



May 20, 2021

Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association Reply Comments***

***In the Matter of Updating Generic Standards for Utility Tariffs for  
Interconnection and Operation of Distributed Generation Facilities Under  
Minn. Stat. §216B.1611***

***Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023***

Dear Mr. Seuffert:

On August 28, 2020, the Commission issued a Notice of Comment Period (Notice) in the above-referenced dockets. This Notice stated that the issue to be addressed in Comments is “Should the Commission revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 which creates guidelines for establishing the terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity?” This Notice also identified other areas open for comment. In its October 30, 2020 Comments, Dakota Electric Association® (Dakota Electric or Cooperative) provided an explanation of the financial relationship between the Cooperative and a distributed generation customer and how this relationship is handled through the contractual and operational relationship between Dakota Electric, as a distribution cooperative, and Great River Energy (GRE or Great River) as a generation and transmission cooperative. The

Cooperative also explained the nature of Qualifying Facilities under the Public Utilities Regulatory Policies Act (PURPA) and how these relate to Dakota Electric's relationship with GRE. Dakota Electric did not have additional comment at the time but stated that it would respond to matters raised in comments of other parties in Reply Comments. On November 13, 2020, the Minnesota Public Utilities Commission (Commission) issued a Notice of Extended Comment requesting initial comments on April 30, 2021 and reply comments on May 20, 2021. On April 30, 2021, Otter Tail Power Company and Minnesota Power Company filed Comments. Dakota Electric reviewed these filings and no new issues or matters were raised; as such, the Cooperative does not have additional comment at this time. Dakota Electric refers the Commission to its October 30, 2020 Comments for its position in this matter.

### **Conclusion**

Dakota Electric appreciates the opportunity to provide comments on this matter. If you or your staff have any questions about these comments, please contact me at 651-463-6258 or [aheinen@dakotaelectric.com](mailto:aheinen@dakotaelectric.com).

Sincerely,

*/s/ Adam J. Heinen*

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Adam J. Heinen  
Vice President of Regulatory Services  
Dakota Electric Association  
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Farmington, MN 55024

**Certificate of Service**

I, Melissa Cherney, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

**Docket Nos. E-999/CI-16-521 and E-999/CI-01-1023**

Dated this 20th day of May 2021

*/s/ Melissa Cherney*

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Melissa Cherney