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October 25, 2019

—Via Electronic Filing—

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

RE: LATE FILED SUPPLEMENTAL COMMENTS
UPDATING GENERIC STANDARDS FOR UTILITY TARIFFS FOR
INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611
DOCKET NOS. E999/CI-01-1023 & E999/CI-16-521

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits these Late Filed Supplemental Comments regarding the draft Technical Interconnection and Interoperability Requirements (TIIR).

Xcel Energy was contacted by industry stakeholders regarding the draft TIIR after the due date for Reply Comments had passed. Through these conversations, suggested edits to the draft TIIR were identified. While we acknowledge that the comment period has closed, we believe some of the information here could strengthen the TIIR before its adoption. We do not believe these clarifying edits are controversial but we bring them forward to share with the DG Working Group in advance of Commission consideration of the TIIR.

1. In section 2, References, IEEE Std C62.92.2-2017 includes a reference to “Part VI- Systems Supplied by Current-Regulated Sources.” This should be deleted from the IEEE Std C62.92.2-2017 reference and included as its own reference as:
“IEEE Std C62.92.6-2017, IEEE Guide for the Application of Neutral Grounding in Electric Utility Systems, Part VI”

2. Section 7.2 does not include an explicit reference to the built-in protective functions certified by UL 1741, which could possibly be interpreted to mean that all DER are required to include external protective relaying for functions that are already included as a part of the UL 1741 certified DER system to meet the IEEE 1547 requirements. A clarifying footnote should be added to the following sentence:
“All equipment providing relay functions shall meet or exceed ANSI/IEEE Standards for protective relays, or standards applicable for the installation voltage, unless otherwise specified by the Area EPS Operator’s TSM”
The footnote should state:
“Inverters certified to UL 1741 may contain protective functions that do not require equivalent external protective relays to meet IEEE 1547 requirements.”
3. Section 7.4 states that “Medium and large DER installations may require more sensitive and faster protection...” This does not fully contemplate the ride-through capabilities meant to support the bulk power system. A clarifying footnote should be to the following sentence:
“Medium and large DER installations may require more sensitive and faster protection to minimize potential damage and ensure safety”
The footnote should state:
“Ride-through capabilities for bulk power system support should be considered before setting protective tripping times that conflict with BPS support.”

While the Company considers these edits to be helpful for clarifying the TIIR, the approval and adoption of the TIIR overall is of greater urgency and importance, with or without the edits suggested here. If parties object to the inclusion of these clarifications in the current draft TIIR, these items can be addressed in future iterations.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at holly.r.hinman@xcelenergy.com. or (612) 330-5941 if you have any questions concerning this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

c: Service List

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E999/CI-01-1023
E999/CI-16-521

Dated this 25th day of October 2019

/s/

Jim Erickson
Regulatory Administrator

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Steve	Kosbab	skosbab@meeker.coop	Meeker Cooperative Light and Power	1725 US Hwy 12 E Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	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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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
Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Burnell	Lauer	blauer.sundial@gmail.com	Sundial Solar	3209 W. 76th St #305 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Nick	Lenssen	lenssen.nick@gmail.com		1195 Albion Way Boulder, CO 80305	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	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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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
Phillip	Lipetsky	greenenergyproductsllc@gmail.com	Green Energy Products	PO Box 108 Springfield, MN 56087	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
William	Lovelace	wlovelace@minnkota.com	Minnkota Power Cooperative	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Liz	Lucente	llucente@mNSEIA.org	MnSEIA	2512 33rd Ave So #2 Minneapolis, MN 55406	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Alex	Magerko	amagerko@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	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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Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Alan	Miller	N/A		2210 20th St NE Stewartville, MN 55976	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	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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Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	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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Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
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
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	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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Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	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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Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 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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Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

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Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	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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John	Williamson	John.Williamson@state.mn .us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas J.	Zaremba	TZaremba@wheelerlaw.co m	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC