

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Hwikwon Ham	Commissioner
John Tuma	Commissioner

In the Matter of Impacts of the “Capacity”
Definition in Minn. Statutes, Section
216B.164 and Associated Rules on Net
Metering Eligibility for Rate-Regulated
Utilities.

DOCKET NO. E-111/M-18-7711,
E-999/CI-16-521,
CI-24-200

Thomas Guttormson

STATE OF MINNESOTA)
) SS
COUNTY OF HENNEPIN)

[¶1] I, Thomas Guttormson, declare under penalty of perjury as follows:

1. I am a Professional Engineer, licensed in the State of Minnesota, and Principal Technology Engineer at Connexus Energy. I have been employed in my current position for over twelve (12) years and have worked as an engineer in the electric cooperative space for thirty-five (35) years.

2. I have been an active participant in the Minnesota Public Utilities Commission’s (MPUC’s) Distributed Generation Work Group (DGWG).

3. I have reviewed and am familiar with Minnesota's Cogeneration and Small Power Production statute, the pertinent distributed generation interconnection process, Cogeneration and Small Power Uniform Contract agreements, average retail utility energy rate guidelines, and the proceedings and issues in the above-entitled matter.

4. I have reviewed the Declaration of Kristi Robinson in this matter and concur with her representations in their entirety regarding how the definition of capacity is and should be applied to interconnection and net metered rate eligibility for solar DG facilities.

5. As a point of emphasis, it is standard practice for Connexus Energy, and to my knowledge all other cooperative utilities and other types of electric utilities in Minnesota, to determine the capacity of a distributed generation (DG) solar facility based on its inverter nameplate rating for purposes of both interconnection and net metered rate eligibility. Nameplate rating is the prevailing standard for determining a distributed solar facility's capacity in all contexts.

6. As so noted in the Declaration of Kristi Robinson, using the amount of energy exported to the grid to determine a qualifying facility's capacity does not align with industry practice or engineering standards. This is a critical point herein repeated in my Declaration. A solar DG facility's capacity is its AC output, not the amount of electricity that gets exported to the grid after the member who owns the facility uses output for their own loads. Note that the relevant statute, Section 216B.164, subd. 3 (a), limits eligibility for retail rate compensation to the net input into the utility system "by a qualifying facility having less than 40-kilowatt capacity" That language reflects the fact that the qualifying facility's capacity


Exhibit B to MREA Initial Comments – Declaration of Tom Guttormson, P.E.
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is what it *has* – namely its production capability – not what gets exported to the grid after some of its production is used at the member’s premise. The nameplate rating of the inverters associated with a facility reflects the AC production capability of the facility.

FURTHER YOUR DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 3rd day of September, 2024.



Thomas Guttormson

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Dated: September 3, 2024

/s/
Thomas Guttormson