



DTE Energy®

MPSC Stakeholder Process - Interconnection

May 6, 2019



Disclaimer



In order to encourage all parties to engage in thoughtful and constructive dialogue during the stakeholder process, it should be made clear that a) stakeholder meetings will be treated like settlement conferences under MRE 408 and no statement or writings of a participant may be used as evidence in current or future legal proceedings; b) DTE Electric by its participation does not waive the right to challenge any provisions or take any positions in this proceeding or in future proceedings regarding these rules. DTE Electric notes this document represents initial thinking on these matters, is not comprehensive, and the Company's positions may evolve as this process continues. The Company reserves its right to modify or expand its positions on this subject matter in the future and/or in response to positions taken by other stakeholders this process.

Objectives of today's discussion



- Discuss the Application process
- Discuss Modification
- Discuss the Site Control process
- Discuss "Queue" Challenges





- you will be able to add "DTE Electric Interconnection Program" to your PowerClerk account.

 Create an application by clicking the "New Generator Interconnection Application" button on the
- Projects will be displayed on the homepage where you will be able to view and track the status of
 any projects as they are processed.
- Emails from the system will be sent out to customers and contractors to confirm project status as well as direct users back to PowerClerk to complete any required forms or upload necessary data.
- If you forget your password, click the "Forgot Password?" link in the bottom of the login box to reset your password.

Any questions? View the <u>PowerClerk</u> tutorial video for questions related to the log in process. Please email <u>interconnection_application@deenery.com</u> or call (313) 235-4333 for questions regarding the DTE Electric interconnection program.

Please review information on the <u>DTE Interconnections Webpage</u> for more details on the process to interconnect with <u>DTE Electric's distribution system</u>.



Several key issues with the interconnection process need to be addressed



Description of Issues¹

Rules vs.
Business
Practice

- Any additional detail should be covered by "business practices"
- This includes provisions related to:
 - Methodologies for screens and studies
 - Timelines for steps in the interconnection process
 - "Queue" management and cost allocation methodologies
- Provides flexibility in light of the fact that MI law does not allow rules to be a "living document" like they are in Minnesota subsequent revisions will be needed



- No definition of an interconnection "queue" in Michigan
- Interconnection "queue" only for administrative purposes
- Any "queue" must prevent speculation and not delay committed projects, through timely removal from any "queue"
- In the field circumstances and system conditions are highly variable. Document submittals and prescribed timelines don't eliminate external influences
- Larger projects generally take longer to study, require information from MISO and other independent transmission sources, and are incompatible with a prescribed approach and prescriptive timelines.
- · A long history of implementation challenges with the MISO queue warrants caution
- Given the complexities of any "queue", any details should be in a "business practice" document and allow flexibility

Highlights from markup of relevant sections of the MN rules



Highlighted Provisions¹



- Interconnection Entities must follow Interconnection Application processes (e.g. processing fees or deposits must be submitted in the proper manner to facilitate Interconnection Application processing);
- Interconnection Applications must contain reliable and accurate information to facilitate Interconnection Application processing;
- Interconnection Applications must be date-and-time-stamped and submitted in the proper manner to facilitate Interconnection Application processing



- After an Interconnection Application is deemed complete, non-material modifications may be considered by the Electric Utility
- All proposed modifications must be submitted in writing by the Interconnection Entity



- Documentation of Site Control must be submitted with the Interconnection Application
- Site Control documentation may be demonstrated by
 - Category 1 or 2: Site owner's signature on the Interconnection Application, if utilizing the Simplified Process
 - Category 3-5: Reliable legal evidence