



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. E017/M-18-712

Dear Mr. Wolf:

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

Otter Tail Power Company's Request for Approval of a Compliance Filing

The Petition was filed on January 4, 2019, 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:

Dean Pawlowski
Principal Engineer
Delivery Planning
Otter Tail Power Company
215 South Cascade
PO Box 496
Fergus Falls, Minnesota 56538-0496

The Department requests that Otter Tail 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
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-18-712

I. BACKGROUND INFORMATION

In its August 13, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* in Docket No. E999/CI-16-521, the Minnesota Public Utilities Commission (Commission) adopted the Minnesota Distributed Interconnection Process (MN DIP) and Minnesota Distributed Interconnection Agreement (MN DIA). In addition, the Commission ordered Otter Tail Power (OTP or the Company) to file updated tariffs reflecting the MN DIP and MN DIA within 90 days of the date of the Order.

On January 4, 2019, OTP submitted a revised copy of the MN DIP and MN DIA.

II. DEPARTMENT ANALYSIS

In its January 4, 2019 filing, OTP submitted a copy of the final Commission approved MN DIP and MN DIA, but did not provide any tariff revisions.

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 OTP tariff. In addition, the standard MN DIA should be included in the tariff.

In this instance, OTP needs to incorporate the MN DIP and MN DIA into its existing tariff whether in its entirety or in sufficient detail to allow customers seeking information to understand its operation in conjunction with OTP tariff offerings. The Department requests

that OTP submit a revised tariff including, at a minimum, 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.

III. DEPARTMENT RECOMMENDATION

The Department requests that Otter Tail 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. E017/M-18-712

Dated this 1st day of February 2019

/s/Sharon Ferguson

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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_18-712_M-18-712
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_18-712_M-18-712

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_18-712_M-18-712
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-712_M-18-712
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_18-712_M-18-712
Alan	Miller	N/A		2210 20th St NE Stewartville, MN 55976	Paper Service	No	OFF_SL_18-712_M-18-712
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-712_M-18-712
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-712_M-18-712
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-712_M-18-712
Michael	Monsrud	mmonsrud@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Paper Service	No	OFF_SL_18-712_M-18-712
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Murtaugh	mmurtaugh@fmcs.coop	Freeborn-Mower Cooperative Services	2501 Main Street East Albert Lea, MN 56007	Electronic Service	No	OFF_SL_18-712_M-18-712
Tony	Nelson	tnelson@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_18-712_M-18-712
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-712_M-18-712
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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_18-712_M-18-712
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_18-712_M-18-712
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_18-712_M-18-712
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_18-712_M-18-712
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-712_M-18-712
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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_18-712_M-18-712
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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_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_18-712_M-18-712
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Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition	3055 Clearview Way San Mateo, MN 94402	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_18-712_M-18-712
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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_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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