

February 26, 2024

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E111/M-23-495

Dear Mr. Seuffert:

The Minnesota Department of Commerce's (Department) January 29, 2024 comments recommended the Minnesota Public Utilities Commission (Commission) approve, with reporting requirements, Dakota Electric Association's (DEA) December 5, 2023 *Petition to Implement a Pilot Residential and Small General Service Behind-the-Meter Battery Storage Program and Tariff* (Petition). DEA's February 5, 2024 reply comments objected to some of the Department's reporting requirements.

With respect to the reporting requirement within 60 days of the completion of the pilot, the Department asked for average values of net costs for participating customers. The Department agrees with DEA that, at an individual level, the information sought would be considered personal. However, aggregating the information across all pilot participants will help gauge the success of the pilot and does not reveal personal information of the participants. The Department is open to considering any change of wording that DEA might propose to ensure any data collected is anonymized and reported as averages to protect member's privacy. There are potential learnings from this pilot and the Department's recommended reporting requirements are meant to capture those learnings.

The Department recommends **approval with conditions** and the Department's team of Adway De and Steve Rakow is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ LOUISE MILTICH
Assistant Commissioner of Regulatory Analysis

LM/ad

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. E111/M-23-495

Dated this **26th** day of **February 2024**

/s/Sharon Ferguson

[illegible]

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