From:	Mackenzie, Susan (PUC)
To:	Benson, Robin (PUC)
Cc:	Kahlert, Kate (PUC)
Subject:	FW: Regarding interconnect agreement
Date:	Thursday, February 05, 2015 9:57:42 AM

Robin,

Can you scan this email and include it in eDockets a letter/filing in docket 13-729?

Thanks,
Susan

Susan Mackenzie
MNPUC
651-201-2241

From: Darryl Thayer [mailto:darylsolar1@gmail.com]
Sent: Wednesday, February 04, 2015 4:32 PM
To: Mackenzie, Susan (PUC)
Subject: Regarding interconnect agreement

Dear Commissioners,

I appreciate the opportunity to comment on the proposed rules for small generators. I have experience installing hundreds of solar PV systems, decades of solar teaching experience, and have consulted with dozens of solar professionals nationwide.

Based on my experience with interconnection with numerous utilities in Minnesota, I am concerned that the proposed changes don't do enough to protect electricity customers who wish to self generate. Specifically, the rules fall short of setting appropriate parameters around a utility's authority to impose unreasonable conditions to interconnect. Examples include:

- the lack of transparency about cost allocations for upgrades to the utility's distribution system
- imposing excessive technical requirements for code compliant systems.

Complaints from solar professionals and their clients are on the rise with the increasing number of systems installed in Minnesota.

I recommend that it be made clear that any upgrades to the utility distribution system be explained and that the costs are fairly distributed between utility and customer. For example, if a transformer upgrade is determined to be necessary to accommodate solar, the utility should offer their analysis of why the upgrade is needed and include a breakdown of shared costs for the upgrade instead of making the customer bear the full cost. The appropriate financial responsibility of the customer is the cost of the transformer less the amount the utility has depreciated over time. Often times the undersized transformer is brought to the attention of the utility because of the solar inspection, however the added solar will reduce the transformer load.

I further recommend both the utility and state acknowledge the state-authorized electrical inspector as having exclusive authority to pass or fail a system. This means that if an electricity customer produces evidence that their system has passed electrical inspection, the system is understood to be code compliant and the utility may not specify additional technical requirements on the customer side of the meter. This is important since a utility that requires a customer to do more than provide evidence of a code compliant system drives up costs and may even specify things that are in conflict with what the state or local electrical inspector approved. In no case should a utility require things of the customer that go beyond code and the state authorized inspector is solely authorized to determine if the system meets code or not. This should be explicit in the rules. State statues, and adopting the NEC sets the

demarcation between the utility and the State regulated inspection. This demarcation is at the mast head or end of the service lateral. Beyond this point it is clearly State Board of electricity and NEC. Arguments that they want to add safety are not warranted and may compromise the safety provided by UL and the NEC.

Thank you for your consideration.

Darryl Thayer