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September 17, 2024

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

Re: *In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on Net Metering Eligibility for Rate-Regulated Utilities*
MPUC Docket No. E002, E111, E017, E015/CI-24-200

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (OAG) respectfully submits this letter in reply to the initial comments of several parties in the above-referenced docket. Following review of initial comments, the OAG believes that several comments seek to have the Commission reinterpret provisions of Minnesota Statutes. The OAG offers these brief comments to emphasize that it is for the Legislature, not the Commission, to rewrite the law.

When interpreting statutes, the objective is to ascertain and effectuate the intention of the legislature. When the statutory text is clear and unambiguous, the plain language of the statute controls.¹ The definition of capacity for purposes of net-metered rate eligibility is written in the plain language of Minnesota Statutes section 216B.164, subdivision 2a(c). Not in subdivision 3, as some utilities suggest.² Therefore, the Commission should continue to consider the definition of capacity in Minn. Stat. § 216B.164 as it has already done—according to the plain language of the definition. Commissioner Ham recognized this during the April 11, 2024 agenda meeting when he said that the Commission “cannot redefine what is defined in statute. The definition of capacity is already defined in the statute.”³

Minnesota Statutes section 216B.164 governs rate eligibility for distributed generation systems. This statute clearly and unambiguously defines “capacity,” for the purpose of this section, as “the number of megawatts alternating current at the point of interconnection between a distributed generation facility and a utility’s electric system.”⁴ This definition of “capacity”

¹ See, e.g., *Cambria Company, LLC. V. M&M Creative Laminants, Inc.*, __ N.W.3d __, 2024 WL 4139394 at *3 (Sep. 11, 2024).

² See, e.g., Minn. Rural Elec. Ass’n at 3.

³ *In the Matter of Dakota Electric Association’s Distribution Interconnection Process and Agreement*, Docket. No. 18-711, Minnesota Public Utility Commission, HEARING, at 1:46:50 (April 11, 2024).

⁴ Minn. Stat. § 216B.164 Subd. 2a (c).

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applies to all of section 216B.164, including subdivision 3. Subdivision 3, on the other hand, does not amend the definition as some utilities imply.

Further, several utilities argue that “capacity” as defined in section 216B.164 means “nameplate capacity.”⁵ But the Legislature did not choose to use the term “nameplate capacity,” even though the Legislature knows this term and has used it in other contexts.⁶ It did not use the term “nameplate capacity” in section 216B.164.⁷

Last, a party challenging the clarity of the statute shall not disregard the letter of the law under the pretext of pursuing its spirit.⁸ Nor can utilities’ past practices rewrite the Legislature’s directive. If any parties find the statute to be ambiguous, or otherwise problematic, the remedy is to pursue a change at the Legislature. The remedy is not adoption of a definition that changes the statute’s meaning.

The OAG urges the Commission to avoid redefining the definition of “capacity” as clearly laid out in section 216B.164, subdivision 2a(c) when making any determination in this proceeding. Instead, the Commission should focus on whether the utilities’ practices must be changed to comply with the statute’s plain language.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Travis Murray

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⁵ See, e.g., OTP Comments at 4.

⁶ See Minn. Stat. 216B.1611, subd. 3a.

⁷ See *State v. Shimota*, 875 N.W.2d 363, 369 (Minn. Ct. App. 2016) (“We presume that the legislature is aware of its own laws”).

⁸ Minn. Stat. § 654.16.

CERTIFICATE OF SERVICE

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MPUC Docket No. E002, E111, E017, E015/CI-24-200

I, JUDY SIGAL, hereby certify that on the 17th day of September, 2024, I e-filed with eDockets these *Reply Comments of the Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

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