

July 21, 2017

Daniel Wolf
Minnesota PUC
121 7th Place, Suite 350
Saint Paul, MN 55101

Docket 17-284 Comments

Dear Mr. Wolf,

I appreciate the PUC's proposal for a subcommittee to resolve disputes related to solar and distributed generation in a timely and fair way. I offer some feedback on the commission's questions open for comment with the primary request that any system adopted by the Commission to resolve DG complaints should include someone with technical expertise in the dispute being decided. This person needs to be considered with standing on par with that of the utility. The utilities set the conditions of interconnection for customers yet sometimes misinterpret codes and standards, and will not accept an engineering argument or even simple logic as to the validity of their position.

I recommend requiring utilities to post additional details and respond to arguments on complaints by DG installers and stakeholders. In addition, require as part of the annual reporting to separate out and provide more description on complaints involving DG so that the state would have more data available and stakeholders could identify common issues across utilities.

The single most important part of any complaint resolution will be to include an expert familiar with distribution engineering knowledge and expertise. This will allow the subcommittee or the Consumer Affairs Office (CAO) or Commission to make unbiased decisions based on current electrical codes, standards and engineering practices. The State created the monopoly utility territories for the public good and has a responsibility to diligently protect captive customers' interests for the public good.

In all cases the Subcommittee, CAO, or Commission must take seriously the legal requirement that the burden is on the monopoly utility when there is a disputed matter. The utility is the gatekeeper for interconnections like solar, wind and storage. More customers will want these technologies over time and effective regulation is important to allow customers to interconnect under conditions that are fair, sound in practice and engineering and not unnecessarily expensive. This is why I appreciate that the PUC is attempting to acknowledge and do something about the technical nature of DG complaints.

A trained unbiased engineer with technical qualifications is essential for the success of any dispute resolution process.

Sincerely,

Darryl Thayer
Owner DT Renewables, DG instructor, electrician, and engineer