



August 18, 2025

**Via Electronic Filing**

Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

Re: Comments

*In the Matter of a Possible Amendment to Rules Relating to the Definition of “Capacity”,  
Minnesota Rules, 7835.0100, subp. 4; Revisor’s ID Number R-04926; PUC Docket No. E-  
999/R-25-86.*

Dear Mr. Bull:

Central Minnesota Municipal Power Agency, d/b/a Central Municipal Power Agency/Services (CMPAS) submits these enclosed comments responding to the Minnesota Public Utilities Commission’s (“Commission”) Request for Comments issued on July 14, 2025, regarding a possible rule amendment to the definition of “capacity”.

We have electronically filed this document with the MPUC, and copies have been served on the parties on the attached service list. Please contact me at (763) 710-3932 or [jaya@CMPAS.org](mailto:jaya@CMPAS.org) with any questions.

Sincerely,

Jay D Anderson  
Chief Executive Officer  
Central Minnesota Municipal Power Agency/Services

Enc. Reply Comments of CMPAS  
cc: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben  
Joseph Sullivan  
Hwikwon Ham  
John A. Tuma  
Audrey Partridge

Chair  
Vice Chair  
Commissioner  
Commissioner  
Commissioner

IN THE MATTER OF A POSSIBLE  
AMENDMENT TO RULES RELATING TO  
THE DEFINITION OF “CAPACITY”  
Docket No. E-999/R-25-86

Comments of  
Central Municipal Power  
Agency/Services

**Introduction**

Central Minnesota Municipal Power Agency, d/b/a Central Municipal Power Agency/Services (CMPAS) submits these enclosed comments responding to the Commission’s Request for Comments issued on July 14, 2025. CMPAS appreciates the chance to submit these comments and looks forward to future opportunities for input.

Additionally, CMPAS notes that its members include the City of Blue Earth, City of Fairfax, City of Glencoe, City of Granite Falls, City of Janesville, City of Kasson, City of Kenyon, City of Mountain Lake, City of Sleepy Eye, City of Springfield, City of Windom and/or their affiliated utilities.

Topic(s) Open for Comment:

**1. Consideration of rule amendment to clarify that a qualifying facility with a nameplate rating of 40 kW capacity or more may be compensated for up to 39 kW of net input into the utility’s system at the rate allowed under Minn. Stat. 216B.164, subd. 3(d).**

The suggested wording from the PUC’s notice requesting comments on the proposed amendment creates needless ambiguity because it would seem to support amending the definition further so that facilities with capacity higher than 40 kW can receive compensation for up to 40 kW of their energy production at the net metered rate under Minn. Stat. 216B.164, subd. 3(d). We believe this is contrary to the plain reading of the statute, which limits net-metering treatment to facilities with an AC nameplate capacity below 40 kW.

CMPAS supports the definition in the underlined wording proposed at the end of the notice, with the clarifying modifications proposed by the utility group led by Xcel Energy. CMPAS has had

an opportunity to review a draft of the utility group's comments more generally and fully supports those comments.

As a final note, the Request for Comment indicated that respondents should include information about whether there is interest in appointing an advisory committee or serving on such committee. Neither CMPAS, nor its member utilities, have an interest in whether an advisory committee should be appointed or in serving on such an advisory committee. CMPAS would defer to the Minnesota Municipal Utilities Association (MMUA) on matters regarding an advisory committee on this matter under Minn. Stat. 14.101.