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June 25, 2024

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: LETTER REQUESTING SUSPENSION OF COMMENT PERIOD  
IN THE MATTER OF AN INVESTIGATION INTO THE IMPLEMENTATION OF A  
SMALL DER CAPACITY RESERVATION  
DOCKET NO. E002/M-24-176

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Letter regarding the Notice of Comment Period (Notice) provided by the Minnesota Public Utilities Commission on April 26, 2024, and extended on May 29, 2024.

The Commission's Notice requested Comments regarding whether the Commission should allow Xcel Energy to establish a capacity reservation for DER applications under 40kW. The Company most recently proposed to reserve system capacity by exceeding our planning standards specifically for small DER projects as explained in our November 1, 2023 proposal in Docket No. E999/16-521. Currently, small DER projects (projects 40 kW or less) have limited growth opportunity in Xcel Energy's service territory due to the popularity of the community solar gardens program – which limited available feeder capacity. We continue to believe the most straightforward and balanced approach for allowing continued growth of small solar with fewer interconnection barriers for our Minnesota customers is to reserve capacity for these small DER projects in our planning standard.

However, we are aware that there are other initiatives that could have substantial impact on how a capacity reservation may be designed and implemented. Minnesota Law 2024, Ch. 126, Art. 6, Sec. 53 (SF 4942) requires the Commission to open a proceeding to establish generic standards for the sharing of utility costs necessary to upgrade a utility's distribution system by increasing hosting capacity or applying other necessary distribution system upgrades at a congested or constrained location. We

anticipate a Commission Notice on this legislation no later than September 1, 2024 as indicated by the law. Depending upon how the cost sharing and build-out approach outlined in this legislation is applied, aligning a small DER capacity reservation and this innovative approach for sharing interconnection upgrade costs could become complicated or even have unintended or negative consequences on small DER projects in ways we have not yet considered.

In addition, we believe there may be overlap with decisions made during the July 2, 2024 hearing regarding our Integrated Distribution Plan that may necessitate further review of any capacity threshold.

As a result of these overlapping items, the Company proposes to suspend the Notice of Comment until we can identify how the interconnection cost sharing policy established by legislation will be implemented and determine the potential impact it may have on customers who interconnect to Xcel Energy's distribution grid. We recommend the suspension until the proceedings mentioned above have concluded. While this timeline may extend into 2025, we believe that understanding how the Commission will apply the above interconnection cost sharing is an important first step prior to engaging in discussions on proposals to reserve hosting capacity for projects up to 40 kW. We thank parties and the Commission for their consideration in this matter.

If the Commission believes there is reason to continue Notice of Comment, we request a 30-day extension to re-evaluate our position on a capacity reservation provided new legislation and possible outcomes of the July 2, 2024 Commission hearing.

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 Jessica Peterson at 612-216-7972 or [jessica.k.peterson@xcelenergy.com](mailto:jessica.k.peterson@xcelenergy.com) or me at 612-337-2268 or [amber.r.hedlund@xcelenergy.com](mailto:amber.r.hedlund@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

AMBER HEDLUND  
MANAGER, REGULATORY AFFAIRS

cc: Service List

## CERTIFICATE OF SERVICE

I, Christine Schwartz, 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 No. E002/M-24-176**

Dated this 25<sup>th</sup> day of June 2024

/s/

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Christine Schwartz  
Regulatory Administrator

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Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_24-176_Official
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_24-176_Official
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_24-176_Official
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_24-176_Official
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-176_Official
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_24-176_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_24-176_Official
Benjamin	Ransom	bransom@mysunshare.com	SunShare	1724 Gilpin Street  Denver, CO 80218	Electronic Service	No	OFF_SL_24-176_Official
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-176_Official
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S  Minneapolis, MN 55406	Paper Service	No	OFF_SL_24-176_Official
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_24-176_Official
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_24-176_Official
Nathaniel	Runke	nrunke@local49.org	International Union of Operating Engineers Local 49	611 28th St. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_24-176_Official
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_24-176_Official
Michael	Rynders	mikey.w.rynders@gmail.com		20260 Oxboro Lane North  Marine on Saint Croix, MN 55047	Electronic Service	No	OFF_SL_24-176_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_24-176_Official
Ryan	Schaefer	ryan.schaefer@live.com		16938 Pleasant Valley Road Shafer, MN 55074	Electronic Service	No	OFF_SL_24-176_Official
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 54602	Electronic Service	No	OFF_SL_24-176_Official
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_24-176_Official
Luke	Schmitz	kid771@yahoo.com		1564 18th Street Northeast Sauk Rapids, MN 56379	Electronic Service	No	OFF_SL_24-176_Official
Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association	4300 220th Street W Farmington, MN 55024	Electronic Service	No	OFF_SL_24-176_Official
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_24-176_Official
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_24-176_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_24-176_Official
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_24-176_Official

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Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_24-176_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-176_Official
David	Shaffer	david.shaffer@novelenergy.biz	Novel Energy Solutions	2303 Wycliff St Ste 300 St. Paul, MN 55114	Electronic Service	No	OFF_SL_24-176_Official
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_24-176_Official
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Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC	5411 Bartlett Blvd Mound, MN 55364	Electronic Service	No	OFF_SL_24-176_Official
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Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_24-176_Official
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_24-176_Official

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Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529  Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_24-176_Official
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719  Baudette, MN 56623	Electronic Service	No	OFF_SL_24-176_Official
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_24-176_Official
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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_24-176_Official
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Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-176_Official

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