

Making the Most of Michigan's Energy Future

Interconnection, Distributed Generation, and Legally Enforceable Obligation Rules Overview

Julie Baldwin Nicholas Evans Cody Matthews Merideth Hadala

March 24, 2020

MPSC Michigan Public Service Commission

TODAY'S TOPICS

- Interconnection
- Distributed Generation
- Legally Enforceable Obligation





RECENT ACTIVITIES







INTERCONNECTION RULES





INTERCONNECTION PROCESSING FRAMEWORK

Pre-Application Report (mandatory for >550 and larger projects)

Simplified Track ≤20 kW	Non-Export Track	Fast Track ≥20 kW and ≤ 1 MW	Study Track
Application Accepted	Application Accepted	Application Accepted	Individual Batch Process Process
Application Review	Review Screens	Review Screens	System Impact Study
Construction	Construction	Construction	Facilities Study
Inspection & Testing	Inspection & Testing	Inspection & Testing	Construction Agreement
Authorization	Authorization	Authorization	Construction Inspection & Testing
to Operate	to Operate	to Operate	Authorization to Operate

5

MPSC



NEW KEY FEATURES

- Pre-Application Report
- Fast Track initial and supplemental review screens are in the rules
- Added an MPSC Staff interconnection ombudsperson and more robust mediation process.
- Transition from old rules to new rules will remove inactive projects from utility interconnection requests.
- Option for a utility to use a batch process for groups of larger, more complex interconnections
 - Potential for shared interconnection facilities and distribution upgrade costs
 - One-year timeframe per batch with up to one-year enrollment period.





TRANSITION TO NEW INTERCONNECTION RULES

Commission

begins contested

case process.

Administrative Process

Formal New Rules Rulemaking Effective Date Begins Utilities file proposed Interconnection Procedures for Utilities develop Commission draft approval within 10 Interconnection business days. Procedures documents with input from Staff and stakeholders.

Order approving Interconnection Procedures is issued no later than 360 days after the effective date of the new rules.





TRANSITION TO NEW INTERCONNECTION RULES

- All pending applications are divided into three groups:
 - Transition Non-Study Group Applications R 460.914
 - Utility has 20 business days to sort applications into the appropriate "track" and begin processing according to the new rules.
 - Simplified Track, Fast Track, or Non-Export Track
 - Advanced Legacy Applications R 460.916
 - Applications with completed distribution studies.
 - Applications will be withdrawn if no activity within 60 business days of the effective date of the new rules.
 - Transition Batch R 460.918
 - Application accumulation window ends 80 business days after the effective date of the new rules.
 - Eligible applications accepted before the effective date of the new rules which do not join the Transition Batch will be withdrawn.
 - The Transition Batch shall be processed within one year.
- New applications accepted within 80 business days after the effective date of the new rules will, by default, join the Transition Batch.

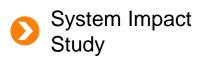


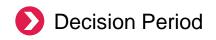


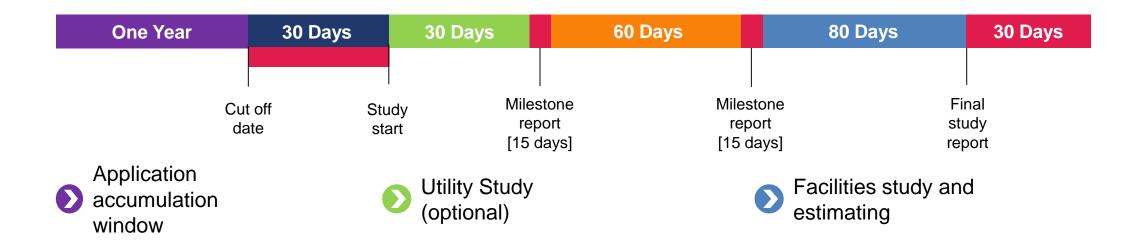
EXAMPLE BATCH PROCESS

At Staff's request, Consumers Energy and DTE developed a potential batch process for discussion purposes only. This is Staff's proposal, which is similar.

Scoping meetings







Application accumulation window for next study





DISTRIBUTED GENERATION & LEGACY NET METERING





Distributed Generation OVERVIEW

- Program Enrollment Process
- Utility Annual Reporting
- Legacy Net Metering Billing Mechanism
- Renewable Energy Credits
- AES DG Program Implementation
- Legacy Net Metering Grandfathering





ENERGY STORAGE

 Must not design or operate the energy storage equipment in a manner that results in the customer's electrical output exceeding 100% of the customer's electricity consumption for the previous 12 months



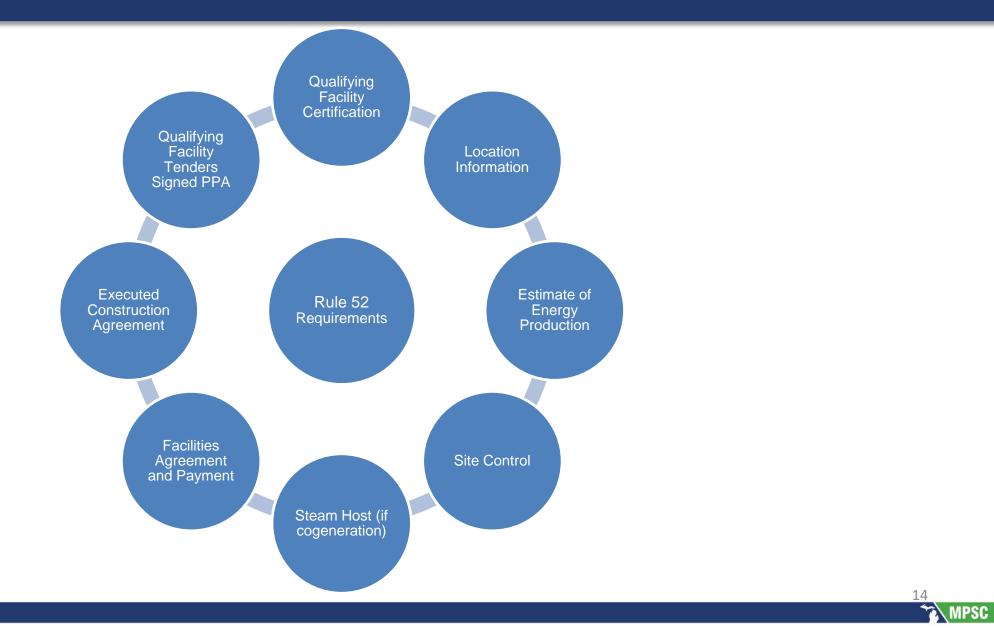


LEGALLY ENFORCEABLE OBLIGATION (LEO)



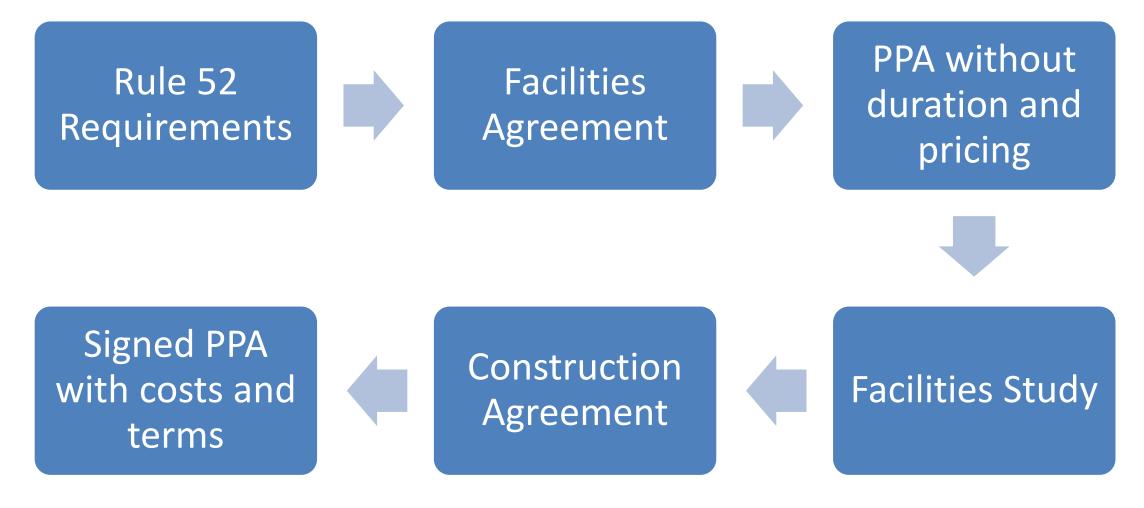


LEO COMPONENTS – R 460.1052





PURPA CONTRACTING PROCESS







IF A FINAL PPA IS NOT SIGNED IN 6 MONTHS

 QF or utility may file an unexecuted PPA within 40 business days

-Or-

- The LEO terminates
 - -QF is responsible for distribution system issues caused by QF
 - Unspent portion of milestone payments refunded to QF





NEXT STEPS



17

MPSC

