



February 26, 2026

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Xcel Energy's 2025 Integrated Distribution Plan
Docket No. E-002/M-25-142**

Executive Secretary Bergman,

Please find enclosed the comments of the Coalition for Community Solar Access, the Minnesota Solar Energy Industries Association, and the Solar Energy Industries Association, collectively the Joint Solar Parties (JSP). The JSP respectfully submits these comments in response to the Notice of Comment Period issued by the Minnesota Public Utilities Commission on November 13, 2025.

The JSP looks forward to continued collaboration with the Commission, the Department of Commerce, the Attorney General, utilities, and all stakeholders to ensure the thoughtful planning and deployment of distributed energy resources that will benefit Minnesota for years to come.

Sincerely,

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**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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**In the Matter of Xcel Energy's 2025 Integrated
Distribution Plan**

**INITIAL COMMENTS of CCSA, MnSEIA
and SEIA, Collectively the Joint Solar Parties
(JSP)**

February 26, 2026

Docket No. E002/M-25-378

EXECUTIVE SUMMARY

The Joint Solar Parties (JSP)—the Coalition for Community Solar Access, the Minnesota Solar Energy Industries Association, and the Solar Energy Industries Association—respectfully submit these comments to the Minnesota Public Utilities Commission (Commission) in the Matter of Xcel Energy's 2025 Integrated Distribution Plan (IDP). The JSP's comments focus on two key areas: Implementation of FERC Orders 841 and 2222, and Flexible Interconnection.

Regarding Xcel's response to IDP requirement No. 3.C.4, which requires it to include information on the impacts of FERC Order 841, the JSP recommend the Commission accept Xcel's Response. Xcel's response anticipated impacts from FERC Order 841 and Order 2222, and raises important issues that Order 2222 empowers state regulators to voluntarily coordinate with utilities and other stakeholders to integrate Distributed Energy Resource (DER) aggregations into wholesale markets. We recommend the Commission address the issues raised by Xcel by opening an investigatory proceeding to proactively address Order 2222 coordination issues, including harmonizing MN DIP with interconnection and aggregation reviews, clarifying rules for "stacking" retail and wholesale services (Dual Participation), and establishing data sharing protocols.

Addressing Flexible Interconnection, the JSP request that Xcel substantiate why it hasn't proposed implementation of Static Flexible Interconnection ("Static FI") yet when the Commission's 2024 order ("Order Point 19") unambiguously required Xcel Energy to implement Static FI in the near term, prior to implementing full Dynamic Flexible Interconnection ("Dynamic FI"). With Dynamic FI unavailable until 2029 at the earliest, bypassing Static FI, a cost-effective, immediately deployable solution, translates directly into mounting interconnection costs, hundreds of stalled DER interconnections, and lost opportunity to build the institutional and technical foundation that a successful transition to Dynamic FI will ultimately require. We urge Xcel to update its Flexible Interconnection proposal and recommend the Commission enforce Order Point 19 by requiring Xcel to develop and implement Static FI in the near term, prior to or in parallel with implementing full, Dynamic FI.

COMMENTS

I. FERC Order No. 2222 Implementation

Order 2222 Implementation requires Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs), such as MISO, to remove barriers for Distributed Energy Resource (DER) aggregations to participate in wholesale energy markets. The Order does not mandate action by state regulators but empowers them to voluntarily coordinate with utilities and other stakeholders to facilitate DER participation. The JSP recommend the Commission open an investigatory proceeding to proactively address coordination issues with the goal of ensuring Order 2222 is effectuated in a cost effective and efficient manner that ensures ratepayers receive the benefits of the investments being made.

IDP Requirement No. 3.C.4 requires the following:

Include information on anticipated impacts from FERC Order 841 (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM-18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional

Transmission Organizations [RTO] and Independent System Operators [ISO]).

The JSP believes that Xcel satisfied this requirement and recommend the Commission accept it. We support Xcel's suggestion that it would be more useful to revise the requirement to include a high-level summary of recent FERC Orders and their potential implications for distribution planning, rather than continuing to provide analysis on Order 841. Order 841, which required RTOs and ISOs to open Energy, Capacity, and Ancillary markets to storage resources at any voltage level, was expanded by Order 2222 in 2020 to allow DER aggregations to provide these services to wholesale markets.¹

The purpose of Order 2222 was to “remove barriers to the participation of distributed energy resource aggregations in the capacity, energy, and ancillary service markets operated by Regional Transmission Organizations and Independent System Operators (RTO/ISO).”² In furtherance of this purpose and pursuant to its exclusive jurisdiction over the wholesale markets,³ FERC declined to include an opt-out mechanism allowing states to broadly prohibit all DERs under their jurisdiction from participating in RTO/ISO markets through aggregations.⁴ While the order did not include an opt-out mechanism, it does not delegate responsibility for implementation to state regulatory authorities. The responsibility for implementation was clearly directed to RTOs/ISOs.

The Order is implemented under FERC’s jurisdiction by regional RTOs/ISOs, which are required to revise their tariffs to ensure that market rules facilitate the participation of DERs.⁵ MISO will implement the required tariff revisions in two Phases. Phase 1 is expected to be complete by September 1, 2026, and completion of final implementation anticipated by June 1, 2029.⁶ The 2025 IDP is a timely opportunity to begin to consider the Order’s implications for distribution planning. Several states in the MISO region have already initiated regulatory

¹ *FERC Order 2222*, 172 FERC ¶61,247, Summary (Sept. 17, 2020) (available at: https://www.ferc.gov/sites/default/files/2020-09/E-1_0.pdf).

² *Id.*

³ Under FPA § 201(b), FERC has exclusive jurisdiction over the sale of electric energy at wholesale in interstate commerce and the transmission of electric energy in interstate commerce. 16 U.S.C. § 824(b). See *FERC v. Electric Power Supply Ass’n* (“EPSA”), 577 U.S. 260, 266 (2016); See also *New York v. FERC*, 535 U.S. 1, 17 (2002).

⁴ *FERC Order 2222*, 172 FERC ¶¶47-48, 56–57.

⁵ *Id.*, at 1.

⁶ FERC, Office of Energy Market Regulations, Dkt. Nos. ER22-1640-006, ER22-1640-007 (Jan. 13, 2026) (“Pursuant to authority delegated to the Director, Division of Electric Power Regulation – Central under 18 C.F.R. § 375.307, the submittals are accepted for filing, effective September 1, 2026 and June 1, 2029, as requested.”).

proceedings to address key areas of coordination: Indiana,⁷ Michigan,⁸ Iowa,⁹ and Wisconsin.¹⁰ Minnesota would benefit from following suit.

In its IDP, Xcel provided commentary on the requirements for implementing Order 2222.

“Given the scope of Relevant Electric Retail Regulatory Authority (RERRA) responsibilities, distribution utilities will need to develop state-jurisdictional tariffs and agreements that define roles and responsibilities for DERs, aggregators, and utilities. RERRAs must also evaluate funding requests for staffing and systems and determine appropriate cost allocation mechanisms.”

We believe FERC was clear that Order 2222 did not delegate implementation responsibilities to states. Nor does it impose any obligations on states. It does not direct states to create new regulatory frameworks or tariffs for DER aggregators. To the contrary, FERC warned that state or utility interposition could create barriers to wholesale participation.¹¹

However, Order 2222 did not preclude or limit state Commission regulation of matters already within its jurisdiction, including retail rates, distribution system planning, distribution system operations, or distribution system reliability, distributed energy resource facility siting, and interconnection of resources to the distribution system.¹² Moreover, the Order empowered state regulators to choose to more closely coordinate with RTO/ISOs, utilities, third-party aggregators, and other stakeholders to promote successful and meaningful DER aggregation participation.¹³

Coordination will enable the Commission to minimize potential issues for non-participating customers, ensure that all ratepayers receive the benefit of investments made, and align local distribution needs with the wholesale market enhancements in an orderly, cost

⁷ *Ind. Util. Regulatory Comm'n*, Implementation Re: FERC Order 2222, <https://www.in.gov/iurc/home/implementation-re-ferc-order-2222/> (last visited Feb. 18, 2026).

⁸ *Demand Response Aggregation*, Mich. Pub. Serv. Comm'n, <https://www.michigan.gov/mpsc/commission/workgroups/demand-response-aggregation> (last visited Feb. 18, 2026).

⁹ *Iowa Utils. Comm'n*, Rulemaking Regarding Third-Party Aggregators of Electric Retail Customers, Docket No. RMU-2025-0020, (Oct. 3, 2025) <https://efs.iowa.gov/> (last visited Feb. 18, 2026).

¹⁰ *Electric Investigation*, Docket No. EI-163, Wis. Pub. Serv. Comm'n, <https://apps.psc.wi.gov/ERF/ERFsearch/content/searchResult.aspx?UTIL=5&CASE=EI&SEQ=163&START=none&END=none&TYPE=none&SERVICE=none&KEY=none&NON=N> (last visited Feb. 18, 2026).

¹¹ *FERC Order 2222*, 172 FERC 61,24, ¶ 298 (“We find that requiring or permitting distribution utilities to authorize the participation of distributed energy resources in RTO/ISO markets directly or as part of an aggregation could create a barrier to distributed energy resource aggregation.”). Available at: https://www.ferc.gov/sites/default/files/2020-09/E-1_0.pdf.

¹² *FERC Order 2222*, 172 FERC 61,24, ¶ 61.

¹³ *Id.* at 322.

efficient manner. Possible roles and responsibilities for state regulators in coordinating the participation of DERs in MISO include developing interconnection agreements and rules; establishing local rules governing distribution system safety and reliability; setting requirements for data sharing, metering, and telemetry; overseeing distribution utility review of DER participation in aggregations; establishing rules for multi-use applications; and resolving disputes between DER aggregators and distribution utilities regarding access to individual DER data.¹⁴

While the Commission could rely on MISO and Minnesota’s electric utilities to implement Order 2222, actively coordinating participation will result in more orderly and cost efficient implementation. Coordination will improve outcomes for Minnesota ratepayers, who will pay for utility investments required for implementation, including “new analytical tools, new processes, new technology systems and staffing.”¹⁵

For these reasons, the JSP recommend the Commission open an investigatory proceeding to develop and address the following Order 2222 implementation issues, which may benefit from its participation and coordination, as identified in Xcel’s IDP.

- *DER Interconnections:* While the Commission is not required to update the MN DIP for 2222 implementation, we recommend reviewing it to determine if the existing process efficiently captures the necessary information to inform a distribution utility review during aggregation review and registration, and amending the processes to ensure the distribution interconnection and Distributed Energy Resource Aggregator (DERA) registration applications are harmonized.
- *DER Aggregation Review:* We agree with Xcel’s statement that “utilities and RERRAs should collaborate to streamline aggregation review processes and leverage existing interconnection data.” Order 2222 allows 60 days for utilities to perform an aggregation review when a DERA proposes a new DEAR. We recommend the Commission consider what actions it can take to prevent the 60-day review window from becoming a bottleneck.

¹⁴ *FERC Order 2222*, 172 FERC 61,24 ,¶ 324.

¹⁵ Xcel Energy, *2025 Integrated Distribution Plan*, Docket No. E002/M-25-142 (October 31, 2025) Chapter 7 - Page 44. .

- *Dual Participation*: The Commission should clarify which retail and wholesale services can be "stacked" and which are mutually exclusive to avoid paying twice for the same physical action. The Commission should also prioritize exploring whether advanced metering solutions already in place in Xcel territory are capable of distinguishing between different grid services.¹⁶
- *Wholesale Market Issues*: FERC has ordered MISO to coordinate with utilities and RERRAs to establish protocols for sharing metering and telemetry data in a manner that minimizes costs and address privacy and cybersecurity.¹⁷ We support the Commission collaborating with utilities and MISO to address these issues.
- *Distribution System Management Tools*: We agree with Xcel that utilities will require advanced tools for real-time monitoring, aggregation reviews, and operational coordination. We recommend that, before considering additional investment, the Commission require Xcel to conduct a thorough review of the grid modernization technology it has already invested in to ascertain whether current capabilities for supporting wholesale metering and telemetry requirements are being fully utilized and identify gaps where additional investment will be required.
- *Data Access*: DERAs cite lack of access to uniform, high quality data as a major barrier to scaling programs. This includes customer data (e.g., meter data), grid data (e.g. hosting capacity data) and real time grid condition data. We encourage the Commission to engage with MISO, utilities, and aggregators to establish data needs and data sharing protocols across utilities and DERAs.

II. Flexible Interconnection

The JSP request that Xcel substantiate why it hasn't proposed implementation of Static FI yet when the Commission's 2024 order (Order Point 19) unambiguously required Xcel to implement Static FI in the near term, prior to implementing full Dynamic FI. We urge Xcel to update its Flexible Interconnection proposal to satisfy Order Point 19.

The JSP recommend the Commission enforce Order Point 19 and require Xcel

¹⁶ *Electric Power Research Institute, Dual Program Participation and Double Counting Perspectives for Distributed Resource Market Participation: An EPRI FO2222 Phase 1 Collaborative Report*, (Jan 17, 2022), at 12. Available at <https://www.epri.com/research/products/000000003002023292>

¹⁷ *FERC Order 2222*, 172 FERC 61,24, 270.

to develop and implement Static FI in the near term, prior to or in parallel with implementing full, Dynamic FI. This recommendation is grounded in three converging realities in Xcel's IDP: (1) Dynamic FI remains at least three years away from meaningful deployment; (2) grid interconnection costs are escalating sharply; and (3) the number of capacity-constrained feeders continues to rise, leaving hundreds of DER projects stalled in the interconnection queue. Static FI is available today, cost-effective, and provides a solid foundation for the eventual transition to Dynamic FI with no material downsides. The Commission should accept only a modified Flexible Interconnection proposal, particularly given the current grid congestion issues Xcel's own data reveal.

Order Point 19 provides:

Xcel shall demonstrate the Company's ability to integrate DERs with the tools available to it, today and in the near term, including specifically through:

- a) Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and
- b) Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation.¹⁸

Order Point 19 required Xcel to demonstrate its ability to integrate DERs using tools available today and in the near term, specifically by: (a) implementing Static FI prior to implementing full, Dynamic FI; and (b) pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity. In adopting this phased approach, the Commission agreed with Grid Equity Commenters that Xcel should proceed “steadily, carefully, and transparently”—allowing the Company to gain experience with these innovations while enabling meaningful stakeholder participation throughout the process.¹⁹ The Commission's rationale was sound then and remains sound today.

¹⁸ Minn. Pub. Utils. Comm'n, *Order Accepting 2023 Integrated Distribution Plan and Modifying Reporting Requirements*, Docket No. E-002/M-23-452 (Sept. 16, 2024), at 26.

¹⁹ *Id.*, at 18.

Xcel's 2025 IDP proposes to skip Static FI entirely, which is non-compliant with Order Point 19. Xcel argues that while “While static Flexible Interconnection (FI) is technically feasible today, it presents significant limitations” that make it inferior to Dynamic FI because its fixed, conservatively designed operating schedules cannot account for real-time grid conditions, resulting in “increased curtailment for the DER owner and reduced utilization of the utility system” compared to a dynamic system.²⁰ The Company further contends that because limited DERMS deployment is now expected in 2026, pursuing Static FI “would be sub-optimal” and that Dynamic FI should be prioritized instead.²¹

Static flexible interconnection is available for near-term implementation. Site-wide import and export controls are already included in Xcel's Technical Interconnection and Interoperability Requirements (TIIR). No new software platforms, real-time grid communication infrastructure, or DERMS integration is required, unlike Dynamic FI, which Xcel itself acknowledges will not be broadly available until 2029 at the earliest.²² Static FI requires only that Xcel formally operationalize capabilities it already possesses and make them available as a voluntary pathway for developers on capacity-constrained feeders.

Xcel's IDP reveals that Dynamic FI is not available as a near-term solution. The Company's proposed deployment timeline is as follows:

- Late 2026–2027: Limited DERMS deployment on five to ten feeders of Xcel's choosing, with FI Dynamic schedules developed for those feeders only and available for projects 1MW and up.
- 2028: Operation and validation of FI on the initial feeders—no expansion.
- 2029 and beyond: Xcel “may consider expanding beyond the initially targeted areas as new opportunities emerge.”²³

Xcel's proposed timeline makes clear that DERMS enabled Dynamic FI will require significant development before it could be broadly available as a tool for reducing interconnection costs and grid congestion. Xcel's proposed acquisition of a DERMS platform in the DCP docket is not, standing alone, evidence that the Company is prepared to implement

²⁰ Xcel Energy, *2025 Integrated Distribution Plan*, Docket No. E002/M-25-142 (October 31, 2025) Chapter 7 - Pages 4-5.

²¹ *Id.*

²² Xcel Energy, *2025 Integrated Distribution Plan*, Docket No. E002/M-25-142 (October 31, 2025) Chapter 7 - Page 5, figure 7.2.

²³ *Id.*, page 5.

Dynamic FI use cases in the near term. The practical effect of Xcel's proposal is that DER developers on capacity-constrained feeders would face three or more years of expensive grid upgrade requirements—costs and delays that Static FI could resolve today through a voluntary curtailment agreement.

The IDP's reporting on current interconnection costs and DER growth underscores the urgency. Xcel's forecast anticipates a minimum of 2180 MWAC of distributed solar will come online in Minnesota by 2030.²⁴ Already, the number of capacity-constrained feeders on Xcel's system has grown sharply, rising 40 percent in a single year — from 53 feeders in January 2024 to 74 in January 2025 — leaving 298 projects totaling 420 MW stalled in the interconnection queue.²⁵ In 2024, Xcel's DER interconnection costs totaled over \$9 million, including \$4.7 million in billed upgrade costs for Community Solar Gardens and \$4.6 million in engineering study fees, with onsite solar projects over 20 kW averaging nearly \$12,000 per project in upgrade costs.²⁶

Static FI could allow developers and customers on capacity-constrained feeders to voluntarily curtail in lieu of triggering costly upgrade obligations, enabling a potentially significant share of the 298 stalled projects to move forward today. Every system that curtails reduces its impact on hosting capacity utilization and allows the utility to get more use out of its existing system before expensive upgrades are required. This tool should not sit unused while utility customers and developers bear escalating costs that will prevent Minnesota from reaching its clean energy goals.

Implementing Static FI now is not a compromise solution—it is a strategically sound precursor to Dynamic FI. Static FI supports three critical functions in the near term. First, as discussed above it would unlock interconnection capacity immediately. Sites that agree to a Static curtailment schedule can proceed to construction today, reducing the backlog of on-hold projects.

Second, it builds institutional and technical experience. As the Commission recognized in its 2024 order, Xcel needs practical experience with flexible interconnection tools before attempting a full DERMS rollout. Static FI provides that experience without the complexity of real-time grid communication. Systems constructed under a Static FI framework can be upgraded

²⁴ *Id.*, Chapter 1, Page 42.

²⁵ *Id.*, Chapter 7, Page 36.

²⁶ *Id.*, Page 15.

to Dynamic FI seamlessly once DERMS is fully operational.

Third, it establishes interoperability and communication standards early. The near-term window is the ideal time to establish standardized communication requirements so that compatible equipment is selected and installed from the outset. Requiring Xcel to implement Static FI now ensures that the infrastructure being built today is ready for Dynamic FI tomorrow.

Xcel argues that Static FI is sub-optimal because it requires conservative fixed operating schedules that may lead to increased curtailment and reduced DER owner revenues. The Company strongly recommends that, now that limited DERMS deployment is planned for 2026, pursuing Static FI would be inefficient. These claims are unpersuasive for several reasons.

Static FI is voluntary and customer-driven. Customers who believe curtailment under Static FI is too costly relative to waiting for Dynamic FI may decline to participate. Static FI expands options; it forecloses none. Offering the option is categorically better than leaving developers with no alternative but expensive grid upgrades.

Dynamic FI remains years away for most interconnections. Xcel's projected 2026 DERMS deployment covers only five to ten feeders selected by the Company. The 298 projects currently on hold are spread across 74 capacity-constrained feeders. The vast majority of developers and customers will not benefit from Dynamic FI for years. Static FI provides a viable path for these interconnections in the interim.

Finally, the Commission has already resolved this issue. Order Point 19 reflects the Commission's considered judgment that a phased approach—beginning with Static FI—is the appropriate way to proceed. Xcel's proposal to skip directly to Dynamic FI is inconsistent with that order and should not be accepted without clear evidence that Dynamic FI is genuinely available to serve the near-term interconnection needs that Static FI would address.

For the foregoing reasons, we respectfully recommend the Commission enforce Order Point 19 and require Xcel to:

- Revise its Flexible Interconnection proposal to develop and implement Static FI in the near term, prior to or in parallel with implementing full, Dynamic FI.
- File a compliance plan within 90 days of its final order in this docket, detailing how static FI will be operationalized, including applicable technical standards, customer-facing documentation, and a timeline for making static FI available to all interconnection applications on capacity-constrained feeders; and

- Report to the Commission annually on the number of interconnections utilizing static FI, the capacity made available as a result, and the progress toward transitioning those interconnections to full dynamic FI as DERMS deployment matures.

CONCLUSION

The Joint Solar Parties respectfully submit that the issues raised in these comments are not peripheral — they are central to whether Minnesota's distributed energy future is built on a foundation that is functional, fair, and forward-looking. Xcel's 2025 IDP presents an important opportunity, but it also reveals two areas where the Commission's continued engagement is essential.

On Order 2222, Minnesota has an opportunity to catch up to the many states across the MISO region — Indiana, Michigan, Iowa, and Wisconsin — that have already initiated regulatory proceedings to address the coordination challenges that DER aggregation participation creates. The JSP urge the Commission to open an investigatory proceeding that addresses interconnection harmonization, aggregation review timelines, dual participation rules, data access, and wholesale market protocols in a coordinated and timely manner. Delay will not make these issues easier to address or less complex.

On Flexible Interconnection, the Commission has already spoken. Order Point 19 established a clear, phased mandate, and the data in Xcel's own IDP confirm that the mandate was well-founded. With 298 projects stalled, 74 capacity-constrained feeders, and interconnection costs exceeding \$9 million in a single year, the cost of continued inaction falls squarely on the developers, customers, and communities that distributed solar is meant to serve. Static FI is available today. It is voluntary, cost-effective, and fully consistent with the eventual transition to Dynamic FI. There is no sound basis for bypassing an immediately available tool for relief.

The JSP look forward to working constructively with Xcel, the Commission and other stakeholders to ensure that the planning and deployment of distributed energy resources in Minnesota reflects the ambition that this moment demands.

In summary, the JSP recommend the Commission:

1. Accept Xcel's Response to IDP requirement No. 3.C.4, which requires it to include information on the impacts of FERC Order 841
2. Address the issues raised by Xcel in addressing IDP requirement No. 3.C.4 by opening an investigatory proceeding to proactively address Order 2222 coordination issues, including harmonizing MN DIP with interconnection and aggregation reviews, clarifying rules for "stacking" retail and wholesale services (Dual Participation), and establishing data sharing protocols.
3. Enforce Order Point 19 and require Xcel to:
 - a. Revise its Flexible Interconnection proposal to develop and implement Static FI in the near term, prior to or in parallel with implementing full, Dynamic FI.
 - b. File a compliance plan within 90 days of its final order in this docket, detailing how static FI will be operationalized, including applicable technical standards, customer-facing documentation, and a timeline for making static FI available to all interconnection applications on capacity-constrained feeders; and
 - c. Report to the Commission annually on the number of interconnections utilizing static FI, the capacity made available as a result, and the progress toward transitioning those interconnections to full dynamic FI as DERMS deployment matures.

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