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Jenna Warmuth
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January 28, 2019

VIA ELECTRONIC FILING

Daniel P. Wolf
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. E015/M-18-713

Dear Mr. Wolf:

Minnesota Power hereby submits its Responses to the Minnesota Public Utilities Commission's ("MPUC") Informational Requests 1 – 4 in the above-referenced Docket.

Sincerely,

A handwritten signature in black ink that reads "Jenna Warmuth". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jenna Warmuth

JW:sr
Attach
cc: Official Service List

**State of Minnesota
Public Utilities Commission**

Utility Information Request

Docket Number: E015/M-18-713 Date of Request: 01/15/2019

Requested From: Minnesota Power Response Due: 01/28/2019

Analyst Requesting Information: Michelle Rosier

Type of Inquiry:

<input type="checkbox"/>	Financial	<input type="checkbox"/>	Rate of Return	<input type="checkbox"/>	Rate Design
<input type="checkbox"/>	Engineering	<input type="checkbox"/>	Forecasting	<input type="checkbox"/>	Conservation
<input type="checkbox"/>	Cost of Service	<input type="checkbox"/>	CIP	<input checked="" type="checkbox"/>	Other

If you believe your responses are proprietary, please indicate.

REQUEST NO. 1	<p>Rider for Parallel Generation</p> <p>a. Section V. pg. no. 60.0. I. Please define "rated" and explain the rationale for the term; rather than using the term "AC capacity." The Company uses "AC capacity at Section V. Pg. No. 60.4 Individual System Capacity Limits).</p> <p>b. Section V, p. no. 60.7. Under the definition of "Standby service" please explain why MP is not:</p> <ul style="list-style-type: none"> i. Naming the "Rider for Standby Service"; rather than referring to "public utility's commission-approved standby tariff" ii. proposing to remove "B. for a utility not subject to the commission's rate authority, the service associated with the applicable tariff in effect under Minnesota Statutes, section 216B.1611; subdivision 3, clause (2)"? <p>c. Section V, pg no. 60.7, Terms and Conditions:</p> <ul style="list-style-type: none"> i. #4. Please explain why the tariff uses "interconnection contract" rather than an "Interconnection Agreement" consistent with MN DIP 1.1.5?
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Response by: Jenna Warmuth
 Title: Senior Public Policy Advisor
 Department: Regulatory Affairs
 Telephone: 218-355-3448

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| | <ul style="list-style-type: none">ii. #6. Please consider revising first sentence edits to recognize a qualifying customer up to 1 MW is entitled to sign a Uniform Statewide Contract (Minn. R. 7835.9910; Minn. Stat. 216B.164; Subd. 6) and elect eligible rates. Remaining edits should recognize what PUC staff believes is the Company's intent to capture that for projects above 40 kW, or projects below 40 kW that elect to, shall also sign the MN DIA. Alternatively, please explain why proposed edits are appropriate. (See MN DIA 1.5)iii. #7. Note spelling error: "disput" should be "dispute."iv. #8. Please explain the rationale for the Company's use of the various terms "generators", "distributed generation systems", and "facilities" in the tariff; compared to the term "Distributed Energy Resource" in the MN DIP. Staff is not suggesting these terms necessarily be replaced; rather, wants to clarify if they have the same or different meanings to the Company. |
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RESPONSE:

a. **Section V. pg. no. 60.0. I.**

Minnesota Power will update the term "rated" to read "AC capacity."

b. **Section V, pg. no. 60.7.**

- i. Minnesota Power will refer to the Rider for Standby Service rather than referring to "public utility's commission approved standby tariff."
- ii. Minnesota Power will remove "B. for a utility not subject to the commission's rate authority, the service associated with the applicable tariff in effect under Minnesota Statutes, section 216B.1611; subdivision 3, clause (2)."

c. **Section V, pg no. 60.7, Terms and Conditions**

- i. Minnesota Power will update "interconnection contract" to reference "Interconnection Agreement" consistent with MN DIP 1.1.5.
- ii. Minnesota Power will update the document to recognize a qualifying customer up to 1 MW is entitled to sign a Uniform Statewide Contract (Minn. R. 7835.9910; Minn. Stat. 216B.164; Subd. 6) and elect eligible rates.
- iii. This is an error and needs to be corrected.
- iv. Minnesota Power utilizes the terms "generators", "distributed generation systems", and "facilities" interchangeably. Minnesota Power is open to updating the tariff language so it consistently refers to "Distributed Energy Resource", in alignment with the MN DIP.

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REQUEST NO. 2	<p>Rider for Distributed Generation</p> <ul style="list-style-type: none">a. Please describe why application of this rider is limited to "on-site extended parallel distributed generation system" and the process for other Interconnection Customers (see MN DIP 1.1.1 Applicability; Glossary of Terms)b. Please describe why the rider uses "distributed generation system" rather than "Distributed Energy Resource" as used in the MN DIP.c. Section V. Pg. No. 82.1. General clean up.<ul style="list-style-type: none">i. Please describe why the Company is not replacing both references to "Mid-Continent Area Power Pool" with "Midcontinent Independent System Operator (MISO)."d. Please confirm the Rider for Distributed Generation will be applied consistent to the MN DIP (see MN DIA 1.2)
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RESPONSE:

- a. Minnesota Power will update the applicability of the tariff to reference “the on-site interconnection of a Distributed Energy Resource operating in parallel with the Company’s distribution system” for consistency with the MN DIP and Minn. Stat. Sec. 216B.1611, subd. 1(1).
- b. Minnesota Power will update the tariff language to reference Distributed Energy Resource, as opposed to distributed generation system.
- c. Minnesota Power will update the tariff language to reference Midcontinent Independent System Operator (MISO) as opposed to Mid-Continent Area Power Pool.
- d. The Rider for Distributed Generation will be applied consistent to the MN DIP.

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REQUEST NO. 3	<p>Electric Service Regulation of Minnesota Power</p> <p>a. Section VI. Pg. No. 3.14: Is the treatment of deposits in the MN DIP/MN DIA consistent with Electric Service Regulations (MP Section IX Deposits and Guarantees) and is the proposed treatment in MN DIP/MN DIA appropriate?</p>
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Response by: Jenna Warmuth
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RESPONSE:

The proposed treatment of deposits and guarantees in the MN DIP / MN DIA covers more than Minnesota Power Section IX Deposits and Guarantees.

Minnesota Power's Section IX refers to outstanding bills resulting from prior service that were not paid and/or disconnected, as well as poor credit history. The guarantee required in the MN DIP / MN DIA is required for all requested services.

For consistency, the Company is open to amending its service regulations to require guarantees for all type of services under the MN DIP/MN DIA.

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REQUEST NO. 4	Please describe if Minnesota Power intends to file with the Commission a copy of the Minnesota Distributed Energy Resource Interconnection Process and Agreement (MN DIP/ MN DIA). If so, when and where will it be filed?
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Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
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RESPONSE:

Minnesota Power intends to file a copy of the Minnesota Distributed Energy Resource Interconnection Process and Agreement (MN DIP/ MN DIA) prior to the Commission Ordered standards' effective date of June 17, 2019.

Response by: Jenna Warmuth
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Department: Regulatory Affairs
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STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 28th day of **January, 2019** she served Minnesota Power’s Responses to PUC IRs 104 in **Docket No. E0159/M-18-713** to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket’s Official Service List for this Docket were served as requested.



Susan Romans