

STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD

IN RE:)	
)	DOCKET NO. RMU-2016-0003
REVIEW OF ELECTRIC)	
INTERCONNECTION OF)	ADDITIONAL COMMENTS ON
DISTRIBUTED GENERATION)	REVISED FORMS
FACILITIES RULES [199 IAC)	
CHAPTER 45])	
)	

The Environmental Law & Policy Center (ELPC), Iowa Environmental Council (IEC), and Interstate Renewable Energy Council, Inc. (IREC), collectively file these comments in response to the Iowa Utilities Board’s Order Providing Revised Forms and Agreements and Requesting Additional Comments issued on December 28, 2016 (Order).

ELPC, IEC, and IREC are appreciative of the Board’s approach to the rulemaking and the modification of the forms and agreements. The Board’s Order Adopting Amendments issued on December 28, 2016, incorporates important best practices that stakeholders put forward on a consensus basis during NOI-2014-0001 into Iowa’s interconnection standards. This is an important step forward for Iowa. The revised forms and agreements help to implement Iowa’s interconnection standards, and we are generally supportive of the revised forms and agreements.

The Board requested comments “regarding the revised forms and agreements to the extent that a participant believes the content of the forms or agreements is inaccurate or may cause unintended consequences.” Order at 2.

We have noticed one inaccuracy. In Attachment 1, Levels 2 To 4 Distributed Generation Interconnection Agreement, the definition for distributed generation facility omits energy storage

facility, and therefore, is not consistent with the definition in the newly adopted rules that includes energy storage facility in the definition.

We appreciate the opportunity to address the revised forms and reserve our right to address comments and concerns raised by other parties.

DATE: January 17, 2017

Respectfully submitted,

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