



Your Touchstone Energy® Cooperative 

October 11, 2019

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association® Reply Comments
In the Matter of Updating the Generic Standards for the Interconnection
and Operation of Distributed Generation Facilities Established under
Minn. Stat. §216B.1611
Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023***

Dear Mr. Wolf:

Dakota Electric Association® (Dakota Electric® or Cooperative) respectfully submits these Reply Comments to the Minnesota Public Utilities Commission (Commission or MPUC) in the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611.

Dakota Electric Reply Comments

Dakota Electric is pleased to see that the initial comments from stakeholders agreed that it is urgent to get the updated technical standards in place and that, with few exceptions, there is widespread support for adopting the proposed TIIR document as developed by the DG working group. It was also apparent that there is a strong need to continue development of the technical standards and for the creation of a process to ensure periodic changes to the technical standards. Dakota Electric continues to support the adoption of the TIIR as presented by the DG working group and then, through a clearly defined update process, continue to improve the TIIR document.

As a member of both the DG working group and the smaller TIIR writing group, Dakota Electric was directly involved with the group's decisions as to what was included within the initial TIIR document and what was not included. Some of the initial comments have pointed out that the TIIR as proposed, is not as comprehensive as members of the DG working group had wished and have commented that additional changes are required within the TIIR to make it more comprehensive. Dakota Electric agrees that additional work is needed to enhance the TIIR document and is recommending future development of the TIIR, but in many areas the national technical standards are still under development so the TIIR standards in those areas must wait until the national standards are completed.

The decisions as to what should be included within the initial TIIR standard and what should be left for future TIIR development was a topic of many of the writing group sessions. The TIIR writing group was challenged with how far the initial TIIR standard should go in developing new technical standards and when the TIIR should be silent on technical issues and wait for the national standards to be developed. There were many subject areas within the TIIR where national standards are still under development. In those areas, the TIIR writing group decided to not start developing Minnesota specific technical standards, which would have a high possibility of being out-of-step with the national standards that are developed. There are several on-going national standards being modified or developed, including changes to the IEEE 1547-2018 standard, in the category III ride through settings and the development of an updated IEEE 1547.1 for equipment conformance test procedures. As these updated standards are approved, Minnesota should proceed with updating the TIIR, not before. If instead, Minnesota decides to create unique Minnesota standards in these areas and those unique Minnesota technical standards are different than the final approved national technical standards, then the electric utilities in Minnesota will be placed in a difficult position as to which of the conflicting technical standards they follow. Instead, the TIIR wiring group chose to limit the scope of the initial TIIR in these areas and to wait for the national technical standards to be developed.

Dakota Electric agrees that the TIIR document needs to continue to be enhanced and is supportive of a clearly defined process. This process needs to be set up to allow identification of areas where the TIIR should be enhanced, creation of a technical body

that will take the proposed modifications and identify which ones need to be addressed and a process to periodically develop and obtain approval for enhancements to the TIIR. The identification portion of this process needs to have the ability for stakeholders to identify problems or shortcomings within the existing TIIR document and needs to require the entity reporting the issue, to also provide a detailed written solution proposal. This would help the review group fully understand the scope of the proposal and provide the review group with a foundation upon which they could use to enhance the TIIR document.

Dakota Electric is not in support of any delays in approval of the proposed TIIR document, as it is necessary to have the TIIR document in place to support the new DIP process and to replace the existing Minnesota Technical Standards which were developed over a decade ago.

Energy Storage

Within Fresh Energy and IREC's comments they discussed energy storage systems and the need for improving the TIIR technical standards for energy storage. Dakota Electric agrees that within the TIIR, energy storage standards are not complete and need to continue to be enhanced. Dakota Electric also agrees that the development and use of energy storage will be a significant element in support of the integration of other DER systems. Since energy storage is a very new and developing technology, the use cases for this technology are also being developed. Thus, we must make sure that the technical requirements do not unduly constrain the application of energy storage. The TIIR writing group did not want to include language within the TIIR that could hinder future use and development of this technology, so the initial TIIR wording was kept flexible. The following is from the proposed TIIR and reflects the opinion of the TIIR writing group. Representatives from Fresh Energy and IREC were both included in the development of this paragraph.

“The absence of guidance on ESS best practices and standards at a national level makes it likely that this section will require future revision sooner than other sections in the document. The intent of this document is to adopt standards as they become available. The approach taken for ESS in the TIIR is to define functional requirements, leaving

implementation, testing, and verification for definition in individual Area EPS Operator's TSM. As was the case with inverter-based DER prior to IEEE 1547 in 2003, the types and use cases associated with ESS will continue to rapidly shift until standards and certifications are developed. Based on these factors, the Area EPS Operator shall specify any additional ESS requirements in the Area EPS Operator's TSM. “

It appears from the comments that the flexibility in the application of energy storage, which was written into the TIIR, is concerning to some of the stakeholders. Instead of flexibility, fixed standard language and fixed agreements are being requested. Dakota Electric believes at this point in the development of the technology and of the use cases for energy storage, it would be premature to develop fixed language within the TIIR and within the interconnection agreements. Dakota Electric agrees that energy storage is unique and important. Improving the technical standards associated with energy storage should be one of the first areas where enhancements to the TIIR are considered. It is also important that any technical standards for energy storage do not jump out ahead of the on-going national standard development.

For energy storage, one of the key areas which needs to be developed is common terminology. During many of the TIIR writing group discussions, especially on energy storage, there was a constant learning process where the parties explained their terminology to the others. Something apparently as simple as export and non-export was understood much differently among each of the parties. So, one of the first areas for improving the technical standards for energy storage would be in the development of standard operating mode terminology and development of a few standard use cases. Starting with a few common operating modes and use cases would help focus the discussions on applicable technical standards.

Conclusion

Dakota Electric appreciates the opportunity to submit these Reply Comments and looks forward to implementation of the new technical requirements. Approval of the proposed initial TIIR standards is very important to allow the regulated electric utilities to start using the newly developed TIIR technical standards and concurrently allow the utilities to create utility specific Technical Standard Manuals (TSM). Placing

additional processes in the path of the creation of the initial TSM technical documents will not help obtain these initial technical standards and will further delay the initial documents. Instead the creation of a clear process where issues and necessary enhancements of the TIIR are reported and resolved along with the creation of a stakeholder working group to continue the development of the TIIR document should be our focus. Upon reading the other comments, Dakota Electric believes that there is general consensus that the TIIR should be approved and that we need a clearly defined process for updating and maintaining the TIIR document.

If you have any questions about these comments, please contact me at 651-463-6337 or at cturner@dakotaelectric.com.

Sincerely,

/s/ Craig Turner

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Certificate of Service

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023

Dated this 11th day of October 2019

/s/ Cherry Jordan

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Ronald	Horman	rhorman@redwoodelectric.com	Redwood Electric Cooperative	60 Pine Street Clements, MN 56224	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Dean	Hunter	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Barb	Jacobs	jaco0270@umn.edu	University of Minnesota	Institute on the Environmen ,	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robert	Jagusch	rjagusch@mmua.org	MMUA	3025 Harbor Lane N Minneapolis, MN 55447	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Chris	Jarosch	chris@carrcreekelectricser vice.com	Carr Creek Electric Service, LLC	209 Sommers Street North Hudson, WI 54016	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Jeremiason	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	205 W. Hwy. 14 Tyler, MN 56178	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mahmoud	Kabalan, PhD	mahmoud.kabalan@stthom as.edu		Mail OSS 100 2115 Summit Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Steve	Korstad	swkorstad@comcast.net	Korridor Capital LLC	20 Red Fox Road St. Paul, MN 551276331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carl	Linville	clinville@raponline.org	Regulatory Assistance Project	50 State Street Suite #3 Montpelier, VT 05602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Tim	Mergen	tmergen@meeker.coop	Meeker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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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Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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_16-521_Official Service List PUC

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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Rafi	Sohail	rafi.sohail@centerpointener gy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

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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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
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