



Minnesota Rural Electric Association

11640 73rd Avenue N | Maple Grove, MN 55369 | p: 763-424-1020 f: 763-424-5820 | www.mrea.org

May 1, 2026

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and
Operation of Distributed Generation Facilities Under Minn. Stat. §216B.1611

Docket No. E-999/CI-16-521

Dear Ms. Bergman:

On April 10, 2026, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* in the above-referenced docket. This Notice requested the following issue to be addressed:

Should the Commission adopt the Technical Subgroup's proposed changes to the Minnesota Distributed Energy Resources Technical Interconnection and Interoperability Requirements (TIIR) and the Minnesota Distributed Energy Resource Interconnection Process (MN DIP) regarding Battery Energy Storage Systems and Limited/Non-Export Systems?

The Commission specifically requested interested participants to submit comments of the following:

- *Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B this Notice?*
- *Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment C to this notice?*
- *What actions should the Commission take regarding the three disputed items in the TSG's report as found in Attachment A to this notice?*
- *Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the August 13, 2018 Order (paragraph 20)?*
- *Are there other issues or concerns related to this matter?*

Minnesota Rural Electric Association (MREA), representing 50 electric cooperative associations in Minnesota, respectively submits these comments for consideration to the Commission.

MREA's Comments

MREA has been an active participant with the Distributed Generation Working Group (DGWG) and was also an active participant of the TSG. MREA commends the fellow participants of the Technical Subgroup (TSG) for this work on this issue and appreciates the knowledge shared by

the participants and outside experts. MREA addresses the issues in the Commission's notice separately below.

Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B to this Notice?

MREA recommends the Commission adopt the TSG's proposed changes to the TIIR as presented in Attachment B to the April 2026 Notice. The TSG has provided well-developed, consensus-based updates to the TIIR that addresses the advancement in DER technology related BESS and Limited/Non-Export Systems.

Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment C to this notice?

MREA believes this question should read "Should the Commission adopt the TSG's proposed changes to the MN DIP as found in Attachment C of this notice?" MREA's electric cooperatives, with the exception of Dakota Electric Association, have adopted a slightly different interconnection process than MN DIP, commonly referred to as C-MIP. The electric cooperative's DER interconnection process already includes process tracks for BESS and limited export DER systems. As such, MREA is not providing comment for this question.

What actions should the Commission take regarding the three disputed items in the TSG's report as found in Attachment A to this notice?

The contested items included in Attachment A are all concepts related to the MN DIP and Uniform Contract as stated in MN Rules 7835. As Minnesota electric cooperatives, with the exception of Dakota Electric Association, are following a slightly different interconnection process and utilize a different uniform contract the electric cooperative's DER interconnection process will not be affected by the Commission's decision regarding the contested items. However, MREA would like to point out that the contested items are related to how and when the term "capacity" (nameplate or export) is used with regards to the interconnection process. The definition of "capacity" is also a contest item in Commission Dockets 24-200 and 25-86. Specifically, as Docket 25-86 is currently in the period of open comment, MREA recommends the Commission should take no action on the first contested item until Docket 25-86 is concluded.

Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the August 13, 2018 Order (paragraph 20)?

MREA has no comment for this question.

Are there other issues or concerns related to this matter?

There are no other items MREA believes need addressing regarding this matter at this time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darrick Moe', with a stylized flourish at the end.

Darrick Moe
President/CEO
Minnesota Rural Electric Association