

**10 kW and Under
Faster & Less Complex Interconnection Procedures
Staff Proposal for Discussion
August 2007**

Please be reminded that the Staff report to the Commission on this workgroup is due September 30. Please review this document, and provide comments in writing to Staff by not later than midnight on September 7. **Please email comments to baldwinj2@michigan.gov.**

Our workgroup was asked to develop faster and less complex interconnection procedures for 10 kW and under interconnection projects. (This task is not limited to inverter-based projects.)

Staff is asking the workgroup to review [Wisconsin Chapter PSC 119 Rules for Interconnection Distributed Generation Facilities](#) and the [Wisconsin Distributed Generation Interconnection Guidelines](#), and [Wisconsin Application and Interconnection Agreement](#) to assess their suitability to Michigan. To highlight similarities and differences between the current Michigan rules and the Wisconsin rules, Staff prepared a comparison document. This comparison document is provided in MS Word format to make it easier for the workgroup to provide comments within the document, if desired.

Staff proposes these additions to the Wisconsin Rules:

1. Provide for a pre-application meeting between utility and project developer.
2. Include a provision for the Commission to appoint expert(s) to provide technical expertise related to interconnection issues.

This function would be similar to the provision in the Animal Contact Current Mitigation Rules or PA 30 Electric Transmission Line Certification Act. Excerpts from these MPSC Administrative Rules appear on the next page. In particular, this expert would provide assistance to the Commission, in the event there are any cost-related or technical issue complaints.

3. Require distribution utilities to consult with transmission owners for all generator projects >2 MW and when total generation on a distribution line will exceed 10 MW.

In comments, please address the following questions:

1. Will these Wisconsin rules provide faster and less complex interconnection procedures for Michigan interconnections for small inverter based systems?
2. Do you support the idea of using these rules as the basis for new Michigan rules? If not, please explain why and provide any alternative recommendations.
3. What modifications (if any) to these Wisconsin rules do you recommend? Do you agree with the proposed modifications Staff has listed?

4. Is it acceptable for Michigan rules to adopt the Wisconsin generator size categories, in particular the “20 kW and less” category?

Animal Contact Current Mitigation Rules

R 460.2704 Request for investigation.

Rule 4. (1) After completion of the procedures in R 460.2702 and R460.2703, a complainant or the utility may request, with notification to the other party, that the commission appoint at least 3 and up to 5 experts to investigate in the manner in R 460.2705. If the commission appoints at least 3 and up to 5 experts, those experts shall have the rights and responsibilities as described in that rule and shall issue their investigation report and conclusions to the commission, the complainant, and the utility.

(2) The funding mechanisms in R 460.2705 shall be used to defray the costs of the experts as determined by the commission.

History: 2007 MR 3, Eff. Feb. 6, 2007.

R 460.2705 Appointment of experts.

Rule 5. (1) If a complainant or the utility requests an investigation through the commission under R 460.2704 of these rules, then the commission may appoint at least 3 and up to 5 experts to investigate the complaint and report findings to the commission within the scope of these rules. The commission shall consider expert individuals based on, but not limited to, all of the following criteria:

(a) Expertise specific to the specie affected.

(b) Objectivity - individuals not directly impacted by the resolution.

(c) Neutral third-party.

(d) Training and expertise in primary distribution systems and certification in secondary wiring systems.

(2) The experts shall limit their conclusions and reports to the subject of the dispute and the facts and circumstances of the specific case for which they were appointed.

(3) Either party may request specific disciplines be represented on the expert team.

(4) The experts shall submit a report to the commission with the results and conclusions of their inquiry, which may suggest corrective measures for resolving the complaint. The reports of the experts shall be received in evidence and the experts shall be made available for cross-examination by the parties at any hearing. The experts shall report to the commission within 30 days of their employ. The commission may grant up to a 30-day extension.

(5) The reasonable expenses of experts, including a reasonable hourly fee or fee determined by the commission, shall be submitted to the commission for approval and, if approved, shall be funded under subrule (6) of this rule.

(6) The utility shall reimburse the experts appointed by the commission for the reasonable expenses incurred in the course of investigating the complaint.

History: 2007 MR 3, Eff. Feb. 6, 2007.

PA 30 Electric Transmission Line Certification Act

460.568 (3) The commission may assess certificate application fees from the electric utility, affiliated transmission company, or independent transmission company to cover the commission's administrative costs in processing the application and may require the electric utility, affiliated transmission company, or independent transmission company to hire consultants chosen by the commission to assist the commission in evaluating those issues the application raises.