May 13, 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
REPLY COMMENTS

Dear Ms. Bergman:

Minnesota Power (or, the "Company") respectfully submits the following Reply Comments regarding updating the generic standards for the interconnection and operation of distributed generation facilities established under Minn. Stat. §216B.1611.

I. Background

On April 10, 2026, the Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment Period for Docket *E999/CI-16-521 In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611.* On May 1, 2026, utilities, state agencies, and clean energy advocates filed Initial Comments regarding proposed updates to the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements ("TIIR") and the Minnesota Distributed Energy Resources Interconnection Process ("MN DIP"). While parties reached consensus on many technical updates, the Company noted several parties still disagree regarding metrics and definitions for program applicability and the continuation of reporting requirements. The Company values the breadth of positions taken by interested parties. This diverse dialogue drives positive change and innovation across the industry that ultimately benefits all customers across the State of Minnesota.

II. Discussion

The Company continues to maintain its recommendation that **Nameplate Rating** rather than **Export Capacity** is the more critical metric for determining MN DIP applicability and program eligibility thresholds. Although the Company certainly understands the legal and technical arguments in favor of export capacity and the benefits that would be associated with this change, the Company believes the core of this issue is less about legal technicalities and clean energy development and more about ensuring safe operating practices and grid reliability for the collective benefit of all Minnesota customers. As noted by Xcel Energy ("Xcel") and supported by the Company, relying on Export Capacity *could* allow systems with significant nameplate ratings to bypass more robust study processes intended to ensure large-scale resources can safely be accounted for and integrated into the Electric Power Systems ("EPS"). E*n masse*, the use of export capacity could create unnecessary and unacceptable risks to grid reliability. Should a power control system fail and full nameplate generation be exported to the EPS, a localized failure could have devastating cascading effects on grid performance and reliability, affecting large swaths of customer bases. In this case, the Company believes that this risk and potential impacts largely outweigh any benefit that may be associated with the use of export capacity rather than nameplate rating.

The Company joins Xcel Energy and maintains its recommendation for the elimination of the temporary annual interconnection reporting requirement. The Company certainly does not oppose transparency and compliance or the development of robust records for the sake of public interest. The Company takes great pride in developing trust, collaboration, and innovation through this transparency. However, given that much of the relevant data is already captured in other regulatory filings such as the Integrated Distribution Plan ("IDP") and Safety, Reliability, and Service Quality ("SRSQ") reports, the Company questions whether the administrative burden of these reports will provide reciprocal or even incremental value to the Commission or the Department of Commerce ("Department"). If the Commission were to support the Company's recommendation, the Company would support continued dialogue with interested parties to develop new and potentially more innovative metrics that may provide relatively more value to the Department and the Commission. If the Commission were not to support the Company's recommendation, the Company would still recommend continued dialogue to improve the value of reporting metrics contained in the annual interconnection reporting requirement.

III. Conclusion

Minnesota Power appreciates the collaborative efforts of the Technical Subgroup ("TSG") and the robust dialogue provided by all participating stakeholders. The Company remains dedicated to addressing engineering-based challenges that contribute to safe, reliable, and transparent interconnection processes to the ultimate benefit of all Minnesota 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
Public Policy Advisor
Minnesota Power
30 West Superior St.
Duluth, MN 55802

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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 13th day of May, 2026, I electronically filed a true and correct copy of Minnesota Power's Reply 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