

By way of background, Foundation Windpower was an active participant in the Unintentional Islanding Working Group (UIWG), which was formed at the direction of the CPUC in D.21-06-002 and administered by Gridworks. The UIWG, last December, issued its Final Report ([see attached](#)).

The UIWG and its Final Report was focused on developing more efficient and effective alternatives to PG&E's current practice of deploying direct transfer trip (DTT) as a method to protect against unintentional islanding of DERs (including rotating machines like wind turbines) on the distribution system. Some of the potential alternatives to DTT discussed in the UIWG Report (and recommended for piloting & testing) include, among other things, DSO deployment of IEC 61850 Generic Object Oriented Substation Event (GOOSE) spread spectrum technology and/or Bulk System Timing Reference (BUSTR) technology, in lieu of DTT. Interim measures, such as having rotating machines leverage inverter-based loss of mains detection (LOMD), were also included in the UIWG Report. Beyond the focused mission of the UIWG, we believe it would make sense to explore incorporating consideration of these recommendations by technical experts (which, unfortunately, I am not) in the High DER grid discussions since they could, more broadly, help fill gaps between current capabilities and operational needs of the distribution system necessary to efficiently operate a high DER grid, which includes developing better systems for communications between DERs, fault detection and grid protection, all in ways that promote stability and ride-through capacity.