

Baldwin, Julie (LARA)

From: Houseman, Doug A <dahouseman@burnsmcd.com>
Sent: Thursday, September 5, 2019 12:28 PM
To: Evans, Nicholas (LARA)
Subject: Strawman rules

Nick –

You did a lot of work on the rules in a short period of time. Well done. But (you knew there would be a but here)...

I have been through the strawman – Julie was right in her comment about the complexity of them – I built a diagram over the weekend and there are several branches to the logic that cause a project to stop and have no path back to successful completion. My whiteboard at home is a mess.

I am happy to discuss this on the phone, but it is too complex to try to put in email.

I notice a number of topics are not addressed in the rules:

- 1) Communications with the site for IEEE 1547 – 2018 purposes
- 2) Data privacy – the overall commission rules have a data privacy provision, but it is not referenced here
- 3) Collection of operating data from the site by the utility (goes to 1 and 2)
- 4) When the utility can take control of a site – what it takes for a utility to be the operator of a 3rd party site
- 5) MISO's FERC 842 – primary frequency response requirements as filed with and approved by FERC
- 6) FERC 841 and 845 rules – as it pertains to storage or are we going to exclude storage from these rules for now – OBTW – these are messy and MISO only has a framework for this, not an actual set of rules.
- 7) Reference to NFPA 855 and NEC 70 for storage – both will be in effect before these rules are and they go to the safety of the systems

As I said in the meeting it is probably better to make the fees a rider in the rate book, since how to create and update riders is well documented by the MPSC and it can be done independent of any other process, with MPSC oversight.

All the best

Doug