



Your Touchstone Energy® Cooperative 

September 24, 2019

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association® Comments
In the Matter of Updating the Generic Standards for the Interconnection
and Operation of Distributed Generation Facilities Established under
Minn. Stat. §216B.1611
Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023***

Dear Mr. Wolf:

Dakota Electric Association® (Dakota Electric® or Cooperative) respectfully submits these comments to the Minnesota Public Utilities Commission (Commission or MPUC) in the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611. Dakota Electric appreciates the significant effort put forth by the Commission Staff and all the members of the DG working group to develop both the process documents for interconnection of DER generation and the Technical Interconnection document (TIIR). Over the past three years many people have contributed their time and talents to help shape these documents. This process, while long and labor intensive, has been very educational for the Dakota Electric engineering staff. Dakota Electric is in support of the TIIR document produced through this process.

Regulatory Background and Notice

The Commission issued its January 24, 2017 Order Establishing Workgroup and Process to Update and Improve Statewide Interconnection Standards in Docket No. E-

999/CI-16-521. The update includes two phases: 1) transition Minnesota's distributed generation interconnection process to one based upon the FERC Small Generation Interconnection Procedures (SGIP) and Agreement (SGIA); and 2) update Minnesota's distributed generation interconnection technical requirements.

On August 23, 2019, the Commission issued a *Notice of Comment Period* (Notice) in the above-referenced dockets. The focus of this Notice was identified as follows:

Should the Commission approve, modify or remand to the Technical Subgroup the proposed statewide Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements and associated implementation plan?

The Notice identified the following topic(s) as being open for comment:

- Should the Commission approve the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (Minnesota DER TIIR) as submitted by the Distributed Generation Workgroup's Technical Subgroup? (Attached to this notice.)

Interim Implementation

- Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on implementation of the statewide technical requirements in the interim as IEEE 1547-2018 implementation to UL 1741 certified equipment is complete (anticipated in 2021)? What, if anything else, should the Commission address related to interim implementation?

Utility Technical Specification Manuals

- Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on the scope of an individual utility's Technical Specification Manual (TSM) and the Commission's oversight? What, if anything else, should the Commission address related to the rate-regulated utilities' TSMs?
- Are there other issues or concerns related to this matter?

Dakota Electric Comments

Topic #1: Should the Commission approve the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (Minnesota DER TIIR) as submitted by the Distributed Generation Workgroup's Technical Subgroup?

Dakota Electric is in full support of the TIIR as submitted and urges the Commission to approve this document.

The DG working group has spent well over a year discussing, analyzing, reviewing and conforming the technical information contained within the TIIR. Without approval of the TIIR, Dakota Electric and its members will continue to be required to follow the Commission's approved 2004 Distributed Generation Interconnection Requirements. It is important that the regulated utilities start using the revised Technical Interconnection standards, this includes the TIIR and each utility's TSM document. This is especially true, since the IEEE has replaced the original IEEE 1547 standard with a new 2018 version of the document, that embraces the new interconnection technologies. The TIIR document, which has been prepared by the Minnesota DG Working Group is designed to conform with the new IEEE 1547-2018 national standard. The older 2004 Minnesota Distributed Generation Interconnection Requirements standard does not support the new IEEE-1547 2018 technical standard. In fact, when the existing 2004 DG Interconnection Requirements were written, the IEEE 1547 standard had not yet been published.

The TIIR document that was presented by the DG working group is an initial TIIR standard. The TIIR will need to continue to be modified and evolve. The TIIR as written, provides a foundation upon which the state of Minnesota can build and grow the DER interconnection standards. The TIIR allows the regulated utilities to incorporate the advanced features of the smart inverters as they become available. Approval of this initial TIIR document is important to start Minnesota on the path to utilizing the new technologies which are becoming available.

Topic #2: Interim Implementation

Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on implementation of the statewide technical requirements in the interim as IEEE 1547-2018 implementation to UL 1741 certified equipment is complete (anticipated in 2021)? What, if anything else, should the Commission address related to interim implementation?

As discussed by the DG Working Group, the IEEE 1547.1 and other standards supporting the main IEEE-1547 2018 standard are still being finalized. Inverters and other DG interconnection equipment have not yet been certified to this new IEEE 1547 interconnection standard. This state of flux with the national standards was voiced as a

concern with implementing the TIIR document before the certified equipment is available. However, not approving the TIIR and waiting a year or more for the equipment to become available will force the regulated utilities, the applicants, and the vendors to continue to follow the outdated 2004 version of the Minnesota Distributed Generation Interconnection Requirements and not allow adoption of new technology. Dakota Electric feels the writing group has provided, within the TIIR, wording to allow flexibility for the utilities to adjust the requirements for certified equipment to align with the availability of the certified equipment.

The TIIR in conjunction with each utility's Technical Standards Manuals (TSM) will provide improved information and guidance for applicants and installers of DER. Without approval of the TIIR, each utility will not be able to complete development of their TSM companion document. For example, presently applicants and installers face confusion as to what are the technical requirements for use of the advanced inverter functions. How should the settings within the advanced inverters be configured? Failure to approve the TIIR for use by the utility will only continue this lack of clarity.

Topic #3: Utility Technical Specification Manuals

Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on the scope of an individual utility's Technical Specification Manual (TSM) and the Commission's oversight? What, if anything else, should the Commission address related to the rate-regulated utilities' TSMs?

Dakota Electric believes that there is sufficient language within the TIIR to direct the development of each utility's TSM document. To improve the TSM document, Dakota Electric plans on discussing with the other utilities how they are handling issues. As one utility develops a more efficient method to resolve an issue, the other utilities will learn from each other through a comparison process.

It is clearly understood by each of the utilities, that they benefit by having common requirements & standards with each other. Common requirements are also beneficial for the vendors and installers. Common requirements lower the cost and the labor required to learn and apply the requirements. Unique utility requirements increase the time required to learn and apply those requirements. Unique requirements also cause

issues with vendors not understanding those unique standards which then causes increased costs. Those issues result in additional labor and costs for both the utility and the installer. So, to avoid increased labor costs, utilities are naturally encouraged to keep their TSM document standards as similar to the neighboring utilities as possible and not have unique requirements.

With the new smart inverter technology and energy storage applications, it will take time to develop utility specific TSM documents and many adjustments to those TSM documents will be required. As a utility learns how best to apply the new technologies, the utilities need to be able to quickly modify their TSM documents to allow use of the new technologies. If the process to modify the utilities TSM document requires an extensive, time consuming process to obtain approval of changes to their TSM document, this would become a disincentive for the utility to embrace changes to their TSM document. It would become easier for the utility to just say no to the applicant for innovative uses of the technology. Encouraging each utility to continue to develop and improve their TSM documents, especially during this time of dynamic changes in DER utilization, is important for all parties involved.

Dakota Electric does not believe that the concern that utilities may include excessive requirements in their TSM is a valid concern. While it is possible that a utility could create an excessive requirement, it would be easy through comparisons with other utilities' TSM documents to show that it is an excessive requirement. The first line of protection for excessive requirements is through interaction with the utility and by providing comparisons with other utility TSM documents. If the TSM standard is unreasonable and the utility is unwilling to adjust their standard, then a complaint to the PUC would be the next step. If instead, the Commission decides to tightly regulate the development and modification of a TSM document, with the intent to help avoid unreasonable standards, then the updating process for each regulated utility would be long and require many hours of work. This would become a disincentive for a utility to modify their TSM document once approved.

Dakota Electric would instead recommend the use of an informational filing each time a regulated utility's TSM is updated. The benefits of using an informational filing, is

that anyone who wants to be notified of an updated TSM document could be on the service list and receive notice of an update. Due to the size of the TSM documents it would be best to not require the entire document be included in the update, but a link is provided within the informational notice to the utility's web site, where the TSM is required to be available.

Dakota Electric suggests that instead of spending the time and labor to regulate the TSM documents, it would be better to focus our limited labor resources and efforts on developing a process for updating the TIIR document and supporting incorporating requirements which are found to be common across the regulated utilities. The initial TIIR has many areas which will need to be expanded and improved. As technology changes, the TIIR needs to grow and develop.

As part of the DG Working Group, Dakota Electric heard several proposals for how to continue development of the TIIR document. One of the ways that is used for updating other national standards, is through a proposed change submittal process. A person can submit a change to the code or standard to a review group and periodically the proposed changes are reviewed and incorporated into the standard document if they are approved. This change proposal process would work best if there is a requirement that any proposal for change does not just identify the issue or problem, but also has a specific written solution. The concept is, proposed changes, which do not provide a written specific suggested change to the existing standard language are not accepted for review.

Finally, Dakota Electric believes a Standing Technical Committee should be established, consisting of technical individuals representing the stakeholders, which has responsibility for reviewing the written proposals for changes to the TIIR and then incorporating those changes into the TIIR document. The Standing Technical Committee could then release the updated document to a larger group for discussion and review. This update period should be no shorter than once per year. This revised document will then need to be filed with the Commission and, through a comment and reply comment process, be vetted and then finally the individual changed sections approved or rejected by the Commission.

Conclusion

Dakota Electric appreciates the opportunity to submit these comments and looks forward to implementation of the new technical requirements.

If you have any questions about these comments, please contact me at 651-463-6337 or at cturner@dakotaelectric.com.

Sincerely,

/s/ Craig Turner

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Certificate of Service

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023

Dated this 24th day of September 2019

/s/ Cherry Jordan

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Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nitzan	Goldberger	n.goldberger@energystorage.org	Energy Storage Association	1800 M Street NW Suite 400S Washington, DC 20036	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Groebner	sgroebner@redwoodelectric.com	Redwood Electric Cooperative	60 Pine St Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Timothy	Gulden	timothy.gulden@yahoo.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tom	Guttormson	Tom.Guttormson@connexusenergy.com	Connexus Energy	14601 Ramsey Blvd Ramsey, MN 55303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
James	Haler	jhaler@southcentralelectric.com	South Central Electric Association	71176 Tiell Dr P. O. Box 150 St. James, MN 56081	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Donald	Hanson	dfhanson@ieee.org	Solar Photovoltaic Systems	P. O. Box 44579 Eden Prairie, MN 55344	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John	Harlander	john.c.harlander@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Chris	Jarosch	chris@carrcreekelectricser vice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	2810 Elida Drive Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC