

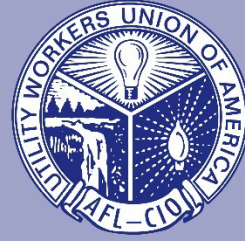
**JAMES SLEVIN**  
PRESIDENT

**PATRICK M. DILLON**  
EXECUTIVE VICE PRESIDENT

**MICHAEL COLEMAN**  
SECRETARY-TREASURER

**CRAIG PINKHAM**  
VICE PRESIDENT

Affiliated with A.F.L.-C.I.O.



1300 L STREET, N.W.  
SUITE 1200  
WASHINGTON, D.C. 20005  
202-899-2851  
202-899-2852 FAX  
[www.uwua.net](http://www.uwua.net)



June 25, 2022

**RE: MPSC Case No. U-20890 – Utility Workers Union of America, AFL-CIO Comments on Draft Interconnection & Distributed Connection Standards.**

The Utility Workers Union of America (UWUA) is a national labor organization whose roughly 45,000 members work in the electric, gas, water, wastewater, and municipal services sectors of the nation's economy. The UWUA has nearly 9,000 members in Michigan alone, the vast majority of which are employed in the energy sector.

Our members operate and maintain the facilities and assets of publicly and privately owned electric utilities, and other energy related services across Michigan's lower peninsula.

**UWUA Electric Utility Employers Include:**

- Alpena Power Company
- Bay City Light and Power
- Cherry Land Electric
- Consumers Energy Company
- City of Croswell Public Lighting
- DTE Energy
- Grand Haven Light and Power
- Midland Cogen Venture
- Traverse City Light and Power
- Zeeland Power and Light
- Utility Lines Construction Service Company (the contract firm that operates and maintains the electric transmission infrastructure for the International Transmission Company (ITC)).

These dedicated workers are plant operators and skilled trades journeymen in power plants (coal, nuclear and hydro), they are renewable energy wind and solar technicians, they are operators, mechanics and relay technicians for Michigan's electrical distribution and transmission system, they are overhead and underground lines workers, they are electric field service workers who troubleshoot and correct electric service issues for all classes of customers; industrial, commercial, agricultural, and residential, they are warehousing and transportation workers, they are electric system designers and planners, they are workers who dispatch crews for service restoration, and they are at the end of the telephone or tablet when a customer calls for a service related issue.

Collectively, these highly skilled women and men are on the job 24 hours a day, 7 days a week working to ensure that the citizens of Michigan receive safe and reliable electricity along the entire electric transmission and distribution delivery system. The necessities of modern life, having light and power when we need it often requires these dedicated professionals to undertake difficult work during all hours of the day or night. Our members take worker and public safety and system reliability seriously. And although the UWUA supports clear interconnection rules, a customer friendly interconnection process should not take precedence over worker safety and system reliability. Worker and public safety along with equipment integrity, which are intertwined, should be paramount when considering interconnection system re-design.

The UWUA points out the following safety and reliability concerns regarding the proposed Interconnection and DG Rules being considered by the Commission in this docket.

**1. Export-Limiting – 460.901(a-b), 460.980(1)**

The new and revised definitions contained in the proposed Rules, including *Limited Export*, *Ongoing Operating Capacity* and *Material Modification* allow for battery storage and generation to be expanded as long as the export value remains the same. The UWUA believes that the maximum capacity could be far greater than the export-limited capacity and therefore could dangerously overload the system if the export-limited design failed. This concern can be remedied in the rules by providing for the utility to consider the actual nameplate capacity of the interconnection during the study process or after it, if the export value remains unchanged.

**2. Inverter Safety – 460.980**

The proposed rules allow for a third party to determine the “certification” of devices that use export-limiting configurations without utility validation. In addition, the proposed rules permit a 30 second plus “inadvertent” export of electricity. The UWUA believes this could create a situation in which an extended period of time of export of energy can occur resulting in significant equipment damage, failure, and personal safety risk to workers and/or the public.

**3. System Protection and Ongoing Operating Capacity – 460.980(4c)**

The proposed definitions and rules require utilities to study the DER assuming that the owner will maintain the current load level for the lifespan of the DER. Under the current rules, utilities do not utilize load as a factor in the study, nor should they since load characteristics can be variable and are subject to change over time, this is especially true for DER’s.

The UWUA believes that the proposed language could be interpreted by developers as meaning that if the DER generation is small relative to the load served, there would not be the possibility of flowback and therefore protective devices do not need to be employed. The UWUA points out that a utility has no control over a customer’s load or how that load changes over time. Under the scenario in which a utility customer with a large system load significantly reduces that load, the amount of flowback to the grid is increased, which cannot be studied

during the interconnection process. If export capacity is increased due to a lack of minimum load, the result could be equipment failure and voltage control issues on the system. The UWUA suggests this can be remedied in the rules by allowing for protective relaying and devices to be installed as determined by the utility.

#### **4. Insufficient Time for Review – 460.942 Non-Export Track Review**

The UWUA is concerned that the Non-Export Track Review process outlined in the proposed rules is unclear on whether or not utilities will have sufficient time to study proposed interconnections or have the ability to perform a more detailed facilities study if it believes that safety concerns are present. Given the concerns that UWUA has raised here relative to export-limiting, inverter safety and system protection, the current non-export track review process language adds additional challenges to ensuring the integrity of proposed projects thereby increasing the likelihood of equipment failure and associated grid and worker reliability and safety issues. The UWUA suggests the rules clearly permit a non-export application to proceed to a facilities study if additional safety concerns may be present.

As pointed out in the opening of these comments, grid reliability is intertwined with worker safety. Interconnections must be designed in a manner which ensures the utmost worker and equipment protection, this is especially important given the ever-increasing need for grid reliance and resiliency due to climate change and associated extreme weather events. The UWUA believes the legitimate safety concerns we have raised on these proposed rules can be corrected by the remedies we have suggested.

We thank the Commission for the opportunity to provide comments aimed at ensuring that worker safety is considered at the forefront of interconnection rule making.

/s/James C. Harrison  
Director of Renewable Energies  
Utility Workers Union of America, AFL-CIO