

May 1, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

Dear Ms. Bergman,

Steve Coleman's comments on the Topics from the Commission's Notice of Comment Period from April 10, 2026, in the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611, PUC Docket Number: E999/CI-16-521 on the issue: Should the Commission approve the Technical Subgroup's proposed changes to the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR) and the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) regarding Battery Energy Storage Systems and Limited/Non-Export Systems?

The Technical Subgroup, TSG, of the Distributed Generation Working Group, DGWG, engaged in a process for more than a year to discuss points on non-exporting and battery storage systems from the Commission. Points 6 and 7 were from an order in Docket 16-521 from April 15, 2024, and Points 11, a. and b. were from an order in Docket 16-521 from January 22, 2020.

6. The Commission directs the DGWG to explore whether and how a new interconnection screen or interconnection track should be created for non-exporting DER applications under 40 kW AC.

7. The Commission directs the DGWG to explore if and how battery storage systems should be evaluated under the MN DIP. Topics to discuss would include: should the battery storage and DER generation be studied on a combined basis in the interconnection process, and whether or not net-metered DER plus storage applications should be treated differently under the MN DIP than non-exporting DER plus storage applications.

11. The Commission recommends the following items for discussion and eventual resolution through the DG Workgroup:

- a. Energy storage control modes and harmonization of the language and structure of the energy storage requirements in the operating agreements;
- b. Determination of explicit treatment of distributed energy resources (DER) using Power Control Systems for maximum capacity and export control in the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) and the TIIR document;

Comments

- A. Should the Commission adopt the TSG's proposed changes to the TIIR as found in Attachment B of this Notice?**

B. Should the Commission adopt the TSG’s proposed changes to the MNDIP as found in Attachment C to this Notice?

Yes, the Commission should adopt the proposed changes to the TIIR and MNDIP as found in Attachments B and C. There was a thorough study and discussion of the proposed changes, and each are in response to the Commission’s orders.

C. What action should the Commission take regarding the three disputed items in the TSG’s report as found in Attachment A to this notice?

a. Contested Item #1: Modify MNDIP to Use “Export Capacity” in 1.1.1

I continue to support our comments proposing to use “Export Capacity” in MNDIP 1.1.1. The use of this newly defined term treats DER using Power Control Systems for maximum capacity and export control in the MNDIP and the TIIR document in a way that facilitates the safe interconnection of the maximum amount of clean energy resources. It is in scope with the Commission’s order. Not defining “Export Capacity” or “Nameplate Capacity” will facilitate an unneeded debate over the use of these newly defined terms and delay adoption of a good update to the MNDIP that supports deployment of carbon free energy resources.

b. Contested Item #2: Modify MNDIP to use 40 kW “Export Capacity” in 1.1.5.1.2.

I continue to support our comments to use “Export Capacity” in MNDIP 1.1.5.1.2.

c. Contested Item #3 In 5.14.3 use “The Export Capacity specified by the Interconnection Customer in the Interconnection Application will be applicable as a limitation in the Interconnection Agreement.”

I continue to support our comments in Attachment A. The additional language of the alternative proposal is not necessary.

D. Should the Commission extend the temporary annual reporting on interconnection through at least 2030 by modifying the requirement in the August 13, 2018, Order (paragraph 20)?

a. Should the Commission make any changes to these reporting requirements?

Yes, the Commission should extend reporting on interconnection through 2030, and the reporting requirements should be modified. The Facility capacity should be removed and replaced with the newly defined terms “Facility Export Capacity” and “Facility Nameplate Capacity”.

E. Are there other issues or concerns related to this matter?

Yes, I am concerned that this process, from the initial education session on March 14, 2025, through the presentation of the report to the full DGWG on March 27, 2026, took over a year to complete. During this extended period, there were times when it was hard for the TSG to keep track of what had been done, and changes in the roster of participants necessitated extra work by the facilitator to ensure everyone was aware of the scope and work that had been accomplished. This was an opportunity to walk, jog, or run, but for several months it felt like the TSG was crawling. Future tasks assigned to the TSG may benefit from schedules with more defined workflows guided by the scope of the ordering points.

Steve Coleman