

My name is Adam Schaller; I am the Vice President of Lakeshore Die Cast and my comments provided below on Case No. U-20890 are based on literature review and my personal experience trying to build and interconnect a distributed energy resource at my die casting company. My die casting company is located in Baroda, Michigan at 8829 Stevensville-Baroda Road in Berrien County. The utility responsible for power supply at my place of business is Indiana Michigan Power, subsidiary of American Electric Power. I've been at Lakeshore Die Cast in a management role since about 2010. In the years between 2010 and 2020 I saw my electricity usage rise by 50% and my price per month more than double. Die casting is an energy intensive business and utilities represent about 10% of my total costs. As a third generation die caster and manufacturer in Michigan, I am always looking for a competitive advantage. I saw how my utility cost increased and started investigating ways to slow down or stymie the increase. This search is what got me interested in on-site generation, particularly solar. In 2020 I installed and connected 150kW AC of generating capacity, the process was straight forward under the old interconnection rules. The latest rule set maintains the previous simplicity for this size of generator which is great. Over the last year my solar project generated about 25% of my total electrical usage and drastically reduced my utility cost. I was so impressed with my solar generation that I started down the path to install more generation. This time around I am working on a 1.25MW system which when combined with my old system will yield 1.4MW AC generation, this is about 2.5 times my current plant yearly demand. I've provided this backstory and information because it helps explain my current situation and why I'm commenting on this case. The new rules don't do anything to address the confusion involved with trying to install solar generation over 150kW in size. The new rules just like old rules say these sized generators must be interconnected and give the rules for interconnecting them. This however is only part of the battle; the other part of the battle is getting the utility to find a tariff that will work and understanding that the utility is required to work with you. I think the new interconnection rule set should explicitly spell out that these sized generators are entitled to net metering as amended in EPACT (Energy Policy Act of 2005) and are qualified facilities as explained in PURPA (Public Utility Regulatory Policies Act). The fact that the old program was called "the net metering program" only adds to the confusion because "the net metering program" is not the same as net metering. My suggestion is that the commission incorporate a section to just explain this or just state what terms a 150kW generating facility that falls outside the distributed generation program are entitled to. These being, net metering as explained in EPACT and sale of power at full avoided cost as clarified in FERC order number 872 and outlined in PURPA.