

**April 07, 2015**

**STATE OF IOWA  
BEFORE THE IOWA UTILITIES BOARD**

**IOWA UTILITIES BOARD**

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**IN RE:** )  
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**DISTRIBUTED GENERATION** ) **DOCKET NO. NOI-2014-0001**  
 )  
 ) **JOINT COMMENTS ON PROPOSED**  
 ) **INTERCONNECTION RULE**  
 ) **CHANGES**  
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The Environmental Law & Policy Center (ELPC), Iowa Environmental Council (IEC), MidAmerican Energy Company (MidAmerican), and Interstate Power and Light Company (IPL) (referred to collectively as “joint commenters”) submit the following joint comments in response to the March 12, 2015 Board Order Soliciting Reply Comments on Proposed Rule Changes Regarding Certain Interconnection Issues.

On February 16, 2015, ELPC and IEC submitted joint proposed rule changes in this docket.<sup>1</sup> IPL submitted its own proposed rule changes and MidAmerican generally concurred with IPL’s changes and offered some additional language changes for consideration. Following the Board’s March 12, 2015 Order, the joint commenters consulted each other about potential areas of agreement on the proposed interconnection rule language. The joint commenters offer these comments to highlight areas of agreement. Joint commenters may also submit separate reply comments focused on areas where our views are not in alignment.

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<sup>1</sup> IREC was also a party with ELPC and IEC to the February 16, 2015 proposed rule changes, but IREC is not a party to these comments.

**Pre-application.** Joint commenters agree on the inclusion of a pre-application request in the interconnection rules. This language is derived from recent revisions by the Federal Energy Regulatory Commission (FERC) to its small generator interconnection procedures (SGIP). The language proposed by ELPC/IEC/IREC and IPL is similar. MidAmerican suggested an addition to the pre-application request language to account for projects that include multiple proposed interconnections. The joint commenters agree that MidAmerican's proposed language should be included.

The one difference between the ELPC/IEC/IREC and IPL pre-application language is the amount of time allotted for a response from the utility to DG applicant. ELPC/IEC/IREC recommended 10 days, and IPL, with the concurrence of MidAmerican, recommended 20 days. The FERC SGIP allows 20 days response time. ELPC and IEC continue to support the 10 day recommendation for the reasons articulated in their February 16 comments. However, ELPC and IEC would support the pre-application request rule language with the 20 day response time as recommended by MidAmerican and IPL.

**Supplemental Review.** Joint commenters agree that the proposed supplemental review will provide clarity and allow projects that do not need Level 4 review to proceed in a structured and transparent manner. There are minor language differences between ELPC/IEC/IREC and IPL proposed language. The joint commenters agree to the language proposed by IPL.

**WHEREFORE,** joint commenters respectfully request that the Board consider the above comments related to pre-application requests and supplemental review in its determination of whether to modify the interconnection rules in Chapter 45.

Dated this 7th day of April 2015.

Respectfully submitted,

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