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May 1, 2026



Mrs. Sasha Bergam
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611
Docket No. E999/CI-16-521
Initial Comments**

Dear Ms. Bergman:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Initial Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8227 or canderson@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ *CODY R. ANDERSON*
Cody R. Anderson
T & D Studies – Engineer II
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pdo
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

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

Docket No. E999/ CI-16-521

INITIAL COMMENTS

I. INTRODUCTION

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

A. The topics open for all parties to comment:

- Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B of this Notice?
- Should the Commission adopt the TSG's proposed changes to the MN DIP as found in Attachment C to this Notice?
- What action 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)?¹
 - Should the Commission make any changes to these reporting requirements?
- Are there other issues or concerns related to this matter?

II. OTTER TAIL RESPONSES

Otter Tail Power will address the topics open for all parties to comment:

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

Otter Tail Power recommends that the Commission adopt the Technical Subgroups proposed, consensus changes to the TIIR as found in Attachment B of this Notice.

Otter Tail Power will comment on any proposed, contested changes to the TIIR in section C. below.

B. Should the Commission adopt the TSG’s proposed changes to the MN DIP as found in Attachment C of this Notice?

Otter Tail Power recommends that the Commission adopt the Technical Subgroups proposed, consensus changes to the MN DIP as found in Attachment C of this Notice.

Otter Tail Power will comment on any proposed, contested changes to the MN DIP in section C. below.

C. What action should the Commission take regarding the three disputed items in the TSG’s report as found in Attachment A to this notice?

1. Contested Item #1 – Use of Export Capacity OR Nameplate Rating in MN DIP section 1.1.1

Otter Tail Power believes that this disputed item is out of scope for this specific subgroup and should be referred to the larger Distributed Generation Working Group (DGWG) and the Commission for a resolution. Changing the language here to “export capacity” instead of “nameplate rating” could affect a wide range of other dockets, tariffs, and proceedings beyond just the MN DIP. To avoid negative effects from this proposed change cascading into other areas, Otter Tail Power believes it would be most appropriate to have this discussion with the full DGWG rather than this targeted subgroup.

Furthermore, Otter Tail Power notes that there are open dockets that are related to this contested item, specifically in Dockets CI-24-200 & R-25-86. Currently, there is an open comment period regarding a Rulemaking to Amend the Definition of “Capacity” under Minn. R. 7835.0100 in Docket R-25-86. Otter Tail Power believes it would be best to take no action on this contested item until after the Rulemaking in Docket R-25-86 has been completed.

If the Commission decides to act on this item, Otter Tail Power believes that the continued use of Nameplate Rating in this section would be appropriate to ensure a clear delineation of the 10 MW limit.

2. Contested Item #2 – Modify to use 40 kW Export Capacity OR retain 20 kW and use Nameplate Rating in MN DIP section 1.1.5.1.2.

Otter Tail Power is not opposed to an increase in the limit from 20 kW to 40 kW but believes it would be reasonable to maintain the existing 20 kW limit found in the MN DIP today.

Regardless of whether the limit is set at 20 kW or increased to 40 kW, Otter Tail Power believes that the limit should be based on Nameplate Rating rather than Export Capacity. The Uniform Statewide Contract (USC) uses the phrase “...rated at...” when describing the size in kilowatts of electricity. This term implies “nameplate rating” as it is stating that this is what the generation system is rated for and is capable of producing at maximum output, not what the generation system can export to the grid. The USC did not consider export capacity when it was created and, as such, a modification to the USC would be required to allow an explicit definition of export capacity. To avoid this, Otter Tail Power believes that if and when export is limited through acceptable control modes and methods, the execution of an Interconnection Agreement to contractually denote those acceptable modes and methods of operation is appropriate and should be required.

Similar to what we commented above in Contested Item #1, Otter Tail Power believes that no modification to this item should be made until after the Rulemaking to Amend the Definition of “Capacity” under Minn. R. 7835.0100 has been completed, Docket No. R-25-86. These are overlapping dockets discussing similar topics that could impact one another. Due to this, any changes made to this item should be made following completion of the rulemaking docket.

3. **Contested Item #3** – In MN DIP section 5.14.3 use either “The Export Capacity specified by the Interconnection Customer in the Interconnection Application will be applicable as a limitation in the Interconnection Agreement.” OR “A DER using an acceptable control method is required to execute an Interconnection Agreement and the Export Capacity specified by the Interconnection Customer in the Interconnection Agreement will subsequently be included as a limitation in the Interconnection Agreement.”

Currently, the Uniform Statewide Contract (USC) does not envision export capacity, and it does not have any way to define the acceptable control modes or methods used to limit the generator below its nameplate rating. Therefore, if an Interconnection Customer wants to limit their system’s export capacity through an acceptable control mode or method, the execution of an Interconnection Agreement to capture and define the terms of operation will have to be required,

regardless of the system's nameplate rating or export capacity (contested item) being under 20 kW or 40 kW (contested item). It is necessary to maintain these records regarding how a system will operate outside of what its nameplate rating defines to both ensure continued safe and reliable operation of the electrical grid and to ensure fair assessments of all future interconnection applications. Follow-on DER projects could be subjected to increased, and potentially unwarranted, interconnection costs for system upgrades identified through the study process if there is no way to accurately record the limited export capabilities and associated acceptable control modes and methods of other local DERs in their respective Interconnection Agreements. Not capturing these limited export capacities could also cause overbuilding of the power system. Since the USC has no existing way to capture these specifics, it is important and necessary that export limited systems pair the USC with a DIA, regardless of size.

D. 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)?

i. Should the Commission make any changes to these reporting requirements?

Otter Tail Power is not opposed to extending the annual reporting requirement on interconnections through at least 2030 by modifying paragraph 20 in the above Order from August 13, 2018.

Otter Tail Power does not recommend any additional changes to the existing reporting requirements.

E. Are there other issues or concerns related to this matter?

Otter Tail Power does not believe that there are any other issues or concerns related to this matter that are relevant to comment on at this time.

III. CONCLUSION

In conclusion, Otter Tail Power appreciates both being able to take part in this Technical Subgroup and to provide feedback on these increasingly important topics. We are open and available to answer any questions Staff or the Commission may have regarding Otter Tail Power's comments above.

Dated: May 1, 2026

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ CODY R. ANDERSON

Cody R. Anderson

T & D Studies – Engineer II

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CERTIFICATE OF SERVICE

**RE: In the Matter of Updating the Generic Standards for the
Interconnection and Operation of Distributed Generation Facilities
Established Under Minn. Stat. § 216B.1611
Docket No. E999/CI-16-521**

I, Paris Olson, hereby certify that I have on this day served a copy of the following, or a summary thereof, on Sasha Bergman and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Initial Comments**

Dated this **1st** day of **May, 2026**.

/s/ PARIS OLSON

Paris Olson
Regulatory Filing Coordinator
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103	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	16-521Official Service List PUC
104	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
105	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
106	Ben	Nelson	benn@cmpasgroup.org	CMPMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	16-521Official Service List PUC
107	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
108	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
109	Rolf	Nordstrom	rnordstrom@gpsd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	16-521Official Service List PUC
110	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	16-521Official Service List PUC
111	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	16-521Official Service List PUC
112	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
113	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	16-521Official Service List PUC
114	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	16-521Official Service List PUC
115	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	16-521Official Service List PUC
116	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
117	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
118	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	16-521Official Service List PUC
119	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
120	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	16-521Official Service List PUC
121	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
122	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
123	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	16-521Official Service List PUC
124	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
125	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	16-521Official Service List PUC
126	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	16-521Official Service List PUC
127	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	16-521Official Service List PUC
128	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	16-521Official Service List PUC
129	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	16-521Official Service List PUC
130	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
131	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
132	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
133	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	16-521Official Service List PUC
134	Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	16-521Official Service List PUC
135	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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136	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
137	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
138	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
139	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
140	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	16-521Official Service List PUC
141	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
142	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
143	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
144	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	16-521Official Service List PUC
145	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	16-521Official Service List PUC
146	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085	Electronic Service		No	16-521Official Service List PUC

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						United States				
147	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	16-521Official Service List PUC
148	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
149	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	16-521Official Service List PUC
150	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
151	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		PO Box 58 Slayton MN, 56172 United States	Electronic Service		No	16-521Official Service List PUC
152	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	16-521Official Service List PUC
153	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
154	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
155	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
156	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		P.O. Box 58 Slayton MN, 56127-0058 United States	Electronic Service		No	16-521Official Service List PUC
157	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
158	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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159	Ellen	Veazey	lveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	16-521Official Service List PUC
160	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
161	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
162	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	16-521Official Service List PUC
163	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
164	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	16-521Official Service List PUC
165	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	16-521Official Service List PUC
166	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
167	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	16-521Official Service List PUC
168	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
169	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						8920 United States				