

October 5, 2023

## RE: Codes and Standards Applicable to Distributed Energy Resources

To Whom It May Concern,

For all Distributed Energy Resources (DER) applying or registering under VT PUC Rule 5.500 or VT PUC Rule 5.100 after January 1, 2024, ISO New England is requiring GMP to assure that all DER interconnections follow the IEEE 1547 and UL1741 codes and standards that are currently in effect in Vermont. These codes and standards are as follows:

- IEEE 1547-2018 (as amended by IEEE 1547a-2020) replaced both 1547-2003 and 1547a-2014 in February 2018
- IEEE 1547.1-2020 superseded IEEE 1547.1a-2005 in May 2020
- UL 1741 (2010) as supplemented by UL1741 SA (2016) and UL 1741 SB (Third Edition, Dated September 28, 2021)

This requirement is based on VT PUC Rule 5.510, copied below in pertinent part:

**5.510 Codes and Standards.** When any listed version of the following codes and standards is superseded by a revision approved by the standards-making organization, then the revision shall be applied under Section 5.505. Applications that are date-and-time-stamped on or before six months after the revision date may follow the previous version of the standard, unless an immediate threat to safety and reliability exists that requires the retrofit of all similarly situated equipment. Applications that are date-and-time-stamped later than six months after the revision date must follow the revised standard.

(A) IEEE P1547 Standard for Interconnecting Distributed Resources with Electric Power Systems as adopted and successor or related IEEE-approved standards.

(B)UL 1741 Inverters, Converters, and Controllers for Use in Independent Power Systems. Recently, at the July 12<sup>th</sup> VSPC meeting, ISO-NE gave a presentation discussing the importance of adhering to these standards. Their presentation can be found here:

https://www.vermontspc.com/library/document/download/7958/ISO%20New%20England\_Marszalkowski\_7\_1 2 2023 VSPC%20Presentation NewSettingsDoc.pdf

In addition, effective January 1, 2024, GMP may require inverter settings that implement the May 9, 2022 ISO "Default IEEE 1547-2018 Setting Requirements" that supersede the February 18, 2018 ISO "Inverter Source Requirement Document" and are made possible by the required UL1741 SB compliant inverters.

If you have any questions or concerns don't hesitate to contact us at dr@greenmountainpower.com.

Sincerely, Green Mountain Power Distributed Resources