

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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| Nancy Lange    | Chair        |
| Dan Lipschultz | Commissioner |
| Matt Schuenger | Commissioner |
| Katie Sieben   | Commissioner |
| John Tuma      | Commissioner |

September 7, 2018

**In the Matter of the Distribution  
System Planning for Minnesota Power**

**Docket Number E002/CI-18-254**

**Comments of Fresh Energy**

Fresh Energy submits these comments in response to the Commission's July 25, 2018 [Notice of Comment Period](#).

Fresh Energy finds that the Draft IDP Requirements are reasonable, based on a robust record, and are an important step forward in the Commission's investigation into distribution system planning. They would provide valuable insight into Minnesota Power's distribution system and planning processes, and they represent the first step toward optimizing DERs and realizing customer and system benefits. We support the Commission generally adopting the staff proposed Requirements with the changes adopted for Xcel Energy at the Commission's August 9<sup>th</sup>, 2018 agenda meeting.

We recognize that there are likely some requirements adopted for Xcel Energy that may not be applicable to Minnesota Power at this time. We expect Minnesota Power to address these items in initial comments and we plan to respond in reply comments.

*/s/ Allen Gleckner*

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