STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF UPDATING THE GENERIC STANDARDS FOR THE INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611	DOCKET NO. E999/CI-16-521

JOINT PARTIES' COMMENTS
April 3, 2025

Nokomis Energy LLC, Clean Energy Economy MN, Enterprise Energy, Novel Energy Solutions LLC, Cooperative Energy Futures, Sunrise Energy Ventures LLC and SunShare, LLC ("Joint Parties") submit these Comments in response to the February 10, 2025 Notice of Comment Period. That notice addressed the following issues:

> 1) Should the Commission grant the Joint Solar Association's (JSA) request to open an investigation into Xcel Energy's internal transmission study process which began in October 2023 and direct Xcel to cease this study process until it receives approval from the Commission?
>
> 2) Should the Commission amend the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) to further clarify the Affected System Study process when the Transmission Owner is also the Area EPS Operator (e.g. Xcel Energy)?

As the Joint Parties explain in more detail below, the Commission should open an investigation into Xcel Energy's ("Xcel") internal transmission study process ("ITS"), direct Xcel to cease the ITS, and refer the matter to the Distributed Generation Working Group (DGWG) to evaluate Xcel's concerns and adopt any needed and appropriate modifications to MNDIP. If the DGWG recommends a version of the ITS for approval by the Commission, the Commission should amend the MNDIP to provide the same clarity and certainty to all of Xcel's study processes.

I. INTRODUCTION

Historically, Xcel referred interconnection applications to the Midwest Independent System Operator ("MISO") for transmission studies, whenever aggregate DER exceeded substation peak load (the "Ad-Hoc Process"). Those studies cost $60,000 and were performed quarterly.

In late 2021, Xcel proposed a new transmission study process, called the MISO Affected System

Impact Study Agreement (the "ASIS Agreement"). Under the ASIS Agreement, Xcel would refer interconnection applications to MISO for transmission studies whenever aggregate DER exceeded substation peak load. Those studies would cost $60,000 and would be performed quarterly. In addition, Xcel could also identify for MISO any project that might cause the exceedance of daytime minimum load ("DML").

When Xcel presented the agreement to the Commission, the Commission expressed concern that Xcel had not sought input on the agreement, nor explained how it was consistent with MNDIP. The Commission ordered the ASIS Agreement stayed pending a full comment period.

In response, Xcel abandoned the ASIS Agreement and returned to the Ad-Hoc Process, explaining that it would rely solely on MISO's screening criteria and study processes, and would not use DML exceedance as a threshold. The Ad-Hoc Process continued until MISO adopted a more formal DER Affected Systems Study in October 2023 ("DER AFS"). The DER AFS calls for Xcel to refer interconnection applications to MISO for transmission studies whenever aggregate DER exceeds substation peak load. Those studies cost $60,000 and are performed quarterly.

Simultaneously, Xcel introduced its own transmission study process ("ITS"), in which Xcel would run a parallel transmission study on projects that do not concern MISO, but which exceed DML. These studies initially cost $60,000[1] and are performed quarterly.

From the perspective of the interconnection applicant, the ITS is more onerous than the ASIS Agreement. Xcel has again unilaterally launched a transmission study process outside MNDIP and returned DML exceedance as the trigger. Worse, the ITS creates a brand new "on-hold" process, and because it is not in MNDIP or any contract, it is not enforceable and is changeable at will. MNDIP stakeholders are subject entirely to Xcel's discretion.

Confronted with this, Xcel explains that it has found a loophole in MNDIP that allows it to be both hands in the handshake, and that analogy to the ASIS Agreement is not appropriate because that was then, and this is now. Incredibly, Xcel now claims that it is *required* to perform the ITS.

The Commission should create a process to evaluate the ITS, and if necessary, amend MNDIP. Xcel is subject to the Commission's jurisdiction, regardless whether it's the Area EPS Operator or the Transmission Owner, and subject to the processes required by MINN. STAT. § 216B.1611.

II. BACKGROUND

Over the course of 2021, Xcel worked with MISO to develop a written process to study DER interconnection applications that may impact the transmission network.[2] Xcel presented the signed version of the ASIS Agreement to the Commission for the first time via letter of December 17, 2021.[3]

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[1] Xcel initially proposed $60,000, then a few months later reduced the cost to $45,000, then a few months later reduced the cost to $33,000, and will reduce it to $27,000 on April 1. *See* Xcel, *Comments*, Doc. No. 16-521 at 14, Attachment D, at 31, 38 (March 13, 2025).

[2] Xcel, *Letter*, Doc. No. 16-521 at 1 (Dec. 17, 2021).

[3] *Id.*

At a hearing on January 20, 2022, the Commission ordered Xcel to stay implementation of the ASIS Agreement until a comment period could be conducted to determine whether the ASIS Agreement required changes to MNDIP. The Commission explicitly stated that this would not require Xcel to put projects in an "on hold" process, but rather that Xcel should use the long-standing Ad-Hoc Process for MISO transmission studies.[4] A few days later, however, Xcel filed a letter with the Commission, erroneously contending that the Commission had directed Xcel to stay the Ad-Hoc Process as well, placing all applicable interconnection applications on hold.[5]

On February 17, 2022, the Commission filed a notice seeking comments on the ASIS Agreement.[6] Prior to its formal comments, Xcel submitted yet another letter to the Commission.[7] In that letter, Xcel announced that it would follow the long-standing Ad-Hoc Process after all.[8] Xcel also explained that it would no longer use daytime minimum load as a threshold for triggering a transmission study:

> For determining the potential of adverse transmission system impacts, under the MISO ad hoc process . . . **we will not use as a threshold** . . . **situations where a DER would exceed Daytime Minimum Load** unless one of the above thresholds was also met.[9]

Xcel submitted comments on March 21, 2022, proposing changes to MNDIP to harmonize it with the ASIS Agreement. First, Xcel proposed an amendment to Attachment 6, System Impact Study Agreement, to reflect the timing of the deposit due to the Transmission Provider, and to reflect that Xcel would be billing the interconnection customer based on the costs of the transmission study provided by the Interconnection Provider (*i.e.*, MISO).[10] Xcel also proposed to amend MNDIP section 4.3.6 to reflect that the need for a transmission study may arise outside of the System Impact

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[4] Commission, *Hearing*, Doc. No. 16-521 at 2:44:30 (Jan. 20, 2022) (stating that the stay should not require an "on hold" process); *see also* Xcel, *Reply Comments*, Docket No. 16-521 at 8 (March 31, 2022) ("Commissioner Schuerger (Beginning at about 3:53:10): As I noted in my discussion with the Company, I do not believe that this requires an interruption, or any placement on-hold of projects."); Xcel, *Information Request No. 3*, Doc. No. 16-521 (Oct. 27, 2023) ("[t]he Commissioner discussion at the January 20, 2022 Agenda Hearing on this issue clearly indicated that the MISO transmission studies would still be needed, and that the action of the Commission would not require placing projects on hold").

[5] Xcel, *Letter*, Doc. No. 16-521 at 2 (Jan. 31, 2022). Xcel filed another letter on February 10, 2022, reiterating its misrepresentation of the Commission's direction. Even after MISO told Xcel that MISO would conduct studies under the ad-hoc process in the absence of the ASIS Agreement, Xcel concluded that "the Commission's decision to stay our implementation of the MISO ASIS Agreement also stays our ability to implement any substantially similar study process." Xcel, *Letter*, Doc. No. 16-521 (Feb. 10, 2022).

[6] Commission, *Notice of Comment Period and DGWG Meeting*, Doc. No. 16-521 (Feb. 17, 2022).

[7] Xcel, *Letter Re: MISO Review of DER Applications Updating Generic Standards For Interconnection And Operation of Distributed Generation Facilities*, Docket No. 16-521 (March 4, 2022).

[8] *Id.* at 2.

[9] *Id.* (emphasis added).

[10] Xcel, *Comments*, Doc. No. 16-521 at 6-7 (March 21, 2022) (emphasis added).

Study.[11]

Finally, Xcel proposed a series of amendments to MNDIP and the Facilities Study Agreement to account for any "transmission provider facilities costs."[12] Xcel further explained the transmission study process: "[u]nder MN DIP 4.3.6, the affected system impact study will be completed by MISO when Xcel Energy identifies the potential for adverse transmission system impacts from the proposed DER interconnection."[13] Regarding daytime minimum load in the proposed ASIS Agreement, Xcel planned to leave it to MISO discretion:

> the MISO ASIS Agreement (par. 2.2.1) provides an opportunity for the Company to notify MISO of situations where a DER project may cause new or increased backflow during Daytime Minimum Load (DML). MISO would then need to determine within 20 Business Days whether to conduct a study for the project.[14]

Xcel also explained that a MISO transmission study may include two or more projects at a time.[15] On March 31, 2022, Xcel submitted reply comments reiterating its support for the changes to MNDIP to better align with the transmission study process.[16]

On the same day reply comments were due, the Commission issued an order formally staying implementation of the ASIS Agreement:

> Xcel Energy must stay implementation of the Affected System Study Agreement until a comment period regarding the following issues has concluded:
>
> 1. Whether the Agreement between Xcel Energy and the Midcontinent Independent System Operator requires changes to MN DIP or to a tariff;
> 2. What those changes might be;
> 3. Whether any changes to the Agreement should be requested;
> 4. Whether any jurisdictional issues exist; and
> 5. Any other related issues.[17]

The commission added that "the stay does not impact the current MN DIP-approved Affected System Study process used by utilities and MISO."[18]

Since then, MISO has updated its DER affected system study process, by formally adopting a

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[11] *Id.*
[12] *Id.* at 9-14.
[13] *Id.* at 3.
[14] *Id.* 9.
[15] *Id.* at 5 ("for purposes of MISO review, if a given substation has two or more feeders, then due to the cadence of MISO review it could be the case for example that two projects each in MN DIP serial review will be part of the same MISO transmission study")
[16] Xcel, *Reply Comments*, Doc. No. 16-521 at 8 (March 31, 2022).
[17] Commission, *Order Modifying Practices And Setting Reporting Requirements*, Doc. No. 16-521 at 12 (March 31, 2022).
[18] *Id.* at 10.

Business Practice Manual after soliciting feedback (the "DER AFS").[19] MISO conducts its studies on a substation basis and does not require utilities like Xcel to submit projects for transmission study simply because they exceed daytime minimum load.[20]

On August 9, 2023, Xcel presented a PowerPoint in the 2023 Q3 MN DER stakeholder workgroup, announcing a new "Transmission Studies Process."[21] Under the new process, Xcel will run a transmission study when aggregate DER is less than substation peak load, but exceeds the substation daytime minimum load.[22]

Nokomis Energy submitted a letter to the Commission on October 4, 2023, raising concerns about the authority for, and application of, Xcel's new transmission study process.[23] Neither the Commission nor Xcel responded. On October 27, 2023, Xcel responded to a series of information requests from the Commission. Among them, Xcel confirmed that it has not used the ASIS Agreement, and has instead used the Ad-Hoc process because "[t]he Commissioner discussion at the January 20, 2022 Agenda Hearing on this issue clearly indicated that the MISO transmission studies would still be needed, and that the action of the Commission would not require placing projects on hold."[24] Xcel also explained that it now considers itself a Transmission Provider under MNDIP.[25]

III. REQUEST FOR COMMENTS

At the November 1, 2024, DGWG meeting open comment period, several parties raised Xcel's internal transmission studies as a subject of discussion. Commission Staff recommended the parties meet offline and directed them to file a report with the DGWG by December 13, 2024. Staff received three reports on December 13, 2024, from Joint Solar Associations ("JSA"), Joint Parties, and Xcel. Also on December 13, 2024, JSA filed a petition for a Commission investigation and for the Commission to direct Xcel to stay the ITS.

On February 10, 2025, the Commission issued a notice of Comment Period regarding JSA's request to open an investigation into the ITS. The Commission first solicited a utility response, and then directed the following topics for comment to all parties:

a. Are the Xcel-transmission studies permissible under the MN DIP? Address specifically, if Xcel Energy is a Transmission Owner or Transmission Provider and whether the internal transmission studies are Affected System Studies.
    - If the transmission studies aren't permissible should the MN DIP be modified to allow for them to be permissible?

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[19] MISO, *Generation Interconnection Business Practices Manual*, BPM-015-r26 (March 1, 2023).
[20] *E.g. id.,* at 123, 129.
[21] *See* Xcel, *2023 Q3 MN DER Stakeholder Workgroup Presentation* at 34-37 (Aug. 9, 2023).
[22] *Id.*
[23] Nokomis Energy, *Letter RE: Transmission Studies*, Doc. No. 16-521 (Oct. 4, 2023).
[24] *See* Xcel, *Information Request No. 3*, Doc. No. 16-521 (Oct. 27, 2023).
[25] Xcel, *Information Request No. 1*, Doc. No. 16-521 (Oct. 27, 2023) ("Northern States Power Company owns the transmission facilities and therefore qualifies under the above definition as being a Transmission Provider.").

- If the transmission studies are permissible, should the MN DIP be modified to add more detail or guidelines to that process? What would the specific edits be and why?

b. Based on the information derived from the two reports provided to the DGWG on this topic:
   - Is the exact timing and quarterly processing of the Xcel-transmission studies open to being modified? Would it be beneficial to include stakeholder input?
   - Is there any information that deserves further investigation or exploration beyond what was discussed in the reports that the Commission should consider?

c. How should the Commission consider impacts of Xcel-transmission studies on interconnection-related or state-goal related programs; such as LMI CSG Program?

d. How should the Commission respond to JSA's request of the following?
   - Should Xcel's internal transmission study be stayed until the Commission grants approval?
   - Should the Commission open an investigation into Xcel's internal transmission studies and refer the matter to the Distributed Generation Working Group (DGWG)?

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

Xcel and Minnesota Power filed Comments on March 13, 2025. The Joint Parties provide their initial comments as follows.

IV. COMMENTS

Despite its 136-page filing, the technical rationale behind Xcel's determination to unilaterally impose transmission studies based on DML exceedance remains unclear. Xcel presumably thinks the ITS is important, but it did not perform such studies until 2024, some *seven years* after Xcel says it began to be concerned.[26] As recently as 2022, Xcel said it would not refer projects that exceeded DML for transmission study. And MISO seems to have no technical concerns until aggregate DER exceeds peak load. Then in 2023, Xcel decided that DML exceedance was a concern again. A series of rationales have followed.

Throughout 2023 and 2024, Xcel explained that it determined that the ITS was needed because of the extensive cost of MISO study upgrades:

> "Due to the extensive cost of transmission upgrades ($8 million) resulting from the first MISO study analysis and resulting reliability concerns, the Company has determined there is an additional need to conduct an internal Transmission System Impact Study."[27]

Xcel has also claimed that when MISO was developing the DER AFS, Xcel noticed a "gap" between the thresholds used by MISO and DML exceedance.[28] Left unaddressed was that this "gap" was *always* there, because the DER AFS and the Ad-Hoc Process that preceded it use the same threshold.

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[26] Xcel, *Comments*, Doc. No. 16-521 at 10 (March 13, 2025).
[27] Xcel, *Compliance Filing*, at 29 (Nov. 15, 2023); Xcel, *Compliance Filing*, at 26 (March 1. 2024); Xcel, *Compliance Filing*, at 21 (May 15, 2023); Xcel, *Compliance Filing*, at 17 (Aug. 15, 2024).
[28] Xcel, *Comments*, Doc. No. 16-521 at 13 (March 13, 2025); *id.* Attachment D, at 17-18.

In response to the request for comments, Xcel offers several other explanations. According to Xcel, the ITS is alternatively *required* by NERC,[29] MNDIP,[30] and the Commission itself.[31] Xcel doesn't seem to have ever offered these explanations before this issue was raised in November 2024. They do not appear in the August 9, 2023 presentation or meeting minutes, nor in the October 27, 2023 Responses to Commission Information Requests. Xcel didn't mention this in any of the compliance reports it has submitted with its comments.

These explanations also wilt under basic scrutiny. If NERC requires the threshold to be DML exceedance, then why can't Xcel quote anything that says that, and why isn't MISO doing it? Isn't NERC also applicable to MISO? If MNDIP or the Commission requires it, then why is the Commission seeking comment on whether MNDIP permits it at all?

All stakeholders would benefit from evaluating the need for the ITS, and including any resulting interconnection study process in the MNDIP. MNDIP exists to provide clarity and certainty around the DER interconnection application process, and unilateral changes to this process inevitably hinder all parties' efforts to meet the state's renewable energy goals.

A. Are The Xcel-Transmission Studies Permissible Under MNDIP? Address specifically, if Xcel Energy is a Transmission Owner or Transmission Provider and whether the internal transmission studies are Affected System Studies.

- **If the transmission studies are permissible, should the MN DIP be modified to add more detail or guidelines to that process? What would the specific edits be and why?**

Xcel seems to meet the definition of Transmission Owner and Transmission Provider and the ITS seem to be Affective System Studies. However, through the discovery that it can be both Area EPS Operator and Transmission Provider,[32] Xcel has figured out how to evade the spirit and purpose of MNDIP. As *Area EPS Operator*, Xcel's obligations, study process, and timelines are all governed by MNDIP. As *Transmission Provider*, however, Xcel has discovered it is no longer bound by MNDIP.

Xcel's study processes are expected to be transparent and within the timelines and scope of MNDIP. Xcel claiming to be a Transmission Provider, and claiming its transmission study process is therefore exempt from MNDIP, is effectively modifying MNDIP. MNDIP was intended to establish a "a practical, efficient interconnection process that is easily understandable for everyone involved" and would give "maximum possible encouragement of distributed energy resources."[33]

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[29] E.g. Xcel, *Comments*, Doc. No. 16-521 at 4, 8, 14, 16, 17, 18, 26, 27 (March 13, 2025).
[30] E.g. Xcel, *Comments*, Doc. No. 16-521 at 6, 13, 19 (March 13, 2025).
[31] E.g. Xcel, *Comments*, Doc. No. 16-521 at 9 (March 13, 2025).
[32] Until Xcel announced the ITS, we are not aware of any suggestion that MNDIP authorized Xcel to perform transmission studies. Xcel made no reference to this in its December 17, 2021 letter, not in the January 31, 2022 letter, not in the February 10, 2022 letter, not in the March 4, 2022 letter, not in the March 21, 2022 comments, not in the March 31, 2022 reply comments, not in any relevant Commission hearings, and not in the discussion of MISO's DER AFS.
[33] MNDIP at 1.

MNDIP governs the interconnection of distributed resources in the state of Minnesota, including all investor-owned utilities, generating asset owners, and other stakeholders within the jurisdiction.[34] Xcel is subject to MNDIP – the processes required by MINN. STAT. § 216B.1611 – and all of its actions and timelines in processing interconnection applications should be provided in, and governed by, MNDIP.

If some version of the ITS is deemed necessary, the MNDIP should be modified to incorporate it. Amendments to the MNDIP would be consistent with the SGIP, on which the MNDIP is based.[35] Minnesota Power also agrees that amendments to MNDIP would be beneficial to clarify the process and make clear the potential for a transmission impact study at the start of the interconnection process.[36]

Overall, edits to MNDIP would incorporate the ITS process, timelines, costs, and thresholds. The ITS also creates some confusion and conflict in the MNDIP, which Xcel recognized when it previously proposed some amendments to MNDIP to incorporate the ASIS Agreement.[37] In addition, Xcel's proposal to be both the Area EPS Operator and the Transmission Provider makes some provisions of MNDIP nonsensical. For example, Section 4.3.6 directs the Area EPS Operator to coordinate with the Transmission Provider within five (5) business days. How is this interpreted if Xcel is both parties and is coordinating with itself? Does Xcel still get 5 business days?

Other structural consequences would need to be spelled out as well. For example, the MNDIP queue is managed by feeder, and requires Xcel to study projects on each feeder, in the order they are deemed complete. Xcel's new transmission process studies projects by substation, however, requiring Xcel to merge the queues of multiple feeders. Xcel claims that its implementation of the ITS is "consistent with how MNDIP has been implemented since day one."[38] This is incorrect. The provision of MNDIP that Xcel cites calls for a "a **single** administrative queue."[39] The cited provision seems to allow Xcel to organize by feeder or substation, but the ITS creates **two** queues, one for feeder and one for substation. That is new, fundamentally changes the order in which projects are studied, and appears to be in conflict with MNDIP.

Most of the information needed for the specific edits would need to come from Xcel, in a process managed by the Commission or DGWG. Xcel claims the ITS is already written down,[40] but Xcel seems to mean they have prepared PowerPoints and responded to Commission information requests and referenced it in compliance filings. Xcel has never provided a document containing all of the thresholds, rules, process, timelines, and costs for the ITS, as would be found in the ASIS Agreement, DER AFS, or the MNDIP.

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[34] *Id.* § 1.1.
[35] Throughout the SGIP, the interconnecting entity is referred to as a "Transmission Provider," which is directed to study impacts to its distribution system and transmission system in the same process. *See* FERC, *Small Generator Interconnection Procedures (SGIP)* at 3.4 (May 16, 2024).
[36] Minnesota Power, *Comments*, Doc. No. 16-521 at 2 (March 13, 2025).
[37] Xcel, *Comments*, Doc. No. 16-521 at 6-14 (March 21, 2022).
[38] Xcel, *Comments*, Doc. No. 16-521 at 22 (March 13, 2025).
[39] *See id.*, quoting MNDIP § 1.8.3 (emphasis added).
[40] Xcel, *Comments*, Doc. No. 16-521 at 20 (March 13, 2025).

Thankfully, Xcel has provided much of this information in its comments. For example, Xcel carefully goes through the study process details; how the projects are studied system wide, one project per substation, per quarter, with costs divided between each project in the study.[41] This process was far from clear to interconnection applicants. Xcel has also included specific details on the timelines associated with the process – even an upcoming ITS schedule – and the inclusion of cluster studies, which was also unclear.[42] This information is extremely valuable to interconnection applicants and can help form the basis of any necessary MNDIP amendments.

B. Based On The Information Derived From The Two Reports Provided To The DGWG On This Topic:

- **Is the exact timing and quarterly processing of the Xcel-transmission studies open to being modified? Would it be beneficial to include stakeholder input?**

- **Is there any information that deserves further investigation or exploration beyond what was discussed in the reports that the commission should consider?**

Despite aligning with MISO's process, Xcel has offered little rationale for the exact timing and quarterly process of the ITS. For example, why is Xcel only studying one project per substation (excluding clusters)? As Xcel has noted, and as is made clear in MISO's Business Practices Manual, MISO conducts transmission studies at the substation level, i.e. 2 or more projects at a time.[43]

It is not clear that this cadence or formality is needed at all. Daytime minimum load can be determined without a system impact study, so the transmission study could be performed at almost any stage in MNDIP. Shouldn't Xcel be conducting its own transmission studies on an as-needed basis? The Commission or the DGWG should carefully examine whether Xcel can conduct transmission studies in parallel with the existing MNDIP timelines and process.

The Commission or the DGWG might also investigate why Xcel is so concerned about DER exceeding daytime minimum load. MISO doesn't seem to be concerned – their threshold has always been DER exceedance of peak load. MISO has planned transmission studies under the ASIS Agreement, the Ad-Hoc Process, and DER AFS. At no point has MISO ever suggested that projects that exceed daytime minimum load pose any risk to the transmission system. Indeed, the only reference to daytime minimum load in either process was added as a courtesy to Xcel in the ASIS Agreement. Despite repeated requests since 2021, Xcel has never offered any explanation for why, if MISO finds mere exceedance of daytime minimum load insignificant, Xcel believes it poses a concern to the very same transmission system.

And although Xcel says it was concerned as early as 2017, they only proposed using DML exceedance in the ASIS Agreement in 2021, later stating they would not apply it in the Ad-Hoc

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[41] Xcel, *Comments*, Doc. No. 16-521 at 14, 24 (March 13, 2025).
[42] *Id.*
[43] *See* Xcel, *Comments*, Doc. No. 16-521 at 5 (March 21, 2022); Midwest Independent System Operator, *Generation Interconnection Business Practices Manual*, at 129.

Process,[44] before proposing it again in 2023. That does not suggest the sort of urgency one expects for a supposed safety and reliability concern. Perhaps there is another, more straightforward way of addressing Xcel's concerns.

Importantly, and to Xcel's credit, they say they are open to "further modifications" of the ITS:[45]

> The Company notes that the ITS process is still in its infancy. The Company suggests that it be allowed to gain some real-world experience with examining the results of the ITS studies for some period so as to have a better-informed base before engaging in further discussions to modify the process. Evaluation of these study results may reinforce the need for the current ITS process or show potential for other viable approaches.[46]

Xcel's statement seems to suggest an evaluation period while the ITS continues. Joint Parties might agree to a version of that, if the ITS is also referred to the DGWG for study, the process is strictly limited, and any evaluation of the ITS focuses on the delays and transmission upgrades recommended through the ITS. If few or no transmission upgrades are recommended by the ITS, the practice should presumptively sunset. If the ITS results in meaningful transmission upgrades, or the DGWG otherwise recommends a long-term version of the ITS, the DGWG should recommend changes to the MNDIP to be ordered by the Commission.

C. How Should The Commission Consider Impacts Of Xcel-Transmission Studies On Interconnection-Related Or State-Goal Related Programs; Such As LMI CSG Program?

The ITS impedes progress in fulfilling the legislature's intent to interconnect distributed generation in a transparent and efficient process to give maximum possible encouragement of distributed energy resources. All distributed resources, like the DSES program, will be slowed down. On substations where DER exceeds DML, interconnection timelines will drag out years as the ITS compounds.

For example, a 90 day study that is only conducted once per quarter may add only 90 days to the first project, but that number compounds for every project waiting to interconnect on the same substation. This ITS "on hold" process is worse than the last (or current) "on hold" process, where only the subsequent projects on the same feeder are placed on hold.[47] Under the ITS, every project

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[44] *See* Xcel, *Letter Re: MISO Review of DER Applications Updating Generic Standards For Interconnection And Operation of Distributed Generation Facilities*, Doc. No. 16-521 at 2 (March 4, 2022); Xcel, *Comments*, Docket No. 16-521 at 9 (March 21, 2022). Xcel complains that this is an analogy to the Ad-Hoc Process. *See* Xcel, *Comments*, Doc. No. 16-521 at 20-21 (March 13, 2025). That is correct. From the perspective of the interconnection customer, there is no difference between the Ad-Hoc Process and the DER AFS. MISO never looked at DML. The only thing that has changed is that Xcel is now doing what Xcel said it was not going to do.

[45] Xcel, *Comments*, Doc. No. 16-521 at 9 (March 13, 2025).

[46] Xcel, *Comments*, Doc. No. 16-521 at 25 (March 13, 2025).

[47] Xcel again objects to this analogy, claiming that the Commission "did not change the queue process" and that the quoted language is not in context. *See* Xcel, *Comments*, Doc. No. 16-521 at 23

at the *substation*, regardless which feeder it is on, even those first in line on a feeder, even those in active study on a feeder, will be put on hold each time Xcel studies a single project from any feeder on the substation.

The impending delays are largely just a math problem. There isn't really much to debate. Which is perhaps why Xcel responds to claims that the ITS will affect a large number of *projects* by saying it affects a small number of *substations*.[48] Left unchecked, the ITS will have real, deleterious effects on the state's distributed energy policies and renewable energy goals.

D. How Should The Commission Respond To JSA's Request Of The Following?

- **Should Xcel's internal transmission study be stayed until the Commission grants approval?**

- **Should the Commission open an investigation into Xcel's internal transmission studies and refer the matter to the Distributed Generation Working Group (DGWG)?**

The Commission should stay Xcel's internal transmission study, open an investigation into the ITS and refer the matter to the DGWG. If the Commission believes it worthwhile to develop an evaluation period while the ITS continues, Joint Parties might agree to a version of that, if the ITS is also referred to the DGWG for study, and the process is strictly limited, as set forth above.

E. Are There Other Issues Or Concerns Related To This Matter?

We have no other concerns beyond the issues raised above.

I. CONCLUSION

The Commission should open an investigation into Xcel's ITS and refer the matter to the DGWG to evaluate Xcel's concerns and adopt any needed and appropriate modifications to MNDIP. Simultaneously, the Commission should direct Xcel to cease the ITS, or agree to a sunset. If the DGWG recommends a version of the ITS for approval by the Commission, the Commission should amend the MNDIP to provide clarity and certainty to the ITS.

[signature page follows]

(March 13, 2025). Xcel then proceeds to explain exactly how the Commission changed the queue process, to alleviate the delays created by the "on hold" process, explaining the analogy. *Id.*

[48] Xcel, *Comments*, Doc. No. 16-521 at 14-15 (March 13, 2025).

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Pursuant to MINN. R. 7829.0400 Subp. 3, I have electronically filed the foregoing with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

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