



June 6, 2001

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48909-7721

Re: **MPSC Case No. U-12485**

Dear Ms. Wideman::

Please find enclosed an original and four copies of the Reply Comments of The Detroit Edison Company along with proof of service.

Very truly yours,

A handwritten signature in black ink that reads "Bruce R. Maters". The signature is fluid and cursive, with the first name "Bruce" and last name "Maters" clearly legible.

Bruce R. Maters

JPC/dj
cc: Service List

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, of the Commission's own motion)
of the interconnection of merchant plants with)
the transmission and distribution systems)
experimental residential load management)
of electric utilities.)

Case No. U-12485

REPLY COMMENTS OF THE DETROIT EDISON COMPANY

The Detroit Edison Company ("Edison:") pursuant to the procedures established in the Michigan Public Service Commission ("Commission") order in this case dated February 5, 2001 files these Reply Comments.

In response to the Commission's directive, proposed generation interconnection guidelines were submitted by Edison, Consumers Energy, Michigan Electric and Gas Association and Michigan Electric Cooperative Association. All responding parties filed guidelines designed to meet the design and configuration of their respective electric systems. Similarly, the fee schedules proposed by the companies cover particular services and therefore, also differ by company. Finally, all responding parties rely to varying extent on IEEE standards, whether in draft or final form.

The conclusions that should be drawn from the filings are first, that individual company guidelines should be reviewed and evaluated on their individual merit. A

uniform Michigan interconnection guideline is more-than-likely impractical given the different operating characteristics of the separate electric companies.

Second, where applicable, the guidelines should be consistently based on IEEE standards as the most widely accepted electrical design standards within the industry.

Finally, while generator size category was a centerpiece in the Staff's October 2, 2000 report, and while all responding parties addressed generator size to some degree, it is also apparent that other items such as circuit design (radial versus network), operating characteristics, (sell-back versus load displacement), and electrical system configuration, such as circuit protection, phasing and grounding are equally important, if not more critical to the establishment of interconnection criteria.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

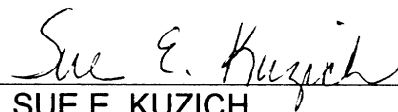
In the matter of, the Commission's own motion)
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_____)

Case No. U-12485

PROOF OF SERVICE

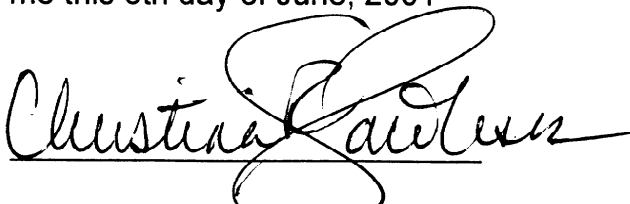
STATE OF MICHIGAN)
) ss
COUNTY OF WAYNE)

SUE E. KUZICH, being first duly sworn, deposes and says that on the 6th day of June, 2001, a copy of **Reply Comments of the Detroit Edison Company** was served upon the parties listed on the attached Service List, a copy of which is attached, by electronic mail and by depositing properly addressed sealed and stamped envelopes into the United States mail by first class.



SUE E. KUZICH

Subscribed and sworn to before
me this 6th day of June, 2001



CHRISTINA R. JACOBSON
NOTARY PUBLIC WAYNE CO., MI
MY COMMISSION EXPIRES Mar 10, 2005

MPSC Case No: U-12485

**SERVICE LIST
(As of May 4, 2001)**

MPSC Staff

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