

January 29, 2019

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E111/M-18-711

Dear Mr. Wolf:

On January 9, 2019, the Minnesota Public Utilities Commission issued a Second Notice of Extended Comment Period *In the Matter of Dakota Electric Association's Updates to Specific Distributed Interconnection Process (MN DIP) and Distribution Interconnection Agreement (MN DIA)*. Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) on Dakota Electric Association's (DEA or the Association) compliance filing.

The Department recommends that the Commission **approve** DEA's tariff filing. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

Susan L. Peirce  
Public Utility Rate Coordinator

SLP/jl  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E111/M-18-711

#### I. BACKGROUND

On November 9, 2018, Dakota Electric Association (DEA or the Association) submitted its updated distributed energy interconnection tariff to comply with the Minnesota Public Utilities Commission's (Commission) August 13, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* in Docket No. E999/CI-16-521. In addition, DEA requests approval to set the threshold for using the Uniform Statewide Contract for interconnection at 40 kW.

On January 4, 2019, DEA submitted a revised filing.

#### II. DEPARTMENT ANALYSIS

In its August 13, 2018 Order, the Commission adopted the Minnesota Distributed Interconnection Process (MN DIP) and the Minnesota Distributed Interconnection Agreement (MN DIA). The MN DIP sets out a revised process to be used for interconnecting distribution generation to electric utility systems.

The Department has reviewed DEA's proposed tariff. The proposed tariff mirrors the MN DIP and MN DIA, and complies with the Commission's August 13, 2018 Order. The Department recommends approval. The Department understands Commission staff has issued Information Requests to DEA. The Department may have additional comments and recommendations once DEA's responses are available.

With respect to the Department does not object to MP's request to set the threshold for signing the Uniform Statewide Contract rather than the MN DIA at 40 kW. Section 1.1.5.2 states,

The Area EPS Operator may propose in its tariff an increase to the size threshold for the application of the Uniform Statewide Contract as a replacement for the MN DIA in its tariff.

The MN DIP permits use of the Uniform Statewide Contract rather than the MN DIA under the circumstances requested by DEA. The Department recommends approval of DEA's request.

### **III. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission approve Dakota Electric Association's proposed Distributed Interconnection Process and Distributed Interconnection Agreement tariffs and approve DEA's request to set the threshold for using the Uniform Statewide Contract rather than the Minnesota Distributed Interconnection Agreement to 40 KW.

/jl

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. E111/M-18-711**

**Dated this 29<sup>th</sup> day of January 2019**

**/s/Sharon Ferguson**

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-711_M-18-711
Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100  PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-711_M-18-711
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Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-711_M-18-711
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-711_M-18-711
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-711_M-18-711
Michael	Monsrud	mmonsrud@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192  Park Rapids, MN 56470	Paper Service	No	OFF_SL_18-711_M-18-711
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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