

December 6, 2017

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

RE: **Clarifying the Department's Position on the Definition of "Capacity"**
Docket No. E002/M-17-773

Dear Mr. Wolf:

The Department would like to clarify that defining a distributed generation facility's capacity can have important consequences, other than threshold implications for certificate of need requirements, which was the Department's concern in the instant docket. For instance, a facility's capacity may impact the type of interconnection review required for a small power producer entering into the unmodified Commission-approved Interconnection Agreement.

Thus, the definition of system capacity used for the purposes of Xcel's, or other public utilities, distributed generation interconnection tariff should be established in the Commission's generic proceeding on updating the state Interconnection Standards (Docket No. E999/CI-16-521). The Department's comments on November 29, 2017 were not intended to apply generally, but only to the instant proceeding.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/lt