



AN ALLETE COMPANY

30 West Superior Street
Duluth, MN 55802-2093
www.mnpower.com



August 15, 2024

VIA E-FILING

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

Re: In the matter of the Interconnection Ombudsperson Surcharge
Docket No. E015/CI-24-248
UTILITY COMMENTS

Dear Mr. Seuffert,

Minnesota Power (or, the “Company”) appreciates the extension granted for Utility Comments and respectfully submits the following in response to the Minnesota Public Utilities Commission’s (or, “Commission”) August 2, 2024 Notice of Comment Period pertaining to the surcharges funding the newly created Interconnection Ombudsperson position.

Tariff Language and Company Fee Tracking

Otter Tail Power’s August 12 comments noted that documentation of Interconnection Application fees are already published and described in the Minnesota Distributed Energy Resources Interconnection Process (or, “MNDIP”). The Company does not currently define interconnection fees on its website for this reason, and recommends that the Ombudsperson Fee should be included with the fees listed in section 1.5.1 of MNDIP.

Process for Reporting, Tracking, and Adjusting Surcharges

The Company began collecting the ombudsperson fee for interconnection applications submitted to Minnesota Power starting on June 3. When an interconnection application is received, Minnesota Power creates a billable charge within its customer information system. A work order has been established and will be used to track those fees and payments to the Commission. The Company will remit payment according to the Commission’s instructions by the 15th of each month.

Cadence and Review

The Company is open to an annual or biannual cadence to review the surcharge and recommends that this cadence be established after the Ombudsperson position is filled and its costs are more clearly understood. The Company also recommends that the Commission plan for fluctuations in the interconnection market by establishing a financial “buffer” for the position.

I AM
ZERO INJURY.

*Together we choose to work safely for our families, each other, and the public.
We commit to be injury-free through continuous learning and improvement.*

Mr. Seuffert
August 15, 2024
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Minnesota Power appreciates the opportunity to provide these comments. If you have any questions regarding this filing, please contact me at 218.428.9846 or jmccullough@mnpower.com.

Respectfully submitted,

A handwritten signature in black ink that reads "Jess McCullough". The signature is written in a cursive style with a large, stylized initial "J".

Jess McCullough
Public Policy Advisor II

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 15th day of August, 2024, she served Minnesota Power's Comments in **Docket No. E015/CI-24-248** on 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.



Tiana Heger