

February 26, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7<sup>th</sup> 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 **26**<sup>th</sup> day of **February 2024** 

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-495_M-23-495
Eric	Fehlhaber	efehlhaber@dakotaelectric. com	Dakota Electric Association		Electronic Service	No	OFF_SL_23-495_M-23-495
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280  Saint Paul,  MN  551012198	Electronic Service	No	OFF_SL_23-495_M-23-495
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_23-495_M-23-495
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street  Farmington, MN 550249583	Electronic Service	No	OFF_SL_23-495_M-23-495
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_23-495_M-23-495
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth,  MN  558022093	Electronic Service	No	OFF_SL_23-495_M-23-495
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-495_M-23-495
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul,  MN  55101	Electronic Service	Yes	OFF_SL_23-495_M-23-495
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-495_M-23-495

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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_23-495_M-23-495