



Minnesota Rural Electric Association

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November 1, 2023

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 September 1, 2023, 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:

What changes to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) should the Commission make to achieve the purpose of Minnesota Law 2023, Chapter 60, Article 12, Section 75 (HF 2310)?

The Commission specifically requested interested participants to submit proposals to address this issue and the following subtopics:

- 1. Interconnection procedures that allow customer-sited distributed generation projects up to 40 kW alternating current in capacity to be processed according to schedules specified in the MN DIP, giving such projects priority over larger projects that may enjoy superior positions in the processing queue.*
- 2. Whether the prioritization of these projects includes areas where the distribution system is capacity constrained, as well as in areas that are not similarly constrained.*
- 3. Whether there are changes to the MN DIP that would be de minimis in nature regarding policy but would update the document to accurately reflect recent changes and references.*
- 4. 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) with the development of Minnesota's DER interconnection process and supporting technical requirement documents. With the exception of Dakota Electric Association, Minnesota electric cooperatives have adopted an interconnection process similar to MN DIP. To date, Minnesota electric cooperatives have not experienced delays with evaluating less than 40 kW applications

due to large-scale applications in the engineering study stage. In addition, very few electric cooperatives have received DER applications for 40 kW and greater systems.

While Minnesota electric cooperatives are not experiencing delays in DER application reviews due to engineering studies over 40 kW systems, MREA does propose creating two queues for application review - one queue specifically for less than 40 kW systems and one queue for 40 kW and greater systems. These would apply to non-constraint areas of individual distribution systems. For constraint areas of distribution systems, a single queue would remain as there is potential for any size DER to end up in the engineering study phase. With this approach, each queue would rely upon engineering models that are updated regularly to reflect the DER application that passed the engineering review stage.

As Minnesota electric cooperatives are following a slightly different interconnection process, with the exception of Dakota Electric Association, MREA will refrain from commenting on specific changes to MN DIP. There are no other items MREA believes need addressing regarding achieving the purpose of *Minnesota Law 2023, Chapter 60, Article 12, Section 75 (HF 2310)*.

Sincerely,

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

Darrick Moe
President/CEO
Minnesota Rural Electric Association