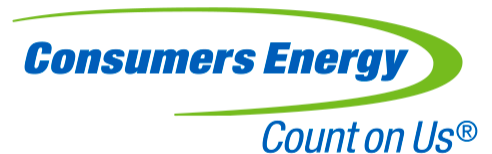


# Consumers Energy Key Points – Forward, Section 1-1.4, Section 2

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# Key Points

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Consumers has identified three key points:

1. Additional provisions
2. Inclusion of key definitions
3. Applicability of Section 1.4

# Disclaimer

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- Consumers Energy's review of the MN DIP does not mean:
  - We have necessarily reviewed other referenced documents, or that we do or do not agree with those referenced documents.
  - Our comments on the assigned sections do not necessarily address those cross-references, which we will address at a later time.
- The fact that we comment or do not comment on particular provisions does not mean we will not have further input on those sections at a later time. We have used best efforts to incorporate as much feedback as possible, but it is difficult to do as only partial/ individual sections of the MN DIP are reviewed.

# Additional Provisions

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- The following additional provisions should be included:
  - Approach to address utility resourcing and technology concerns:
    1. Change indicators
    2. Issue escalation process
    3. Waiver provisions
  - Sale of home - transfer of generator rights process
  - Process for Utility to notify MPSC of Application Agent non-adherence to rules without penalizing the home owner

# Inclusion of Key Definitions

The following should be clearly defined and/or consistently applied in the rules:

- “Operating In Parallel”
- “Certified Equipment”
- “Nameplate Ratings”

# Applicability of Section 1.4

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- (Section 1.4.1) Establishing a specific cost is premature. The cost for providing this information has yet to be determined.
- (Subsections 1.4.1.1–8 and 1.4.2.1–14) Not all of these subsections are applicable to Consumers Energy's higher distribution voltages.
  - 46 kV distribution system is operated as a looped system so much of the information would not be available for the higher voltages
- (Section 1.4.2) Much of the information does not exist today (time to develop, implement, and cost recovery needed). For example:
  - Location of aggregate existing and proposed generation
  - Minimum load data
- (Subsections 1.4.2.2 & 3) Confidentiality concerns with providing generator information.

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Thank you