

# Consumers Energy DG/LNM & Battery Storage

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May 29, 2019

**Consumers Energy**

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# General Comments

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- Consumers Energy is proposing certain changes to the language of the existing Interconnection and Net Metering Standards (including definitions) to accommodate electric storage technology. The same comments would apply to the language of the MN DIP or any new MPSC rule.
- Consumers Energy's comments are for discussion purposes only in the context of this rulemaking. These comments are not intended to be exhaustive and may be expanded or modified upon further analysis.

# Flexibility

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- Electric storage technology and related policy is rapidly evolving. New MPSC rules should generally avoid being prescriptive and leave flexibility to utility tariffs and procedures, and to future Commission orders.

# Interconnection

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- DG/LNM programs can't accommodate batteries without changes to interconnection rules.
- Examples:
  - Define and distinguish between "electric generating equipment" and "electric storage equipment"
  - Modify definition of "project"
  - Require interconnection agreements for storage
  - Material modification (next slide)

# Material Modification

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- Utilities need visibility to batteries on their systems, particularly where grid-connected.
- Adding a battery or increasing the size of a battery should require a new interconnection agreement.
- Adding a battery should be considered an increase in generator capacity (due to potential increase/change in output).
- Modified systems participating in DG/LNM should be offered new opportunities under future tariff.

# DG/LNM Eligibility

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- For DG/LNM customers, batteries should not be used to increase system output beyond historical customer consumption.
- LNM tariff and statute not designed for systems with battery storage.

# Technical Standards

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- UL 1741 includes a new Power Control System certification with four modes:
  - Unrestricted
  - Export only
  - Import only
  - No exchange
- Incorporating this certification standard may allow tariffs and procedures to be tailored to specific types of batteries or operational modes.

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Thank You