



DTE Energy®

MPSC Stakeholder Process - Interconnection

February 19, 2019





Objectives of today's discussion

- Discuss current issues with the interconnection process
- Discuss the Fast Track process

From the utility perspective, several current issues with the interconnection process need to be addressed



Description of Issues¹

1 MN rules must adhere to MI law

- Producing a final redlined 2.3 version the MN rules will not be possible without baseline revisions to make the rules compatible with MI law and clarify definitions
- Need an opportunity to revisit previous sections and provide additional revisions
- Need an opportunity to view the revised ruleset in its entirety, prior to moving to the formal rulemaking process

2 Functioning of the Interconnection “Queue”

- Existing MI rules do not define a “queue” and the definition in the MN rules is incomplete
- MN rules increase the number of potential “queues”, but do not describe how they are to be managed
- Rules should give priority to those applications that are meaningfully moving forward
- Large volumes of speculative projects overload circuit queues and increase study costs for all applicants

3 Provisions needed to manage high request volumes

- Prescriptive deadlines in both the existing MI rules and MN rules are unmanageable at high request volumes and large project sizes
- MN rules increase the quantity of deliverables and associated deadlines, but do not contain provisions to address manageability
- Balancing the needs of both the utility and the applicant will be key to achieving a manageable interconnection process

4 Larger projects are incompatible with prescriptive timelines

- DTE’s subtransmission system is intermingled with that of ITC’s transmission system
- Projects interconnecting on DTE’s subtransmission system require the use of MISO transmission topology data and contingency analyses
- Identifying the point of interconnection (POI) can require more time, given that the closest POI may actually be on ITC’s transmission system and projects may interact with MISO projects
- Clarity needed on how to handle projects, where interconnecting at the transmission level may be the most efficient option

¹This is not a complete list



The Fast Track Process is incompatible with larger projects

Category 3 projects and above (>150 kW), without meaningful onsite load, will require a full engineering review

- Impact to system operation & reliability is potentially significant
- Discussion needed on what the appropriate size threshold should be
- Current MN screens do not apply to Michigan

Fast Track process requires data that is not available prior to a full engineering review

- Identifying a more appropriate threshold for MI may help mitigate data requirements
- Phased engineering review process may also be an alternative

