



AN ALLETE COMPANY

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



October 18, 2022

VIA E-FILING

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

Re: In the Matter of Updating Generic Standards for Utility Tariffs
for Interconnection and Operation of Distributed Generation
Facilities Under Minn. Stat. §216B.1611
Docket Nos. E999/CI-16-521, E-999/CI-01-1023
Minnesota Power Reply Comments

Dear Mr. Seuffert:

On August 29, 2022, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Supplemental Comment Period seeking comment on whether the Commission should revise or replace Attachment 6 of the September 28, 2004 Order in Docket No. E999/CI-01-1023 which creates guidelines for establishing terms of the financial relationship between an electric utility and a distributed generation customer with no more than 10 MW of capacity.

Minnesota Power’s (or “the Company”) positions with respect to this issue were stated in its April 30, 2021 Comments in the above-referenced dockets. The Company has no changes to its positions at this time.

Minnesota Power continues to believe this is a statutory interpretation issue, and the Commission in its prior Orders in these dockets has followed the authority provided by the Legislature when the statutes were enacted. This is consistent with the recommendation in the September 28, 2022 Reply Comments of the Minnesota Commerce Department, Division of Energy Resources (“Department”) to “narrow the scope of inquiry to the legal questions regarding potential conflicts between these various state and federal statutes and rules.”¹

Minnesota Power also agrees with the Department’s suggestion regarding the timing of further proceedings, specifically that the Commission may want to consider timing its proceeding to utilize additional information available starting in 2023, including from deployment of Advanced Metering Infrastructure meters and IEEE 1547-2018 compliant

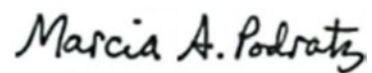
¹ Department’s September 28, 2022 Reply Comments, Page 3, Paragraph III.A.

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advanced inverters and lessons learned from time-of-use rates.² The Company is a participant in the Commission's ongoing Distributed Generation Workgroup ("DGWG") in Docket No. E999/CI-16-521 and looks forward to additional discussions as part of the DGWG.

If you have any questions regarding these Reply Comments, please contact me at (218) 355-3570 or mpodratz@mnpower.com.

Sincerely,



Marcia Podratz
Regulatory Compliance Principal

MAP:th

² Department's September 28, 2022 Reply Comments, Page 4, Paragraph II.B.

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 18th day of October, 2022, she served Minnesota Power’s Supplemental Reply Comments in **Docket Nos. E999/CI-16-521 and E-999/CI-01-1023** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket’s Official Service List for this Docket were served as requested.



Tiana Heger