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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

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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
Regulatory Filing Coordinator
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