



September 24, 2019

VIA ELECTRONIC FILING

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

Re: 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. E-999/CI-16-521 & Docket No. E999/CI-01-1023

Dear Mr. Wolf:

On August 23, 2019, the Minnesota Public Utilities Commission (“Commission”) released a Notice of Comment Period (“Notice”). Minnesota Power (or, the Company”) hereby submits, via electronic filing, in response to the Minnesota Public Utilities Commission’s Notice. In the Notice the Commission provides four topics open for comment as listed below:

- Should the Commission approve the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (Minnesota DER TIIR) as submitted by the Distributed Generation Workgroup’s Technical Subgroup? (Attached to this notice.)
- Interim Implementation
Is the language in the Technical Subgroup’s recommended draft sufficient and appropriate on implementation of the statewide technical requirements in the interim as IEEE 1547- 2018 implementation to UL 1741 certified equipment is complete (anticipated in 2021)?
What, if anything else, should the Commission address related to interim implementation?
- Utility Technical Specification Manuals
Is the language in the Technical Subgroup’s recommended draft sufficient and appropriate on the scope of an individual utility’s Technical Specification Manual (TSM) and the Commission’s oversight? What, if anything else, should the Commission address related to the rate-regulated utilities’ TSMs?
- Are there other issues or concerns related to this matter?

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Minnesota Power is fully supportive of the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (Minnesota DER TIIR) as submitted by the Distributed Generation Workgroup's Technical Subgroup.

The Interim Implementation and Utility Technical Specification Manuals language is sufficient and appropriate and the Company has no further edits or comments.

The Company appreciates the Commission's attention to this matter. If you have any questions regarding this filing, please contact me at (218) 723-3448 or jwarmuth@mnpower.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenna Warmuth". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

Jenna Warmuth
Senior Public Policy Advisor

JW:sr

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **24th** day of **September, 2019** she served Minnesota Power's Letter in **Docket No. E- 999/ CI-16-521 & Docket No. E999/CI-01-1023** to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Susan Romans