

November 7, 2025

**VIA E-FILING**

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

**Re:** In the Matter of Establishing Tariffs for  
Distribution Cost Sharing for Interconnection  
In Constrained Areas  
**Docket No. E015/CI-24-288**  
**INITIAL COMMENTS**

Dear Ms. Bergman:

In accordance with the Minnesota Public Utilities Commission's October 2, 2025 Notice of Extended Comment Period, Minnesota Power hereby submits its Comments in the above referenced matter. If you have any questions regarding this filing, please contact me at (218) 355-3082 or [cvatalaro@allete.com](mailto:cvatalaro@allete.com).

Respectfully,



Claire Vatalaro  
Public Policy Advisor

CMRV:th  
Attach.

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

---

In the Matter of Establishing Tariffs  
For Distribution Cost Sharing for  
Interconnection in Constrained  
Areas

Docket No. E015/CI-24-288  
**INITIAL COMMENTS**

---

**I. INTRODUCTION**

On August 30, 2024, the Minnesota Public Utilities Commission (“Commission”) initiated this proceeding to establish by order generic standards for the sharing of utility costs necessary to upgrade a utility's distribution system by increasing hosting capacity or applying other necessary distribution system upgrades at a congested or constrained location in compliance with Minnesota Session Laws – 2024, Regular Session, CHAPTER 126 – S.F.No. 4292, Article 6, Section 53.1. The Commission issued a notice soliciting stakeholder members on September 26, 2024, and Minnesota Power (or, “Company”) submitted its letter of request to participate in the work group on October 16, 2024.

Following a series of workgroup meetings throughout 2025, the workgroup submitted draft standards to the Commission in September of 2025. On September 26, 2025, the Commission issued a Notice of Comment Period (“Notice”) to discuss what generic standards the Commission should adopt for the Distribution System Reactive Upgrades Process (“DSRUP”). On October 3, 2025, the Commission extended the comment period, with an initial comments deadline of November 7, 2025. In the following section, the Company presents to the Commission its specific recommendations for which of the generic standards to adopt for the DSRUP.

**II. TOPICS OPEN FOR COMMENT**

- 1. What draft generic standards, outlined in Attachment A and Attachment B should the Commission adopt for the DSRUP?*

Minnesota Power has outlined its positions on Attachment A and B of the Notice in the table and narrative below:

Table 1: Minnesota Power Positions on Attachment A

Subsection	Minnesota Power Position
<b>A. Introduction</b>	Minnesota Power supports this section as proposed.
<b>B. Definitions</b>	Minnesota Power supports the definitions identified but notes it may be helpful to clarify if reactive upgrades include or is limited to 10 MW.
<b>C. Upgrade Cost Thresholds</b>	Minnesota Power supports 1.a and 2.a
<b>D. Pro Rata Cost Calculation</b>	Minnesota Power supports 1 and 2, but does not support 3 and 4 as there are too many unknowns between developing an estimate for an upgrade and executing the project.
<b>E. Interconnection Process</b>	Minnesota Power generally supports the items laid out in Section E, however, takes no position with 4.a, and has reservations with 5 as it would be challenging to streamline impact studies.
<b>F. Mobilization Threshold and Window</b>	Minnesota supports the items laid out in Section F, with the exception of opposing item 6, as it is specific to Xcel.
<b>G. Upgrade Prioritization</b>	Minnesota Power generally supports what is laid out in section G. However, items 1 and 4 would benefit from more clarity in the language. The Company would prefer prioritization based on order of signed interconnection agreements and down payments.
<b>H. Payment Details</b>	Minnesota Power generally supports the Payment Details that are described in Section H. Item 2 needs a determination of fee and Item 6 needs clarifying language regarding credit score minimums.
<b>I. Payback Period</b>	Minnesota Power supports items 1.a, both 2.a and 2.b, and 3.
<b>J. Annual Ratepayer Cost Cap</b>	The Company generally is supportive of this section, apart from preferring item 1 over 2, and does not support item 3.
<b>K. Cost Recovery</b>	The Company supports what is identified in Section K.
<b>L. Cost Allocation</b>	The Company supports 1 or 2, and 3.
<b>M. Publication of DSRUP Information and Data</b>	The Company supports Section M.
<b>N. Reporting and Process Evaluation</b>	Minnesota Power generally is supportive of what is laid out in Section N.
<b>O. Dispute Resolution</b>	Minnesota Power supports Section O.
<b>P. Tariff Implementation</b>	Minnesota Power supports Section P.

Additionally, Minnesota Power is supportive of the process laid out in Attachment B regarding dispute resolutions.

2. *Do the draft standards address and accomplish the goals and requirements described in the Minnesota Session Laws – 2024, Regular Session, CHAPTER 126 – S.F.No. 4292, Article 6, Section 53?*

Minnesota Power has found that all the goals and requirements set forth in the Minnesota Session Laws – 2024, Regular Session, CHAPTER 126 – S.F.No. 4292, Article 6, Section 53 are addressed in the drafted standards.

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

Minnesota Power does not have any additional issues or concerns related to this matter at this time.

**III. CONCLUSION**

Minnesota Power appreciates the opportunity to participate in this workgroup and contribute to establishing an equitable and efficient framework for lowering barriers to upgrades in capacity constrained areas. The Company remains committed to continued collaboration on this matter and is available for questions or further discussion. If you have any questions regarding this filing, please contact me at [cvatalaro@allete.com](mailto:cvatalaro@allete.com) or 218-355-3082.

Dated: November 7, 2025

Respectfully submitted,

*Claire Vatalaro*

Claire Vatalaro  
Public Policy Advisor II  
218.355.3082  
[cvatalaro@allete.com](mailto:cvatalaro@allete.com)  
Minnesota Power  
30 W Superior St.  
Duluth MN 55802

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

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

---

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 7<sup>th</sup> day of November, 2025, I electronically filed a true and correct copy of Minnesota Power's Initial Comments in **Docket No. E015/CI-24-288** 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