



414 Nicollet Mall  
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December 18, 2024

—Via Electronic Filing—

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

RE: COMMENTS  
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. E999/CI-16-521

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Notice of Comment Period issued on November 27, 2024 in this docket.

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 Nathan Kostiuk at [nathan.c.kostiuk@xcelenergy.com](mailto:nathan.c.kostiuk@xcelenergy.com) or contact me at [brian.t.monson@xcelenergy.com](mailto:brian.t.monson@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

BRIAN MONSON  
MANAGER, REGULATORY AFFAIRS

Enclosure  
cc: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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. E999/CI-16-521

**COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the Notice of Comment Period issued on November 27, 2024, in this docket. The focus of the Comment Period is on whether the Commission should approve the Technical Subgroup's (TSG's) proposed changes to the State of Minnesota Distributed Energy Resources Interconnection Process (MN DIP), specifically regarding adding new study screens for unintentional islanding.

The proposed changes are crucial for enhancing the reliability and safety of our energy systems. By incorporating these new study screens, we aim to mitigate the risks associated with unintentional islanding, thereby ensuring a more robust and secure interconnection process for Distributed Energy Resources (DERs). This collaborative effort reflects our commitment to continuous improvement and innovation in the energy sector.

The topics open for comment are as follows and are addressed in these Comments:

- Should the Commission adopt the TSG's proposed changes to the MN DIP as found in Attachment A to this Notice?
- Are there other issues or concerns related to this matter?

## COMMENTS

### I. THE COMMISSION SHOULD ADOPT THE TSG'S PROPOSED CHANGES TO MN DIP

The subgroup under the Distributed Generation Working Group (DGWG) was formed by the directive of the Commission, which required the TSG to convene and examine the possibility of unintentional islanding caused by the interconnection of Distributed Energy Resources (DERs). The TSG's mandate included identifying additional screens that utilities can perform to assess the risk of unintentional islanding and determining if there are less costly alternatives to Voltage Supervisory Reclosing (VSR) for addressing any perceived risk. The TSG sought feedback from the DGWG during this examination and was tasked with filing a report with its findings and recommendations by December 31, 2024.

The TSG held five meetings between May and July 2024 to thoroughly explore these issues:

- **Meeting #1 (May 16, 2024, 2 PM Central):** This meeting focused on utility concerns with unintentional islanding, DER installers' concerns with VSR or other unintentional islanding mitigation solutions, and the screening methods used by other entities.
- **Meeting #2 (May 30, 2024, 2 PM Central):** The discussion delved into the underlying causes of islands, including the relationships between faults, system protection, and islanding. The meeting also reviewed case studies of actual islands that have occurred or modeling of islanding potential.
- **Meeting #3 (June 13, 2024, 2 PM Central):** This session continued the educational discussions and focused on technical screens for identifying the potential of unintentional islanding and identifying changes to the MN DIP.
- **Meeting #4 (June 27, 2024, 2 PM Central):** The TSG proposed screens for unintentional islanding and discussed mitigation solutions for the potential of unintentional islanding (tool bag).
- **Meeting #5 (July 11, 2024, 2 PM Central):** The final meeting reviewed the TSG consensus on technical screens and mitigation solutions to present to the full DGWG.

The TSG's diligent analysis and collaborative efforts culminated in a report outlining their findings and recommendations, which they submitted to Staff on August 26, 2024, in Docket 16-521. This report is included as Attachment A to the Notice of Comment Period.

On November 1, 2024, the TSG presented their findings and recommendations to the DGWG. The presentation slides were subsequently filed in Docket No. 16-521 on November 12, 2024. During the presentation, the TSG clarified that their scope, as agreed upon by all parties, was twofold: firstly, to gain an understanding of the potential for unintentional islanding caused by the interconnection of DERs under the current interconnection process and technical requirements; and secondly, to identify additional screens that utilities can perform to assess the risk of unintentional islanding. We note that the TSG did not explore whether there are less costly alternatives to VSR, as the TSG reached a consensus on the language for the additional screen before delving into cost alternatives and decided to conclude their work at that point.

The Company supports the TSG's recommendation to incorporate an additional screen into the MN DIP, and we appreciate the collaborative effort that led to this recommendation. The insights and recommendations provided by the TSG, through their diligent analysis of unintentional islanding risks associated with DER interconnections, are invaluable. Incorporating an additional screening measure into the MN DIP will significantly enhance our ability to assess and mitigate such risks effectively.

## **II. CHANGES TO TARIFFS WILL BE NEEDED**

As our Section 10 tariff incorporates the MN DIP, if the Commission approves the changes proposed by the TSG, the Company will subsequently need to amend our tariff to ensure alignment. The proposed changes to the MN DIP include the addition of new study screens for unintentional islanding, which will necessitate corresponding updates to our tariff provisions.

The TSG's recommendations are designed to enhance the reliability and safety of our energy systems by incorporating additional screening measures to assess the risk of unintentional islanding. These changes will require utilities to perform new assessments during the interconnection process, ensuring that potential risks are identified and mitigated effectively. As a result, our tariff must be updated to reflect these new requirements and provide clear guidance to stakeholders on the implementation of the additional screens.

To facilitate a smooth transition and ensure compliance with the updated MN DIP, we respectfully request a period of 30 days from the issuance of the Commission's Order to implement these necessary changes to our tariff. This timeframe will allow us to make the required amendments, communicate the updates to all relevant parties, and ensure that our processes are fully aligned with the new standards.

## CONCLUSION

In summary, the Company:

- Supports the recommendation put forth by the TSG and
- Respectfully requests a period of 30 days from the issuance of any Order on this topic to appropriately amend our tariffs.

We appreciate the opportunity to comment on this matter and extend our thanks to everyone involved in the TSG for their time and collaborative spirit throughout this process to ensure the continued reliability and safety of our energy systems.

Dated: December 18, 2024

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No.      E999/CI-16-521**

Dated this 18<sup>th</sup> day of December 2024

/s/

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Joshua DePauw  
Regulatory Administrator

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102	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	16-521Official Service List PUC
103	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	16-521Official Service List PUC
104	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	16-521Official Service List PUC
105	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
106	Alex	Nelson	anelson@dakotaelectric.com	Dakota Electric Association		4300 220nd St Farmington MN, 55024 United States	Electronic Service		No	16-521Official Service List PUC
107	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	16-521Official Service List PUC
108	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
109	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	16-521Official Service List PUC
110	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	16-521Official Service List PUC
111	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	16-521Official Service List PUC



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
112	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	16-521Official Service List PUC
113	Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc		P.O. Box 639 Tyler MN, 56178-0639 United States	Electronic Service		No	16-521Official Service List PUC
114	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	16-521Official Service List PUC
115	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	16-521Official Service List PUC
116	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	16-521Official Service List PUC
117	Bethany	Owen	bowen@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	16-521Official Service List PUC
118	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
119	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	16-521Official Service List PUC
120	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
121	Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company		PO Box 496 215 S. Cascade St. Fergus Falls MN, 56537-0496 United States	Electronic Service		No	16-521Official Service List PUC
122	Susan	Peirce	susan.peirce@state.mn.us		Department of Commerce	85 Seventh Place East St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
123	Wess	Pfaff	wes.pfaff@mrenergy.com			null null, null	Electronic Service		No	16-521Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				Service List PUC
124	DONNA	PICKARD	dpickard@aladdinsolar.com	Genie Solar Support Services		1215 Lilac Lane Excelsior MN, 55331 United States	Electronic Service		No	16-521Official Service List PUC
125	Crystal	Pomerleau	crystal.r.pomerleau@xcelenergy.com	Xcel		null null, null United States	Electronic Service		No	16-521Official Service List PUC
126	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	16-521Official Service List PUC
127	Elizabeth	Psihos	elizabeth.psihos@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
128	Peter	Reese	preese@sundialsolarenergy.com	Sundial Energy, LLC		3363 Republic Ave Saint Louis Park MN, 55426 United States	Electronic Service		No	16-521Official Service List PUC
129	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	16-521Official Service List PUC
130	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	16-521Official Service List PUC
131	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	16-521Official Service List PUC
132	Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC		1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	16-521Official Service List PUC
133	Daniel	Rogers	dan@nokomispartners.com			2639 Nicollet Ave Ste 200 Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
134	Michael	Ruiz	michael.ruiz@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC

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135	Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electrical Association		PO Box 529 24386 State Highway 4 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
136	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	16-521Official Service List PUC
137	Kenric	Scheevel	kjs@dairy.net.com	Dairyland Power Cooperative		3200 East Ave S PO Box 817 La Crosse WI, 54602 United States	Electronic Service		No	16-521Official Service List PUC
138	Dean	Schiro	dean.e.schiro@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
139	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	16-521Official Service List PUC
140	Matthew	Schuerger	matthew.schuerger@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
141	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
142	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	16-521Official Service List PUC
143	Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
144	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	16-521Official Service List PUC
145	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	16-521Official Service List PUC

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146	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	16-521Official Service List PUC
147	Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power		1725 US Highway 12 E Suite 100 Litchfield MN, 55355 United States	Electronic Service		No	16-521Official Service List PUC
148	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
149	Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy		800 LaSalle Avenue P.O. Box 59038 Minneapolis MN, 55459-0038 United States	Electronic Service		No	16-521Official Service List PUC
150	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	16-521Official Service List PUC
151	Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Association		24386 State Hwy. 4, PO Box 529 Sleepy Eye MN, 56085 United States	Electronic Service		No	16-521Official Service List PUC
152	Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies		5810 Nicollet Ave Minneapolis MN, 55419 United States	Electronic Service		No	16-521Official Service List PUC
153	Brandon	Stamp	brandon.j.stamp@xcelenergy.com	Xcel Energy		401 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	16-521Official Service List PUC
154	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	16-521Official Service List PUC
155	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	16-521Official Service List PUC
156	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis	Electronic Service		No	16-521Official Service List PUC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55402-4629 United States				
157	Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric		22636 US Highway 59 PO Box 788 Worthington MN, 56187 United States	Electronic Service		No	16-521Official Service List PUC
158	Bryant	Tauer	btauer@whe.org	Wright-Hennepin		6800 Electric Dr Rockford MN, 55373 United States	Electronic Service		No	16-521Official Service List PUC
159	Emma Marshall	Torres	emarshall-torres@convergentep.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC
160	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	16-521Official Service List PUC
161	Jeff	Triplett	triplettj@powersystem.org	MREA		10710 Town Square Dr NW St 201 Minneapolis MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
162	Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric		22636 US Hwy. 59 P.O. Box 788 Worthington MN, 56187-0788 United States	Electronic Service		No	16-521Official Service List PUC
163	Lise	Trudeau	lise.trudeau@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
164	Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy		null null, null United States	Electronic Service		No	16-521Official Service List PUC
165	Ellen	Veazey	iveazey@solarunitedneighbors.org	Solar United Neighbors		1350 Connecticut Ave NW Ste 412 Washington DC, 20036 United States	Electronic Service		No	16-521Official Service List PUC
166	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	16-521Official Service List PUC
167	Wendy	Vorasane	wendy.vorasane@idealenergies.com			null null, null United States	Electronic Service		No	16-521Official Service List PUC

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168	Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power		PO Box 248 501 S 1st St Montevideo MN, 56265 United States	Electronic Service		No	16-521Official Service List PUC
169	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	16-521Official Service List PUC
170	Samantha	Weaver	samantha@communitysolaraccess.org	Coalition for Community Solar Access		1380 Monroe St. Washington DC DC, 20010 United States	Electronic Service		No	16-521Official Service List PUC
171	Elizabeth	Wefel	eawefel@flaherty-hood.com	Missouri River Energy Services		525 Park St Ste 470 Saint Paul MN, 55103 United States	Electronic Service		No	16-521Official Service List PUC
172	John	Williamson	john.williamson@state.mn.us	Minnesota Department of Labor and Industry		443 Lafayette Rd N St. Paul MN, 55155-4341 United States	Electronic Service		No	16-521Official Service List PUC
173	Danielle	Winner	danielle.winner@state.mn.us		Department of Commerce	85 7th Place East Suite 500 Saint Paul MN, 55101 United States	Electronic Service		No	16-521Official Service List PUC
174	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	16-521Official Service List PUC
175	Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box Sioux Falls SD, 57109-8920 United States	Electronic Service		No	16-521Official Service List PUC
176	Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services		3724 West Avera Drive P.O. Box 88920 Sioux Falls SD, 57108-8920 United States	Electronic Service		No	16-521Official Service List PUC