

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

**In the Matter of a Formal Complaint
and Petition for Expedited Relief by
Sunrise Energy Ventures LLC Against
Northern States Power Company d/b/
a Xcel Energy**

**COMMENTS of the MINNESOTA
SOLAR ENERGY INDUSTRIES
ASSOCIATION’S (MnSEIA)**

January 19, 2021

Docket No. E,G-999/CI-20-492

Introduction

The Minnesota Solar Energy Industries Association (MnSEIA or the Association) is a 501(c)(6) nonprofit trade association that represents our state’s solar businesses, with over 110 member companies, which employ over 4,000 Minnesotans.

Comments

MnSEIA respectfully wishes to note industry concern with two of the issues raised by this Complaint. The Complaint touches upon issues that concern many solar businesses seeking to interconnect with the grid owned and operated by Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company). First, we are concerned that Xcel refuses to reconductor feeder lines with 556 AL conductor wire to support the development of distributed energy resources (DER), even when the costs of those grid upgrades would be borne by developers and not ratepayers. Second, we remain dismayed—as we have expressed in other forums—at the lack of transparency to the system impact studies the Company conducts during the interconnection process for community solar gardens (CSGs) under its Solar*Rewards Community program.

Regarding 556 AL conductor wiring, MnSEIA is concerned that this upgrade is available to Xcel as a technical solution to increased load, but not to interconnect distributed generation. Our concern is that this business practice is arbitrary and discriminatory. Prior to this matter we were not aware that this technical solution is foreclosed as an option for DER developers, because the policy is apparently unwritten. A review of MN DIP and the CSG standard contract shows no mention of wire sizes beyond a passing definition in a footnote.¹ This lack of contractual certainty raises the question of whether the Company’s business practice is arbitrary, in addition to being discriminatory on its face. The Company essentially admits in its response to Sunrise’s Complaint that 556 AL conductor *is a discriminatory practice*—in that it is reserved for increased load, but not increased DER—but contends that it is not unreasonably so. As to reasonability, Xcel asserts that “quality of service or reliability issues”² would arise in the case of decreased load on a feeder that had been upgraded to 556 AL in order to accommodate DER, but those issues would not arise in the case of decreased load on a feeder that had been upgraded to accommodate increased load. The Company further contends that, “there is no public interest for the Commission to dictate utility practices on the protocols involved in the 556 AL issue.”³

MnSEIA disagrees. The question of what is and what is not a reasonable utility interconnection practice is a subject that Minn. Stat. 216B.1611 directs the Commission to consider. The Legislature has determined that interconnection “tariff standards must: [...] allow for reasonable terms and conditions, consistent with the cost and operating characteristics of the various technologies, so that a utility can reasonably be assured of the reliable, safe, and efficient operation of the interconnected equipment.”⁴ Therefore, the question of reasonableness of the utility practice at issue here is in the public interest. On the other hand, the interconnection regulation that stems from that statute, the Minnesota Distributed Energy Resources Interconnection Process (MN DIP), makes no mention of this issue. This disconnect requires Commission guidance.

¹ See State of Minnesota Distributed Energy Resources Interconnection Process (MN DIP) v.2.3 § 3.1 Applicability at 12, footnote 9, “For purposes of this table, a Mainline is the three-phase backbone of a circuit. It will typically constitute lines with wire sizes of 4/0 American wire gauge, 266 kcmil, 336.4 kcmil, 397.5 kcmil, 477 kcmil and 795 kcmil.”

² See Northern States Power, d/b/a Xcel Energy, COMMENT ON THREE ISSUES FROM JANUARY 4, 2021 NOTICE IN THE MATTER OF A FORMAL COMPLAINT AND REQUEST FOR EXPEDITED RELIEF BY SUNRISE ENERGY VENTURES LLC AGAINST NORTHERN STATES POWER COMPANY DOCKET NO. E002/C-20-892, Docket No. E002/C-20-892, Doc. Id. 20211-169712-01 (January 4, 2021) at 5.

³ *Ibid.*

⁴ See Minn. Stat. 216B.1611, Subd. 2. (a) (4).

Secondarily, MnSEIA would like to note that many of the issues arising from the system impact study (SIS) in this case highlight the problems with what MnSEIA members have described as a “black box.” But for the lack of transparency in SIS reports, the parties in this case may have come to a less contentious conclusion. Here, and elsewhere, MnSEIA members have lodged complaints that SIS reports often do not include relevant assumptions and requirements or impediments to interconnection. We are optimistic that these reports can be improved upon through the interconnection standards working group created through PUC Docket 16-521. However, the issue is still very much live, and requires attention until the process is truly changed.

Beyond the specific requests for relief here, MnSEIA is hopeful that the Commission will consider addressing these issues that have the potential to impact the interconnection of DER across the state.

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