

October 10, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/CI-16-521

Dear Mr. Wolf:

On August 23, 2019, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comments on the proposed Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR). Initial comments were filed on September 24, 2019. The Minnesota Department of Commerce, Division of Energy Resources (Department) offers the attached reply comments.

The Department recommends that the Commission **approve** the TIIR. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst Coordinator

SLP/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E999/CI-16-521

I. INTRODUCTION

On August 23, 2019, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comments on the proposed Minnesota Technical Interconnection and Interoperability Requirements (TIIR) as proposed by the Distributed Generation (DG) Workgroup's Technical Subgroup.

On September 24, 2019, initial comments were filed by the Minnesota Department of Commerce (Department), Xcel Energy (Xcel), Otter Tail Power Company (OTP), the Interstate Renewable Energy Coalition and Fresh Energy (IREC), Dakota Electric Association (DEA), and the Minnesota Rural Electric Association (MREA).

The Department offers the following reply comments.

II. DEPARTMENT REPLY

Parties to the proceeding were in general consensus recommending approval of the TIIR. Xcel proposed a modification to the definition section of the TIIR to reflect the technical standards that would apply when an application was submitted prior to the effective date of the Minnesota Distributed Interconnection Process (MN DIP). The Department does not object to Xcel's proposed revised language.

A number of parties recommended adoption of a revision or change management process to address the need for revisions to the TIIR over time. DEA recommended the establishment of a Standing Technical Committee, consisting of technical individuals representing the various parties, to take responsibility for reviewing written proposals for changes to the TIIR. The Department agrees that use of a change management process would be an efficient way to enable the technical standards to be adjusted with the advent of new technologies. The Department recommends that a Technical group be established to review and recommend changes to the TIIR for the DG community and ultimately the Commission. Changes to the TIIR, including specific language revisions, could be proposed and reviewed on an annual basis. The Department does not recommend a more frequent revision process as consistency and experience should be gained prior to revisions.

IREC recommended using the DG Workgroup to address standards pertaining to energy storage and voltage regulation. The Department recommends that additional standards be addressed through the proposed change management process.

Finally, parties differed in their approach to utility-specific Technical Specification Manuals (TSMs), and whether the TSMs should be informational filing or subject to Commission approval. The Department notes that Minn. Rules pt. 7835.1300 requires utilities interconnected to a qualifying facility to file information in Minn. Rules pt. 7835.1400 to 7835.1800 annually on or before March 1st. Minn. Rules pt. 7835.0800 Schedule E states:

Schedule E must contain the utility's safety standards, required operating procedures for interconnected operations, and the functions to be performed by a control and protective apparatus. These standards and procedures must not be more restricted than the standards contained in the electrical code under part 7835.2100 or the interconnection standards distributed to customers under part 7835.4750. The utility may include in schedule E suggested types of equipment to perform the specified functions. No standard or procedure may be established to discourage cogeneration or small power production.

The Department understands Minnesota rules to generally require the annual filing of the TSM, and to provide some guidance regarding the standards that are contained in the TSM. The Department recommends that the Commission require utilities to file their TSM on an annual basis with their other reporting requirements contained in Minnesota rules.

III. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission:

- Approve the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR), with Xcel's proposed modification to the TIIR definitions section;
- Establish a change management process for an annual review of any proposed changes to the TIIR;
- Require utilities to file their Technical Specification Manuals as part of their annual reporting under Minn. Rules 7835.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. E999/CI-16-521

Dated this **10th** day of **October 2019**

/s/Sharon Ferguson

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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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Murtaugh	mmurtaugh@fmcs.coop	Freeborn-Mower Cooperative Services	2501 Main Street East Albert Lea, MN 56007	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Tony	Nelson	tnelson@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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
Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	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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Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
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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
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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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	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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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Robyn	Woeste	robynwoeste@alliantenergy.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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