

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

July 21, 2017

RE: REPLY COMMENTS COMMISSION INQUIRY INTO THE CREATION OF A COMMISSION SUBCOMMITTEE UNDER MINN. STAT. §216A.03, SUBD. 8 DOCKET NO. E999/CI-17-284

CURE- Communities United for Responsible Energy

Dear Mr. Wolf,

Since 1985, CURE has been involved in numerous dockets related to energy planning and infrastructure permitting. Our comments have often included process evaluation and recommendations. In the last 15 years, we have particularly focused on community and distributed generation. We write to support the PUC staff's recommendation for the implementation of a DG subcommittee, and the comments of the supporting parties.

We have carefully reviewed the record of comments. It is important to the implementation of the subcommittee that it be immediately authorized by the commission. The Commission's investigations, dockets on distribution system planning and grid modernization; the investments of all parties in these proceedings; and the effective implementation of distributed generation projects will all be well served by immediate appointment of this subcommittee. The subcommittee will be a place to implement and test policy, to better connect opportunities represented by the parties with policy goals, and to provide an ongoing platform. It will allow the Commission to support a more direct and inclusive vehicle for addressing and/or resolving specific questions and issues, such as those represented in the comments.

The comment period has resulted in the development of a very thorough set of comments and issues. After the timely appointment of the subcommittee, and a review of the comments by staff, the Commission could consider the efficacy of developing a one day or half day technical conference to work through the scope of the subcommittee so that it can address the most pressing issues in a timely fashion, develop a work plan, and lay out immediate, intermediate and mid-term items for consideration by the committee.

But regardless of what type of DG subcommittee process is implemented, we agree with Xcel and other parties, that: "there should be a planned evaluation and review period to examine lessons learned and necessary adjustments. We suggest that the initial review and information gathering take place during the first 12 months of the DG subcommittee's operation. The review should include a plan for a systematic evaluation, identifying the goals and results that are examined, listing the information and data that will be collected, and discussing how the data is tied to the results and helps to answer whether the goals were met".

Thank you for your consideration of our comments.

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