



**MICHIGAN ELECTRIC
COOPERATIVE ASSOCIATION**

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Michael W. Peters
Executive Vice President
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**Alger Delta Cooperative
Electric Association**
Gladstone

Cherryland Electric Cooperative
Grawn

Cloverland Electric Cooperative
Dafer

**Great Lakes Energy
Cooperative**
Boyne City/Newaygo/Scottville/Hart

**HomeWorks Tri-County
Cooperative**
Portland/Blanchard

Midwest Energy Cooperative
Cassopolis/Adrian

**Ontonagon County Rural
Electrification Association**
Ontonagon

**Presque Isle Electric
& Gas Co-op**
Onaway

Thumb Electric Cooperative
Ubyly

**Wolverine Power
Supply Cooperative**
Cadillac

CountryLines
Magazine



Touchstone EnergySM
The power of human connections

May 7, 2001

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way, Ste. 7
Lansing, MI 48911

Re: Case No. U-12485; In the matter, on the
Commission's own motion, of the interconnection of merchant
plants with the transmission and distribution systems of
electric utilities.

Dear Ms. Wideman:

Enclosed please find an original and four copies of MECA's proposed standards
for interconnection as required in Case No. U-12270. Attached to our comments are
copies of the *Draft Standard for Interconnecting Distributed Resources with Electric
Power Systems (IEEE P1547/D07)* prepared by the Institute of Electrical and
Electronics Engineers, Inc (IEEE) and *Comments in response to the IEEE Draft
Standard* filed by the National Rural Electric Cooperative Association (NRECA) with
the IEEE committee responsible for the development of the *Draft Standard*. Electronic
copies of these two documents were not available at the time of filing. We will post
electronically when they are available.

If there are any questions or comments, do not hesitate to contact me.

Sincerely,

Michael W. Peters
Executive Vice President & General Mgr.
Michigan Electric Cooperative Association

Cc: Albert Ernst
Cooperative Managers

**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission's own motion,)
of the interconnection of merchant plants with)
the transmission and distribution systems)
of electric utilities.)
_____)

Case No. U-12485

**PROPOSED INTERCONNECTION STANDARD FILED BY MECA
ON BEHALF OF MICHIGAN'S ELECTRIC COOPERATIVES**

These comments and proposed interconnection standard are filed by the Michigan Electric Cooperative Association (MECA) on behalf of its member cooperatives¹ in response to the above captioned Order.

1. On June 5, 2000, Public Act 141 of 2000 took effect. Subsection 10e(3) provides:

The commission shall establish standards for the interconnection of merchant plants with the transmission and distribution systems of electric utilities. The standards shall not require an electric utility to interconnect with generating facilities with a capacity of less than 100 kilowatts for parallel operations. The standards shall be consistent with generally accepted industry practices and guidelines and shall be established to ensure the reliability of electric service and the safety of customers, utility employees, and the general public. The merchant plant will be responsible for all costs associated with the interconnection unless the commission has otherwise allocated the costs and provided for cost recovery.

MCL 460.10e(3); MSA 22.13(10e)(3).

2. At its meeting on February 5, 2001, the Michigan Public Service Commission (Commission) issued an Order in the above captioned docket. In part, the Order

¹ MECA's membership consists of the following: Alger Delta Cooperative Electric Association, Cherryland Electric Cooperative, Cloverland Electric Cooperative, Great Lakes Energy Cooperative, HomeWorks Tri-County Electric Cooperative, Midwest Energy Cooperative, The Ontonagon County Rural Electrification Association, Presque Isle Electric & Gas Co-op, Thumb Electric Cooperative, and Wolverine Power Supply Cooperative, Inc.

- required all electric utilities under the Commission's jurisdiction to file a draft set of standards for the interconnection of merchant plants with their transmission and distribution systems.
3. The Order further provided that two or more utilities may fulfill the obligation imposed by the Order by cooperating in the preparation of a joint proposal.
Commission Order, page 13, footnote 11.
 4. MECA has reviewed the Order and the Staff report on interconnection standards. We have also reviewed recommendations and reports from other states and organizations, including the *Draft Standard for Interconnecting Distributed Resources with Electric Power Systems (IEEE P1547/D07)* prepared by the Institute of Electrical and Electronics Engineers, Inc (IEEE) and *Comments in response to the IEEE Draft Standard* filed by the National Rural Electric Cooperative Association (NRECA) with the IEEE committee responsible for the development of the *Draft Standard*. Copies of both documents are attached as *MECA 1* and *MECA 2*.
 5. The IEEE Interconnection Standards Committee met on April 18-20, 2001, to deliberate further revisions to the *Draft Standard*. However, the latest revision is not yet available. MECA recommends the Commission consider the IEEE *Draft Standards*, and subsequent modifications, and as modified by the comments filed

by the NRECA, as the basis for the development for an interconnection standard
for the state's electric cooperatives.

MECA and its members stand ready to work with the commission staff in the
development of a uniform interconnection standard for the state's electric
cooperatives.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael W. Peters", written over a horizontal line.

Michael W. Peters
Executive Vice President & General Manager
The Michigan Electric Cooperative Association
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