

## Baldwin, Julie (LARA)

---

**From:** Tanya Paslawski <Tanya@megautilities.org>  
**Sent:** Friday, May 1, 2020 4:16 PM  
**To:** Evans, Nicholas (LARA); Baldwin, Julie (LARA)  
**Subject:** MEGA Interconnection, etc. Rule Comments  
**Attachments:** Interconnection DGLNM LEO Rules MEGA feedback 5\_1\_20.docx

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi Julie and Nick! Thanks again for all of your work on these rules. Certainly no small undertaking. Every time I read them I see something new that is a reminder of how complicated this is. Some comments are included in the attached version of the rules and here are a couple of additional thoughts for in the next draft.

First, the current proposal does not provide guidance on the administration of a queue for individual study projects, the most likely approach for the small utilities, other than a general first in/first out approach. Some flexibility for queue administration in the procedures with the goal of processing applications most efficiently will be valuable. Any necessary caveats that will prohibit one applicant from unreasonably holding up a string behind it being key. I know this has been the subject of a lot of discussion in the past.

Also, we propose in our attached comments that there may be instances where batch processing of geographically connected projects would be the best approach while others are individual. Can we find a way to make that an option? We can work out the details as part of the procedures but would like the rules to be written in a way that doesn't preclude efficiencies like this. Finally, the transition batch process is fairly detailed and involved and not necessary or conducive to the way small utilities are managing interconnection requests. The ability to opt out and provide simplified terms in procedures is preferred.

It will also be helpful to maintain industry participant communication on these rules even after the formal process begins. Regular meetings to provide a forum to share best practices, raise concerns, and address concerns will be helpful to all. MEGA is happy to support such an ongoing process in any way.

Thanks again! Please reach out with any questions.

Kind regards,  
Tanya

Tanya Paslawski  
President  
Michigan Electric and Gas Association  
(517) 484-7730 office  
(517) 819-9683 cell  
[tanya@megautilities.org](mailto:tanya@megautilities.org)  
[www.megautilities.org](http://www.megautilities.org)