

May 1, 2026

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Updating the Generic
Standards for the Interconnection and Operation of
Distributed Generation Facilities Established
under Minn. Stat. §216B.1611
Docket No. E999/CI-16-521
INITIAL COMMENTS

Dear Ms. Bergman:

Minnesota Power (or, the “Company”) respectfully submits the following Initial Comments regarding updating the generic standards for the interconnection and operation of distributed generation facilities established under Minn. Stat. §216B.1611. In the Minnesota Public Utilities Commission (“Commission”) Notice of Comment Period (“Notice”), the Commission identified the following issue related to this docket:

Issue: Should the Commission approve the Technical Subgroup’s (“TSG”) proposed changes to the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (“TIIR”) and the Minnesota Distributed Energy Resources Interconnection Process (“MN DIP”) regarding Battery Energy Storage Systems and Limited/Non-Export Systems? The Commission then identified the following topics open for discussion.

- 1) Should the Commission adopt the TSG proposed changes to the TIIR as found in Attachment B of this Notice?
- 2) Should the Commission adopt the TSG’s proposed changes to the TIIR as found in Attachment C to this Notice?
- 3) What action should the Commission take regarding the three disputed items in the TSG’s report as found in Attachment A to this notice?
- 4) Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the August 13, 2018 Order (paragraph 20)?

- a. Should the Commission make any changes to these reporting requirements?
- 5) Are there other issues or concerns related to this matter?

The Company appreciates the opportunities for collaboration initiated by the Commission and provides the following Initial Comments in response to the topics outlined above. Specifically:

1. Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B of this Notice?

The Company supports the adoption of TSG's proposed changes to the TIIR as found in Attachment B of this Notice, to ensure alignment with national standards like IEEE 1547 subject to the resolution of the contested items discussed in response to issue 3.

2. Should the Commission adopt the TSG's proposed changes to the TIIR Interconnection Process as found in Attachment C to this Notice?

The Company presumes this topic for discussion meant to reference the MN DIP rather than the TIIR. If this is the case, the Company would support the adoption of TSG's proposed changes in Attachment C, subject to the resolution of the contested items discussed in response to issue 3. If the Company's presumption is incorrect and this topic was meant to reference the TIIR, the Company would need to re-evaluate its position.

3. What action should the Commission take regarding the three disputed items in the TSG'S report as found in Attachment A to this notice?

Regarding the three disputed items found in Attachment A, the Company recommends the Commission maintain the use of Nameplate Rating for several reasons, all of which are outlined in the Commission's August 13, 2018, Orders¹. Additionally, the Company prefers the Commission to retain the 20kW rating as it relates to 1.1.5.1.2, but would also support an increase to 40kW, so long as this capacity is in reference to a distributed energy resource ("DER") nameplate rating. Finally, the Company recommends the Commission adopt alternative B for interconnection agreement wording, as explicitly documenting export limitations is critical to ensure transparency and long-term grid reliability.

4. Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the

¹ See *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement*, Docket No. E-999/CI-01-1023 E-999/CI-16-521 (August 13, 2018) available at: <https://efiling.web.commerce.state.mn.us/documents?doSearch=true&dockets=16-521&documentId=&onBehalfOf=&content=&receivedFrom=&receivedTo=>

August 13, 2018 Order (paragraph 20)? Should the Commission make any changes to these reporting requirements?

Regarding the proposed extension of annual reporting on interconnection, the Company would propose that the Commission eliminate this temporary requirement rather than extend it through 2030. The reporting requirements outlined in the August 13, 2018, Order were not intended to be a long-term reporting requirement. Additionally, many of these data points are already captured in other regulatory filings such as the Integrated Distribution Plan ("IDP") and Annual Service Reliability and Service Quality ("SRSQ") reports. If the Commission were to determine that an extension of this temporary Order is required, the Company would propose that the scope of the report should be limited to the existing metrics outlined in the August 13, 2018, Order. If there are certain metrics the Commission or another interested party feels would be absent if this Order were not extended, the Company is willing to participate in working groups or other forums to ensure these metrics can be included in other filings.

5. Are there other issues or concerns related to this matter?

The Company hasn't identified any other issues or concerns to raise at this time and values the inputs provided by participating parties during this engagement process. The company appreciates that this technical working group is intended to help solve engineering-based challenges, contributing to a safe, reliable, and functional interconnection framework to the benefit of all customers.

If you have any questions regarding this filing, please contact me at 1-218-355-3016 jgries@mnpower.com with any questions related to this matter.

Respectfully,



Joshua Gries
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Minnesota Power
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STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 1st day of May, 2026, I electronically filed a true and correct copy of Minnesota Power's Initial Comments in **Docket No. E999/CI-16-521** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Tiana C. Heger