

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.

Section 4. Study Process

4.1 Applicability

The Study Process shall be used by an Interconnection ~~Entity Customer~~ proposing to interconnect its DGER with the ~~Area EPS Operator's Distribution System~~ Distribution Utility's Distribution Grid, if the DGER 1) is not eligible for **Error! Reference source not found.** ~~Section 2~~ Simplified Process review or **Error! Reference source not found.** ~~Section 3~~ Fast Track Process review, or 2) did not pass the Fast Track Process or the Simplified Process. ~~The application fee described in section 1.5.1.3 shall be applied to the application completeness review costs and the first deposit required in this section.~~

4.2 Scoping Meeting

4.2.1 A scoping meeting shall be held within ~~thirtyten (340)~~ thirty (30) Business Days after the Interconnection Application is deemed complete or, if applicable, the Fast Track Process or Simplified Process has been completed and the Interconnection ~~Entity Customer~~ has elected to continue with the Study Process, or as mutually agreed to by the Parties. The ~~Distribution Utility Area EPS Operator~~ and the Interconnection ~~Entity Customer~~ will bring to the meeting personnel, including system engineers and other resources, as may be reasonably required to accomplish the purpose of the meeting. Scoping meeting may be held in person or via telecommunications. Scoping meeting are limited to two (2) hours per application for the first Interconnection Application by the Interconnecting Entity or Application Agent and One (1) hour for the second and subsequent Interconnection Applications. Multiple applications by the same interconnecting entity may be addressed in the same meeting.

4.2.2 The purpose of the scoping meeting is to discuss the Interconnection Application and review existing study results (if any) and relevant underlying data and assumptions relevant to the Interconnection Application. The Parties shall further discuss whether the ~~Distribution Utility Area EPS Operator~~ should perform a system impact study or studies, ~~or proceed directly to a facilities study or an Interconnection Agreement.~~ If the ~~Distribution Utility Area EPS Operator~~

CCR: This could slow down the process of moving a project into study. Can change "shall" to "may" and make it at the Interconnection Entity's discretion if a meeting is needed

CCR: Should not exclude in person meetings

CCR: Subsequent applications could be as complex as a first app or involving completely different lines or substations and need more than (1) hour review times.

determines there is no potential for Transmission System or Distribution System adverse system impacts, the Interconnection Application shall proceed directly to a facilities study ~~or an executable Interconnection Agreement~~, as agreed to by the Parties.

4.2.3 The scoping meeting may be omitted by mutual agreement.

4.3 Engineering Review~~System Impact Study~~

4.3.1 ~~An Engineering Review system impact study~~ shall identify and detail the electric system impacts that would result if the proposed DGDER(s) were interconnected without project modifications or electric system modifications, and to study potential impacts, including but not limited to those identified in the scoping meeting. ~~An Engineering Review system impact study~~ shall evaluate the impact of the proposed interconnection on the reliability of the electric system.

~~4.3.2 If the Parties agree at the scoping meeting that a system impact study should be performed, the Area EPS Operator shall provide the Interconnection Customer, as soon as possible, but not later than five (5) Business Days after the scoping meeting, a system impact study agreement as defined in 4.3.3.~~

~~If the scoping meeting is omitted by mutual agreement or, if applicable, the Simplified Process or Fast Track Process has been completed and the Interconnection Customer has elected to continue with the Study Process, and a system impact study is required, the Area EPS Operator shall provide the Interconnection Customer a system impact study agreement within ten (10) Business Days.~~

4.3.2 The Engineering Review system impact study Agreement s (Attachment 6) shall include an outline of the scope of the study and a non-binding good faith estimate of the cost to perform the study. If applicable, the agreement shall list any additional and reasonable technical data on the DG ER needed to perform the Engineering Review system impact study. The scope of and cost responsibilities for an Engineering Review system impact study are:

4.3.2.1 Phase I – Model validation, data collection, thermal load flow, over and under voltage, affected system, protection, flicker, and harmonic reviews.

4.3.2.2 Phase II – Should Phase I reveal any reason for additional review, those reviews will be detailed to the Interconnecting Entity and permission to proceed will be obtained by the Distribution Utility from the Interconnecting Entity. An additional deposit shall be required. The reviews that are performed will apply Good Utility Practice in the Distribution Utility’s sole judgment and be designed to consider and protect

CCR: There needs to be clearly defined timelines for when study agreements are sent by the utility along with when they are required to be returned by Interconnection Entities. This helps avoid major slow downs to the study process and a backlog of projects.

CCR: The scope of any phases, information included in study, timeline for study, and the cost of studies need to be discussed in greater detail with input from all Stakeholders. This seems to be adding complexity to a single Engineering Review study. Currently other utilities do not break it down into further studies with added costs.

Distribution Utility equipment, Distribution Utility personnel, electrical system reliability and retail electric customer electric service and equipments. A separate true up to actual costs shall occur.

4.3.2.3 Sub-transmission Engineering Review supplemental. This review -will be performed if- sub-transmission equipment or systems are affected by a proposed distribution-connected interconnection. It is a separate review for which a separate deposit shall be paid by the Interconnection Entity and a separate true up to actual costs shall occur.

CCR: This appears to leave things too vague and at the sole discretion of the utility to various additional levels of studies they want to require along with the costs of studies.

4.3.2.4 The Interconnecting Entity will be notified of pass/fail and additional work required at the end of each review phase and must affirmatively elect to move forward in writing. The Distribution Utility will inform the Interconnecting Entity of the results within ten (10) business day of completion of a phase and allow the Interconnecting Entity to decide to move forward.

4.3.2.5 If the Distribution Utility does not receive trued up payment for the actual costs of the prior phase study and a deposit for the next phase review within ten (10) days of notification of the Interconnecting Entity, the Distribution Utility shall deem the application withdrawn, submit a final invoice for work performed and terminate the application.

10 days is not enough time for any Interconnection Entity to make large financial decisions based on study data (particularly if no consultation is available with the utility). Should be 30 days

4.3.2.6 The Interconnecting Entity may withdraw the application at any time during the Engineering Review and pay actual costs incurred by the Distribution Utility.

4.3.2.7 After payment to the Distribution Utility of the trued up-of actual costs of the study, the Distribution Utility will provide a completed Engineering Review report to the Interconnecting Entity.

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4.3.3 described in the attached system impact study Engineering Review agreement. A deposit of the good faith estimated costs for each system impact study shall be provided by the Interconnection Customer Entity when it returns the study agreements. The additional and reasonable technical data, if applicable, shall be returned with the Engineering Review system impact Agreement. Upon Interconnection Entity-Customer request, the Area-Distribution Utility EPS Operator shall grant a time frame extension as described in 5.2.3 if additional technical data is requested. of up to five (5) business days without impacting queue position. After five (5) business days, the queue position will incur a day for day slip until the data is provided. After thirty (30) business days the Distribution Utility will terminate the application -and send an invoice for any costs incurred which shall be paid promptly by the Interconnection Entity.

Commented [A1]: Queue needs to be defined.

CCR: Agree that Queue needs better definition in this document, however a day for day slip seems unfair especially since there is no way of knowing the complexity or quantity of additional data the EPS may require.

4.3.4 In order to remain in consideration for interconnection, an Interconnection ~~Entity Customer who has requested- an System Impact Study~~ Engineering Review must return the executed ~~Engineering Review Agreement system impact study agreement~~ and pay the required study deposit within twenty (20) Business Days. ~~The Distribution Utility shall terminate the application -if the Engineering Review Agreement and deposit is not returned within twenty (20) business days.~~

CCR: 30 days should be consistent

4.3.5 ~~A p~~Phase I of the ~~Engineering ReviewSystem Impact Study~~ shall be completed within thirty (30) Business Days after the ~~system impact study agreementEngineering Review Agreement~~ is signed by the Parties and delivered with deposit to the ~~Distribution UtilityArea EPS Operator, and all requested technical data is provided by the Interconnecting Entity to the Distribution Utility.~~

Commented [A2]: Feasibility of all timelines depend on the quantity of applications received at any given time. Larger projects require more time.

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4.3.5.1 If Phase II study is required the Distribution Utility will have an additional forty-five (45) days to complete those studies and provide the outcome to the Interconnecting Entity if they are in Good Financial Standing with no payments in arrears. -For projects interconnecting at the sub-transmission level, timelines will be determined by the scope of work.

4.3.5.4.3.6 ~~-~~The results and, if necessary, ~~Distribution Studyfacilities study agreement~~ shall be delivered to the Interconnection ~~Entity Customer~~ within five (5) Business Days of completion ~~and full payment for the actual costs of the Engineering Review of the System Impact Study.~~ Upon request, the ~~Distribution Utility Area EPS Operator~~ shall provide Interconnection ~~EntityCustomer~~ supporting documentation ~~and workpapers~~ developed in the preparation of the ~~Engineering Rreview system impact study~~, subject to confidentiality arrangements consistent with these procedures and the ~~Engineering ReviewSystem Impact Study agreement. In no event shall an Interconnection Entity be entitled to access to Critical Energy Infrastructure Information ("CEII") or other similarly sensitive electrical system information.~~

CCR: Please better define CEII. As suggested study agreements should contain NDA language and allow for proper information regarding electrical system at the POI be shared with Interconnection Entities.

4.3.6.1 If the ~~Engineering Reviewssystem impact study~~ shows an affected system (either sub-transmission or transmission) the ~~Distribution Utility w-Area EPS Operator~~ will notify the affected system and the ~~Interconnecting Eentity.~~

4.3.5.14.3.6.2 If there is an affected system. The Distribution Utility shall pause any reviews until the affected system has completed their review. Time spent waiting for the affected system(s) shall not count against any timelines for any party.

4.3.5.24.3.6.3 If the affected system is sub-transmission the ~~Distribution Utility Area EPS Operator~~ will provide a good faith estimate of

CCR: This document should clearly define additional study processes (if needed) for sub-transmission and / or transmission impacts, as well as a rough cost baseline, and create realistic timelines for achieving those studies.

the amount of time and money the sub-transmission study will take.

~~4.3.5.34.3.6.4~~ If the affected system is transmission, the Distribution Utility ~~Area EPS Operator~~ will provide the information to the transmission operator and/or MISO and suspend the studies until a resolution by the affected system is provided.

~~4.3.5.44.3.6.5~~ Should MISO determine that the interconnection is large enough to be included in the MISO queue the application will be assigned a MISO queue number and placed in the inactive queue until MISO provides resolution.

~~4.3.5.54.3.6.6~~ The Interconnecting Entity shall liaison with ITC and MISO directly after notification.

~~4.3.5.64.3.6.7~~ The Interconnecting Entity will pay all ~~trued up actual~~ ~~any~~ costs ~~to~~ with the Distribution Utility ~~at the time~~ ~~once a transmission affect is found.~~ ~~Area EPS Operator within 60 business days of being notified that there is a transmission affect.~~

~~4.3.5.74.3.6.8~~ If the interconnect is placed in the MISO queue it will return to active status within the Distribution Utility ~~Area EPS Operator's queue at the top of the active queue~~ ~~so long as it does not place the interconnect application higher in the queue than it started.~~

CCR: at least 30 days should be allotted for accounting and verification of such "Trued up" costs. Merely discovering a transmission affect is found should not be means for requiring immediate payment of a "true up".

Commented [A3]: See additions above – in MN all transmission is owned by the Area EPS Operators. Not true in Michigan

CCR: Projects should not lose Queue position simply because a Transmission level impact study is needed

4.4 Distribution Facilities Study

~~4.4.1~~ If construction of facilities is required for interconnection of the Interconnecting Entity, a Distribution facilities Study ~~may~~ will be necessary to specify and estimate the cost of the equipment, engineering, procurement and construction work identified in the Interconnection process in Initial Review, Supplemental Review, or the Study Process to provide interconnection and interoperability of the DGER with the Area EPS Operator's ~~Distribution System as required.~~

~~4.4.1~~ ~~d by Minnesota Technical Requirements. Interconnection Applications reviewed in the Simplified Process and Fast Track Process that require construction of facilities may be eligible, upon determination of the Area EPS Operator, to forego a facilities study as described in section 3.2.2.2.~~

The Distribution Utility ~~Area EPS Operator~~ shall provide the Interconnection Entity ~~Customer~~ a Standard Distribution facilities Study agreement in tandem with the results of the Interconnection Entity's Engineering Review ~~Customer's system impact study report, or, if required, Transmission System impact study.~~

If no ~~system impact study~~ Engineering Review is required, but a

~~Distribution facilities~~ Study is required, then the ~~Distribution Utility~~ ~~Area EPS Operator~~ shall provide as soon as possible, but not later than five (5) Business Days after the scoping meeting, a Standard Distribution facilities study agreement.

If the scoping meeting is omitted by mutual agreement and no ~~Engineering Review system impact study~~ is required, but a ~~Distribution facilities~~ Study is required, the ~~Area EPS Operator~~ ~~Distribution Utility~~ shall provide the Interconnection ~~Customer~~ ~~Entity~~ a Standard facilities ~~Distribution~~ Study agreement within ten (10) Business Days after the Interconnection Application is deemed complete and, if applicable, the Simplified Process or Fast Track Process has been completed.

4.4.2 The Standard facilities ~~Distribution~~ study agreement (~~Attachment 7~~) shall be accompanied by an outline of the scope of the study and a non-binding good faith estimate of the cost to perform the ~~facilities~~ ~~Distribution~~ Study. The scope of and cost responsibilities for the ~~facilities~~ ~~Distribution~~ Study are to be outlined in the described in the attached facilities study agreement by the Distribution Utility. A deposit of the good faith estimated costs for the ~~facilities~~ ~~Distribution~~ Study shall be provided by the Interconnection ~~Entity~~ ~~Customer~~ at the time it returns the executed Standard Distribution study agreement.

4.4.3 In order to remain under consideration for interconnection, the Interconnection ~~Entity~~ ~~Customer~~ must return the executed Standard Distribution ~~facilities~~ study agreement and pay the required study deposit within fifteen (15) Business Days.

4.4.4 The ~~Interconnection~~ ~~Entity~~ must provide with the return of Standard Distribution Study Agreement and deposit the following documents, if the Interconnection Entity has not already done so, at a minimum:

4.4.4.1 Site Control and site access forms

4.4.4.2 Documentation from the local government that the project meets general zoning guidelines

4.4.4.3 Any environmental studies required and those environmental studies that have been completed or, if accurate, a statement and explanation that environmental studies are not required.

4.4.4.4 If required by the size of the site transformer or other fluid filled device, a spill prevention plan will be provided.

4.4.4.5 A final site design.

4.4.4.6 Any other documentation required by the administrative rules.

4.4.34.4.5 If the Standard Distribution Study Agreement is not returned within fifteen (15) business days, the Distribution Utility shall terminate the application

CCR: Often times these items are going on in conjunction with Utility Studies. Since these can be high cost items it is not right to require them to be complete before entering into a paid study. Particularly when the upgrade costs estimates from the study will drive any decision to move forward.

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CCR: Should maintain at least a 30 Day period for consistency

and issue and invoice Interconnection Entity for any and all Distribution Utility costs incurred by the Distribution Utility in furtherance of Interconnection Entity's Application. Interconnection Entity shall promptly pay the invoice in full.

~~4.4.4.4.6~~ The ~~Distribution facilities S~~study shall specify and estimate the cost of the equipment, engineering, procurement and construction work (including overheads) needed to implement the conclusions of the Engineering Review system impact study(s). The estimate shall be a US Department of Energy Class 5 estimate¹.

Commented [A4]: foot note reference

~~4.4.7~~ Conceptual dDesign for any required Interconnection Facilities and/or Upgrades shall be performed under the Standard Distribution Facilities Study Study Agreement, ~~unless the Interconnection Application is processed under the provisions of section 3.2.2.2. However, in the event that the Interconnection Customer did not provide to the Area EPS Operator all required Conditional Use Permits at the time of entering into the Facilities Study Agreement, any such Design and/or Upgrades by the Area EPS Operator may be delayed until after the Interconnection Customer has provided to the Area EPS Operator all required Conditional Use Permits or provided a final design. The information in the Conditional Use Permits, or changes to the design, may result in significant modifications to the planned design and/or Upgrades. The Interconnection Customer may send to the Area EPS Operator a redacted version of the Conditional Use Permit to ensure confidentiality, but any and all information that the Area EPS Operator would reasonably need to perform an accurate Facilities Study shall not be redacted. If necessary to comply with these requirements, a confidential version of the Conditional Use Permit may be provided to the Area EPS Operator, with the confidential information being clearly marked and subject to the Confidentiality provisions in 5.9.~~

CCR: This section should remain as a system of checks and balances against inflated upgrade costs

~~4.4.5~~ The Area EPS Operator may contract with consultants to perform activities required under the facilities study agreement. The Interconnection Customer and the Area EPS Operator may agree to allow the Interconnection Customer to separately arrange for the design of some of the Interconnection Facilities. In such cases, facilities design will be reviewed and/or modified prior to acceptance by the Area EPS Operator, under the provisions of the Facilities Study Agreement. If the Parties agree to separately arrange for design and construction, and provided security and confidentiality requirements can be met, the Area EPS Operator shall make sufficient information available to the Interconnection Customer in accordance with confidentiality and critical infrastructure requirements to permit the Interconnection Customer to obtain an independent design and cost estimate for any necessary facilities.

~~4.4.6.4.8~~ Subject to tolling for affected system studies, ~~t~~In cases where distribution upgrades are required, the D~~istribution facilities S~~study must be completed within

¹ Cost Estimating Guide for Program and Project Management, U.S. Department of Energy, Office of Management, Budget and Evaluation, DOE G 430.1-1X, April 2004

~~sixty-fourty five (6045)~~ Business Days of the receipt of the executed ~~distribution facilities~~ study agreement, ~~supporting documents~~ and deposit.

4.4.74.4.9 ~~In cases where no Upgrades are necessary, and the required facilities are limited to Interconnection Facilities, the facilities study must be completed within thirty (30) Business Days of the receipt of the executed facilities study agreement and deposit. The Distribution Utility shall liaise with the transmission operator and/or MISO as required to compete the study if they are affected systems. The time that the Distribution Utility must wait for information from transmission operator and/or MISO will not count against the deadline and the deadline shall be tolled for that period and a reasonable additional period of time necessary to incorporate affected system data into the Distribution Utility's Distribution Study. The Distribution Utility will endeavor to inform the Interconnecting Entity weekly of such status but failure to do so shall not constitute violation of these rules.~~

CCR: This document should solve any issue of timeline by developing an acceptable timeline for such Transmission Impact information to be returned to the Utility

4.4.84.4.10 ~~Once the ~~D~~distribution facilities ~~S~~study is completed and paid for in full a draft ~~D~~distribution facilities ~~S~~study report shall be prepared and transmitted to the Interconnection ~~Entity-Customer~~. Upon request, the ~~D~~distribution Utility ~~Area~~ ~~EPS Operator~~ shall provide Interconnection ~~Entity-Customer~~ existing supporting documentation ~~and workpapers~~ developed in the preparation of the ~~Interconnection Facilities-Distribution~~ Study, subject to confidentiality arrangements consistent with these procedures and the ~~Standard ~~D~~distribution facilities ~~S~~study Agreement~~. In no event shall an Interconnection Entity be entitled to access to Critical Energy Infrastructure Information ("CEII") or other similarly sensitive electrical system information.~~

CCR: Clear scopes and deliverables should be defined in this document and protected by NDA within the signed study agreement.

4.4.94.4.11 ~~Within ten (10) Business Days of providing a draft ~~D~~distribution facilities ~~S~~study report to Interconnection ~~Entity-Customer~~, the ~~Area-EPS Operator~~ ~~Distribution Utility~~ and Interconnection ~~Entity-Customer~~ shall meet to discuss the results of the ~~D~~distribution facilities ~~S~~study unless the meeting is omitted by mutual agreement. ~~This m~~Meeting shall occur ~~-may be held in person or~~ via telecommunications ~~unless a face to face meeting is requested. The meeting may be rescheduled once by either party. -~~~~

4.4.104.4.12 ~~Interconnection ~~Entity-Customer~~ may, within twenty (20) Business Days after receipt of the draft report, provide written comments to the ~~D~~distribution Utility ~~Area~~ ~~EPS Operator~~, which the ~~Area~~ ~~EPS Operator~~ shall ad~~D~~distribution Utility will address ~~acknowledge~~ in the final report. ~~Once the ~~Interconnection~~g ~~Entity's~~ questions have been addressed the report shall be deemed final.~~~~

4.4.13 ~~The ~~D~~distribution Utility ~~Area~~ ~~EPS Operator~~ shall issue the final ~~distribution facilities~~ study report within fifteen (15) Business Days of receiving Interconnection ~~Entity-Customer~~'s comments or promptly upon receiving Interconnection ~~Entity-Customer~~'s statement that it will not provide comments. The ~~D~~distribution Utility ~~Area~~ ~~EPS Operator~~ may reasonably extend the time frame, upon notice to the Interconnection ~~Entity-Customer~~ in order to address~~if~~ the Interconnection ~~Entity-Customer~~'s comments ~~with~~require additional analyses or~~

~~if lead to~~ significant modifications to the Distribution Study are determined to be necessary by the ~~Distribution Utility Area EPS Operator~~ prior to issuance of the final ~~distribution facilities~~ study report. The ~~Interconnecting Entity~~ is responsible for any and all actual additional costs incurred by the ~~Distribution Utility Area EPS Operator~~ to answer their questions.

4.5 Study Capability and Resources

4.5.1 The Distribution Utility shall report to the commission annually on the number of studies of all types completed pursuant to these rules and estimate the number of anticipated studies and associated expense each calendar quarter in the coming year.

4.5.2 Should the number of studies in process exceed this anticipated level in a calendar quarter, the Distribution Utility shall notify the commission in writing and the commission shall promptly, but in no event later than fifteen (15) business days, issue waiver of all timelines in these rules ~~to the Distribution Utility until such time as the number of studies returns to the anticipated level.~~

~~4.4.14.5.3~~ 4.5.3 During any period of timeline waiver, the Distribution Utility will report monthly to the commission on steps it is taking to reduce study backlogs.

CCR: Provisions should be given for natural increase in the amount of studies pursuant with the requirements to add renewables by the RPS and IRP for major utilities.

CCR: It should be up to the MPSC discretion as to whether to issue a waiver of timelines based on the number of applications.