

- 6) Power inverter based Distributed Resources may not have soft start technology to limit the rate of change of power output at starting.
- 7) Interaction of Distributed Resources with other devices such as voltage regulators, load tap changers and switched capacitor banks may produce objectionable voltage flicker.

Overcurrent Protection and Protective Device Coordination - With the addition of a Distributed Resource on a circuit, another source of fault current is introduced. The available fault current at any location on the feeder will depend upon the type of fault (e.g. line-to-ground, three phase, double-line-to-ground, etc.), the fault impedance, and the status of the Distributed Resource on the feeder (i.e. on or off line). Each Distributed Resource technology has its own unique fault current characteristics.

The presence of Distributed Resources may create several problems with overcurrent protection and the coordination of protective devices. Some of the problems include:

- 1) The "reach" of overcurrent protective devices may be reduced due to a reduction in the fault current contribution from the station source with Distributed Resources on a feeder. For faults located downstream from a Distributed Resource, the fault current contribution from the station source will be reduced when the Distributed Resource unit is on line.
- 2) Recloser to fuse coordination may no longer exist with the introduction of a Distributed Resource on the feeder so fuses may blow for temporary faults.
- 3) Sectionalizers may misoperate if the Distributed Resource maintains voltage when the sectionalizer should be "counting" an operation.
- 4) Nuisance tripping of a circuit recloser or station breaker may occur from a fault located on an adjacent feeder due to the fault current contribution from the Distributed Resource.
- 5) The presence of an interconnection transformer with a primary voltage wye grounded winding connection and a secondary voltage delta connection at the Distributed Resource can desensitize ground fault relays and the ground fault settings on recloser controls.
- 6) The introduction of Distributed Resource to a secondary spot or grid network system can cause nuisance trips of protectors and protector cycling and may lead to out of phase protector closing resulting in equipment damage.
- 7) The presence of a Distributed Resource may exacerbate cold load pickup problems following a feeder outage.
- 8) The addition of a Distributed Resource may increase the available fault current to the point where utility system or customer owned protective device fault interrupting ratings are exceeded.
- 9) If the Distributed Resource remains on the feeder after a protective device opens for any reason, then the protective device may reclose with the system voltage and the Distributed Resource voltage out of synchronism.
- 10) Distribution automation schemes may be adversely affected by the introduction of Distributed Resources.

11) System under frequency conditions may result in feeder or transformer overload conditions.

Harmonic Current Injection - Several Distributed Resource technologies have the potential for introducing harmonic distortion. Possible harmonic issues include:

- 1) Rotating machines produce 3rd harmonic distortion. Machines having a pitch of either 5/6 and 11/16 introduce the most distortion with 2/3 pitch being the preferred pitch to minimize distortion.
- 2) Inverter based Distributed Resources may inject harmonic voltages and currents into the utility grid or may serve as a system sink for harmonics.
- 3) Wye-wye transformer connected Distributed Resources and single phase Distributed Resources have the potential for being the worst harmonic sources.

Other Issues - Several other issues relating to the interconnection of Distributed Resources need to be considered. Potential problems to look for include:

- 1) Voltage on unfaulted phases may approach 1.73 times nominal during single line to ground faults when delta-wye or delta-delta connected transformer banks are used for the Distributed Resource transformation.
- 2) Resonant overvoltages can occur if a synchronous or induction generator Distributed Resource is isolated with capacitors during line to ground faults.
- 3) Single phase switching of a delta connected Distributed Resource transformer bank may create ferroresonant overvoltage conditions.
- 4) Distributed Resources may present utility worker and public safety concerns by inadvertently re-energizing the electric power system during abnormal system conditions.
- 5) The addition of Distributed Resource may overload conductors or equipment.
- 6) The presence of a Distributed Resource may defeat attempts to clear fault conditions by continuing to energize the feeder during fault events.
- 7) Induction and synchronous machine Distributed Resources may be over excited by the presence of a capacitor bank in an unintentional islanding situation and produce high voltages in the island.
- 8) Inverter based Distributed Resources may inject direct current onto the feeder causing transformer saturation.
- 9) When a grounded-wye high-side/delta low-side connected transformer bank is used to connect a Distributed Resource, circulating current in the delta winding may result in transformer overloading. This transformer connection allows zero sequence current to circulate in the delta winding.
- 10) When feeders are switched from their normal configuration to affect load transfers or to restore power to customers during outage situations, the presence of a Distributed Resource may create voltage regulation problems, objectionable voltage flicker, improper protective device operation and coordination or other problems.