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January 11, 2021

Via Electronic Filing

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

RE: NOTICE OF COMMENT PERIOD; DOCKET NO. E002/C-20-892

Dear Mr. Seuffert:

Nokomis Energy submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's January 4, 2021 Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at matthew@nokomisenergy.com or (612) 999-8600 if you have any questions regarding this filing.

Regards,

A handwritten signature in black ink, appearing to read "Matthew D. Melewski", with a long, horizontal flourish extending to the right.

Matthew D. Melewski
General Counsel

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A FORMAL COMPLAINT
AND PETITION FOR EXPEDITED RELIEF BY
SUNRISE ENERGY VENTURES LLC AGAINST
NORTHERN STATES POWER COMPANY, D/B/A
XCEL ENERGY

DOCKET NO. E-002/C-20-892

NOKOMIS ENERGY COMMENTS

January 11, 2021

Nokomis Energy is a multifaceted clean energy development and consulting company operating primarily in the upper Midwest. We appreciate this opportunity to comment on this matter of significant public policy.

On January 4, 2021, the commission filed a notice of comment period, seeking comment on whether the Commission should open an investigation on Sunrise Energy Ventures LLC's Formal Complaint and Petition for Expedited Relief against Xcel Energy for unreasonable methodologies, policies and practices regarding interconnection of three CSG projects. Nokomis Energy submits these comments because we believe it is in the public interest for the Commission to investigate the allegations made in Sunrise Energy Ventures LLC's Formal Complaint and Petition for Expedited Relief.

One of the issues raised in Sunrise's Complaint is Xcel's reliance on unwritten engineering and construction policies that exist outside of Xcel's tariffs. In this case, Sunrise is objecting to the arbitrary nature of re-conductoring. Pursuant to this "policy," Xcel dictates certain conductors when connecting DERs to their distribution grid, and uses the specificity of the conductors it uses as an excuse to deny that capacity exists on certain feeders. Alternatively, Xcel may require a CSG developer to install much larger conductors than are required.

Sunrise's experience is not unique. In January of 2019, Xcel notified Nokomis that there was no capacity for project SRC068270, due the fact that the connecting feeder required a conductor size larger than 336AL, which according to Xcel is "the largest standard overhead conductor used for mitigating voltage and thermal impacts caused by DER." After receiving the no capacity notice, Nokomis informed Xcel that the current conductor size of the existing feeder was actually 556AL, notwithstanding Xcel's supposed policy. Xcel eventually relented and provided Nokomis an Interconnection Agreement after a substantial delay.

These specific technical disputes speak to a larger concern with the manner in which Xcel implements the MNDIP. Outside of the scope of MNDIP, Xcel maintains written and unwritten policies that Xcel routinely uses to deny or limit capacity, or dictate the evaluation of an interconnection application. These policies are not currently subject to any Commission scrutiny, but are frequently invoked by Xcel. This is an ongoing problem that will continue to frustrate the Commission's directives.

Nokomis believes that the Commission should undertake a process to bring Xcel's written and unwritten policies under its oversight, to ensure technical competency, consistency with legal obligations, and propriety within the various programs overseen by the Commission.