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March 13, 2025



Mr. Will Seuffert
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
Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8227 or canderson@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ *CODY R. ANDERSON*
Cody R. Anderson
Transmission & Distribution Studies Engineer

lcd
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**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

COMMENTS

I. INTRODUCTION

A. The topics open for all parties to comment:

- Are the Xcel-transmission studies permissible under the MN DIP? Address specifically, if Xcel Energy is a Transmission Owner or Transmission Provider and whether the internal transmission studies are Affected System Studies.
 - If the transmission studies aren't permissible should the MN DIP be modified to allow for them to be permissible?
 - If the transmission studies are permissible, should the MN DIP be modified to add more detail or guidelines to that process? What would the specific edits be and why?
- Based on the information derived from the two reports provided to the DGWG on this topic:
 - Is the exact timing and quarterly processing of the Xcel-transmission studies open to being modified? Would it be beneficial to include stakeholder input?
 - Is there any information that deserves further investigation or exploration beyond what was discussed in the reports that the Commission should consider?
- How should the Commission consider impacts of Xcel-transmission studies on interconnection-related or state-goal related programs; such as LMI CSG Program?
- How should the Commission respond to JSA's request of the following?
 - Should Xcel's internal transmission study be stayed until the Commission grants approval?

- Should the Commission open an investigation into Xcel's internal transmission studies and refer the matter to the Distributed Generation Working Group (DGWG)?
- Are there other issues or concerns related to this matter?

II. OTTER TAIL RESPONSES

Otter Tail Power will address the topics open for all parties to comment:

- A. Are the Xcel-transmission studies permissible under the MN DIP? Address specifically, if Xcel Energy is a Transmission Owner or Transmission Provider and whether the internal transmission studies are Affected System Studies.**
- 1. If the transmission studies aren't permissible should the MN DIP be modified to allow for them to be permissible?**
 - 2. If the transmission studies are permissible, should the MN DIP be modified to add more detail or guidelines to that process? What would the specific edits be and why?**

Otter Tail Power concurs with Xcel Energy's (Xcel) December 13, 2024, Transmission Studies for DER Project Report, affirming that Xcel is both a Transmission Owner and Transmission Provider. Xcel owns and operates its transmission facilities, which are used for electricity transmission, thus qualifying as a Transmission Provider. Further, Xcel is a registered Transmission Owner (TO) and Transmission Provider (TP) as listed on the North American Electric Reliability Corporation's active registry.¹

¹ NERC Compliance Functional Registration, see Norther States Power (Xcel Energy) NRC ID# NCR01020, available at https://www.nerc.com/pa/comp/Registration%20and%20Certification%20DL/NERC_Compliance_Registry_Matrix_Excel.xlsx (accessed March 12, 2025).

According to MN DIP, section 4.3.6:

“In instances where the System Impact Study shows potential for Transmission System adverse system impacts, within five (5) Business Days following the identification of such impacts by the Area EPS Operator, the Area EPS Operator shall coordinate with the appropriate Transmission Provider to have the necessary studies completed to determine if the DER causes any adverse transmission impacts.”

Based on these definitions and the clear language in the MN DIP, Otter Tail Power believes Xcel should be able to conduct their own internal Transmission Studies, provided the MISO review trigger threshold of 1 MW aggregate transmission backflow has not been reached. This is because there is potential for adverse impacts on the local Xcel-owned transmission system, even if the MISO review trigger has not yet been met. Xcel conducting internal transmission impact studies under these conditions is permissible and aligns with the statewide interconnection process document, the MN DIP.

B. How should the Commission consider impacts of Xcel-transmission studies on interconnection-related or state-goal related programs; such as LMI CSG Program?

Otter Tail Power supports enabling Transmission Owners, like Xcel, to identify and study adverse impacts on their transmission system. This is crucial, especially when adverse impacts can occur under the MISO review trigger threshold of 1 MW aggregate additional backflow onto the Transmission System. Transmission Owners should retain the authority to study additional flows under the MISO review trigger threshold for adverse system impacts to ensure the reliability of the system. Given the essential nature of these internal Transmission Studies, Otter Tail Power believes the Commission should continue to support the need for these studies apart from the statewide interconnection goals.

C. How should the Commission respond to JSA's request of the following?

- 1. Should Xcel's internal transmission study be stayed until the Commission grants approval?**
- 2. Should the Commission open an investigation into Xcel's internal transmission studies and refer the matter to the Distributed Generation Working Group (DGWG)?**

Otter Tail Power recommends that the Commission deny JSA's request and continue permitting Xcel to conduct necessary internal Transmission Studies to ensure the safety and reliability of their transmission system when the MISO review threshold of 1 MW backflow to the transmission system is not met. Additionally, Otter Tail Power believes the Commission should not open an investigation or refer the matter to the DGWG, as the existing language in section 4.3.6 of the MN DIP clearly allows Xcel to perform these studies as the Transmission Provider.

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

Otter Tail Power emphasizes the importance of this matter due to the varying voltage classes of transmission in Minnesota. MISO studies generally assess transmission voltage levels of 100 kV or higher. Transmission Owners are also responsible to study their transmission systems that are below 100 kV. The lower voltage transmission systems are generally analyzed by Otter Tail Power or other respective utilities in lieu of MISO due to the lower voltage transmission systems not being included within the MISO models. Therefore, Otter Tail Power advocates for allowing Transmission Providers (other than MISO) to study their own transmission-class systems when the voltage level is generally not included within the MISO models. The 1 MW threshold can have a more significant impact on lower voltage transmission systems and adverse impacts could go unnoticed, potentially leading to reliability issues if these internal transmission studies are stayed or eliminated by the Commission.

III. CONCLUSION

In conclusion, Otter Tail Power asserts that JSA's request for the Commission to investigate and potentially halt Xcel's internal transmission study could introduce unwanted reliability problems. Xcel and other Transmission Owners should retain the ability to assess adverse impacts on their transmission facilities, especially when the minimum review criteria threshold for the Independent System Operator (MISO) has not been met. Failing to do so could compromise the overall reliability of the power system by allowing issues to go unnoticed.

Dated: March 13, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ CODY R. ANDERSON

Cody R. Anderson

Transmission & Distribution Studies Engineer

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CERTIFICATE OF SERVICE

**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**

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Comments**

Dated this **13th** day of **March, 2025**.

/s/ LAURA DEWEY
Laura Dewey
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108	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
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110	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	16-521Official Service List PUC
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	16-521Official Service List PUC
112	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
113	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	16-521Official Service List PUC
114	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	16-521Official Service List PUC
115	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	16-521Official Service List PUC
116	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
117	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
118	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	16-521Official Service List PUC
119	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
120	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	16-521Official Service List PUC
121	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
122	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
123	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	16-521Official Service List PUC
124	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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125	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	16-521Official Service List PUC
126	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
127	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	16-521Official Service List PUC
128	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	16-521Official Service List PUC
129	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	16-521Official Service List PUC
130	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	16-521Official Service List PUC
131	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	16-521Official Service List PUC
132	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
133	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
134	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
135	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
136	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	16-521Official Service List PUC
137	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
138	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
139	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
140	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
141	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	16-521Official Service List PUC
142	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
143	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	16-521Official Service List PUC
144	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC
145	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
146	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
147	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street	Electronic Service		No	16-521Official

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157	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	16-521Official Service List PUC
158	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
159	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
160	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
161	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		22636 US Hwy. 59 P.O. Box 788 Worthington MN, 56187-0788 United States	Electronic Service		No	16-521Official Service List PUC
162	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
163	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
164	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	16-521Official Service List PUC
165	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
166	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
167	Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power		PO Box 248 501 S 1st St Montevideo MN, 56265 United States	Electronic Service		No	16-521Official Service List PUC
168	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060	Electronic Service		No	16-521Official Service List PUC

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						United States				
169	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
170	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	16-521Official Service List PUC
171	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	16-521Official Service List PUC
172	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
173	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	16-521Official Service List PUC
174	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
175	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	16-521Official Service List PUC