

October 18, 2022

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
Saint Paul, MN 55101-2147

Re: Docket Numbers E999/CI-16-521, E999/CI-01-1023

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) submits these comments in support of the motion by the Minnesota Solar Energy Industries Association (“MnSEIA”), Environmental Law and Policy Center, Fresh Energy and Vote Solar to amend the Distributed Generation Tariffs¹ and appreciates the Commission’s invitation to submit supplemental comments on this important topic.

The City of Minneapolis enterprise, residents, and businesses are served by Xcel Energy, an investor-owned electric utility subject to rules governed by Attachment 6, and our comments focus on Xcel Energy’s DG Tariff. We support adoption of the Joint Parties’ proposed red-line modifications to Attachment 6, which would obligate Xcel Energy to update its DG tariff.²

As a local government with clean energy and climate mitigation goals largely aligned with state goals and federal government commitments under the Paris Agreement, Minneapolis recognizes that fair and effective rules governing DG interconnection will advance goals for clean energy, economic development, decarbonization, and energy affordability for the businesses and residents we represent as well as for our enterprise.

While the City of Minneapolis is on track to meet our State-aligned greenhouse gas emissions reduction goal of 30 percent by 2025 for our geography, neither the city nor the State are on track to meet the State of Minnesota’s targets beyond 2025 leading to 80 percent reduction by 2050.^{3,4} Meeting these

¹ Docket Nos. 01-1023, 16-521 (Mar. 23, 2018).

² Docket E999/CI-16-521, Joint Comments by MNSEIA, ELPC, Fresh Energy, and Vote Solar. (October 30, 2020)

³ City of Minneapolis Greenhouse Gas Inventory.

⁴ The Next Generation Energy Act of 2007 requires the state to reduce greenhouse gas emissions in the state by 80% between 2005 and 2050, while supporting clean energy, energy efficiency, and supplementing other renewable energy standards in Minnesota. [MPCA Website \(Oct. 2018\)](#)

science-based federal, state, and local climate goals is a municipal priority as climate change is increasingly a health and safety issue for our residents who are experiencing more extreme weather.

We share the concerns expressed by MnSEIA, Environmental Law and Policy Center, and Vote Solar (DG Parties) that the calculation for Xcel Energy's DG Tariff rate has not worked for any projects to date, even as the utility's pricing has increased over time while the cost of renewable generation has decreased.⁵ In our experience there are multiple barriers that make it difficult for local governments to meet renewable energy goals through distributed generation that could be addressed through modifying the existing DG Tariff.

For example, net metered projects are statutorily capped at 1 MW, making it difficult to access the lower per-unit costs that would be available under a working 10-MW DG tariff. Under the current status quo, net metered solar projects must also co-site with load, which is a preferred approach when feasible but in other situations, the City of Minneapolis would like to optimize solar siting for higher production and lower project costs. While the city has completed multiple net metered projects, on-site net metering is insufficient by itself to allow Minneapolis to meet our renewable energy goals enterprise- and community-wide. We understand that other business and academic customers in Minneapolis have similar concerns, and updating the DG tariff, which has been available but not accessible as written since the mid-2000s, may be a solution.

An effective DG tariff is necessary to help meet State, federal and local policy goals to deploy renewable energy resources more quickly, leading to a more affordable and resilient grid for participants and non-participants alike.

In summary, as a large energy customer and representative of our constituents' interests, we urge the Commission to address the issues identified by the Joint Petitioners and modify Attachment 6 to allow market-driven renewable energy development consistent with the spirit of Minn. Stat. § 216B.1611. Doing so will establish a more equitable and transparent process for deploying projects under the DG Tariff.

Thank you for your consideration of our comments.

Sincerely,



Kim W. Havey, LEED AP, AICP
Director, Division of Sustainability

⁵ Joint DG Parties Comments, Docket Numbers E999/CI-16-521 and E999/CI-01-1023: Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. § 216B.1611 (Sept. 28, 2022)

STATE OF MINNESOTA)

) ss. **CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 18th day of October 2022, I served a copy of the following via e-mail and/or via U.S. Mail:

**SUPPLEMENTAL COMMENTS OF THE CITY OF MINNEAPOLIS
REGARDING DOCKET NOS. E999/CI-16-521, E999/CI-01-1023**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



Stacy A. Miller

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Abbey	Ross	ross.abbey@us-solar.com	United States Solar Corp.	Electronic Service	No
Allen	Brian	brian.allen@allenergysolar.com	All Energy Solar, Inc	Electronic Service	No
Allen	Michael	michael.allen@allenergysolar.com	All Energy Solar	Electronic Service	No
Amster Olzweski	David	david@mysunshare.com	SunShare, LLC	Electronic Service	No
Anderson	Janet	jainstp@q.com	-	Electronic Service	No
Bailey	John	bailey@ilsr.org	Institute For Local Self-Reliance	Electronic Service	No
Bakk	Mark	mbakk@lcp.coop	Lake Country Power	Electronic Service	No
Beaton	Laura	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	Electronic Service	No
Benson	Jeff	jbenson@southcentralelectric.com	South Central Electric Association	Electronic Service	No
Bergan	Sara	sebergan@stoel.com	Stoel Rives LLP	Electronic Service	No
Bertsch	Derek	derek.bertsch@mrenergy.com	Missouri River Energy Services	Electronic Service	No
Black	William	bblack@mmua.org	MMUA	Electronic Service	No
Bradley	Kenneth	kbradley1965@gmail.com	N/A	Electronic Service	No
Brekke	Jon	jbrekke@grenergy.com	Great River Energy	Electronic Service	No
Brennan	Kathleen M.	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	Electronic Service	No
Browning	Christopher	christopher.browning@nexteraenergy.com	N/A	Electronic Service	No

Brusven	Christina	cbrusven@fredlaw.com	Fredrikson Byron	Electronic Service	No
Burdette	Jessica	jessica.burdette@state.mn.us	Department of Commerce	Electronic Service	No
Byer	Jerry	jbyer@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	Electronic Service	No
Carlisle	Daniel T	todd-wad@toddwadena.coop	Todd-Wadena Electric Cooperative	Electronic Service	No
Carnival	Douglas M.	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	Electronic Service	No
Carruth	Pat	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.	Electronic Service	No
Colburn	Kenneth A.	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	Electronic Service	No
Commerce Attorneys	Generic Notice	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Cooper	Brooke	bcooper@allete.com	Minnesota Power	Electronic Service	No
Cordt	Curtis	ccordt@mvec.net	Minnesota Valley Electric Cooperative	Electronic Service	No
Cray	Kevin	kevin@communitysolaraccess.org	CCSA	Electronic Service	No
Crocker	George	gwillc@nawo.org	North American Water Office	Electronic Service	No
Dahl	Stacy	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	Electronic Service	No
Dahlberg	David	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	Electronic Service	No
Daniels	Lisa	lisadaniels@windustry.org	Windustry	Electronic Service	No
Darabi	James	james.darabi@solarfarm.com	Solar Farm, LLC	Electronic Service	No
DeBleeckere	Patricia	tricia.debleeckere@state.mn.us	Public Utilities Commission	Electronic Service	No
DeMarre	Danielle	danielle.demarre@allenergysolar.com	All Energy Solar	Electronic Service	No
Denniston	James	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	Electronic Service	No

Dieren	Curt	curt.dieren@dgr.com	L&O Power Cooperative	Electronic Service	No
Dietrich	Cheryl	cheryl.dietrich@nexteraenergy.com	NextEra Energy Resources, LLC	Electronic Service	No
Doege	Robin	Rdoege@stearnselectric.org	Stearns Electric Association	Electronic Service	No
Dolan	Kristin	kdolan@meeker.coop	Meeker Cooperative Light & Power Assn	Electronic Service	No
Downer	Steve	sdowner@mmua.org	MMUA	Electronic Service	No
Dunlop, P.E.	John R.	JDunlop@RESMinn.com	Renewable Energy Services	Electronic Service	No
Eide Tollefson	Kristen	healingsystems69@gmail.com	R-CURE	Electronic Service	No
Engelking	Betsy	betsy@nationalgridrenewables.com	Geronimo Energy, LLC	Electronic Service	No
Er	Oncu	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	Electronic Service	No
Fair	Catherine	catherine@energycents.org	Energy CENTS Coalition	Electronic Service	No
Farrell	John	jfarrell@ilsr.org	Institute for Local Self-Reliance	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Fox	Christine	cfox@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	Electronic Service	No
Frank	Kornbaum	fkornbaum@mnpower.com	N/A	Electronic Service	No
Franklin	Mike	mfranklin@mncef.com	MN Conservative Energy Forum	Electronic Service	No
Franzen	Nathan	nathan@nationalgridrenewables.com	Geronimo Energy, LLC	Electronic Service	No
Frye	Katelyn	kfrye@mnpower.com	Minnesota Power	Electronic Service	No
Galvin	Hal	halgalvin@comcast.net	Provectus Energy Development llc	Electronic Service	No
Garvey	Edward	garveyed@aol.com	Residence	Electronic Service	No

Gleckner	Allen	gleckner@fresh-energy.org	Fresh Energy	Electronic Service	No
Glumack	Jenny	jenny@mrea.org	Minnesota Rural Electric Association	Electronic Service	No
Goldberger	Nitzan	n.goldberger@energystorage.org	Energy Storage Association	Electronic Service	No
Groebner	Sarah	sgroebner@redwoodelectric.com	Redwood Electric Cooperative	Electronic Service	No
Gustafson	Cody	cgustafson@mnpower.com	N/A	Electronic Service	No
Guttormson	Tom	Tom.Guttormson@connexusenergy.com	Connexus Energy	Electronic Service	No
Haberman	Natalie	townsend@fresh-energy.org	Fresh Energy	Electronic Service	No
Haler	James	jhaler@southcentralelectric.com	South Central Electric Association	Electronic Service	No
Hanson	Donald	dfhanson@ieee.org	Solar Photovoltaic Systems	Electronic Service	No
Harlander	John	john.c.harlander@xcelenergy.com	Xcel Energy	Electronic Service	No
Heinen	Adam	aheinen@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Hendricks	Jared	jared.hendricks@owatonnautilities.com	Owatonna Municipal Public Utilities	Electronic Service	No
Henkel	Annete	mui@mnutilityinvestors.org	Minnesota Utility Investors	Electronic Service	No
Hentges	Ryan	ryanh@mvec.net	Minnesota Valley Electric Cooperative	Electronic Service	No
Hoffman	Joe	ja.hoffman@smmpa.org	SMMPA	Electronic Service	No
Horman	Ronald	rhorman@redwoodelectric.com	Redwood Electric Cooperative	Electronic Service	No
Hubbard	Jan	jan.hubbard@comcast.net	N/A	Electronic Service	No
Hunter	Dean	Dean.Hunter@state.mn.us	Minnesota Department of Labor & Industry	Electronic Service	No
Jacobson	Ralph	ralphj@ips-solar.com	N/A	Electronic Service	No

Jacobson	Casey	cjacobson@bepc.com	Basin Electric Power Cooperative	Electronic Service	No
Jaffray	John S.	jjaffray@jjrpower.com	JJR Power	Electronic Service	No
Jagus	Robert	rjagus@mmua.org	MMUA	Electronic Service	No
Jarosch	Chris	chris@carrcreekelectricservice.com	Carr Creek Electric Service, LLC	Electronic Service	No
Jeremiason	Brian	bjeremiason@llec.coop	Lyon-Lincoln Electric Cooperative, Inc.	Electronic Service	No
Johnson Phillips	Sarah	sarah.phillips@stoel.com	Stoel Rives LLP	Electronic Service	No
Jones	Nate	njones@hcpd.com	Heartland Consumers Power	Electronic Service	No
Joyce	Kevin	kjoyce@tesla.com	N/A	Electronic Service	No
Kaehler	Ralph	Ralph.Kaehler@gmail.com	N/A	Electronic Service	No
Kaehler	Cliff	cliff.kaehler@novelenergy.biz	Novel Energy Solutions LLC	Electronic Service	No
Kampmeyer	Michael	mkampmeyer@a-e-group.com	AEG Group, LLC	Electronic Service	No
Kegel	Jack	jkegel@mmua.org	MMUA	Electronic Service	No
Key	Tom	tkey@epri.com	EPRI	Electronic Service	No
Klein	Brad	bklein@elpc.org	Environmental Law & Policy Center	Electronic Service	No
Kluempke	Jack	Jack.Kluempke@state.mn.us	Department of Commerce	Electronic Service	No
Kosbab	Steve	skosbab@meeker.coop	Meeker Cooperative Light and Power	Electronic Service	No
Krause	Michael	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	Electronic Service	No
Krikava	Michael	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	Electronic Service	No
Kumpe	Corrina	ckumpe@mysunshare.com	N/A	Electronic Service	No

Landsman	Jeffrey L.	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	Electronic Service	No
Larson	Mark	mlarson@meeker.coop	Meeker Coop Light & Power Assn	Electronic Service	No
Lauer	Burnell	blauer.sundial@gmail.com	Sundial Solar	Electronic Service	No
Leischow	Dean	dean@sunrisenrg.com	Sunrise Energy Ventures	Electronic Service	No
Lenssen	Nick	lenssen.nick@gmail.com	N/A	Electronic Service	No
Levenson Falk	Annie	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	Electronic Service	No
Liberkowsky	Amy	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	Electronic Service	No
Linville	Carl	clinvill@raponline.org	Regulatory Assistance Project	Electronic Service	No

Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Doyle	Renee	Doyle Electric Inc.	PO Box 295, Amboy, MN-56010	Paper Service	No
Hainault	Tony	Hennepin County DES	701 4th Ave S Ste 700, Minneapolis, MN-55415-1842	Paper Service	No
Kopel	Chris	Central Minnesota Municipal Power Agency	459 S Grove St, Blue Earth, MN-56013-2629	Paper Service	No
Reinhardt	John C.	Laura A. Reinhardt	3552 26th Ave S, Minneapolis, MN-55406	Paper Service	No