



Your Touchstone Energy® Cooperative 

February 5, 2019

Daniel P. Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

***Subject: Dakota Electric Association® Responses to  
Minnesota Public Utilities Commission Staff Information Requests  
Docket No. E-111/M-18-711***

Dear Mr. Wolf:

Enclosed are Dakota Electric Association responses to Minnesota Public Utilities Commission Staff Information Requests 1 through 4 in Docket No. E-111/M-18-711.

If you or your staff have any questions about these responses, please contact Craig Turner or Doug Larson.

Sincerely,

/s/ Doug Larson

Doug Larson  
Vice President of Regulatory Services  
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Dakota Electric Association

Response to

State of Minnesota  
Public Utilities Commission

Utility Information Request

***Docket Number:*** *E-111/M-18-711*  
***Request Number:*** *1*  
***Requested By:*** *Michelle Rosier*  
***Date of Request:*** *January 23, 2019*  
***Response Prepared By:*** *Craig Turner*  
*Dakota Electric Association*  
*651-463-6337*  
***Date of Response:*** *February 4, 2019*

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**Proposed MN Distributed Energy Resource Interconnection Process – Dakota Electric Association (MN DIP – DEA)**

**a. DIP – DEA Sec. 1.1.5.1.2. Please explain how the terms and conditions of interconnection will be communicated to Interconnection Customers with projects not eligible to complete the DIP-DEA Att. 2 Simplified Application with its associated terms and conditions if qualifying customers elect to only complete the Uniform Statewide Contract.**

If a DER is not eligible to use the Simplified Application, then according to 1.1.5.1.4 they are by procedure not eligible to only use the Uniform Statewide Contract and thus would be required to sign the interconnection agreement DEA-DIA and would receive the terms and conditions of interconnection as part of that agreement.

Dakota Electric was following the 1.1.5.1.5 option to propose in its tariff an increase the size threshold for the application of the Uniform Statewide Contract. By Dakota Electric following that option and modifying the 1.1.5.1.2 to allow the Applicant with a DER interconnection which is using a certified inverter and is between 20kW and 40kW to only sign the Uniform Statewide Contract, Dakota Electric has created a hole where the Applicant does not have a clear terms and conditions for their interconnection.

Dakota Electric is fine with following the same terms and conditions for certified inverter based qualifying DER interconnections which are less than 40kW but more than 20kW. So, Dakota Electric proposes to replace the existing 1.1.5.1.5 language granting Dakota Electric the ability to modify the 20kW threshold with the following language;

“If the DER application is for a qualifying DER which is 40kWac or less, utilizes a certified inverter and the Applicant chooses to use only the Uniform Statewide Contract, then the terms and conditions for the simplified process shall apply.”

**b. DIP – DEA Sec. 3.4.5.2. Please explain why “Area EPS” is not replaced by “Dakota Electric” in this instance.**

In looking at the Dakota Electric supplemental filing in early January, all the Area EPS have been changed to Dakota Electric within section 3.4.5.2. Please let us know if we missed something here.

**c. DIP – DEA Sec. 4.4.1; 2nd paragraph. Please explain why “local transmission supplier” is more appropriate than MN DIP defined terms: “Transmission Owner” or “Transmission Provider.”**

Dakota Electric will change the local transmission supplier to the defined term of “Transmission Provider” in section 4.4.1.

**d. DIP – DEA NEW Sec. 5.1.3. Is this new language consistent with DIP – DEA Sec. 5.7 Inspection, Testing, Commissioning and Authorization? Should there be a reference to consistency with Minnesota Technical Requirements (see DIP-DEA 5.7.1)?**

The new section 5.1.3 that is proposed by Dakota Electric is mostly a copy of the existing section 2.3.2 which provides up to 10 days for coordination of testing and inspection for the testing of smaller qualified systems. Section 5.7.2 states that the utility will have “no fewer than 5 business days in advance, or as may be agreed to by the Parties”. The new section 5.1.3 has added the term “reasonable time frame” for coordination between the Applicant and Dakota Electric for the larger systems. This helps limit the maximum time for scheduling the testing. Dakota Electric believes that adding the word reasonable helps the Applicant in discussions with Dakota Electric, if Dakota Electric appears to be unreasonable in scheduling the testing and inspection with the Applicant.

Section 5.7 appears to apply to all DER interconnections and only requires a minimum time frame for scheduling testing. Section 2.3.2 and the new section 5.1.3 are providing maximum terms for scheduling the testing and so they do not appear to conflict with section 5.7.

**e. DIP – DEA 5.6.6. Please explain why “Distribution” is not added to “Upgrades” given Dakota Electric’s comments at p. 13.**

Dakota Electric will add the word “Distribution” before the word “Upgrades” in three different locations within 5.6.6. Dakota Electric will also add the word “Distribution” before the word “Upgrades” in 5.6.5.

**f. DIP – DEA; Att. 1 Pre-Application Report Request Form. Are GPS Coordinates a required or optional field in the Pre-Application Report Request? Please include rationale?**

GPS coordinates are an optional field which can be used by the Applicant. For installations, especially in rural areas, where there is no address, such as in a farmer's field, GPS coordinates are the most efficient way to describe the proposed location.

**g. DIP – DEA; Att. 1. Please explain why Dakota Electric is not including a question about existing DER on the Pre-Application Report Request.**

Dakota Electric agrees that adding this question would be useful and plans on adding this to the pre-application report request form.

**h. DIP – DEA; Att. 1. Please explain why “Point of Interconnection – Additional Information” is an appropriate header given the DIP – DEA Glossary of Terms include “Point of Common Coupling” and “Point of DER Connection.”**

Dakota Electric agrees that it would be more consistent to use “Point of Common Coupling” instead of the existing “Point of Interconnection” for this form. Dakota Electric will be changing this to “Point of Common Coupling”

**i. DIP – DEA; Att. 1. Under “Payment and Agreement” 2nd bullet, please explain with Dakota Electric uses “proposed point of interconnection” rather than “proposed Point of Common Coupling.”**

Dakota Electric agrees that it would be more consistent to use “proposed Point of Common Coupling” instead of the existing “proposed Point of Interconnection” for this form. Dakota Electric will be changing this to “proposed Point of Common Coupling”

**j. DIP – DEA; Att. 2 Simplified Application. Under “For Office Use Only”, will Dakota Electric Association’s online portal allow for maintaining multiple “date received” entries if an incomplete application must be re-submitted? If not, please describe how Dakota Electric will track applications that are initially not deemed complete.**

The on-line application portal will allow for keeping track of multiple “date received” entries, if an incomplete application must be re-submitted by the Applicant.

**k. DIP – DEA; Att. 2 & Att. 3. Under “Distributed Energy Resource Information”, please explain why “Aggregate Inverter(s) Nameplate Rating” and “Aggregate DER Capacity (the sum of nameplate capacity of all generation and storage devices at the PCC)” are collected.**

The capacity of a DER may be a combination of inverter and non-inverter “AC” sources. Collecting this information will allow for the evaluation of multiple energy production devices at a site (i.e. wind plus solar plus storage).

**i. Is the latter intended to be the DER Capacity limit described at MN DIP 5.14.3; or would it potentially be a larger kWac than the “Aggregate Inverter(s) Nameplate Rating”? Please include rationale.**

DIP-DEA Att. 2 & Att.3. requests the Applicant to explain how the capacity will be limited. This explanation will allow Dakota Electric to work with the Applicant to apply section 5.14.3. Additionally, it is possible at a single installation for the kWac to be larger than the aggregate kWac of the inverter nameplates. An example of this would be a member with solar DER and a backup diesel generation at the same site. For this example, the Aggregated DER Capacity would be greater than the Aggregated Inverter(s) Nameplate Rating.

**l. DIP – DEA; Att. 2 & Att. 3. “Equipment Certification.” Is this a required field or can the customer submit specification sheets as an alternative to filling out this section? Please explain.**

In the Simplified and Fast Track process the Applicant will be asked to list the different certified components for the DER system. This is required information. They will also be required to submit specification sheets for the equipment to provide the additional information. There are two reasons for requiring both pieces of information. The first is the need to document the certified equipment information directly on the signed application, so when the installation is inspected the approved the equipment matches up with the signed application. The specification sheet also needs to be downloaded to reduce the time required by Dakota Electric to look up the information on the internet during the review process. This also helps reduce the chance that Dakota Electric would look up and find incorrect specifications which are old and outdated or just simply incorrect. As functionality and firmware updates are constantly changing it is important that Dakota Electric is provided with the specific information for the certified equipment which will be used with the interconnection.

**m. DIP – DEA; Att. 2 & 3. Under “Interconnection Agreement”, please explain why “Utility’s Agreement for Cogeneration and Small Power Production Facilities” is used rather than “Uniform Statewide Contract.” Should the DIP – DEA use a consistent term or why are different terms appropriate?**

Dakota Electric agrees the “Uniform Statewide Contract” wording would be better to use on the application form instead of the generic “Utility’s Agreement for Cogeneration and Small Power Production”. Dakota Electric will make this change.

**i. Similarly, is the MN DIA – DEA “the Utility’s Distribution Interconnection Agreement” or “Distributed Energy Resource Interconnection Agreement”?**

The MN DIA-DEA is the Minnesota Distributed Energy Resource Interconnection Agreement (Adopted for use by Dakota Electric Association from the Minnesota Distributed Energy Resource Interconnection Agreement MN DIA)

The term “Utility’s Distribution Interconnection Agreement” is used within the Interconnection Agreement block on the Simplified Process application. Based

upon this question Dakota Electric believes that changing this to “Distributed Energy Resource Interconnection Agreement” would provide more consistency. Dakota Electric will make this change.

**n. DIP – DEA; Att. 2. Under “Disclaimers...” Will Dakota Electric inform the customer of the opportunity to request a timeline extension if a deadline is missed pursuant to MN DIP 1.8.2? How will the customer know where to look for information on how to request an extension for a timeline “outlined in the Interconnection Process” (i.e. MN DIP 1.8.2 and 5.2.2)?**

The Applicant will be informed and provided information about how to respond back to the on-line portal to request an extension. The actual process used is still a work in process for the on-line portal, but Dakota Electric wants to have a process where the goal is no surprises for the Applicant.

**i. 2nd row under “Disclaimers...”. What are the implications of moving an application from Simplified to Fast Track process and how is the customer informed when initialing this disclaimer at time of submission for the Simplified Process?**

The Member is informed by the online portal upon determination by Dakota Electric’s initial screening that the application belongs in the Fast Track Process. Prior to signing and submitting the application the Member is made aware of this possibility that, the application may start in the Simplified Process but may not end up in that a process after evaluation. The disclaimers are there to inform the member that this could happen. The good news is the review time difference between the simplified and fast track process is very minimal and via the on-line portal process the Applicant will automatically be asked the questions which reflect the proper track. Though this on-line process flow, we hope to avoid Applicants assuming they fall under the Simplified Process and submitting the wrong application.

**o. DIP – DEA; Att. 2. Information Required on One-Line Diagram. Given the Simplified Application is capped at 20 kW, why include the language about when a licensed Minnesota Professional Engineer is required?**

Dakota Electric agrees that given the Simplified Application is capped at 20kW and requires use of a certified inverter the language about Minnesota Professional Engineer is required should be removed. Dakota Electric will remove that language on the Simplified Application.

**p. DIP – DEA; Exhibit B. Energy Storage Application. Why remove references to the Minnesota Technical Requirements and the information on what type of projects need to complete the Exhibit (“An application to interconnect is required only for storage designed to operate in parallel with the grid. Backup generators and electric vehicles that do not parallel need not apply.”)?**

Dakota Electric agrees that removing the information about which energy storage systems are not required to apply, should have not been removed from Exhibit B. Dakota

Electric will add the following to the MN DIP-DEA Exhibit B “Additional information in the application may be required. See Minnesota Technical Requirements. (An application to interconnect is required only for storage designed to operate in parallel with the grid. Backup generators and electric vehicles that do not parallel need not apply.)”

**q. DIP – DEA; Exhibit B. Should “Address of Generating Facility” be replaced with “Address of DER”?**

Yes, Dakota Electric will make this change.

**r. DIP – DEA; Att. 3 Interconnection Application. Are the only specification sheets needed “Inverter specification sheets”?**

No, it depends upon the type of DER proposed to be interconnected. Equipment Certification section in Att. 2 requires the Applicant include all certified equipment manufacture specification sheets with the application. In many cases, such as home solar installations, this may only be the inverter specifications sheets, but with larger systems or home systems with export limiting controls there could be additional equipment information required. Having this information will allow Dakota Electric to quickly review the application and reduce the time required for Dakota Electric engineering staff to look up and gather the information about the equipment for the DER application. This will also reduce the chance of Dakota Electric staff looking up the data for the wrong equipment during the review process.

This question brings up a good point, how will the Applicant know which pieces of certified equipment need to be reported, since most pieces of electrical equipment are certified through some process. The working group will need to consider this as part of the Technical Requirements and Dakota Electric will need to include some direction within our TSM.

**s. DIP – DEA; Att. 3. Under “Distributed Energy Resource Information”, please describe why Dakota Electric is using “Estimated Installation Date”; rather than, “Interconnection Customer’s Requested In-Service Date”? What impact does this have on DIP-DEA Sec. 5.8.1?**

Dakota Electric views that both terms are the same. The estimated installation date is the date the Applicant plans on installing the system and the term “Requested In-Service Date” is the date the applicant plans on using the system, for most systems this date is the same. Dakota Electric would like to work with our members and allow them to estimate the installation date on the application and work with Dakota Electric to complete the installation. For larger systems the estimated installation date could be months ahead of the Requested In-Service Date. Dakota Electric would like to know when to expect the physical installation to begin, so if the installation goes faster than expected, Dakota Electric can be ready to support the installation.

**t. DIP – DEA; Att. 3. Under “Transformer Fuse Data.” Does Dakota Electric intend to require a copy of fuse manufacturer’s Minimum Melt and Total Clearing Time-Current Curves? If so, how is that communicated to the Interconnection Customer?**

Typically, no, the Member will need to fill out the information requested for Transformer Fuse Data and Dakota Electric should be able to reference standard fuse response curves. If that information is not complete or we can’t reference the data a request may be made for additional technical data, which could include the manufacturer’s minimum melt and total clearing time as part of a Facilities Study (4.4).

**u. DIP – DEA; Att. 3. Under “Interconnection Protective Relays.” Does Dakota Electric intend to require a copy of any Proposed Time-Overcurrent Coordination Curves? If so, how is that communicated to the Interconnection Customer?**

The Member will need to fill out the information requested in the Interconnection Protective Relays (For Microprocessor Controlled Relays) or Interconnection Protective Relays (For Relays with Discrete Components). If traditional utility relays are used, then Dakota Electric should have all the information required. If unique protective relaying is proposed, additionally information may be required as part of a Facilities Study (4.4)

**v. DIP-DEA; Att. 3. Under “Current Transformer Data.” Does Dakota Electric intend to require a copy of manufacture’s excitation and ration correction curves? If so, how is that communicated to the Interconnection Customer?**

This data is typically not required if the Applicant can provide the requested CT manufacture, type, and accuracy class information. In the unique instance when the basic information is not able to be provided, performance information about the CT’s used for the protective relays may be requested.

**w. DIP – DEA; Att. 3 Under “Disclaimers...” 2nd row. What does an initial mean? How is the Fast Track Process’s “Supplemental Review” option prior to Study Process (MN DIP 3.3.-3.4) to be understood in context of this disclaimer? Is this an agreement to move forward with the Study Process or will Dakota Electric offer a Customer Options Meeting (MN DIP 3.2.3)?**

The initials under the Disclaimers section of the Attachment 3 application are just an acknowledgement of the statements. The original MN DIP document just stated that “The Area EPS Operator shall notify the Interconnection Customer with an opportunity to request a timeline extension...” This is our first step in notifying the Applicant. The plan is to have the process also inform the Applicant that they are at the end of the time frame window and can request an extension of time. Dakota Electric would hate to have an Applicant’s application withdrawn and the Applicant required to re-apply just because they did not know about this possibility.

The second initials are not an approval to proceed with the study process and the costs associated. If the study process is required, the Applicant will be presented with a study agreement and estimated costs before Dakota Electric would proceed.



**x. DIP – DEA; Att. 3. Under “Application Signatures ...” Does “Terms and Conditions of the Interconnection Process” refer to the MN DIA or something else? Unlike the Simplified Application, the Interconnection Application does not streamline the process by including Terms and Conditions as an attachment to the application in the MN DIP.**

This was intended to refer to the Terms and Conditions of the MN DIP-DEA. When the Applicant signs the MN DIA-DEA interconnection agreement they will be agreeing to abide by the terms and conditions of the MN DIA-DEA.

**y. DIP-DEA Sec. 4.4 & Att. 7. Facilities Study Agreement. Does Dakota Electric intend to use the Facilities Study only for Distribution “Upgrades” or would it also potential cover Area EPS “Interconnection Facilities”? (see Glossary of Terms)**

Dakota Electric intends to use the Facilities Study Agreement to cover only distribution facilities, including the Interconnection Facilities which are part of the Dakota Electric distribution system. Since Dakota Electric will only be involved with DER interconnections where the Point of Common Coupling is on the Dakota Electric distribution system and since Interconnection Facilities are defined as being between the Point of Common Coupling and the DER, then all Interconnection Facilities will be either supplied by Dakota Electric or the Applicant.

Dakota Electric Association

Response to

State of Minnesota  
Public Utilities Commission

Utility Information Request

**Docket Number:** *E-111/M-18-711*  
**Request Number:** *2*  
**Requested By:** *Michelle Rosier*  
**Date of Request:** *January 23, 2019*  
**Response Prepared By:** *Craig Turner*  
*Dakota Electric Association*  
*651-463-6337*  
**Date of Response:** *February 4, 2019*

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**Proposed MN Distributed Energy Resource Interconnection Agreement – Dakota Electric Association (DIA – DEA)**

**a. DIA-DEA; Att. 3. One Line Diagram... Is the one-line submitted in this attachment the latest version of the one-line submitted by the Interconnection Customer during the Interconnection Process review or why is a new version appropriate?**

The one-line diagram that is attached to the DIA is normally different than the one-line provided with the application. Most of the time, during the process of reviewing the interconnection, the one-line diagram provided with the application is not the final design. Dakota Electric has normally provided the one-line attachment for the interconnection agreement (DIA) as part of supplying the interconnection agreement to the Applicant for signature. The one-line diagram attached to the interconnection agreement typically contains different information than the application one-line diagram. The one-line diagram provided by the Applicant with the application can also be in a different size format which does not fit well within the legal interconnection application format and the one-line used for the interconnection application is not required to be signed by a P.E. as that is not used for construction.

The DIA one-line diagram needs to show information in support of the interconnection application, such as the Point of Interconnection, metering, monitoring, facility ownership and other information in support of the information discussed within the DIA including items included within the DIA operational attachment 5.

On the proposed MN DIA-DEA attachment 3, Dakota Electric used the words from the existing 2004 Integration Agreement, section III as a starting point for the information needed to support the interconnection agreement. Dakota Electric's intent was to help the

Applicant and other users of this DIA document understand the important information which needs to be included in the DIA one line.

**a. Should the one-line diagram requirements in DIP-DEA Att. 3 and DIA-DEA Att. 3 be the same or why is it appropriate for them to differ?**

Dakota Electric's experience has shown that the one-line diagram attached to the application will be different than the one-line which is created for the interconnection agreement.

Dakota Electric Association

Response to

State of Minnesota  
Public Utilities Commission

Utility Information Request

*Docket Number:* E-111/M-18-711  
*Request Number:* 3  
*Requested By:* Michelle Rosier  
*Date of Request:* January 23, 2019  
*Response Prepared By:* Doug Larson  
Dakota Electric Association  
651-463-6258  
*Date of Response:* February 4, 2019

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**a. Please provide the rationale for Dakota Electric Association not filing DIP-DEA related revisions in the following tariffs: 1) Schedule 55: Parallel Generation; 2) Schedule 60: Standby Service; and 3) Schedule 61: Distributed Generation. (Example: Minnesota Power's proposed tariff revisions in E015/M-18-713.)**

The Dakota Electric schedules identified contain primarily rate information. The edits in the referenced Minnesota Power filing relate primarily to names of documents that change as part of the DIP/DIA proceeding. Dakota Electric intends to update any document names when the DIP/DIA is approved.

**b. Will Dakota Electric be updating these tariffs as a compliance filing once the DIP/DIA – DEA is approved? If not, please explain why it is not necessary and if the tariffs will be applied consistent to the approved DIP-DEA and DIA-DEA.**

Yes.

Dakota Electric Association

Response to

State of Minnesota  
Public Utilities Commission

Utility Information Request

*Docket Number: E-111/M-18-711*  
*Request Number: 4*  
*Requested By: Michelle Rosier*  
*Date of Request: January 23, 2019*  
*Response Prepared By: Craig Turner*  
*Dakota Electric Association*  
*651-463-6337*  
*Date of Response: February 4, 2019*

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**a. Dakota Electric is proposing to only accept Interconnection Process materials via a new online portal and will not accept information or materials in-person, by postal mail or e-mail. Please describe Dakota Electric's testing, education and roll out plan for this new tool.**

Dakota Electric has not yet created an education and roll out plan for the new on-line tool. But it would be reasonable for Dakota Electric to reach out to installers who have recently been active with installations for Dakota Electric Members. Dakota Electric would also provide information at various member service events occurring later this spring.

Several other Cooperatives will be rolling out the use of the on-line portal before Dakota Electric's June 2019 expected roll out and this should help get some of the bugs out of the computerize system. In addition, Dakota Electric plans to run the online tool in house, through multiple simulations starting in May 2019.

**b. If a customer encounters log in or other online portal issues, what impact could this have on timeframes? Will the customer have access to a trained Dakota Electric employee for assistance?**

There is no log in requirement for the Interconnection Applicant. Each application will be given a unique code. The Applicant will be required to use that code for future access. We are still under design of the portal and it may contain additional security measures. If someone does break through the security and gets into an application, only the application words would be available for viewing. All the documents which are downloaded, including the one-line diagrams are not viewable by any users. Even the Applicant will not be able to view or up-load the attachments back to their computer once they have downloaded the attachment. We believe this protects most of the confidential

information which would be provided by the Applicant. Until the application is submitted to Dakota Electric the Applicant will be able to replace any downloaded attachments with new versions.

If the website is not available for some reason, the online portal developer is available to troubleshoot and maintain the site. So, interruptions are expected to be brief. Dakota Electric also has a generation coordinator who will be available to help anyone with on-line portal issues. The generation coordinator contact information is published on our web site and it is normal for them to routinely get phone calls and emails about generation interconnection questions.

**c. Are passwords automatically reset or processed by the online portal administrator?**

Passwords are only needed by the utility personal to process an DER interconnection application. The approach is to make the portal easy to use and not require passwords and logins. A unique code is used for each interconnection application. So, the interconnection application can easily be shared between the interconnection vendor and the customer. This also allows for the vendor to have multiple staff personnel working on and sharing the same interconnection application.

Interconnection Applicants can request and receive an email if they forget their unique application code. The email address of the Interconnection Customer is required to be entered to then the portal generates an email to the Interconnection Customer's email address with the unique code for the application.

**d. What option does a customer have to review materials to ensure they're complete and accurate before submission? Once a customer has submitted the application, can they amend or replace it prior to it being returned to them by Dakota Electric?**

The Interconnection Applicant can review their application and material during multiple steps of the application process. Their application information is available to view prior to payment of the processing fee; prior to the electronic signing of the application and; prior to submitting the application to Dakota Electric. Any files which are down loaded into the portal will not be viewable by the Applicant.

Once an application is submitted to Dakota Electric, the Applicant may view a PDF of the application (but not the attachments). The application cannot be amended until the application is submitted for the initial completeness review and engineering screens. If the application is deemed incomplete by the utility, the Interconnection Applicant will then be allowed to submit missing material and is provided the steps to do so through the online portal.

**e. What type of files are allowed to be uploaded (e.g. .jpg; .gif; .pdf; .docx; other)? Will any file types not be uploadable?**

The portal is designed to accept the typical standard formats of PDF, .JPG, and. PGN. The user will be able to upload these types of file formats. Uploading files in other formats will not be supported.

**f. What is required to complete an electronic signature and online payment?**

The signature step takes place within the online portal through an electronic signature application that meets local and international security and authentication requirements, including Minnesota Statute 325K and 325L. All data processed through the electronic signature application is encrypted using industry standard 256-bit HTTPS encryption. Users of the DG Portal will not need to create an account for either the online payment or the electronic signature application to complete the application process in the online portal.

**g. How will the online portal recognize what is an applicant agent vs. interconnection customer's contribution to the application?**

The online portal does not track specifically who answers the questions of the DER application. Should an applicant's agent fill out the on-line application, an email is sent to the email provided of the Interconnection Customer, with a hyper link to sign the interconnection application electronically. Signatures are tracked and verified through an established electronic signature application. (See part f of the IR.) It is possible for an Applicant Agent to falsify that they are the Interconnection Customer and electronically sign the interconnection application, but it would be considered forgery and is unlawful.

**h. Will the customer be able to view, save, print documents from the online portal?**

Interconnection Customers can start an application and save their progress without submission to the Utility. Interconnection Customers will be provided a unique confirmation code to continue their application and submit to the Utility. Interconnection Customers and Applicants can view their answers to the interconnection application prior to payment, signature and submittal to the Utility. Interconnection Customers also can access their application after submission to the Utility, download a PDF copy (of only the application portion) which they can then save or print for their records. The plan is for applications that have been started but not completed and submitted to the Utility will exist in the online portal for 6 months and then discarded.