

July 18, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-16-204

Dear Mr. Wolf:

On June 5, 2017, the Minnesota Public Utilities Commission (Commission) Staff submitted an Information Request to Minnesota Power (MP or the Company), asking the Company to provide a side-by-side comparison of the costs of serving customers with distributed generation (DG) versus those without DG. The purpose of this comparison was to demonstrate the basis for Minnesota Power's proposed monthly service charges in its Cogeneration and Small Power Production Tariff.

On June 21, 2017, Minnesota Power responded to the Information Request. The Company's response included the requested side-by-side comparisons for Residential and General Service customers, but also proposed to eliminate the monthly service fee and related language entirely from the tariff. The Company explained that a majority of its customers are now using Advanced Metering Infrastructure (AMI). With AMI, the only incremental cost of serving DG customers is the one-time cost of reprogramming meters to bi-directional functionality. Minnesota Power calculated this reprogramming cost as approximately \$0.05/month. Therefore, the Company determined that the incremental cost of serving DG customers was too low to warrant a monthly fee.

On July 6, 2017, the Commission issued a *Notice of Comment Period* soliciting comment on the following:

- Minnesota Power's proposal to eliminate its monthly service charge for DG customers; and
- Other topic-related issues.

The Department submits these Reply Comments in response to the Commission's Notice.

Commission's Order

On May 22, 2017, the Public Utilities Commission issued their Order *In the Matter of Minnesota Power's Petition for Approval of Revisions to Rider for Parallel Generation*. In that Order, the Commission approved Minnesota Power's cogeneration and small power production tariff subject to the following additional requirements (Order Point 2):

- a. Minnesota Power shall include the Department's requested additions that it agreed to incorporate in its December 12, 2016, reply comments;

- b. Minnesota Power shall include the updates to Schedule E proposed in its March 14, 2017 information-request response;
- c. The Commission approves provisionally Minnesota Power's monthly service charges based on generation size and meter costs as listed in its initial February 29, 2016 filing;
- d. Record development on Minnesota Power's monthly service charges will continue in Docket No. E-015/M-16-204; the Commission delegates authority to the Executive Secretary to issue notices and set deadlines;
- e. Minnesota Power shall incorporate language into its tariff specifying that production meters are required only for systems between 40 kW and 1,000 kW; and
- f. Minnesota Power shall replace "same legal entity" with "customer" in the meter aggregation sections of its tariff.

Further, the Commission required Minnesota Power to file a compliance filing within 60 days of the Commission's Order (Order Point 6).

The Department expects the Company to fulfill Order Points 2.a, 2.b., 2.e. and 2.f. in its Compliance filing. Order Points 2.c. and 2.d are the focus of these comments in light of the Company's proposal to discontinue imposing the monthly service charges provisionally approved through the Commission's May 22, 2017 Order.

The Department does not oppose Minnesota Power's proposal to discontinue imposing monthly service charges on its DG customers. However, the Department notes that the Company still intends to require production meters for systems incentivized by either MP or by the Made in Minnesota Program, as well as for systems sized between 40kW and 1,000kW. The Company clarified to the Department via email that since production meters are necessary for the Company to comply with the Solar Energy Standard (SES), the Company is providing production meters free of any upfront charge to DG customers and recovering the costs from all of MP's customers through the standard customer charges. The Department concludes that this is a reasonable way to recover these costs, as SES compliance benefits all customers on the Company's system. Therefore, the Department recommends that the Commission approve Minnesota Power's proposal and require the Company to submit a compliance filing incorporating the changes to its tariff needed to comply with the Commission's determination on this matter.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst Coordinator

/s/ DANIELLE WINNER
Rates Analyst

/lt

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
Reply Comments**

Docket No. E015/M-16-204

Dated this 18th day of July 2017

/s/Sharon Ferguson

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| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, Minnesota 55405 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| David | Amster Olzweski | david@mysunshare.com | SunShare, LLC | 1774 Platte St Denver, CO 80202 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| 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_16-204_Official List 16-204 |
| Jeff | O'Neill | jeff.oneill@ci.monticello.mn.us | City of Monticello | 505 Walnut Street Suite 1 Monticello, Minnesota 55362 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Russell | Olson | rolson@hcpd.com | Heartland Consumers Power District | PO Box 248 Madison, SD 570420248 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------|--------------------------------------|------------------------------------------------------------------------------|--------------------|-------------------|---------------------------------------|
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Jeffrey C | Paulson | jeff.jcplaw@comcast.net | Paulson Law Office, Ltd. | 4445 W 77th Street Suite 224 Edina, MN 55435 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Mary Beth | Peranteau | mperanteau@wheelerlaw.com | Wheeler Van Sickle & Anderson SC | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Jennifer | Peterson | jjpeterson@mnpower.com | Minnesota Power | 30 West Superior Street Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Marcia | Podratz | mpodratz@mnpower.com | Minnesota Power | 30 W Superior S Duluth, MN 55802 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Hannah | Polikov | hpolikov@aee.net | Advanced Energy Economy Institute | 1000 Vermont Ave, Third Floor Washington, DC 20005 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| David G. | Prazak | dprazak@otpc.com | Otter Tail Power Company | P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Gayle | Prest | gayle.prest@minneapolis.mn.gov | City of Mpls Sustainability | 350 South 5th St, #315 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Gregory | Randa | granda@lakecountrypower.com | Lake Country Power | 2810 Elida Drive Grand Rapids, MN 55744 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|----------------------------------------|------------------------------------------|-------------------------------------------------------------------|--------------------|-------------------|---------------------------------------|
| Mark | Rathbun | mrathbun@greenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Michael | Reinertson | michael.reinertson@avante nergy.com | Avant Energy | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| John C. | Reinhardt | | Laura A. Reinhardt | 3552 26Th Avenue South Minneapolis, MN 55406 | Paper Service | No | OFF_SL_16-204_Official List 16-204 |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206 St. Paul, MN 551011667 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Michael | Riewer | MRiewer@otpc.com | Otter Tail Power Company | PO Box 4496 Fergus Falls, MN 56538-0496 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Craig | Rustad | crustad@minnkota.com | Minnkota Power | 1822 Mill Road PO Box 13200 Grand Forks, ND 582083200 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Robert K. | Sahr | bsahr@eastriver.coop | East River Electric Power Cooperative | P.O. Box 227 Madison, SD 57042 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Richard | Savelkoul | rsavelkoul@martinsquires.c om | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Thomas | Scharff | thomas.scharff@versoco.c om | Verso Corp | 600 High Street Wisconsin Rapids, WI 54495 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|------------|--------------------------------------|-------------------------------------------|------------------------------------------------------------------------------|--------------------|-------------------|------------------------------------|
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Dean | Sedgwick | N/A | Itasca Power Company | PO Box 457 Bigfork, MN 56628-0457 | Paper Service | No | OFF_SL_16-204_Official List 16-204 |
| Maria | Seidler | maria.seidler@dom.com | Dominion Energy Technology | 120 Tredegar Street Richmond, Virginia 23219 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| William | Seuffert | Will.Seuffert@state.mn.us | | 75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| David | Shaffer | DShaffer@MnSEIA.org | Minnesota Solar Energy Industries Project | 1005 Fairmount Ave Saint Paul, MN 55105 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Patricia F. | Sharkey | N/A | Midwest Cogeneration Association | P.O. Box 87374 Carol Stream, IL 60188 | Paper Service | No | OFF_SL_16-204_Official List 16-204 |
| Patricia | Sharkey | psharkey@environmentallawcounsel.com | Midwest Cogeneration Association. | 180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Bria | Shea | bria.e.shea@xcelenergy.com | Xcel Energy | 414 Nicollet Mall Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------|-----------------------------------|----------------------------------------------------------------------------|--------------------|-------------------|---------------------------------------|
| Doug | Shoemaker | dougs@mnRenewables.org | MRES | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Mrg | Simon | mrgsimon@mrenergy.com | Missouri River Energy Services | 3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Anne | Smart | anne.smart@chargepoint.com | ChargePoint, Inc. | 254 E Hacienda Ave Campbell, CA 95008 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Trevor | Smith | trevor.smith@avantenergy.com | Avant Energy, Inc. | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Ken | Smith | ken.smith@evergreenenergy.com | Ever Green Energy | 1350 Landmark Towers 345 St. Peter St St. Paul, MN 55102 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Joshua | Smith | joshua.smith@sierraclub.org | | 85 Second St FL 2 San Francisco, California 94105 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Beth H. | Soholt | bsoholt@windonthewires.org | Wind on the Wires | 570 Asbury Street Suite 201 St. Paul, MN 55104 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Tom | Stanton | tstanton@nrri.org | NRRI | 1080 Carmack Road Columbus, OH 43210 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Byron E. | Starns | byron.starns@stinson.com | Stinson Leonard Street LLP | 150 South 5th Street Suite 2300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-------------|---------------------------------|------------------------------------------|-----------------------------------------------------------------------------------|--------------------|-------------------|------------------------------------|
| James M. | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Thomas P. | Sweeney III | tom.sweeney@easycleanenergy.com | Clean Energy Collective | P O Box 1828 Boulder, CO 80306-1828 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Steve | Thompson | stevet@cmpasgroup.org | Central Minnesota Municipal Power Agency | 459 S Grove St Blue Earth, MN 56013-2629 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Pat | Treseler | pat.jcplaw@comcast.net | Paulson Law Office LTD | 4445 W 77th Street Suite 224 Edina, MN 55435 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Lise | Trudeau | lise.trudeau@state.mn.us | Department of Commerce | 85 7th Place East Suite 500 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Karen | Turnboom | karen.turnboom@versocom.com | Verso Corporation | 100 Central Avenue Duluth, MN 55807 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Lisa | Veith | lisa.veith@ci.stpaul.mn.us | City of St. Paul | 400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------|---------------------------------|----------------------------------------------------|----------------------------------------------------------------|--------------------|-------------------|------------------------------------|
| Roger | Warehime | warehimer@owatonnautilities.com | Owatonna Public Utilities | 208 South WalnutPO Box 800 Owatonna, MN 55060 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Jenna | Warmuth | jwarmuth@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802-2093 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Paul | White | paul.white@prcwind.com | Project Resources Corp./Tamarac Line LLC/Ridgewind | 618 2nd Ave SE Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Jason | Willett | jason.willett@metc.state.mn.us | Metropolitan Council | 390 Robert St N Saint Paul, MN 55101-1805 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Cam | Winton | cwinton@mnchamber.com | Minnesota Chamber of Commerce | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Daniel P | Wolf | dan.wolf@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_16-204_Official List 16-204 |
| Thomas J. | Zaremba | TZaremba@wheelerlaw.com | WHEELER, VAN SICKLE & ANDERSON | 44 E. Mifflin Street, 10th Floor Madison, WI 53703 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |
| Christopher | Zibart | czibart@atcllc.com | American Transmission Company LLC | W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022 | Electronic Service | No | OFF_SL_16-204_Official List 16-204 |