

**PREFERRED DECISION OPTIONS**  
Proposed by Commissioner Ham  
**Agenda Meeting: August 14, 2025; Item 3\*\***

**DOCKET NUMBER** E999/CI-16-521

**ANALYST** Derek Duran

**DATE/TIME SUBMITTED** August 12, 2025; 4pm

**TITLE** Ham Preferred Decision Options

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

**Ham Preferred Decision Options**

1. Xcel is authorized to incorporate the MISO DER AFS study process and results in its compliance with the MN DIP. (*Staff Alternative*)
4. Decline to investigate Xcel's use of the ITS at this time. (*Xcel*)
5. Require Xcel to file a report, 30 days following a Commission Notice, to the Commission that includes, at minimum, the following: (*Staff Alternative*)
  - a) A complete description and detailing of the full Xcel ITS process including the thresholds, rules, process, timelines, and costs
  - b) Technical evidence or reasoning, with supporting data, on why the ITS-related DERs may have adverse impacts, including how they may constitute a "qualified change" under MISO's definition of qualified change per NERC FAC-002-4 as well as further reasoning for the other cited NERC standards
  - c) Evidence with supporting data of potential backflow onto the transmission system where DERs are greater than DML (e.g. during springtime)
  - d) Xcel's plan to evaluate the ITS after [X Time Period], the metrics the process will be measured against, the reporting requirements the Company will file between now and the evaluation.
  - e) Any other information the Executive Secretary considers necessary for the investigation.
6. Delegate authority to the Executive Secretary to refer the review of Xcel's Internal Transmission Studies to the Distributed Generation Work Group. After review, the DGWG may file recommendations with the Commission on a timeline to be determined by the Executive Secretary. (*JSA, Joint Parties*)

*[If the DGWG is tasked with review of the Xcel ITS, Staff also recommends the following] (Staff suggestion)*

- a) Xcel shall present the contents of the proposed report in the first DGWG meeting following the Order. Additionally, if a report is filed, parties may submit relevant questions and clarifications to Commission Staff who will relay them to Xcel to have answered at the DGWG meeting.
  - b) The Executive Secretary will also determine the appropriate next steps in the review.
  - c) The following topics may be included in DGWG meetings:
    - i. Potential changes to the structure or details of the ITS process
    - ii. When an evaluation period may be appropriate and what measures or metrics to be included in that evaluation
    - iii. Any recommended MN DIP edits that may be appropriate regarding the ITS process
    - iv. Actions that may increase transparency into the ITS process or indications to interconnection customers that an ITS or MISO DER AFS may be required
7. Require Xcel to include the full details, procedures, costs, various deadlines and schedules, as well as a summary of the justification of the necessity of the ITS process be made publicly available on Xcel's interconnection webpage. Included in this publication is a table listing the substations likely needing an ITS that is updated monthly. *(Staff Alternative)*
8. Require Xcel to include whether a substation is likely to need an ITS in their Hosting Capacity Analysis (HCA) and complementary map. *(Staff Alternative)*