

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, are 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.

1.5 Interconnection Application

1.5.1 The Interconnection ~~Customer Entity~~ shall submit an Interconnection Application to the ~~Area EPS Operator, Electric Utility~~, together with the processing fee or deposit specified in the Interconnection Application. Additional fees or deposits for the interconnection process shall not be required, except as otherwise specified in these procedures. ~~Application form templates are available in Attachment 2: Simplified Application Form and Attachment 3.~~ The ~~Area EPS Operator's Electric Utility's~~ tariff shall include specific fees for ~~Simplified Process, Fast Track Process, and Study Process~~ consistent with:

- 1.5.1.1 ~~Full recovery of the cost of processing the interconnection applications be up to \$100~~
- 1.5.1.2 ~~For certified, Fast Track Process eligible applications, the processing fee shall be up to \$100 + \$1/kW. For non-certified Fast Track Process eligible applications, the processing fee shall be up to \$100 + \$2/kW.~~
- 1.5.1.3 ~~For an Interconnection Application that is not eligible or does not apply for Simplified Process or Fast Track Process, the processing fee shall be consistent with Rule 18 a down payment not to exceed \$1,000 plus \$2.00 per kW toward the deposit required for the study(s) under Section 4 Study Process.~~
- 1.5.1.2 ~~Interconnection Applications shall contain a single line diagram and site diagram. A signature from a professional engineer licensed in Minnesota Michigan shall be required when: 1) Certified equipment is greater than 250 kW; or 2) non-certified equipment is greater than 50 kW the interconnection is greater than Category 2.~~
- 1.5.1.3 ~~Interconnection entity's submittal of the application through the Electric Utility's online application system.~~

1.5.2 The Interconnection Application shall be date- and time-stamped, ~~upon initial and, if necessary, resubmission receipt. Unless Section 2 Simplified Process applies, the Interconnection Customer shall be notified of receipt by the Area EPS Operator within three (3) Business Days of receiving the Interconnection Application.~~ The ~~Area EPS Operator Electric Utility~~ shall notify the Interconnection Customer ~~consistent with Business practice XXX.XX,~~ within ten (10) Business

Commented [A1]: DTE recommends having a fixed cost with a per MW cost for category 3,4,5 projects

Days of the receipt of the Interconnection Application as to whether the Interconnection Application is complete or incomplete subject to modification based on application volume and storm response under XXXXXX. If the Interconnection Application is incomplete, the Area EPS Operator Distribution Utility shall provide along with the notice that the Interconnection Application is incomplete, a written list detailing all information that must be provided to complete the Interconnection Application. The Interconnection Customer Entity will have ten (10) Business Days after receipt of the notice to submit all of the listed information. If the Interconnection Customer does not provide the listed information within the deadline the Interconnection Application will be deemed withdrawn. ~~An Interconnection Application will be deemed complete upon submission of documents adhering to Minnesota Technical Requirements and containing the listed information to the Area EPS Operator. The Area EPS Operator will have five (5) Business Days to review the additional material and notify the Interconnection Customer if the Interconnection Application is deemed complete. The date and time stamp of receipt of a complete Interconnection Application shall be accepted as the qualifying date for the purposes of establishing queue position as described in section 1.8.~~

1.6 Modification of the Interconnection Application or an DER Interconnection

1.6.1 ~~At any time a~~ After an Interconnection Application is deemed complete, including after the receipt of an Engineering Review and Distribution Study ~~Fast Track, supplemental review, system impact study, and/or facilities study results~~, the Interconnection Customer Entity, the Area EPS Operator Electric Utility, or the Affected System owner may propose identify non-material modifications to the ~~planned~~ Interconnection Application that may improve the costs and benefits (including reliability) of the Interconnection, and/or the ability of the Area EPS Operator Electric Utility to accommodate the Interconnection. The Interconnection Entity Customer shall submit to the Area EPS Operator Electric Utility, in writing, all proposed modifications to any information provided in the Interconnection Application. Notwithstanding the foregoing, in no event shall the Electric Utility be required to accept or implement a modification to the Electric Utility's distribution system, transmission system or generation proposed by an Interconnection Entity or Affected System. Neither the Area EPS Operator Electric Utility nor the Affected System operator may unilaterally modify the Interconnection Application after it is deemed complete.

Commented [A2]: If changes occurred during study phases additional fees and time may be required to accommodate the results, it is recommended that a specific scope is studied and completed for each phase.

~~1.6.2 Within ten (10) Business Days of receipt of a proposed modification, the Area EPS Operator shall evaluate whether a proposed modification to either an Interconnection Application or an existing DER Interconnection constitutes a Material Modification. If applicable, the Area EPS Operator shall make Reasonable Effort to consult with the Affected System owner. The definition in Glossary of Terms includes examples of what does and does not constitute a Material Modification.~~

Commented [A3]: With online systems there are needs for optimizations, fixes and upgrades, this is intended to mean that a submitted application will not have any changes to the interconnection related information.

Commented [A4]: Allowing modifications to the interconnection at any time, will affect other studies and cause delays in the interconnection process. How many cycles of modifications are allowed by the customer to the original application? How much do they pay for modifications, since many of them will require a complete re-study?

~~1.6.2.1~~ 1.6.1.1 If the proposed modification is determined to be a Material Modification or changes to study parameters, then the Electric Utility Area EPS Operator shall notify the Interconnection Customer Entity in writing that the Customer Interconnecting Entity may: 1) withdraw the proposed modification; or 2) proceed with a new Interconnection Application for such modification. The Interconnection Customer Entity shall provide its determination in writing to the Area EPS Operator Electric Utility within ten (10) Business Days after being provided the Material Modification determination results. If the Interconnection Customer Entity does not provide its determination, the Customer's Interconnection Entity's Application shall be deemed withdrawn.

Commented [A5]: Changes to the site location, POI, type of generation or storage, equipment nameplate (AC or DC capability) or study parameters will require restudy and evaluation. This may invalidate all prior study

~~1.6.2.1~~ 1.6.1.2 If the proposed modification is determined not to be a Material Modification ~~and, then the Area EPS Operator~~ Electric Utility ~~agrees with the proposed modification, the Electric Utility shall notify the Interconnection Customer Entity in writing that the modification has been accepted and that the Application will proceed. If the Electric Utility disagrees with the proposed modification, then the Electric Utility shall notify the Interconnection Entity in writing that its proposal is rejected and that the Interconnection Entity may 1) withdraw the proposed modification; or 2) proceed with a new Interconnection Application. Interconnection Customer Entity shall retain its eligibility for interconnection, including its place in the interconnection queue.~~

~~1.6.3~~ Any dispute as to the Area EPS Operator's determination that a modification constitutes a Material Modification shall proceed in accordance with the dispute resolution provisions in section 5.3 of these procedures.

~~1.6.4~~ 1.6.2 Any modification to physical equipment, cybersecurity, operating software or firmware, machine data, equipment configuration or to the interconnection site, or location of the interconnection site ~~of the DER~~ not agreed to in writing by the ~~Area EPS Operator~~ Electric Utility and the Interconnection ~~Entity Customer~~ may be deemed a withdrawal of the Interconnection Application and may require submission of a new Interconnection Application as described in section 1.6.1; ~~unless proper notification of each Party by the other as described in sections 1.6.1 and 1.6.2.~~

1.7 Site Control

Documentation of site control must be submitted with the Interconnection Application. Site control may be demonstrated through providing documentation showing any of the following:

~~1.7.1~~ Ownership of ~~or~~ a leasehold interest in, ~~or a right to develop~~ a site demonstrating the right to construct for the purpose of constructing the DER ~~Interconnecting Entity's generator.~~

~~1.7.2~~ An option to purchase or acquire a leasehold site ~~for the purpose of constructing the Interconnecting Entity's generator; such purpose; or~~

~~1.7.3~~ An exclusivity or other business relationship between the Interconnection Customer and the entity having the right to sell, lease, or grant the Interconnection Customer the right to possess or occupy a site for such purpose; ~~or~~

~~1.7.4~~ 1.7.2 For ~~DERs utilizing the Section 2 Simplified Process~~ Category 1 or 2 Interconnection utilizing the simplified process, proof of site control may be demonstrated by the site owner's signature on the Interconnection Application.

1.8 Queue Position

~~1.8.1~~ Queue Position is assigned by the Area EPS based on when the Interconnection Application is deemed complete as described in section 1.5.2. The Queue Position of each Interconnection Application will be used to determine the cost responsibility for the Upgrades necessary to accommodate the interconnection. The Queue Position also establishes conditional interconnection

capacity for an Interconnection Customer, contingent upon all requirements of the MN DIP and MN Technical Requirements being met.

~~1.8.2~~ Subject to the provisions in sections 1.5, 1.6, and 1.7, the DER shall retain the Queue Position assigned to their Interconnection Application throughout the review process for the purpose of determining cost responsibility and conditional interconnection capacity, including when moving through the processes covered by Section 2 Simplified Process and Section 3 Fast Track Process. Failure by the Interconnection Customer to meet the time frames outlined in these procedures or request a timeline extension shall result in a withdrawal of the Interconnection Application. The Area EPS shall notify the Interconnection Customer of the missed time frame with an opportunity to request a timeline extension as defined in section 5.2.3 before the Interconnection Application is deemed withdrawn.

Commented [A6]: Queue discussions need to inform this section

~~1.8.3~~~~1.8.1~~ The Area EPS Operator Electric Utility shall maintain a single, administrative queue and may manage the queue by geographical region (i.e. POCC, feeder, substation, etc.) This administrative queue shall be used to address Interconnection Customer inquiries about the queue process. If the Area EPS Operator and the Interconnection Customer(s) agree, Interconnection Applications may be studied in clusters for the purpose of the system impact study; otherwise, they will be studied serially.

Commented [A7]: Any additional detail should be in a Business Practice

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~~1.8.4~~~~1.8.2~~ Each Area EPS Operator Electric Utility that has received at least forty (40) complete Interconnection Applications, including Simplified Process Applications, in a year shall maintain a public interconnection queue, available in a sortable spreadsheet format on its website, which it shall update on at least a monthly basis unless no changes to the spreadsheet have occurred in that month. The date of the most recent update shall be clearly indicated. The content of the report must be agreed to by the Electric Utility but, At a minimum, the following shall be included in the public interconnection queue:

~~1.8.4.1.1~~~~1.8.2.1.1~~ Application or Queue Number

~~1.8.4.1.2~~~~1.8.2.1.2~~ Date Application Deemed Complete

~~1.8.4.1.3~~~~1.8.2.1.3~~ Interconnection Process Track (Simplified, Fast Track, or Study Process)

~~1.8.4.1.4~~~~1.8.2.1.4~~ Proposed generator DER Capacity (Nameplate Rating unless

~~1.8.4.1.5~~~~1.8.2.1.5~~ Generator DER type (technology)

~~1.8.4.1.6~~ Proposed generator DER Location by geographic region (i.e. by feeder or line section)

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Commented [A8]: Complexity of determining the interrelation of feeder or line section and any circuit modifications that occur.

~~1.8.4.1.7~~~~1.8.2.1.6~~ Status of the Application's progress through the process (e.g. Initial Review, Supplemental Review, Facilities Study, Construction, Inspection, etc.)