



February 1, 2019

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-18-713

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's Tariff Encompassing the Rider for Parallel Generation, Rider for Standby Service, Rider for Distributed Generation Service, and the Company's Electric Service Regulations, and Request for Approval to Increase the Uniform Statewide Contract Threshold from 20 kW to 40 kW via the Minnesota Distributed Energy Resource Interconnection Process (MN DIP).

The Petition was filed on November 13, 2018, in compliance with the Minnesota Public Utilities Commission's (Commission) August 18, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* in Docket No. E999/CI-16-521, by:

Jenna Warmuth
Senior Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802-2093

The Department requests that Minnesota Power submit a revised tariff, and is available to answer any questions the Commission may have.

Sincerely,
Susan L. Peirce
Public Utility Rate Coordinator

SLP/jl

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Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-18-713

I. BACKGROUND INFORMATION

On November 13, 2018, Minnesota Power (MP or the Company) submitted updated tariffs to comply with the Minnesota Public Utilities Commission's (Commission) August 13, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* in Docket No. E999/CI-16-521. In addition, MP requested approval to increase the threshold for using the Uniform Statewide Contract from 20 kW to 40 kW.

II. DEPARTMENT ANALYSIS

In its August 13, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement*, the Commission adopted new procedures for interconnecting distributed generation systems (Minnesota Distributed Interconnection Process – MN DIP), and a standard interconnection agreement (Minnesota Distributed Interconnection Agreement – MN DIA). Minnesota Power has submitted revised tariffs for its Rider for Parallel Generation, Rider for Standby Service, Rider for Distributed Generation Service, and Electric Service Regulations. The revisions are limited to changing the threshold for signing the Uniform Statewide Contract to 40 kW, and referencing the Minnesota Distributed Energy Resource Interconnection Agreement. MP further incorporated by reference the MN DIP requirements into its tariffs.

While the Department does not think it necessary that a utility include the entirety of the MN DIP and MN DIA in its tariffs, language describing the general process, timelines and fees and the MN-DIA should be included in the tariff. Simply referencing the MN-DIP and MN-DIA without including any details is insufficient. For example, the MN-DIP sets out a Simplified Process, Fast Track Process and Study Process to be followed for interconnecting distributed generation facilities depending on the size and complexity involved. Each process has specific eligibility requirements and timeframes associated with it, and should be detailed in the appropriate MP tariff. In addition, the standard MN DIA should be included in the tariff.

The Department requests that MP submit a revised tariff including sufficient details of the MN DIP and the MN DIA to inform customers of the various processes, timelines, and fees, and incorporating the standard MN DIA.

The Department does not object to MP's request to set the threshold for signing the Uniform Statewide Contract rather than the MN DIA at 40 kW. Section 1.1.5.2 of the MN DIP states,

The Area EPS Operator may propose in its tariff an increase to the size threshold for the application of the Uniform Statewide Contract as a replacement for the MN DIA in its tariff.

The MN DIP permits use of the Uniform Statewide Contract rather than the MN DIA under the circumstances requested by MP. The Department recommends approval of MP's request.

III. DEPARTMENT RECOMMENDATION

The Department requests that Minnesota Power submit a revised tariff including details of the MN DIP and the MN DIA. The Department will offer additional recommendations after reviewing the tariff revisions.

/jl

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
Comments**

Docket No. E015/M-18-713

Dated this 1st day of February 2019

/s/Sharon Ferguson

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Brian	Lydic	brian@irecusa.org	Interstate Renewable Energy Council, Inc.	PO Box 1156 Latham, NY 12110-1156	Electronic Service	No	OFF_SL_18-713_M-18-713
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_18-713_M-18-713
Alex	Magerko	amagerko@epri.com	EPRI	942 Corridor Park Blvd Knoxville, TN 37932	Electronic Service	No	OFF_SL_18-713_M-18-713
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-713_M-18-713
Ralph	Martin	rmartin@stearnselectric.org	Stearns Cooperative Electric Association	PO Box 40 Melrose, MN 56352	Electronic Service	No	OFF_SL_18-713_M-18-713
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_18-713_M-18-713
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_18-713_M-18-713
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_18-713_M-18-713

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	McWilliams	jmm@dairy.net.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_18-713_M-18-713
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-713_M-18-713
Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-713_M-18-713
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Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-713_M-18-713
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-713_M-18-713
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-713_M-18-713
Michael	Monsrud	mmonsrud@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Paper Service	No	OFF_SL_18-713_M-18-713
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-713_M-18-713

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tony	Nelson	tnelson@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_18-713_M-18-713
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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_18-713_M-18-713
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_18-713_M-18-713
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-713_M-18-713
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_18-713_M-18-713
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-713_M-18-713
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Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_18-713_M-18-713
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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_18-713_M-18-713

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	Sonstegard	robynnsec@wiktel.com	North Star Electric Cooperative, Inc.	PO Box 719 441 State Hwy 172 NW Baudette, MN 56623	Electronic Service	No	OFF_SL_18-713_M-18-713
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Mike	Steckelberg	msteckelberg@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_18-713_M-18-713
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-713_M-18-713
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Thompson	stevet@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	OFF_SL_18-713_M-18-713
Daniel	Tonder	d.tonder@mnpower.com	Minnesota Power	PO Box 60 Little Falls, MN 56345	Electronic Service	No	OFF_SL_18-713_M-18-713
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Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_18-713_M-18-713
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John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_18-713_M-18-713
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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