

October 29, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/CI-16-521

Dear Mr. Seuffert:

On August 28, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice for Comment* seeking comment on whether the Commission should revise or replace Attachment 6 of the Commission's September 28, 2004 Order in Docket No. E999/CI-01-1023.¹ Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/Susan L. Peirce
Rate Analyst Coordinator

SLP/ar
Attachment

¹ *In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 212, ORDER ESTABLISHING STANDARDS*, Docket No. E999/CI-01-1023, September 28, 2004.



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Commerce Department Division of Energy Resources

Docket No. E999/CI-16-521

I. BACKGROUND INFORMATION

On September 28, 2004, the Minnesota Public Utilities Commission (Commission) issued an *Order Establishing Standards* in Docket No. E999/CI-01-1023. The September 2004 Order established the interconnection process, technical requirements, standard Interconnection Agreement, and methodology for calculating rates for Distributed Generation (DG) Systems

In 2016, the Commission commenced the current proceeding to update the generic standards for the interconnection and operation of DG facilities established under §Minn. Stat. 216B.1611. To date, the Commission has issued an *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* (August 13, 2018), and an *Order Establishing Updated Interconnection and Interoperability Requirements* (January 22, 2020).

On August 28, 2020, the Commission issued a *Notice of Comment Period* seeking comment on whether the Commission should revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 (2004 Order) which creates the guidelines for establishing the terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity.

II. DEPARTMENT ANALYSIS

Since the Commission's 2004 Order was issued, a number of proceedings have occurred that address various aspects of avoided cost. Most notably, the Commission approved a Value of Solar (VOS) methodology in its April 1, 2014 Order in Docket E002/M-14-65.² The VOS methodology is an avoided cost methodology that calculates the avoided cost of nine components in determining the value that distributed solar brings to the grid. In addition, the value of solar capacity has been addressed in a Standby Service proceeding (Docket No. E999/CI-15-115)³ and *In the Matter of a Rate for Large Solar Photovoltaic Installations* (Docket No. E002/M-13-315). All three of these proceedings address aspects of avoided cost that could offer meaningful guidance to the Commission in any proceeding to revise Attachment 6.

² *In the Matter of Establishing a Distributed Solar Value Methodology under Minn. Stat. §216B.1664, subd 10 (e) and (f)*, Order Approving Distributed Solar Methodology, April 1, 2014, Docket No. E999/M-14-65.

³ *In the Matter of a Commission Inquiry Into Standby Service Tariffs*, Docket No. E999/CI-15-115.

Revisiting the Attachment 6 methodology may be appropriate, but the Department cautions that any revisions must be done in consideration of more current proceedings and methodologies such as the VOS in order to ensure that the methodologies and rate outcomes are consistent. Should the methodology adopted under an Attachment 6 revision of avoided cost result in significantly higher avoided costs than that generated under the VOS, distributed generation customers would have an incentive to choose projects that would use the revised Attachment 6 results rather than VOS. Additionally, the VOS focuses solely on solar generation and capacity, but could be adopted for other types of renewable generation.

Although the Department supports reviewing Attachment 6 methodology, the Department recommends that the Commission defer such a review for at least six months due to workload considerations. The Department and many of the interested parties are currently involved in the Commission's proceeding to consider utility investment projects that could assist the Minnesota economy in its recovery from the COVID-19 pandemic.⁴ Additionally, at least two general rate cases are expected to be filed in the next week. Consequently, the Department recommends deferring review of Attachment 6 for at least 6 months. .

In conclusion, the Department recommends that the Commission delay review of Attachment 6 for at least six months to ensure stakeholders have the capacity to participate, and that the subsequent review consider avoided cost calculation methodologies previously used or adopted.

/ar

⁴ *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G999/CI-20-492.

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. E999/CI-16-521

Dated this **29th** day of **October 2020**

/s/Sharon Ferguson

[illegible]

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Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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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_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, Minnesota 55362	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
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
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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_16-521_Official Service List PUC
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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
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@idealenergies.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Patrick	Quinn	pquinn@GREnergy.com		N/A	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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Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michelle	Rebholz	michelle.rebholz@state.mn.us	Public Utilities Commission	Suite 350121 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC	3363 Republic Ave Saint Louis Park, MN 55426	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.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
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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

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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