



Minnesota Rural Electric Association

11640 73rd Avenue N | Maple Grove, MN 55369 | p: 763-424-1020 f: 763-424-5820 | www.mrea.org

December 18, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. §216B.1611

Docket No. E-999/CI-16-521

Dear Mr. Seuffert:

On November 27, 2024, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* in the above-referenced docket. This Notice requested the following issue to be addressed:

Should the Commission approve the Technical Subgroup's proposed changes to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) regarding adding new study screens for unintentional islanding?

The Commission specifically requested interested participants to submit comments of the following:

- *Should the Commission adopt the TSG's proposed changes to the MN DIP as found in Attachment A to this Notice?*
- *Are there other issues or concerns related to this matter?*

Minnesota Rural Electric Association (MREA), representing 50 electric cooperative associations in Minnesota, respectively submits these comments for consideration to the Commission.

MREA's Comments

MREA has been an active participant with the Distributed Generation Working Group (DGWG) and was also an active participant of the TSG. MREA commends the fellow participants of the TSG for this work on this issue and appreciates the knowledge shared by the participants and outside experts. MREA recommends the Commission adopt the TSG's proposed changes as presented in Attachment A to the November 2024 Notice.

As Minnesota electric cooperatives are following a slightly different interconnection process, with the exception of Dakota Electric Association, MREA will be working with the Minnesota electric cooperatives in 2025 to incorporate the language in Attachment A to adopted cooperative interconnection process, (C-MIP). There are no other items MREA believes need addressing regarding this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrick Moe". The signature is fluid and cursive, with the first name "Darrick" written in a larger, more prominent script than the last name "Moe".

Darrick Moe
President/CEO
Minnesota Rural Electric Association