WORKSHOP 2 – TELECONFERENCE – April 10, 2008, 9:00

COMPANY	APPLICATION FEES
OtterTail	Tier 1 = $100 Tier 2 = $50 plus $1 per kW of rated generation output – Max $1,000 Tier 3 = $100 plus $2 per kW of rated generation output – Max $1,500 Tier 4 = $100 plus $2 per kW rated generation output – Max $2,000
MDU	Tier 1 = $100 Tier 2 = $100 plus $1 per kW of rated generation output – Max $500 Tier 3 = $500 plus $2 per kW of rated generation output – Max $1,000 Tier 4 = $1,000
Black Hills Power	Tier 1 = $100 Tier 2 = $100 plus $1 per kW of rated generation output – No Max Tier 3 = $100 plus $2 per kW of rated generation output – No Max Tier 4 = $100 plus $2 per kW of rated output – No Max
Xcel Energy	Tier 1 = $100 Tier 2 = $50 plus $1 per kW of rated generation output – Max $500 Tier 3 = $100 plus $2 per kW of rated generation output – Max $1,000 Tier 4 = $100 plus $2 per kW rated generation output – Max $1,000
NorthWestern Energy	Tier 1 = $100 Tier 2 = $50 plus $1 per kW of rated generation output – Max $500 Tier 3 = $100 plus $2 per kW of rated generation output – Max $1,000 Tier 4 = $200 plus $2 per kW rated generation output – Max $2,000
MidAmerican	Tier 1 = $100 Tier 2 = $50 plus $1 per kW of rated generation output – Max $500 Tier 3 = $100 plus $2 per kW of rated

	generation output – Max $1,000 Tier 4 = $100 plus $2 per kW rated generation output – Max $1,000
PUC STAFF SUGGESTION	Tier 1 = $50.00 Tier 2 = $50 plus $1 per kW of rated generation output – Max $500 Tier 3 = $100 plus $2 per kW of rated generation output – Max $1,000 Tier 4 = $100 plus $2 per kW rated generation output – Max $1,000
WORKSHOP II COMMENTS: Black Hills – - Tier 1 - at lest an hour…$100 more reasonable - No Max. the larger the project the more expensive - Max in Tier 4 too low? - Tier 2 - $500 (aprox 5 hours) 5 hours enough?? Brad Klien – - Disagreement: (i) Tier 1 – keep small G in mind (ii) Max for fee – this is just for the application… studies will be allocated to the applicant. Tier 2 – only if meet the screens. Further study the project falls into higher tiers…and higher fees Xcel – sitting on application. Sig. enough do discourage it. Tiers not as simple….will still	

take time. Window of time in which an applicant MUST move forward – eliminate applicant sitting… Mid A – ok with $50 on tier 1 -level 4. $1,000 plus $2 kW no max (Illinois) Xcel – ok with $50 on tier 1 WHAT IS TYPICAL COST? Careful for app fee no to exceed initial study cost. Mid A – hate to see a cap when we don't know what exposure will be. Xcel – less matter of $$ more an issue of time. Divert other employees to do the study work. If you hit the cap…likely size will be large and true study costs will be recovered. NWE – FERC application higher to get a slot….not necessarily a review at that time.	
COMPANY	**INSURANCE AMOUNTS**
Straw man	• *General liability insurance is not required for 200kW or smaller* • *All other interconnection customers must obtain prudent amounts of general liability insurance…*

Otter Tail	Tier 1 = $500,000 Tier 2 = $750,000 Tier 3 = $1,000,000 Tier 4 = $2,000,000
MDU	*Didn't submit a rewrite of this section*
Black Hills Power	Proof of general liability insurance required 10 kW or less = $300,000 (min) 10kW – 200 kW = $500,000 (min) Greater than 200kW = $1,000,000 (min)
Xcel	<u>Proposal 1</u> Less than 20kW = $300,000 (min) 20kW – 250kW = $1,000,0000 (min) Greater than 250kW = $2,000,000 (min) <u>Proposal 2</u> 10kW or less = $300,000 (min) 10 kW – 2 MW = $2,000,000 (min) Greater than 2MW = case by case
Northwestern Energy	Used FERC small generation insurance. • maintain general liability insurance • amount sufficient to insure against all reasonably foreseeable direct liabilities given size and nature ..etc…of the system • shall obtain additional insurance if necessary as a function of owning and operating the facility • Certification required.
MidAmerican Energy	Agree with Ottertail or Xcel

<u>COMMISSION STAFF PROPOSAL -</u>

Tier 1 = Similar to FERC Rule – proof of homeowners, general liability, or commercial liability sufficient to insure against all reasonable foreseeable direct liabilities given size, nature…etc…

- Utility is given some discretion based on particular system
- Applicant is given opportunity to independently work with his or her insurance company for inclusion

Tier 2 = Tier 2 – minimum of $500,000
Tier 3 and 4 = minimum $1,000,000

With the option to seek higher coverage from the PUC if necessary

IREC – NM process of what the risks were at various levels.
Inverter based – little risk
Under 200kW…not enough to do damage to transformer ($5,000 or less)
Larger system – blown transformer….$1,000,000 plenty! Could go with less

Brad K. – state experience giving idea about the actual risks and trying to match insurance numbers.
Other states record – no showing of insurance claim
Some states chose high requirements…but new info…
What is cost for $1,000,000?

Xcel – danger is shut down…there is a mild hazard.
In NM took position that all carry insurance for a prudent homeowner and business owner. When get into higher levels….minor cost compared to installation, etc.
Risk = unknown. Reasonable to ask for amount to cover unknown.

PUC – most homeowners 300 – 500 thousand. Marginal cost to increase. $200 / year aprox - Homeowners? Coverage should be in the rule to cover any hole.

Mid A – had a claim. Entity had wind t on property adjacent to d line. Disabled feature. Damaged property. Possible to cause damage.

Brad – not treat DG people differently than others that may cause risks. Trees…etc….

PUC – risks with respect to interconnection…tower fall should be dealt with in the permitting of the tower. Boding…etc….

BHP – Joint project, but not utility owned. There are circumstances that are outside the utility control…concern is when that may happen and injuries occur. No control to maintain safety standards. Would general liability insurance cover this? Require a specific rider.

IREC – second Xcel….standard home ins. General liability insurance does cover solar system…but if major insurance claim, ins. Company would work to exclude these sorts of things. No claim or move as of yet to require this.

Otter Tail – insurance numbers never high enough… ins. Is relatively inexpensive…why lowball? Experience in MN. Numbers in MN t. are lower than OT preference. Prefer to start high.

Not any claim? Specific to particular type. YES.
Separate out inverter based systems. …wind or other is predominately the type of application in SD.

Xcel – not necessarily an additional layer. BUT obtaining assurance that it is there…

COMPANY	**OTHER INSURANCE REQUIREMENTS**
OtterTail	Policy endorsements: • include utility as an additional insured • contain a severability or interest clause or cross liability clause • utility shall not incur liability to the insurance carrier for payment of premium • provide for 30 days notice to the utility prior to cancellation, termination alteration or material change (endorsements not apply when facility connected to an account receiving residential service from utility and generating capacity smaller or equal to 25kW) Self insurance requirements – • provide evidence of sufficiency • immediately obtain other insurance if self-insurance no longer possible
MDU	None
Black Hills Power	None
Xcel	Proposal 1 = Same as Ottertail Proposal 2 = Except for solar systems on residential premise with a capacity of 10 kW or less: • utility named as an additional insured • 30 day written notice to utility of change or cancellation
NothWestern Energy	Parties agree to notify each other in the case of accident or incident resulting in injuries or damages within scope of coverage
MidAmerican	Agree with OtterTail or Xcel

COMMISSION STAFF PROPOSAL –

- initial proof
- 30 day notice required if decreasing or canceling policy
- notice of damage or accident
- allow for self-insurance under conditions provided by Otter Tail

muni…..self-insured? Insurance pool…
School district?

Xcel – strongly suggest a provision for self-insurance. Difficult "fight" without that provision.

Utility as additional insured – smaller systems (less than 100 kw) difficult to get this. Not necessarily part of policy. A road block. Process to educate the company. When is this appropriate? At what level?

Xcel – only tied to commercial…not residential.

Otter Tail – given MN process…try to align the two. Consistency.
BHP – agree with OT and Xcel.

TIME

GENERAL SUGGESTION	
Small company staffing challenges – Xcel suggestion.	Utility that uses consultants may exceed each time deadline for review of tier 2 and tier 3 by a period not to exceed 20 business days provided a good faith effort is made to complete the review sooner *STAFF QUESTION: do all utilities have someone in-house that can study applications? Is time (due to workload) the restriction?…or are qualified employees also a challenge? Will any utility NEED outside consulting help because they DO NOT have someone on staff that can handle the applications?* *Xcel – do in house…but SD problem is single engineer involved. If he is gone,*

	problem…have a central pool, but only for the big stuff. Same that serves all states. Small installs…not pulling on that pool. *NWE – will check…some in house. Work with other company locations or outside resources.* *BHP – do it in house…have it in house. If requests increase…need to seek outside help.* *MDU – in house. Matter or time being the issue.* *OT – one engineer most familiar with SD. Possibly pull more…but rely on one person. Also depends on OTHER things going on…other things out of utility control.*
Method of counting "days"	Generally, change all "calendar days" to "business days"

In house…consultant option –
Kara suggestion.
Not for level 1??

Brad – uncomfortable with opening this up to level 2? And expanding times beyond FERC time frames. If rules set out longer process….wonder what outside perceptions are regarding SD friendly to DG. Set rules…and allow an agreement process or waiver process better than writing something into the rule.

No penalty for NOT meeting timeframes. – Commission complaint. Ability to work with and communicate with Commission.

Mid A. – set reasonable expectations…want to meet customer expectations

NEW – don't want consumer complaints….want to meet consumer expectations.

COMPANY	TIER 1 TIME FRAMES
Otter Tail	• 10 day "completeness" report to consumer • consumer supplement incomplete application within 10 days • utility has an addition 10 days to determine whether complete WITNESS TEST = consumer has 15 days to resolve problem
MDU	• 10 day "completeness" report to consumer • 10 days notice prior to commissioning
Black Hills Power	• 10 day "completeness" report to consumer • 20 days notice prior to commissioning
Xcel	• acknowledge receipt within 3 days • 10 day "completeness" report to consumer • 10 days notice prior to commissioning
NorthWestern	• 10 day "completeness" report to consumer • 20 days notice prior to commissioning
Mid American	• 10 day "completeness" report to consumer • 10 day notice prior to commissioning

Commission Staff Questions:

1) *How much help is available for the applicant in completing an application?*
   - *This clearly takes utility staff time…answering phone calls, written info requests, etc….*
   - *On the other hand, if "reasonable" assistance is provided, easier to justify longer timeframe to the Commission. "The applicant had every opportunity and reasonable help in completing the application." Also easier to justify Ottertail's suggestion.*

Mid A – 4 – 5 customers within the last week….spent 4 – 5 hour.
IREC – installers with the most questions. The next installation not require another call…more calls initially in the process

Xcel – once in the grove….less questions for tier 1. larger projects have more complex questions that take longer….more of an ongoing conversation.

COMMISSION STAFF PROPOSAL:

- NO required notice of receipt. The consumer could send the important paperwork certified, UPS, ETC…there are ways the consumer can receive notice of receipt. Not the company's responsibility.
- 10 days notice of completeness.
- 10 day notice prior to commissioning

Should the consumer be made aware of when DAY 1 starts?
Useful…
Could have some online application…or check on status?
3 days out of FERC

Is 10 days notice enough for commissioning?

- BHP – staffing issue
- NWE – staffing issue

Not a complete surprise….notice of the project ahead of time.
Brad – hate to have unusual circumstance be the norm for the usual project….write rule so goal is meet the time frame….flexibility for unusual circumstance.

NWE – not a lot of experience regarding what time this will take….and what demands are on staff. Not had a lot of requests. No way to anticipate…error on conservative side.

Brad – look at FERC SGIP…lays out 5 days. 10 day is already double.

BHP – what is harm in requiring additional notice? Staff issues – also deal with day-to-day work schedules. Fitting it into that already planned schedule. Goal is to do it ASAP…but reality is that employees already have tight work orders and schedules.

Jason IREC – suggestion…on application…estimated commissioning date. No less than 20 days from date of application. 5 day window to notify window to notify as planned. If can't meet date….need to give 5 days notice. Goal to keep beginning to end under a month.

NHP – complicated to keep track of all timeframes. Intervening circumstances may make this difficult. Not heard any determent in a longer period

Brad – timing important to consumer…time = money. Substantial investment…when not operational = money to the consumer. Additional time and other barriers make projects not feasible. Timeframes are another way to minimize the potential barriers. 20 business days of full month of waiting…vs, 5 days could be substantial.

Xcel – FERC does state 5 days. 5 days is in CO. however. Limit is 10 kW. It works for 10 although tight and aggressive. Not handle 5 day notice for over 10 kw.

Brad – 5 days in general provisions in 4.4….

NW….at least 5 business days or otherwise mutually agreed to.
IREC – parties could mutually agree to longer period…but not necessarily have to. Would like same language.

Brad – some language recognizing unusual circumstances and want to accommodate that. IF we can write the rule to address typical project rather than to write rule to address unusual.

COMPANY	**TIER 2 TIME FRAMES**
Otter Tail	• 10 day "completeness" notice • 30 days for initial review after receipt of complete application (or within a period of mutual agreement) • 10 day commissioning notice WITNESS TEST = 15 days to correct deficiencies *STAFF QUESTION = why decrease the time to correct deficiencies? How does this a benefit the utility?*
MDU	• 10 day "completeness" notice • *left initial review at 20 days (from straw man)* • 10 day commissioning notice WITNESS TEST = *left 30 days to correct deficiencies (from straw man)*
Black Hills Power	• 10 day "completeness" notice • 20 day notice of planned commissioning *witness test and initial review times unchanged*
Xcel	• acknowledge receipt within 3 days • 10 day "completeness" notice – NOTE: consultant concern!

	• If incomplete, applicant must supplement with additional info in 20 days. • Initial review time: 20 days…NOTE: consultant concern! • 20 day commissioning notice (Note: 10 days adequate up to about 500 kW…above it and 20 days necessary)
NorthWestern Energy	• 10 day "completeness notice" • 20 day notice before commissioning *others unchanged*
Mid American	• 10 day "completeness" notice • 10 day commissioning notice

COMMISSION STAFF QUESTIONS:

1) Should tier 2 commissioning notices be distinguished by kW (see Xcel suggestion)?

- *This seem to add an additional layer of complexity*

COMMISSION STAFF PROPOSAL:

- 10 day "completeness" notice
- 20 day initial review
- 20 day commissioning notice

OT – Witness test…trying to convert business days to calendar
Review time increase. 30 days necessary…as these projects get bigger.

Brad – review to determine if screens are met. – if screens are met, no further studies. If studies are triggered…additional timeframes apply. Procedures already address this need.
FERC rule lays out 15 days for initial review screen – customers appreciate times that don't extend beyond FERC rules

IREC – Jason – not understand why any limit at all. Faulty inverter example – need to get a new one…why cancel application if more time is necessary to fix the problem?

Witness test – work to give consumer more time??
Xcel – given time frame not necessarily important….everyone should have to live by rules. Utility should be as flexible as needed

Brad – customer should be accountable as well.
Jason – IREC – "Utility not unreasonably withhold"

Xcel – 10 days appropriate for smaller system

Jason – IREC – appreciate…..

Xcel – if going to include broad span within Tier system…need either include flexibility or break it up.

ALL TIERS….sees missing timeframe.
Mid A – no time frame after initial review is done….no timeframes after the review for the contract to be submitted to the applicant…and for the applicant to return it.
Illinois deal with this….timeframe for applicant to return contract after receipt.
Ok with a larger timeframe….for everyone's benefit.

IREC- Jason – agree…..suggest 60 days.
Simplicity sake…keep it the same for all tiers.

COMPANY	**TIER 3 TIME FRAMES**
Otter Tail	• If a feasibility study is necessary, utility must complete it in 20 days • 10 day "completeness" notice • 30 days for initial review after receipt of complete application (or within a period of mutual agreement) • *commissioning notice left at 5 days* Witness test = 20 days *vs. 30 days* for applicant to correct any deficiencies *STAFF QUESTION = why decrease the time to correct deficiencies? How does this a benefit the utility?*
MDU	• 10 day "completeness" notice • *left initial review at 20 days (from straw man)* • 10 day commissioning notice
Black Hills Power	• 10 day "completeness" notice • 20 day notice of planned commissioning
Xcel	*Suggestion 1 – delete tier 3 and add language to tier 4 to allow waiver of studies or steps for simpler and smaller applications – reserve for general discussion at the end of the conference call*

	Suggestion 2 - • Feasibility Study – costs assigned to consumer if shown necessary…utility bears burden if unnecessary • *Left 5 day "completeness" notice* • 20 day commissioning notice
NorthWestern Energy	• 10 day "completeness notice" • 20 day notice before commissioning
Mid American	• 10 day "completeness" notice • 10 day commissioning notice

STAFF PROPOSAL –
- 10 day "completeness" notice
- feasibility study – consumer pay if necessary, utility pay if not (Xcel suggestion)

Xcel – feasibility study. Screens that may let dangerous applications through. Require approval…need safety net. Proposed safety net – we can study and have the time for it…when utility feels the project is a danger. Utility takes risks of cost unless there truly is a problem. If demonstrate there is a problem – the DG must pay for that study. Shared cost and risk.
Normal practice that we minimize efforts---skip unnecessary steps if no danger or problem. Small end of ranges are simple…high ends are issue.

Tier 4 – give ability to skip stuff….same as tier 3.

Brad – Tier 3 issue one that important to larger industrial customers
Design what is needed for tier 3 along with those consumers….generators not intended to export power can be reviewed in a different way

Xcel – shared risk…used in TX. Some t 3 highly disruptive and still pass screens

Jason – IREC – non-exporter can go in under t 2…and the one thing change is not comply with 15% screen. …would this work?
Xcel – depends how you define size of the unit and what is considered part of the 15% criteria….thinks the t 2 definition is flex enough

COMPANY	**TIER 4 TIME FRAMES**
Otter Tail	• 15 days for "completeness" notice

	• If a feasibility study need to be performed - 30 days to complete (vs. 15) • If the feasibility study identifies possible adverse impacts – 60 days to complete an interconnection system impact study agreement (vs. 15) • If the systems impact study shows interconnection facilities are necessary – 20 days (vs 15) to develop an interconnection facilities study agreement. • *Left 20 business days for planned commissioning* Witness test = 15 days *vs. 30 days* for applicant to correct any deficiencies *STAFF QUESTION = why decrease the time to correct deficiencies? How does this a benefit the utility? Why is Tier 4 different than 3?*
MDU	*No changes made*
Black Hills Power	• Different approach to the Studies – if studies (all studies are subsequently defined…) are necessary utility provide applicant with study scope and estimate within 15 days • Applicant return executed copy of study agreement within 60 days • *10 day completeness review* • *10 day commissioning notice*
Xcel	• 20 day commissioning notice – may be done in stages
NorthWestern Energy	• increased time for system impact study
Mid American	

STAFF PROPOSAL –

- Use BHP suggestion regarding studies
- 20 day commissioning notice

OT – tier 4 – need more time. Don't have many – will be challenging – hence increase time frames
Tier 4 cap…10 vs 20
Anything above 10 MW kicked to FERC process

Xcel – 35 kv that can accommodate in the 10 – 20 range.

BHP – study suggestion – follow FERC more closely.

NEW – use FERC greater than 20mW..well defined and people are using them for those types of facilities.

Brad – appreciate comments to track FERC process. Thought it already looked like FERC

BHP – looked at LGIP
Brad – import language in to the SGIP rather than make other changes?

Xcel – support time limits on response.

IREC – Jason – reasonable…what is reasonable?

BHP – revisions intended as a queue management issue. Keep flow…have times. "reasonable" is too difficult to define. Have time limits to meet customer expectations to make it possible to treat all customers the same.

Xcel – "or as mutually agreed upon!!!!"

COMPANY	**STUDY COSTS - $100 per HOUR ISSUE**
Otter Tail	Actual study costs paid by consumer
MDU	
Black Hills Power	Actual costs paid by consumer
Xcel	Two suggestions: 1) small utility rule – in addition to the $100 allowed by the rule, allow small utilities to collect consulting costs. Small utility must provide a good faith estimate of the costs of such consultants within 10 days 2) allow all utilities to collect – the utility must justify why outside consultant required. Require applicant agree to extra money for consultants or extra time for in-house review.

NorthWestern Energy	
Mid American	

STAFF QUESTION: do all utilities have someone in-house that can study applications? Is time the restriction…or are qualified employees also a challenge? Will any utility NEED outside consulting help because they DO NOT have someone on staff that can handle the applications?

STAFF PROPOSAL –

- uncomfortable with a maximum amount in the rule
- feel it is appropriate to include some consumer protection

1) Keep $100 limit for in-house staff costs
2) Allow actual cost recovery for outside consultant needs
   a) notify consumer of need for outside help to meet time limits
   b) provide consumer with estimate of cost
   c) notify consumer of possible time extensions necessary if in-house staff used exclusively
   d) allow consumer the option to choose….in-house and longer time frame vs. outside consultant and higher price.

Outside consultant cost – what do they cost…cap???

NWE – 175 – 200 per hour.

Brad – do utilities have an idea-longer term – when no longer a new process – are there plans to increase in-house capabilities so not to rely on outside consultants.

OT – have hired more staff. And will consider hiring more in the future

NREL – Mike C. – consultants are available for less than $175 – 200. seasoned elec. Engineer…$75 – 100 range. Try to keep rates fair. Get more info before putting money toward hourly rate.

BHP – agree more with NW regarding rates…shortage of engineers in industry. Shortage of students.
Xcel – agree with BHP and NWE…rates up in the past years. Hiring tends to fall behind the demand. Don't want to lay off letter…always some need for consultants.

NWE…qualified consultant to handle all issues…expensive….

OT – not charged back to rate payers….working under MISO..all study costs charged to the customer.

Jason – IREC – concerned for tendency that need to use consultant…and not require utility to stick with either time frames or monetary cap….expectation that it be dealt with in house…etc…

NWE – caution for rulemaking regarding staffing needs – directly related to expenses and rates. Need flex. As a company to handle what is going on. Q: no idea what going to get or not get…..new process. Don't want to be in a position where more staff is necessary and only get few a year. May be more cost effective to only use consultants.

Jason – that is where one fixed rate whether in house or consultants is better….force utility to make economic choice. 100 more than what paying in-house engineers---balance built in.

OT – in favor of charging actual cost studies without any cap. It take expertise to do studies = high price.

Brad – at least for t 1 and t 2 keep costs down for review of screens.
Initial screening done in house or at caped rate. Hope not require outside expertise or consultants.
T 1 AND T2 - costs remain low? – is this a good compromise.

Xcel – upper end of tier 2 not necessarily easily done in house.

NWE – goal not to use consultants unnecessarily…..want to do it on a cost effective basis. Goal not to use consultants to mark up costs or make the process more cumbersome.
On the other hand…recognize not large utilities. If outside cost – cost causer pay is the basic principle.

Jason – IREC – customer has the option to contest whether reasonable to charge as much as possible….avoid dispute resolution process. Make more sense to have utility deal with commission on cost issues. Can be rate based. Up to commission whether reasonable. Set good target regarding what it is…if it is more we can adjust the price. Uncertainty is a problem for small DG.

OT – communication between utility and customer are key----if get application that requires outside consultant work. Important to get estimate and get consumer consent. Consistent with MISO.

COMPANY	**DEPOSIT – COST ESTIMATES**
Otter Tail	100% paid in advance
MDU	
Black Hills Power	50% of cost for studies paid in advance 25% of cost for facilities paid in advance

Xcel	• 50% of the cost estimate for studies - for interconnections for 500kW or less – deposit not exceed $1,000 • 25% deposit of estimated costs for facilities necessary to complete an interconnection – 500kW or less not to exceed $10,000.
NorthWestern Energy	50% of costs
Mid American	

STAFF PROPOSAL –
50% deposit for all study cost estimates not to exceed $1,000 for 2 MW of less
25% deposit for all estimated costs not to exceed $10,000 for 2 MW of less

Xcel – agree…
NWE – agree…

Jason – IREC –

NWE – 20 mw of greater – study hours = 100 – 130 hours per study.

Jason – figure from hydro project. Certainty is important…
Xcel – not clear in SM…before any study proceed – should be agreement and consumer agreement.
BHP – included that type of language.

OTHERS	**SUGGESTION OR DISCUSSION**
Reporting Requirements	Staff suggestion – Staff does not desire regular filings. Rather, suggest records retention similar to BHP - utility maintain application records for a period of time - maintain interconnection agreements for a period of time - records produced upon request Brad – this type of info useful for developing industry and commission. Something in the middle----help understand where issue are and what types of generators get through process

	successfully and which have problems. Something other than filing requirement to allow easy access. Mid A – issue – confidentiality. Individual contract or consumer info available for review? Customer info is not public record. Brad - Strawman – annual report summarizing. Jason – not looking for contract. What aggregated info. A simple sheet every year. Brad – rules that require info to be collected…yet not necessarily filed. Valuable and easy to do. BHP – application in SD.
Generators over 10mW	Staff suggestion – upper level of Tier 4 modified to 10mW (other tiers modified accordingly – discussion below) Account for the "over 10 MW projects" through the use of Xcel's suggestion: - those facilities rated over 10mW start with the tier 4 process and Technical standards and modify as needed by mutual agreement - provide "complaint process"…but don't dictate project evaluation or application process beyond the starting point
Tier definitions – level of generation	Current Straw man = • Tier 1 = 25 kW or less • Tier 2 = 2 MW or less • Tier 3 = 10 MW or less • Tier 4 = 20 MW or less Company suggestions: • Tier 1 = 25kW, 10 kW (BHP) or

	less – *discussion from BHP* • Tier 2 = 2 MW or less • Tier 3 = 10 MW, 2 MW (Xcel) or less – *discussion from Xcel* • Tier 4 = 20 MW, 10 MW (Xcel) or less Staff Suggestions: • Tier 1 = 25 kW • Tier 2 = 2 MW or less • Tier 3 = 10 MW or less • Tier 4 = 10 MW or less
Shift to elevated tier level	Is a new/separate application necessary in the case of non-approval? Staff proposes – NO. Xcel suggestion: By mutual agreement, the review process can move directly to the next tier without filing a separate formal application.
Clarifying and solidifying "Technical Standards"	Does explicit inclusion of a "Technical Standards" definition (to be IEEE 1547) in the rule eliminate concern regarding uncertainty?