

**Appendix 3: Comparison of Existing and Proposed DG Interconnection Agreements**

Category	OEB Distribution System Code Appendix F	OEB Transmission System Code	BC Hydro	Alberta	Interstate Renewable Energy Council	Markham Hydro Distribution Inc. (Power Stream)	Public Services Commission of Wisconsin	FERC Appendix F
Size	Mid-Size (500 kW to <10 MW) connected on distribution systems at voltages above 15 kV	Transmission Connected	• All distribution connected generation	• All distribution connected generation	• Up to 10 MW	• Substation Connection	• 20 kW to 15 MW	• Up to 20 MW
Main Sections	Connection Requirements in Appendix F	<ul style="list-style-type: none"> <li>The agreement consists of 9 main prts plus Schedules:</li> <li>1. General (13 sub parts)</li> <li>2. Representations and warranties (two sub parts)</li> <li>3. Liability and Majeure (two sub parts)</li> <li>4. Dispute Rsolution (one sub part)</li> <li>5. Term, Termination and Event of Default (two sub parts)</li> <li>6. Disconnection and Reconnection ( one sub part)</li> <li>7. Exchange and Confidentiality of Information (one sub part)</li> <li>8. Transmission Service and other Charges (one sub part)</li> <li>9. Technical and Operating Requirements (five sub parts)</li> <li>Schedules (11 schedules)</li> </ul>	<ul style="list-style-type: none"> <li>The agreement consists of 10 main sections:</li> <li>1. System &amp; Services</li> <li>2. Terms &amp; Termination</li> <li>3. Interconnection Operation</li> <li>4. Liabilities</li> <li>5. Force Majeure</li> <li>6. Regulatory Approvals</li> <li>7. Dispute</li> <li>8. Notice</li> <li>9. General provision</li> <li>Schedule A – connection requirements.</li> </ul>	<ul style="list-style-type: none"> <li>The agreement cosmists of 9 main sections:</li> <li>Recitals</li> <li>1. Intent of Parties</li> <li>2. Operating Authority</li> <li>3. Operating in Charge</li> <li>4. Description</li> <li>5. Suspension of Interconnection</li> <li>6. Safe Work Planning</li> <li>7. Maintenance Outage</li> <li>8. Access</li> <li>9. Revision and Approvals</li> <li>Signatures</li> </ul>	<ul style="list-style-type: none"> <li>The agreement cosmists of 10 main sections plus exhibits:</li> <li>Recitals</li> <li>1. Scope and Limitations</li> <li>2. Inspection, Testing, Authorization and Access</li> <li>3. Term, Termination and Disconnection</li> <li>4. Cost responsibility</li> <li>5. Billing, payment, Milestone, Financial Security</li> <li>6. Assignment, Liability, Indemnity, Force Majeure, Consequential Damages, Default</li> <li>7. Insurance</li> <li>8. Disputes Resolution</li> <li>9. Miscellaneous</li> <li>10. Notice</li> <li>Signatures</li> </ul>	<ul style="list-style-type: none"> <li>The agreement cosmists of 6 main sections and 7 Appendices :</li> <li>Recitals</li> <li>1. Introduction</li> <li>2. Definitions</li> <li>3. Assignment of responsibility</li> <li>4. Work Co-ordination and protection</li> <li>5. Electrical Plant Revisions</li> <li>6. General</li> </ul>	<ul style="list-style-type: none"> <li>The agreement consists of 16 section:</li> <li>Recitals</li> <li>1. Design Requirements</li> <li>2. Representation and Warranties</li> <li>3. Interconnection Device</li> <li>4. Modifications to DG facility</li> <li>5. Insurance</li> <li>6. Indemnification</li> <li>7. Commissioning</li> <li>8. Access</li> <li>9. Disconnection for maintenance</li> <li>10. Disconnection without notice</li> <li>11. Disputes</li> <li>12. Amendments</li> <li>13. Term</li> <li>14. Assignment</li> <li>15. Signatures</li> </ul>	<ul style="list-style-type: none"> <li>The agreement cosmists of 14 main Articles</li> <li>1. Scope and Limitations</li> <li>2. Inspection, Testing, Authorization and Access</li> <li>3. Term, Termination and Disconnection</li> <li>4. Cost responsibility</li> <li>5. Cost responsibility for Network upgrades</li> <li>6. Billing, payment, Milestone, Financial Security</li> <li>7. Assignment, Liability, Indemnity, Force Majeure, Consequential Damages, Default</li> <li>8. Insurance</li> <li>9. Confidentiality</li> <li>10. Disputes</li> <li>11. Taxes</li> <li>12. Miscellaneous</li> <li>13. Notice</li> <li>14. Signatures</li> </ul>
Number of Pages	• 37	• 91	• 18 pages including cover page and table of contents	• 3	• 12	• 12 plus Appendices	• 4	• 28 pages including cover page and table of contents
Table of Constants	• N/A	• 4 pages	• Two pages	• Not included	• Not included	• One page	• Not included	• Two pages

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Recitals	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>4 points</li> </ul>	<ul style="list-style-type: none"> <li>5 items 1/3 of page</li> </ul>	<ul style="list-style-type: none"> <li>two paragraphs</li> </ul>	<ul style="list-style-type: none"> <li>Three points- 1/3 of page</li> </ul>	<ul style="list-style-type: none"> <li>Three paragraphs</li> </ul>	<ul style="list-style-type: none"> <li>5 items ( 1/3 of a page</li> </ul>	<ul style="list-style-type: none"> <li>two statements</li> </ul>
Technical Requirements	<ul style="list-style-type: none"> <li>Appendix F details the connection process with includes Distributor's response time</li> <li>Appendix F details connection requirements which are mainly based on IEEE 1547 and CSA.</li> </ul>	<ul style="list-style-type: none"> <li>Schedules E, F and G detail requirements (23 pages).</li> </ul>	<ul style="list-style-type: none"> <li>Connection requirements are attached as Schedule A. Project Specific connection requirement issued by BC Hydro in addition to the published "35 kV and Below Interconnection Requirements for Power Generators"</li> </ul>	<p>The agreement assumes that all applicators codes and regulations have been met prior to connection</p>	<ul style="list-style-type: none"> <li>Reference to IEEE 1547. Some specific requirements are listed in the agreement</li> </ul>	<ul style="list-style-type: none"> <li>Reference to OEB Distribution System Code, IEEE, CSA, ANSI,</li> </ul>	<ul style="list-style-type: none"> <li>Reference to the Wisconsin Administrative Code PSC 119.</li> </ul> <p>No technical requirements are described in the document with the exception of the requirement of a disconnect switch so as to provide visual isolation for work protection.</p>	<ul style="list-style-type: none"> <li>Reference to IEEE and other standards Some specific requirements are listed in the agreement</li> </ul>
Representations and Warranties	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Sub section each for Generator and Transmitter</li> </ul>	<ul style="list-style-type: none"> <li>included</li> </ul>	<ul style="list-style-type: none"> <li>Not Included</li> </ul>	<ul style="list-style-type: none"> <li>Included in the Miscellaneous</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>5 bullet points</li> </ul>	<ul style="list-style-type: none"> <li>Included in the Miscellaneous</li> </ul>
Cost Allocation/Responsibilities	<ul style="list-style-type: none"> <li>Cost of the required additions and modification of the distribution system to accommodate the generator is borne with the generator</li> </ul>	<ul style="list-style-type: none"> <li>Schedule B covers mechanism for payment of transmission charges but operational costs are not covered</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Cost responsibility of Interconnection facilities and distribution system</li> </ul>	<ul style="list-style-type: none"> <li>Cost of switching beyond prescribed and work responsibility between parties is covered</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Cost responsibility of Interconnection facilities and distribution system</li> </ul>
Interconnection point	<ul style="list-style-type: none"> <li>Isolating disconnect switch required as part of the Technical Requirements</li> </ul>	<ul style="list-style-type: none"> <li>Isolating disconnect switch required as part of the technical requirements in Schedule E</li> </ul>	<ul style="list-style-type: none"> <li>Connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Included in project description</li> </ul>	<ul style="list-style-type: none"> <li>Not mentioned, but part of interconnection approval process and to be shown on the single line diagram which will be attached as an Exhibit</li> </ul>	<ul style="list-style-type: none"> <li>Connection point and interface item well described</li> </ul>	<ul style="list-style-type: none"> <li>Disconnects switch</li> </ul>	<ul style="list-style-type: none"> <li>Not mentioned, but part of interconnection approval process and to be shown on the single line diagram which will be attached as an Exhibit</li> </ul>
Notification of modifications	<ul style="list-style-type: none"> <li>Impact assessment will determine the required modifications for connection</li> </ul>	<ul style="list-style-type: none"> <li>Schedule A gives contact details and Section 28 and Schedule D provide for transmitter approval of certain modifications</li> </ul>	<ul style="list-style-type: none"> <li>three paragraphs outlining notification process and liabilities</li> </ul>	<ul style="list-style-type: none"> <li>Not included except that the DG must meet all of the applicable codes and regulation</li> </ul>	<ul style="list-style-type: none"> <li>One paragraph requiring the generator to give notice prior to change</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>one paragraph outlining notification lead time for the various categories of generation</li> </ul>	<ul style="list-style-type: none"> <li>One paragraph requiring the generator to give notice prior to change</li> </ul>
Insurance	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>No express provision</li> </ul>	<ul style="list-style-type: none"> <li>Liability insurance required - \$5M</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Not a requirement but recommended</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>Liability insurance requirements – two paragraphs</li> </ul>	<ul style="list-style-type: none"> <li>Not a requirement but recommended</li> </ul>
Indemnification	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>Covered in the liability section and Schedule K</li> </ul>	<ul style="list-style-type: none"> <li>Liabilities and Indemnities – three point including insurance requirements</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Five paragraphs in Article 6</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>one paragraph</li> </ul>	<ul style="list-style-type: none"> <li>Five paragraphs in Article 6</li> </ul>
Commissioning and Testing	<ul style="list-style-type: none"> <li>Addressed but not in detail. Based on ESA.</li> </ul>	<ul style="list-style-type: none"> <li>Covered in Section 28 and in the technical</li> </ul>	<ul style="list-style-type: none"> <li>Must follow BC Hydro</li> </ul>	<ul style="list-style-type: none"> <li>Not covered in agreement but</li> </ul>	<ul style="list-style-type: none"> <li>The Generator shall test and</li> </ul>	<ul style="list-style-type: none"> <li>Reference to codes and utility practices</li> </ul>	<ul style="list-style-type: none"> <li>Distributor reserves the right to test of witness</li> </ul>	<ul style="list-style-type: none"> <li>The Generator shall test and inspect its Small Generator</li> </ul>

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	<ul style="list-style-type: none"> <li>Appendix F should be revised to include the complete IEEE 1547 series in which P1547.1 covers commissioning and testing</li> </ul>	requirements for new and modified facilities	commissioning procedures (Separate document)	thoroughly covered the Alberta Distributed Generation Interconnection Guide as Appendix H	inspect its Small Generator Facility and interconnection facilities prior to interconnection, and in accordance with IEEE 1547 Standards.		testing prior to in-service	Facility and interconnection facilities prior to interconnection, and in accordance with IEEE and other standards.
Access to Facility	<ul style="list-style-type: none"> <li>Not Addressed</li> </ul>	<ul style="list-style-type: none"> <li>Section 27.1 and 27.13</li> </ul>	<ul style="list-style-type: none"> <li>requirement for BCH staff to enter the generator's property</li> </ul>	<ul style="list-style-type: none"> <li>requirement for "Wire Owner" staff to enter the generator's property</li> </ul>	<ul style="list-style-type: none"> <li>requirement for Distributor staff to enter the generator's property</li> </ul>	<ul style="list-style-type: none"> <li>requirement for Distributor staff to enter the generator's property</li> </ul>	<ul style="list-style-type: none"> <li>requirement for Distributor staff to enter the generator's property</li> </ul>	<ul style="list-style-type: none"> <li>requirement for Distributor staff to enter the generator's property</li> </ul>
Disconnection for repairs (planned outage)	<ul style="list-style-type: none"> <li>Not addressed</li> </ul>	<ul style="list-style-type: none"> <li>The Transmitter has the right to request disconnection of the generator for maintenance purposes upon reasonable notice</li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro has the right to request disconnection of the generator for maintenance purposes upon reasonable notice</li> </ul>	<ul style="list-style-type: none"> <li>The Wire Owner has the right to request disconnection of the generator for maintenance purposes upon reasonable notice</li> </ul>	<ul style="list-style-type: none"> <li>The distributor has the right to request disconnection of the generator for maintenance purposes upon reasonable notice.</li> </ul>	<ul style="list-style-type: none"> <li>The distributor has the right to request disconnection of the generator for maintenance purposes upon reasonable notice</li> </ul>	<ul style="list-style-type: none"> <li>The distributor has the right to request disconnection of the generator for maintenance purposes upon reasonable notice.</li> </ul>	<ul style="list-style-type: none"> <li>The distributor has the right to request disconnection of the generator for maintenance purposes upon reasonable notice.</li> </ul>
Disconnection without notice	<ul style="list-style-type: none"> <li>Not addressed</li> </ul>	<ul style="list-style-type: none"> <li>Part Six dedicated to disconnection</li> <li>Transmitter reserves the right to disconnect if (among others) :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro reserves the right to disconnect :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> </ul>	<ul style="list-style-type: none"> <li>The Wire Owner reserves the right to disconnect :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> </ul>	<ul style="list-style-type: none"> <li>The Wire Owner reserves the right to disconnect :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> <li>Well covered</li> </ul>	<ul style="list-style-type: none"> <li>Not adequately covered</li> </ul>	<ul style="list-style-type: none"> <li>The Distributor reserves the right to disconnect :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> </ul>	<ul style="list-style-type: none"> <li>The Wire Owner reserves the right to disconnect :</li> <li>Termination of Agreement</li> <li>Non compliance</li> <li>Emergency</li> <li>Default</li> <li>Well covered</li> </ul>
Notices	<ul style="list-style-type: none"> <li>Not addressed</li> </ul>	<ul style="list-style-type: none"> <li>Specified in section 5 and contacts provided in Schedules A and J</li> </ul>			<ul style="list-style-type: none"> <li>Contact of both parties to be provided</li> </ul>	<ul style="list-style-type: none"> <li>Contact of both parties to be provided</li> </ul>		<ul style="list-style-type: none"> <li>Contact of both parties to be provided</li> </ul>
Dispute	<ul style="list-style-type: none"> <li>Not addressed</li> </ul>	<ul style="list-style-type: none"> <li>Part 4 deals with dispute resolution</li> </ul>	<ul style="list-style-type: none"> <li>Parties right to appeal</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>Process Included but not applicable in Ontario</li> </ul>	<ul style="list-style-type: none"> <li>Not covered</li> </ul>	<ul style="list-style-type: none"> <li>Generator right to appeal</li> </ul>	<ul style="list-style-type: none"> <li>Process Included but not applicable in Ontario</li> </ul>
Amendments	<ul style="list-style-type: none"> <li>The Code may be amended only in accordance with the procedures set out by the Board in the licence issued to a distributor.</li> </ul>	<ul style="list-style-type: none"> <li>Section 9 describes amendment procedures.</li> <li>Can't amend without leave of Board except where expressly allowed and mutual agreement</li> </ul>	<ul style="list-style-type: none"> <li>agreement by both parties</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>agreement by both parties</li> </ul>	<ul style="list-style-type: none"> <li>agreement by both parties</li> </ul>	<ul style="list-style-type: none"> <li>agreement by both parties</li> </ul>
Force Majeure	<ul style="list-style-type: none"> <li>Item 2.3 of the main body of the Code covers Force Majeure</li> </ul>	<ul style="list-style-type: none"> <li>Section 16 covers Force Majeure</li> </ul>	<ul style="list-style-type: none"> <li>Outlines Force Majeure conditions</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>Outlines Force Majeure conditions. Two paragraphs</li> </ul>	<ul style="list-style-type: none"> <li>Not Covered</li> </ul>	<ul style="list-style-type: none"> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>Outlines Force Majeure conditions. Two paragraphs</li> </ul>
Assignment	<ul style="list-style-type: none"> <li>Not Addressed</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>	<ul style="list-style-type: none"> <li>Notice required</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>	<ul style="list-style-type: none"> <li>Written notice</li> </ul>

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Term of agreement	<ul style="list-style-type: none"> <li>Required as part of "Condition of Service"</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or is in default</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or default</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or default</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or default</li> </ul>		<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or default</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing until both parties agree to terminate or generator ceases to generate or default</li> </ul>
Attachments	<ul style="list-style-type: none"> <li>Appendix A to G</li> <li>Appendix F covers embedded generation</li> </ul>	<ul style="list-style-type: none"> <li><b>Schedule A:</b> single line diagram, description of the customer's connection point</li> <li><b>Schedule B:</b> transmission services and associated charges</li> <li><b>Schedule C:</b> cure periods for defaults</li> <li><b>Schedule D:</b> fault levels and modifications requiring approval by the transmitter</li> <li><b>Schedule E:</b> general technical requirements</li> <li><b>Schedule F:</b> additional technical requirements</li> <li><b>Schedule G:</b> protection system requirements</li> <li><b>Schedule H:</b> facilities deemed compliant and obligation to comply</li> <li><b>Schedule I:</b> exchange of information</li> <li><b>Schedule J:</b> contacts for purposes of notice</li> <li><b>Schedule K:</b> special provisions</li> </ul>	<ul style="list-style-type: none"> <li>Specific Connection requirements including Single line diagram.</li> <li>Contact List</li> </ul>	<ul style="list-style-type: none"> <li>Single line Diagram and Contact List</li> </ul>	Exhibits to be attached: <ul style="list-style-type: none"> <li>Details of interconnection</li> <li>Operations requirements – as per IEEE 1547</li> <li>Cost sharing</li> <li>Restrictions</li> <li>Copies of Feasibility, Impact and Facilities Study Agreement</li> </ul>	<ul style="list-style-type: none"> <li>Appendix A – Distributor Contacts</li> <li>Appendix B – Customer Contacts</li> <li>Appendix C – Equipment Identification</li> <li>Appendix D - Single line Diagram</li> <li>Appendix E – Contractor notification Form</li> <li>Appendix F - Scheduled time of Operation</li> <li>Appendix G - Addendum</li> </ul>	<ul style="list-style-type: none"> <li>Single line Diagram and Contact List</li> </ul>	Attachments: <ul style="list-style-type: none"> <li>Glossary of Terms</li> <li>Description of Costs</li> <li>One Line Diagram</li> <li>Milestones</li> <li>Additional Operating requirements for Transmitter</li> <li>Transmission Provider estimate</li> </ul>
OTHERS	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
Connection Requirements	<ul style="list-style-type: none"> <li>Appendix F</li> </ul>	<ul style="list-style-type: none"> <li>Technical requirements part of agreement</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>	<ul style="list-style-type: none"> <li>Separate detailed connection requirement document</li> </ul>
Connection Requirement Document	<ul style="list-style-type: none"> <li>Appendix F</li> </ul>	<ul style="list-style-type: none"> <li>The Transmission System Code forms an integral part of the Connection Agreement</li> </ul>	<ul style="list-style-type: none"> <li>35 kV and Below Interconnection Requirements for Power Generators</li> </ul>	<ul style="list-style-type: none"> <li>Alberta Distributed Generation Interconnection Guide</li> <li>67 Pages includes sample agreement as Schedule C</li> </ul>	<ul style="list-style-type: none"> <li>Relies on IEEE 1547, UL 1741 and FERC Order 2006 for certification of generators</li> </ul>	<ul style="list-style-type: none"> <li>OEB Distribution System code and other standards</li> </ul>	<ul style="list-style-type: none"> <li>Wisconsin Administration Code Chapter PSC 119</li> </ul>	<ul style="list-style-type: none"> <li>Connection requirements rely on IEEE and other applicable standards</li> </ul>