

September 3, 2024

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

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net
Metering Eligibility for Rate-Regulated Utilities**
Docket No. E002, E111, E017, E015/CI-24-200

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and
Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities

The Department recommends that the Commission clarify that utilities should apply the definition of capacity for purposes of tariff eligibility at the point of interconnection. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

SL/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002, E111, E017, E015/CI-24-200

I. INTRODUCTION

The Department provides the following comments In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities.

The discussion in the current docket stems from a prior proceeding that exposed the conflation of the definitions of capacity in differing contexts, namely those of interconnection requirements and for purposes of net-metered rate eligibility. The Department maintains that the statute governing net-metered rate eligibility is clear: capacity is defined at the point of interconnection, or the point of common coupling, with the utility system. Interconnection requirements and the Minnesota Distributed Energy Resource Interconnection Process (MN DIP) serve a distinct purpose and, therefore, consider capacity in a different context. MN DIP contemplates nameplate capacity to allow utilities to assess the safety and reliability related to the interconnection of distributed energy resources (DER). MN DIP ensures that utility concerns regarding safety and reliability are satisfied prior to permitting interconnection, including for systems with power or capacity limitations.

Once DER are approved for interconnection, for purposes of net metering eligibility, utilities should comply with the clear statutory language of Minn. Stat. § 216B.164.

II. PROCEDURAL HISTORY

On October 2, 2023, the Minnesota Solar Energy Industry Association (MnSEIA) objected to language used by Dakota Electric Association (DEA) in its technical specification manual (TSM) regarding the system capacity of an interconnected facility and its net-metered rate eligibility.¹

On October 12, 2023, the Commission issued a Notice of Comment Period on whether the Commission should take any action on MnSEIA’s Objection.²

¹ *Objection of MNSEIA to Portion of Dakota Electric Association’s TSM Related to Qualified Facilities with Capacity Less than 40 kW – 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 (October 2, 2023).* (eDocket [202310-199324-01](#)). Hereinafter “Objection.”

² *Notice of Comment Period – In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (October 12, 2023).* (eDocket [202310-199548-01](#)).

On April 11, 2024, the Commission considered the matter and determined further exploration of the issues raised regarding the definition of “capacity” is warranted.³

On May 22, 2024, the Commission issued its Order initiating a proceeding into the application of the definition of “capacity.”⁴

On June 4, 2024, the Commission issued a Notice of Comment Period⁵ in the present docket requesting that parties comment on the following:

How should the Commission apply the definition of “capacity” in Minn. Stat. § 216B.164 and Associated Rules without creating reliability problems related to net-metering rate eligibility for rate-regulated utilities?

The Notice identified the following topics open for comments:

- How should the Commission consider the “capacity” definition in Minn. Stat. § 216B.164 and associated rules on net metering eligibility for rate-regulated utilities?
- What should the Commission consider regarding the definition of “capacity” as it relates to reliability and net metering rate eligibility?
- Are there other issues or concerns related to this matter?

On July 30, 2024, the Commission extended the comment period at the request of the Minnesota Rural Electric Association (MREA), DEA, MnSEIA, Xcel Energy, Minnesota Power, and Otter Tail Power.⁶

III. DEPARTMENT ANALYSIS

The Department responds to each of the notice topics below.

³ *Staff Briefing Papers – In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (April 11, 2024).* (eDocket [20244-204954-02](#)). Hereinafter “April 11, 2024 Briefing Papers.”

⁴ *Order Initiating Proceeding Into Definition of “Capacity” – In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (May 24, 2024).* (eDocket No. [20245-207026-02](#)). Hereinafter “May 22, 2024 Order.”

⁵ *Notice of Comment Period - In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities, Docket No. E002, E111, E017, E015/CI-24-200 (June 4, 2024).* (eDocket No. [20246-207384-01](#)). Hereinafter “Notice.”

⁶ *Notice of Extended Comment Period - In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities, Docket No. E002, E111, E017, E015/CI-24-200 (July 30, 2024).* (eDocket No. [20247-209118-01](#)).

A. *THE “CAPACITY” DEFINITION IN MINN. STAT. § 216B.164 AND ASSOCIATED RULES*

The Commission identified the following topic open for comments in its Notice:

How should the Commission consider the “capacity” definition in Minn. Stat. § 216B.164 and associated rules on net metering eligibility for rate-regulated utilities?

As identified in Section II, the issues put forth for discussion in this proceeding stem from MnSEIA’s Objection to specific language used in DEA’s TSM regarding system capacity and net-metered rate eligibility. Namely, MnSEIA objected to the use of “aggregate nameplate capacity” for purposes of determining net-metered rate eligibility.⁷ While the objection was specific to a single reference in DEA’s TSM and, ultimately, remedied by the deletion of the sentence containing the contested reference,⁸ the proceeding revealed a broader dispute regarding the application of the definition of capacity as it relates to net-metered rate eligibility among utilities beyond just DEA. Both the MREA⁹ and the Minnesota Municipal Utility Association¹⁰ (MMUA) submitted comments supporting DEA’s use of nameplate capacity as consistent with statutes and industry practices.¹¹

The proceeding revealed a conflation of the application of the definition of capacity for purposes of net-metered rate eligibility and interconnection requirements. Net-metered rate eligibility is established in Minn. Stat. § 216B.164 and the associated rules in Minn. Rules Chapter 7835. Meanwhile, the process for establishing interconnection requirements is set forth in Minn. Stat. § 216B.1611, which, subsequently, resulted in the creation of the Minnesota Distributed Energy Resource Interconnection Process (MN DIP)¹² and the related Minnesota Technical Interconnection and Interoperability Requirements (TIIR).¹³ Further, the TSM at question in MnSEIA’s Objection lays out

⁷ Objection at 1.

⁸ May 22, 2024 Order at Order Point 1.

⁹ *Comments, Minnesota Rural Electric Association, In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (January 12, 2024).* (eDocket No. [20241-202140-01](#)).

¹⁰ *Comments, Minnesota Municipal Utilities Association, In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (January 12, 2024).* (eDocket No. [20241-202157-01](#)).

¹¹ The Department notes that the Commission’s Notice explicitly frames the issue in this docket as it relates to rate-regulated utilities.

¹² *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement – In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Laws 2001, Ch. 212; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E999/CI-01-1023, E999/CI-16-521 (August 13, 2018).* (eDocket No. [20188-145752-02](#)).

¹³ *Order Establishing Updated Technical Interconnection and Interoperability Requirements – In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Laws*

the technical requirements specific to DEA’s system, consistent with the TIIR and MN DIP. Commission Staff created a helpful table summarizing the statutes, rules, and relevant documents for both net-metered rate eligibility and interconnection requirements to highlight the distinct purposes, which the Department recreates here to inform the discussion in this proceeding:

Department Table 1: Relevant Minnesota Statutes and Rules for Net Metering Rates and Interconnection Requirements¹⁴

Topic	Net Metering Rates	Interconnection Requirements
Statute	Minn. Stat. § 216B.164	Minn. Stat. § 216B.1611
Rules or Order	Minn. R. Ch. 7835 or Cooperative Rules	MN DIP (includes MNDIA/TIIR) or Cooperative version
Relevant Utility Document	Utility Tariff on Rates	Utility Interconnection Tariff and TSM
DEA Tariff/Documents	Schedule 55 Parallel Generation Rate	

The reference in DEA’s TSM to net-metered rate eligibility, therefore, conflated the distinct purposes of rate eligibility and interconnection requirements and was removed per the Commission Order to avoid confusion.¹⁵

Net-metered rate eligibility is a distinct consideration from interconnection requirements and, therefore, the governing statute for net-metered rate eligibility should control for how to consider capacity. The governing statute, Minn. Stat. § 216B.164, provides a clear definition of capacity for the purposes of determining eligibility:

*“Capacity” means the number of megawatts alternating current (AC) at the point of interconnection between a distributed generation facility and a utility’s electric system.*¹⁶

Minn. R. Ch. 7835 are the rules promulgated to implement Minn. Stat. § 216B.164 and provide additional guidance for purposes of understanding capacity in the context of net-metered rate eligibility. First, Minn. R. 7835.0100, Subp. 4 defines capacity as, “the capability to produce, transmit, or deliver electric energy, and is measured by the number of megawatts alternating current at the point of common coupling between a qualifying facility and a utility’s electric system.”¹⁷ Further, Minn. R. 7835.0100, Subp. 17a defines “point of common coupling” as “the point where the qualifying

2001, Ch. 212; *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611*, Docket Nos. E999/CI-01-1023, E999/CI-16-521 (January 22, 2020). (eDocket No. [20188-145752-02](#)).

¹⁴ April 11, 2024 Briefing Papers at 15.

¹⁵ May 22, 2024 Order at Order Point 1.

¹⁶ [Minn. Stat. § 216B.164, Subd. 2a\(c\)](#)

¹⁷ [Minn. R. 7835.0100, Subp. 4](#)

facility's generation system, including the point of generator output, is connected to the utility's electric power grid."¹⁸

The definition of capacity under Minn. Stat. § 216B.164 and the associated rules in Minn. R. Ch. 7835 provide clear guidance that capacity is defined at the point of interconnection, also called the point of common coupling, with the utility system. For purposes of net-metered rates, then, capacity at the point of interconnection determines eligibility rather than nameplate capacity. Unlike in the context of interconnection requirements—discussed further below, and in which capacity is, at times, explicitly defined as nameplate capacity—Minn. Stat. § 216B.164 and Minn. R. Ch. 7835 consistently utilize the point of interconnection for purposes of defining capacity in the context of net-metered rate eligibility. In this context, then, utilities should abide by the definition of capacity provided in the governing statute.

Minn. Stat. § 216B.164 is the statutory application of the federal Public Utility Regulatory Policies Act (PURPA) and the related Federal Energy Regulatory Commission (FERC) regulations in Minnesota.¹⁹ Specific parts of Minn. Stat. § 216B.164 and Minn. R. Ch. 7835, therefore, reference relevant portions of PURPA and FERC regulations, namely Code of Federal Regulations, title 18, part 292 (18 CFR 292). 18 CFR 292 established that cogeneration or small power production facilities meeting certain criteria are qualifying facilities (QF) and the QF language carried over to Minn. Stat. § 216B.164 and Minn. R. Ch. 7835. Minn. R. 7835.0100, Subp. 19 defines a QF as one that satisfies the conditions of 18 CFR 292.²⁰ While QF is not defined in Minn. Stat. § 216B.164, it is used throughout the statute. For purposes of small power production facilities, most relevant to the discussion in this proceeding, the conditions laid out to qualify as a QF pertain to system size and fuel use.²¹

In contrast, “net metered facility” is defined in both Minn. Stat. § 216B.164 and Minn. R. 7835.0100, Subp. 15a as, “an electric generation facility constructed for the purpose of offsetting energy use through the use of renewable energy or high-efficiency distributed generation sources.”²² Thus, Minn. Stat. § 216B.164 and Minn. R. 7835.0100 contemplate net-metered facilities as distinct from a QF and the limitations for a net metered facility to offset energy use would only apply when the relevant statute or rule refers to a net-metered facility. Elsewhere in the statute and rules where the term QF is used, the broader definition, absent an obligation to offset energy use, would apply. However, for both a QF and a net-metered facility, the capacity as defined at the point of interconnection applies.

The implication of applying the definition of capacity at the point of interconnection for purposes of net-metered rate eligibility allows systems with nameplate capacity higher than the statutory capacity limits to remain eligible, provided they limit capacity at the point of interconnection below the relevant

¹⁸ [Minn. R. 7835.0100, Subp. 17a](#)

¹⁹ [Minn. Stat. § 216B.164, Subd. 2](#)

²⁰ [Minn. R. 7835.0100, Subp. 19](#)

²¹ [18 CFR 292.203](#)

²² [Minn. Stat. § 216B.164, Subd. 2a\(j\)](#), [Minn. R. 7835.0100, Subp. 15a](#)

threshold. DEA²³ and other parties raised concerns with this outcome, as it would incentivize larger DER systems to access the more lucrative average retail rate,²⁴ shifting distribution costs to other ratepayers.

The Department recognizes this concern. Nonetheless, Minn. Stat. § 216B.164 sets net-metered rate eligibility and, therefore, systems with capacity at the point of interconnection below the statutory limit—namely 40 kW_{ac} for purposes of the average retail rate under Minn. Stat. § 216B.164, Subd. 3(d)—remain eligible. The statute does not exclude the outcomes contemplated by commenters during the previous proceeding, but the concerns remain hypothetical and unquantified. It is not clear to the Department the extent of the potential problem caused by such systems retaining net-metered rate eligibility.

The statute contemplates the potential impact of larger systems on other ratepayers. Minn. Stat. § 216B.164 provides mechanisms for purposes of protecting ratepayers from excessive potential impacts of DER systems. First, Minn. Stat. § 216B.164, Subd. 4c provides public utilities the ability to limit the generation capacity of systems to 120 percent of the customer’s on-site maximum electric demand, for wind generation, or annual electric energy consumption, for solar or other distribution generation.²⁵ Second, Minn. Stat. § 216B.164, Subd. 3(a) provides cooperative and municipal utilities the ability to charge an additional fee to net-metered customers for purposes of recovering remaining fixed costs.²⁶ Should the hypothetical cost impacts materialize from larger systems retaining net-metered rate eligibility, Minn. Stat. § 216B.164 provides a potential resolution. As the likelihood and magnitude of such impacts remain hypothetical and unknown, they provide insufficient grounds to apply the definition of capacity in a manner inconsistent with the clear statutory language.

Further, DER system owners are required to operate their systems per the terms laid out in the interconnection agreement signed prior to the utility connecting their systems. The DER system owner provides the necessary information in the interconnection application to inform the utility of the system’s operation, including the amount of energy which can be exported onto the utility’s system. If the DER owner violates the terms of the agreement, including exporting energy at a higher capacity than stated in the interconnection agreement, the utility has recourse to provide notice of default to the owner and, potentially, terminate the interconnection agreement.²⁷

Finally, Minn. Stat. § 216B.164, Subd. 1 indicates, “[t]his section shall at all times be construed in accordance with its intent to give the maximum possible encouragement to cogeneration and small

²³ *Comments, Dakota Electric Association, In the Matter of Dakota Electric’s Updates to Specific Distribution Interconnection Process and Interconnection Agreement; In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distribution Generation Facilities Established Under Minn. Stat. § 216B.1611, Docket Nos. E111/M-18-711, E999/CI-16-521 (January 12, 2024).* (eDocket No. [20241-202121-01](#)). DEA Comments at 5.

²⁴ [Minn. Stat. § 216B.164, Subd. 3\(d\)](#)

²⁵ [Minn. Stat. § 216B.164, Subd. 4c](#)

²⁶ [Minn. Stat. § 216B.164, Subd. 3\(a\)](#)

²⁷ See [MN DIA Article 3.3 and 7.7](#)

power production consistent with protection of the ratepayers and the public.”²⁸ The statutory intent is to maximize the encouragement of cogeneration and small power production. The statute also provides protection for ratepayers and the public. The maximum possible encouragement to cogeneration and small power production dictates that the application of the definition of capacity for purposes of net-metered rate eligibility be consistent with the language of the governing statute, namely that capacity is defined at the point of interconnection.²⁹

B. THE DEFINITION OF “CAPACITY” AS IT RELATES TO RELIABILITY AND NET METERING RATE ELIGIBILITY

The Commission identified the following topic open for comments in its Notice:

What should the Commission consider regarding the definition of “capacity” as it relates to reliability and net metering rate eligibility?

As outlined above in Table 1, the safety and reliability of the electric system as it relates to the interconnection of DER is addressed in Minn. Stat. § 216B.1611 and the resulting process and technical requirements established in MN DIP and the TIIR. For purposes of interconnection requirements, DER capacity is referred to in a distinct manner from that of net-metered rate eligibility. This distinct approach is appropriate for the context, given the safety and reliability concerns related to interconnection, but it also must remain distinct from net-metered rate eligibility.

MN DIP contemplates interconnection standards for multiple DER systems at a single point of interconnection. The MN DIP glossary defines DER as follows:

A source of electric power that is not directly connected to a bulk power system. DER includes both generators and energy storage technologies capable of exporting active power to an EPS [electrical power system]. An interconnection system or a supplemental DER device that is necessary for compliance with this standard is part of a DER. For the purpose of the MN DIP and MN DIA, the DER includes the Customer’s Interconnection Facilities but shall not include the Area EPS Operator’s Interconnection Facilities.³⁰

Further, MN DIP provides guidance on the application of the definition of capacity in the context of interconnection requirements. MN DIP section 5.14 provides guidance on the capacity of DER as follows:

5.14.1 If the Interconnection Application is for an increase in capacity for an existing DER, the Interconnection Application shall be evaluated on the basis of the new total

²⁸ [Minn. Stat. § 216B.164, Subd. 1](#)

²⁹ [Minn. Stat. § 216B.164, Subd. 2a\(c\)](#)

³⁰ [MN DIP Glossary of Terms at 1.](#)

alternating current (“AC”) capacity of the Distributed Energy Resource. The maximum capacity of a Distributed Energy Resource shall be the Aggregate Nameplate Rating or may be limited as described in 5.14.3.

5.14.2 An Interconnection Application for a DER that includes a single or multiple energy production devices at a site for which the Interconnection Customer seeks a single Point of Common Coupling shall be evaluated on the basis of the Aggregate Nameplate Rating of the multiple DERs unless 5.14.3 applies.

5.14.3 If the maximum capacity of the DER(s) is limited (e.g., through use of a control system, power relay(s), or other similar device settings or adjustments), then the Interconnection Customer must obtain the Area EPS Operator’s agreement that the manner in which the Interconnection Customer proposes to implement such a limit will effectively limit active power output so as to not adversely affect the safety and reliability of the Area EPS Operator’s system. Such agreement shall not be unreasonably withheld. If the Area EPS Operator does not so agree, then the Interconnection Application must be withdrawn or revised. Nothing in this section shall prevent an Area EPS Operator from considering an output higher than the limited output (e.g. Aggregate Nameplate Rating), if the limitations do not provide adequate assurance, when evaluating system impacts. See Minnesota Technical Requirements for more detail.³¹

MN DIP’s usage of aggregate nameplate rating to define capacity in the context of interconnection requirements is distinct from that of net-metered rate eligibility, and it is appropriate in that context. For purposes of evaluating the safety and reliability of the interconnection of the proposed DER system, the aggregate nameplate rating provides utilities with a more conservative approach for assessing system safety and reliability impacts, as it effectively assumes the maximum potential impact to the utility’s system.

The notable exception to the use of aggregate nameplate rating is outlined in MN DIP 5.14.3, above, in which the interconnection of a DER with capacity limited below that of its nameplate capacity. This alternative capacity definition, however, retains significant discretion for the utility to ensure its concerns regarding safety and reliability are sufficiently addressed. Specifically, any limited DER resource “must obtain the Area EPS Operator’s agreement that the manner in which the Interconnection Customer proposes to implement such a limit will effectively limit active power output so as to not adversely affect the safety and reliability of the Area EPS Operator’s system.”³² Absent the utility’s agreement, the interconnection application must be withdrawn or revised to satisfy the utility’s concerns. Importantly, the utility also retains the right to evaluate system impacts “considering

³¹ [MN DIP at 29-30.](#)

³² *Ibid.*

an output higher than the limited output (e.g. Aggregate Nameplate Rating), if the limitations do not provide adequate assurance.”³³

Therefore, MN DIP lays out the process to address the safety and reliability concerns of the utility to arrive at a signed interconnection agreement. The interconnection agreement, in turn, lays out the terms by which the DER system must operate, including power export limits and the manner in which the limits are put in place by the owner that satisfy the utility’s concerns. Any operation of the DER system that does not comply with the interconnection agreement can be addressed by the utility through the mechanisms described in the agreement.³⁴

The technical requirements for power control limiting are described in further detail in TIIR section 11. Multiple reasons and mechanisms for power control limiting are noted, including a control system, relaying, or sizing to load, but importantly “the use and method for Power Control limiting shall require approval from the Area EPS Operator.”³⁵ With the utility’s approved method, the DER system capacity can be limited and “the limited DER AC capacity value may be used by the Area EPS Operator when performing impact studies if the means of limiting capacity is determined to be adequate by mutual agreement.”³⁶ Once again, the utility retains authority to ensure its safety and reliability concerns regarding DER interconnection are fully satisfied prior to interconnection, and the DER operator must abide by the terms of the interconnection agreement.

In addition to abiding by the terms of the interconnection agreement, MN DIP also requires DER owners to purchase and maintain general liability insurance.³⁷ While not a reliability safeguard in itself, this requirement does provide a means for compensation in the event of operational issues impacting the system. Further, utility installation of advanced metering infrastructure offers utilities advanced monitoring capabilities to detect events that pose safety risks to the distribution grid. Future deployments of DER Management Systems will offer the capability to utilize remote shutoff capabilities to preserve the integrity of the distribution grid.

Through the safety and reliability assurances outlined in MN DIP and TIIR, utility concerns will be satisfied upon arriving at a signed interconnection agreement. However, nothing in the process to arrive at a signed interconnection agreement negates the proper treatment of DER owners for purposes of net-metered rate eligibility as outlined in Minn. Stat. § 216B.164.

The relationship between the interconnection requirements outlined in MN DIP and net-metered rate eligibility is ordinal. First, a facility must apply for interconnection and proceed through the interconnection process laid out in MN DIP, utilizing the MN DIP capacity definition. Once a facility

³³ *Ibid.*

³⁴ See [MN DIA Article 3.3 and 7.7](#)

³⁵ [TIIR 11.1 at 35.](#)

³⁶ [TIIR 11.2 at 36.](#)

³⁷ [MN DIP 5.10 at 27, MN DIA 8 at 17.](#)

completes the necessary studies and reviews and completes an interconnection agreement, then the capacity definition for purposes of net-metered rate eligibility in Minn. Stat. § 216B.164 applies.

C. OTHER ISSUES OR CONCERNS

The Commission identified the following topic open for comments in its Notice:

Are there other issues or concerns related to this matter?

The Department has no other issues or concerns related to this matter.

IV. CONCLUSION AND RECOMMENDATION

The Department appreciates the opportunity to provide comments for Commission consideration in this matter. As the Department outlined in these comments, the governing statute is clear that capacity is defined at the point of interconnection with the utility system with respect to net-metered rate eligibility. The Department recommends the Commission clarify that utilities should apply the definition of capacity for purposes of tariff eligibility at the point of interconnection.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002, E111, E017, E015/CI-24-200

Dated this **3rd** day of **September 2024**

/s/Sharon Ferguson

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-200_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Danielle	DeMarre	danielle.demarre@allenergysolar.com	All Energy Solar	1264 Energy Lane St Paul, MN 55108	Electronic Service	No	OFF_SL_24-200_Official
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_24-200_Official
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_24-200_Official
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Kristin	Dolan	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	1725 US Hwy 12 E. Ste 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_24-200_Official

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John R.	Dunlop, P.E.	JDunlop@RESMinn.com	Renewable Energy Services	Suite 300 448 Morgan Ave. S. Minneapolis, MN 554052030	Electronic Service	No	OFF_SL_24-200_Official
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_24-200_Official
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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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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_24-200_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_24-200_Official
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_24-200_Official
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_24-200_Official
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_24-200_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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