



January 19, 2024

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

Subject: Dakota Electric Association Comments

***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 Mr. Seuffert:

On September 1, 2023, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period (Notice) in the above-referenced docket. This Notice stated that the issue to be addressed is:

What changes to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) should the Commission make to achieve the purpose of Minnesota Law 2023, Ch. 60, Art. 12, Sec. 75 (HF 2310)?

Specifically, the Commission requested that proposals address the following topics:

1. Interconnection procedures that allow customer-sited distributed generation projects up to 40 kilowatts alternating current in capacity to be processed according to schedules specified in the MNDIP, giving such projects priority over larger projects that may enjoy superior positions in the processing queue.
2. Whether the prioritization of these projects include areas where the distribution system is capacity constrained as well as in areas that are not similarly constrained.
3. Whether there are changes to the MN DIP that would be de minimis in nature regarding policy but would update the document to accurately reflect recent changes and references.
4. Are there other issues or concerns related to this matter?

On November 1, 2023, Dakota Electric Association (Dakota Electric or Cooperative) submitted a proposal in response to the Commission's Notice. In our proposal filing, we noted that we remain in the "free phase" of distributed energy resource (DER) interconnections so we have not experienced significant interconnection issues or concerns between under 40 kW (small DER) and over 40 kW (large DER) facilities. Given these facts, we proposed a relatively straightforward interconnection review process that we believe provides sufficient preference to small DER systems based on the current realities of our distribution system. Specifically, Dakota Electric proposed a process where utilities maintain at least two queues for DER interconnections. One for systems which are smaller than 40kW, and one for systems larger than 40kW. The utility continues to process less than 40kW DER applications as they come in for all portions of their system which are not already limited. When a larger than 40kW system is proposed, any required studies are completed with a base of existing and proposed level of DER. The base of existing DER is then increased to a level that reflects the expected amount of less than 40kW DER interconnection requests over the next 6 to 12 months. The proposed larger than 40 kW DER is then studied with that updated base of interconnected DER. No other larger than 40kW DER can proceed in that area (substation) until that first DER has completed the process and is cleared for interconnection or withdrawals their request.

The following parties filed proposals on November 1, 2023:

- Minnesota Rural Electric Association;
- Otter Tail Power Company;¹
- Xcel Energy; and
- Minnesota Solar Energy Installers Association (MnSEIA).

The utility proposals were generally similar and involved the creation of separate queues for small DER and large DER with certain nuances based on the current realities of each utility system. For example, as illustrated in Xcel Energy's proposal, the level of DER development (across all projects sizes) is orders of magnitude larger on the Xcel Energy system than other utilities in the state. Part of Xcel Energy's two queue proposal involves creation of priority and general queues. This is a workable solution in instances where there is high DER penetration (like what Xcel Energy currently has), but in instances where there is lower penetration, or smaller numbers of interconnection requests, this proposal would likely represent additional work and documentation that will not provide significant benefit to the utility or DER consumers. The Cooperative sees the logic behind this process; however, it may be potentially burdensome and resource intensive for smaller utilities.

MnSEIA's proposal, based on Dakota Electric's understanding, is somewhat higher level in nature but shares the general concept that there needs to be some sort of queue bifurcation. MnSEIA listed three changes that would need to be made to the MN DIP:

- (1) To allow the creation of a different level of screening review for non-exporting or net metered facilities;
- (2) In the event that a screen is not passed - obtaining interconnection approval through the usage of advanced inverter settings for curtailment to mitigate export in excess of grid capacity;
- (3) For small projects that are not sized to load, the impact of the smaller project or projects on the larger projects in the queue should be

¹ Otter Tail did not make a formal proposal, but it expressed a willingness to participate in any future Distributed Generation Working Group regarding this topic.

determined so that those costs can be offset or otherwise compensated so that the larger projects are not prejudiced.

Dakota Electric reviewed MnSEIA's proposal and there are components that we believe warrant additional discussion in the Distributed Generation Working Group (DGWG). In particular, the Cooperative touched on the idea of sized to load and the impact of export on the distribution system in the discussion topic section of our proposal filing.²

MnSEIA's proposed sized to load requirement associated with small DER is based on 200% of the reasonably expected average annual total consumption of electricity, which it claims is based off legislation in Colorado. The Cooperative agrees that systems that are not sized to load place additional stresses on the distribution and can unreasonably shift costs to other consumers. However, Dakota Electric notes that MnSEIA's definition of sized to load does not align with our understanding, or application, of sized to load from an operational or engineering perspective. If the Commission wishes to analyze each of the proposals on a holistic or combined basis, this is the sort of topic or area that should be discussed amongst DGWG participants.

The Commission's November 22, 2023 Notice of Comment Period also included reply comments due on February 2, 2024. Dakota Electric anticipates that other parties will respond to the various proposals on January 19, 2024, and we will provide, if necessary, additional response, review, and discussion of the proposals and filed comments in reply comments.

If you or your staff have any questions about these comments, please contact me at 651-463-6258 or aheinen@dakotaelectric.com.

Sincerely,

/s/ Adam J. Heinen

Adam J. Heinen
Vice President of Regulatory Services

² November 1, 2023 Dakota Electric Proposal Filing, Pages 9-16.

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Certificate of Service

I, Melissa Cherney, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

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

Dated this 19th day of January 2024

/s/ Melissa Cherney

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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@nmp agency.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.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sergio	Navas	snavas@sundialsolarenerg y.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Samantha	Norris	samanthanorris@alliantene rgy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	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, MN 55362	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
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
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
Cezar	Panait	Cezar.Panait@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Wess	Pfaff	wes.pfaff@mrenergy.com		N/A	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
Crystal	Pomerleau	crystal.r.pomerleau@xcel energy.com	Xcel	N/A	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
Elizabeth	Psihos	elizabeth.psihos@idealener gies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.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
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_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC	1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Daniel	Rogers	dan@nokomispartners.com	Nokomis	2639 Nicollet Ave Ste 200 Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
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
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_16-521_Official Service List PUC
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Schuerger	matthew.schuerger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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_16-521_Official Service List PUC
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Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	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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Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC