

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

June 2, 2025

VIA E-FILING

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

Re: In the Matter of the Implementation of the New Distributed Solar Energy Standard Pursuant to 2023 Amendments to Minnesota Statutes, Section 216B.1691

Docket No. E-015/CI-23-403

In the Matter of Commission Consideration and Determination of Compliance with Renewable Energy Standard and Solar Energy Standard for Year 2024 **Docket No. E-999/PR-25-12**

In the Matter of the Green Pricing Verification Process **Docket No. E-999/PR-02-1240**

In the Matter of Commission Consideration and Determination of Compliance with Renewable Energy Standards (RES) Biennial Reporting **Docket No. E-999/M-22-85**

Dear Mr. Seuffert:

The Minnesota Public Utilities Commission ("Commission") issued a Notice of Renewable Energy Certificate ("REC") Retirement Process for Renewable Energy Objectives and Green Pricing Programs ("Notice") on March 12, 2025, in the above-referenced dockets. The Notice and associated template also address the reporting requirements of utilities subject to the Solar Energy Standard ("SES") reporting obligations under Minn. Stat. § 216B.1691, subd. 2f and the Commission's January 29, 2021 Order in Docket No. E-999/M-20-464 (In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard).

On May 24, 2023, Minn. Stat. § 216B.1691 was amended to include the distributed solar energy standard ("DSES"). On June 26, 2024, the Minnesota Public Utility Commission ("Commission") issued an Order in Docket No. E-015/CI-23-403 (*In the Matter of the Implementation of the New Distributed Solar Energy Standard ("DSES") Pursuant to 2023 Amendments to Minnesota Statutes, Section 216B.1691*) clarifying the implementation of the DSES. Specifically Order point 8 states:



Each utility shall file a report annually on June 1, beginning in 2025, along with the solar energy standard and renewable energy standard reports in Docket No. E999/PR-YR-12, with the following:

- a. Annual Minnesota retail sales for the previous calendar year.
- b. The total Minnesota retail sales for customers excluded from the DSES requirement.
- c. Annual qualifying solar generation on the utilities' system for the previous calendar year, including the total number of units registered in M-RETS to that utility and S-RECs generated in the past year from those units.
- d. From 2025–2030, utilities must also report the following:
 - i. The status of process implementation, project procurements and construction.
 - ii. Any considerations, such as those outlined in Minn. Stat. § 216B.1691, subd. 2b, that may create challenges with achieving compliance, and which under Minn. Stat. § 216B.1691, subd. 2h(f), may allow the Commission to modify or delay implementation.
- e. Estimated amount of solar generation (expressed as capacity) a utility would be required to obtain in 2030.
- f. Estimated solar energy requirements to meet the DSES in 2030.
- g. A short summary of ongoing efforts to obtain solar energy, including a brief summary of the anticipated mix of project sizes for DSES compliance.

The Notice and associated template also address the reporting requirements of utilities subject to the Distributed Solar Energy Standards ("DSES") reporting obligations under Minn. Stat. § 216B.1691, subd. 2h.

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Minnesota Power respectfully submits its Compliance Report response to this Notice that includes the required Eligible Energy Technology Standard ("EETS"), SES and DSES data.

Please contact me at (218) 355-3182 or dmencel@mnpower.com if you have any questions on this filing.

Respectfully,

Debbie A. Mencel

Regulatory Compliance Specialist

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DAM:th Attach.

STATE OF MINNESOTA))ss	AFFIDAVIT OF SERVICE VIA ELECTRONIC FILING
COUNTY OF ST. LOUIS)	

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 2nd day of June, 2025, I electronically filed a true and correct copy of Minnesota Power's Annual Report in **Docket No. E015/CI-23-403, E999/PR-25-12, E999/PR-02-1240, and E999/M-22-85** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.

Tiana Heger