

- 1) Why are you starting with Minnesota's new unfinished rules for interconnection, there are so many parts that are still in flight and they have not even been tested in a table top exercise, why do you want to start with them?
- 2) How do you translate the Minnesota (MN) law into Michigan (MI) law? We have statutory preference for Biogas/biomass and 5 categories of interconnection – how does that work with the Minnesota rules?
- 3) MN uses the small generator interconnect procedures that were quickly adopted by FERC – SGIP ignored so many comments that MISO and the other ISO's (which are under FERC jurisdiction) created their own rules and procedures, rather than following SGIP? Why are you proposing this for MI?
- 4) ICF created a wonderful after action report on what went wrong in MN and the new MN rules ignore all of the recommendations in the ICF report (if you don't have a copy, I can happily send it to you), for instance ICF indicated that applications needed to move forward or out of the process, and instead MN adopted the modification clause that can be done infinite times, with a 10 to ?? number of days of restudy with each proposed modification, instead of the application is what it is and if you change it you withdraw and re-apply, this is just one point in the process where a developer can game the system and keep others in limbo. They also don't put any restudy costs for other applications behind them in the queue on the applicant who is the cost causer.
- 5) There is no reservation in the system for customers who actually live on the system – so if a commercial out of country developer proposes a large interconnection on a distribution circuit and a farmer (like me) wants to put in 20KW there might not be room for my system without having to upgrade the whole circuit (in my case it would be over \$4 million dollars because it would take a voltage upgrade and a new substation). Should the rules not reserve some space for the customer who actually draw power from the circuit and have paid for it to be maintained?
- 6) How do these rules help low income customers, I don't see a single provision for a preference for low income interconnections or for encouraging rental customer access to solar? I know this is beyond the scope of the actual rules, but if the rules as written are adopted, by the time programs can be created for these customers – there may not be capacity left for them to be part of the solution.
- 7) The state law says that all of the interconnection costs are the responsibility of the interconnecting customer – but in the MN rules there are caps on application costs and study fees. Is the commission going to uphold the state law or provide an allowance for costs that go beyond the allowed fees. IF the commission provides an allowance, what is the impact on my rates?
- 8) The MN rules allow for uncertified equipment to be installed on the grid. Who has the liability for this equipment for reliability, harmonic, flicker, and other impacts – if an uncertified installation causes failures of appliances and air conditioning units at neighboring households who pays for this?
- 9) I am concerned about the security of the grid and the possibility to disable the grid by asking 100s or 1000s of questions in informal and pre-application queries (BTW – no one pays for informal queries – why do they exist if there is a pre-application process) that the asking agent can map the grid, powerflows and vulnerabilities. There is no responsibility in the MN rules to keep any of the grid information confidential.

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