



March 13, 2025

VIA E-FILING

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/M-16-521
INITIAL COMMENTS**

Dear Mr. Seuffert:

On February 10, 2025, the Commission issued a notice of comment on whether the Commission should open an investigation into Xcel Energy's internal transmission study process, if the Commission should halt Xcel's study process until it is approved by the Commission, and whether to amend the Minnesota Distributed Energy Resources Interconnection Process (or, "MNDIP") to clarify the Affected System Study process.

Attached are Minnesota Power's comments in this matter.

Please contact me at (218) 355-3178 jmccullough@mnpower.com with any questions related to this matter.

Respectfully submitted,



Jess McCullough
Public Policy Advisor

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

In the Matter Updating the Generic Standards
for Interconnection and Operation of
Distributed Generation Facilities Established
Under Minn. Stat. § 216B.1611

Docket No. E999/M-16-521

INITIAL COMMENTS

I. INTRODUCTION

On February 10, 2025, the Minnesota Public Utilities Commission (or, “Commission”) issued a Notice of Comment Period relating to the disputed legality of Xcel Energy’s internal transmission study process as described in a report filed with the Distributed Generation Working Group on December 17, 2024. Minnesota Power (or, the “Company”) submits its responses to this Notice in the following section.

II. TOPICS OPEN FOR COMMENT

- 1) *Should the Commission grant the Joint Solar Association's (JSA) request to open an investigation into Xcel Energy's internal transmission study process which began in October 2023 and direct Xcel to cease this study process until it receives approval from the Commission?*

Minnesota Power does not believe it is necessary for the Commission to open an investigation into this matter. The Minnesota Distributed Energy Resources Interconnection Process (or, "MN DIP") 4.3.8 states "A Transmission System impact study, if required, shall be completed and the results transmitted to the Interconnection Customer in as timely a manner as possible after the transmission system impact study agreement is signed by the Parties." Due to the variable levels of interconnection demand across Minnesota, the Company supports allowing transmission owners the flexibility needed to conduct these studies in a timely and efficient manner.

- 2) *Should the Commission amend the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) to further clarify the Affected System Study process when the Transmission Owner is also the Area EPS Operator (e.g. Xcel Energy)?*

The Company does recognize the benefits of clarifying the process for such studies in the MN DIP. Should the Commission decide to amend the MN DIP, the Company recommends that the potential for a transmission impact study be made clear to the applicant at the start of the interconnection process and that such studies are a necessary part of the interconnection process for reliability reasons, as established in North American Electric Reliability Corporation (or, "NERC") standards and Midcontinent Independent System Operator (or, "MISO") transmission planning practices.

III. CONCLUSION

The Company recognizes that undue delays in the interconnection process are undesirable for customers and utilities. However, potential impacts to the transmission system must be assessed for safety and reliability reasons. For this reason, the Company supports modifications to the MN DIP that would allow customers to factor in the potential of a system impact study in their planning process.

Dated: March 13, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jess McCullough".

Jess McCullough
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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 March, 2025, I electronically filed a true and correct copy of Minnesota Power's Initial Comments in **Docket No. E999/M-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 E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger