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January 23rd, 2024.
Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611 (Docket E999/CI-16-521)

Dear Mr. Seuffert:

All Energy Solar submits to the Minnesota Public Utilities Commission comments addressing the issue, "What changes to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) should the Commission make to achieve the purpose of Minnesota Law 2023, Ch. 60, Art. 12, Sec. 75 (HF 2310)," noticed for comment on September 1, 2023, in this docket.

Sarah Whebbe
All Energy Solar
Policy Analyst

Michael Allen
All Energy Solar
CEO

January 23, 2024

DOCKET NO. E999/CI-16-521

IN THE MATTER OF UPDATING THE GENERIC STANDARDS FOR THE INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION FACILITIES ESTABLISHED UNDER MINN. STAT.§ 216B.1611.

INITIAL COMMENTS REGARDING THE CREATION OF A PRIORITY QUEUE FOR SYSTEMS WITH CAPACITY OF UP TO 40 KW.

Katie J. Sieben	**Chair**
Joseph Sullivan	**Vice-Chair**
Hwikwon Ham	**Commissioner**
Valerie Means	**Commissioner**
John A. Tuma	**Commissioner**

ALL ENERGY SOLAR'S COMMENTS

I. Introduction

The issue in this proceeding is what changes the Commission should make to the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) pursuant to the implementation of Minnesota Law 2023, Ch. 60, Art. 12, Sec. 75 (HF 2310). Section 75 tasked the Commission with establishing interconnection procedures allowing customer-sited DG projects up to 40 KW AC 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.

All Energy Solar supports the Commission taking a broad view of the full scope and breadth of solar and storage now slated to be interconnected as a result of HF 2310. We encourage the Commission to consider whether the proposals before them will actually serve as long term solutions to resolve the grid congestion issues that have prevented <40KW BTM projects from interconnecting, and whether the proposals will make interconnection faster for smaller projects.

We encourage the Commission to consider whether a one size fits all approach reserving 50% of the distribution grid will support the affordable interconnection of the full suite of new DG programs created by the legislature, including Solar on Schools and Solar on Public Buildings along with FTM solar installations.

Finally, we support the Commission's consideration of MnSEIA's proposal to utilize advanced interconnection solutions already working in other states with 100% clean energy deployment goals. Minnesota is not the first or only state updating its interconnection policies to accommodate a high penetration of renewable energy on the distribution grid and we need not waste time or grid capacity by reinventing the wheel.

II. Background

On September 1, 2023 the Commission issued a notice of comment period In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. §216B.1611. On November 1, 2023 proposals for modifications for MN DIP were filed by Dakota Electric Association, Otter Tail Power Company, Xcel Energy, the Minnesota Rural Electric Association and MNSEIA.

Before addressing the proposals for "Queue Priority" changes to MnDIP, we believe it is important to lay out the context within which this proposal is occurring and take a holistic view of Minnesota's clean energy deployment goals. These facts are relevant to the discussion about the issues and challenges that may be created as a result of implementing these proposals, and addressing them now may save time and resources in the future when utilities across Minnesota are interconnecting hundreds of MegaWatts of Distributed Generation (DG). The first section of our comments will discuss the full scope of the initiatives created by the Legislature alongside the "Priority Queue" language. Our comments will then incorporate details arising out of the ongoing implementation of these laws in order to discuss potential impacts of implementing the proposals before the Commission in this docket.

A. BTM and FTM Generation In Statute.

Minnesota's 2023 legislative session was historic for a multitude of reasons. HF 7 established Minnesota's goal to reach 100% carbon free energy by 2040. Subsequent legislation in HF 2130 focused on creating new opportunities for Behind the Meter (BTM) and Front of the Meter (FTM) solar and storage to help fulfill Minnesota's carbon free energy future. 2023 legislation created the Distributed Solar Energy Standard (DSES), which Xcel estimates will procure 500 MW of FTM solar generating capacity by 2029.[1] It also updated the Community Solar Garden (CSG) program which is expected to result in an additional 400 MW of FTM solar generating capacity by 2029.[2] Xcel forecasts that combined, the DSES and the new CSG program are expected to add 900 MW of dedicated power producing solar DER interconnected between 2025-2029.[3]

2023 Legislation also made investments in certain categories of large BTM solar, where Lawmakers believed the funds would serve the public interest. HF 2310 appropriated $15,000,000 from the general fund for the statewide Solar on Schools program and $14,310,000 from the Renewable Development Account (RDA) for Solar on Schools in Xcel territory.[4] [5] Lawmakers appropriated another $5,000,000 from the RDA to the Solar On Public Buildings grant program.[6] Legislation also invested in Small BTM residential solar by allocating $17,500,000 in RDA funding to Xcel Energy's Solar Rewards program.[7] Finally, the legislature invested $7,000,000 in RDA and General funds in the newly established, statewide small scale storage grant program.[8]

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[1] Minn. Laws 2023, Ch. 60, Art.12, Sec.16.

[2] Minn. Laws 2023, Ch. 60, Art.12, Sec.14.

[3] *In The Matter Of Updating The Generic Standards For The Interconnection And Operation OF Distributed Generation Facilities Established Under Minn. Stat. §216B.1611*, Xcel Energy, PROPOSAL, DOCKET NO. E999/CI-16-521, (November, 1, 2023), Attachment A at 3-4.

[4] Minn. Laws 2023, Ch. 60, Article 10, Sec. 2, Subd. 2.

[5] Minn. Laws 2023, Ch. 60, Article 11, Sec. 2, Subd. 12.

[6] Minn. Laws 2023, Ch. 60, Article 11, Sec. 2, Subd. 7.

[7] Minn. Laws 2023, Ch. 60, Article 12, Sec. 6.

[8] Minn. Laws 2023, Ch. 60, Article 11, Sec. 2, Subd. 9. See also, Minn. Laws 2023, Ch. 60, Art. 10, Sec. 2, Subd. 2.

B. Interconnection

Lawmakers foresaw that interconnection of the full scope of solar and storage directed in 2023 would require updating the MN DIP and the use of new technology. Lawmakers also sought to rectify the less than favorable outcomes of outdated interconnection procedures in the current MnDIP by creating the Distributed Generation Upgrade program. $10,000,000 in RDA funding was granted to Xcel to complete infrastructure investments necessary to enable electricity customers to interconnect distributed energy resources, and to "Advance innovative solutions that can minimize the cost of distribution and network upgrades required for interconnection including… energy storage, control technologies, smart inverters, distributed energy resources management systems, and other innovative technologies and programs."[9]

In response to HF 2310's directives to advance innovative solutions that can minimize the cost of distribution upgrades and network upgrades required for interconnection, Xcel Energy stated that such solutions are not practical at this time and "Innovative solutions, such as storage programs, power control systems, advanced inverter functions, or DERMS, would require more study and evaluation of costs and benefits when compared to a traditional solution."[10]

C. Integrated Distribution Plan

HF 2310 directed Xcel to publish updates to its IDP, including forecasting the rate of DG interconnection and forecasting interconnection costs.[11]

In Xcel Energy's recent IDP, published on November 1st, 2023, the utility's forecasting data shows that they are anticipating a large increase in the interconnection of FTM Solar beginning in 2025 as a result of the DSES and CSG program.[12] In contrast, the IDP does not forecast any significant growth in the rate of behind the meter DER adoption until the mid-2040s.[13]

Xcel's IDP filing forecasts the cost of distribution upgrades to accommodate projected growth in DG.[14] They propose two options for the interconnection of a high penetration of DG, both of which rest on the concept of a system wide reservation of grid capacity. One option, presented here in this docket, would reserve 50% of the available capacity across their entire grid for <40KW BTM solar.

Xcel's own forecasting shows that their proposal to reserve 50% of the capacity of the distribution system system for a "priority queue" will create $100,000,000 in existing upgrade costs immediately.[15] The IDP forecasts show that when the proposed 50% capacity reservation is used, Distribution Upgrade Grid costs begin to skyrocket in 2026 - 2027, right as the rate of deployment to meet the state's energy goals accelerates.[16]

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[9] Minn. Laws 2023, Ch. 60, Art. 12, Sec. 38.

[10] *In The Matter Of The Request For Approval Of A Renewable Development Fund For Distributed Energy Resources System Upgrade Program Under Section* § 216C.378, Xcel Energy, PROPOSED PROGRAM PLAN, Docket No. E002/M-23-458, (November, 1, 2023), Appendix I, at 3.

[11] Minn. Laws 2023, Ch. 60, Art. 12, Sec. 20.

[12] *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*, Xcel Energy, 2023 INTEGRATED DISTRIBUTION PLAN, Docket No. E002/M-23-452, (November, 1, 2023) Appendix I – Page 3.

[13] Id, Appendix I, at 6-7.

[14] Id, Appendix I, at 6.

[15] Id, Appendix I, at 5.

[16] Id, Appendix I, at 6.

III. Queue Priority Proposals

A. Xcel Energy

Xcel Energy's proposal creates two queues; a "Priority Queue" in which projects will be allowed capacity up to 100 percent of the system (feeder/substation) equipment rating, and a "General Queue" in which projects will be allowed capacity up to 50 percent of the system (feeder/substation) equipment rating.

Xcel proposes that the "Priority Queue" will be available to BTM systems sized under 40 KW permitted to generate up to 120% of historic load. All other projects, including BTM projects larger than 40KW and all FTM will move through the General Queue. In addition to creating two queues, Xcel proposes "capacity reserve levels'' for each of the queues. Xcel states that it expects half of all residential customers to have a PV system within the next 10 years.[17] There is no forecasting provided to support this claim. Nonetheless, the Company used it as the basis for its proposal to redline the MN DIP and allow the Company to pursue its policy of placing 50% thermal limits on interconnection applications in the General Queue, if approved.

Xcel also proposes to remove the current standard of utilizing DML as a measure of available grid capacity. In response to information requests, Xcel engineers stated the removal of DML reflects a heightened concern that large DER systems which exceed the localized Load or are not associated with a localized Load could impact Operational Flexibility. [18] This proposal reflects the Company's belief there is a reduced risk to operational flexibility for smaller DER systems as they are usually associated with a localized Load.[19]

<u>Comments: MN DIP Modifications</u>

Xcel proposes a "one size fits all" standard that creates two separate interconnection queues and applies a flat capacity reservation across every substation and feeder in its territory.

The Company proposes that it is necessary to reserve 50% of the capacity of the entire distribution grid to achieve a "queue priority" for <40KW projects. The "capacity reservation" change to the MN DIP is not De Minimis in nature and goes beyond the scope of the "priority queue" statute. Xcel's capacity reservation proposal will make the cost of interconnection unreasonable for the other DG programs created by the legislature in 2023, including Solar on Schools, Solar on Public Buildings, the DSES, and the new CSG program.

The Legislature directed Xcel in Minn.Stat § 216B.2425 and Minn. Stat. § 216C.378 to enable the use of advanced technologies that minimize the cost of interconnection, intending that these tools be utilized to enable a reasonable cost for the interconnection of the full scope of DG contained in HF 2310.
Far from minimizing the cost of interconnection, Xcel's own forecasting shows their proposal has the potential to create $100,000,000 in existing upgrade costs for all >40 KW BTM solar and all FTM solar.

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[17] *In The Matter Of Updating The Generic Standards For The Interconnection And Operation Of Distributed Generation Facilities Established Under Minn. Stat. §216B.1611*, Xcel Energy, PROPOSAL, DOCKET NO. E999/CI-16-521, (November, 1, 2023), at 11.
[18] Addendum I, Xcel Energy IR Responses 1-4, Data Request No. 1, Page 3.
[19] Id.

The legislature invested in the Solar on Schools and Solar on Public Buildings programs, intending that the funds provide grants for BTM solar serving the public interest by affordably lowering the cost of operating these buildings through the use of solar energy. Xcel's capacity limitation for the general queue will subvert the intention of the legislature to deploy public funding into public interest programs. In addition, it will prevent the affordable interconnection of the 900 MW of FTM solar in the DSES and new CSG program.

Xcel has not offered reliable forecasting to support burdening schools, public buildings, DSES projects and CSG projects with $100mm in upgrade costs; it's forecasting of BTM residential solar in the interconnection docket distinctly differs from the forecasting it stated in its IDP where it states small BTM solar is not expected to grow significantly for another 20 years. These statements are contradictory, nonsensical and do not provide a clear basis for burdening the entire DG market with millions of dollars in upgrade expenses. We encourage the Commission to clarify ambiguities in Xcel's DG interconnection forecasting before accepting its capacity reservation proposal.

Finally, a capacity reservation is not a long term solution to resolving the question of how to allow customer-sited DG projects < 40 KW AC to be processed according to schedules specified in the MN DIP. Xcel estimates that approximately 90% of feeders and 60% of substations would currently have capacity for the Priority Queue and these percentages would be subject to change as new applications are submitted into the interconnection process.[20] As more DG is deployed, priority queue applications will continue to be subject to delays and excessive cost issues under Xcel's proposed capacity reservation system.

120% "Sized To Load" Rule

Xcel's proposal seeks to define "customer sited" interconnection applications as applications that comply with a proposed 120 percent rule "whereby the total generation system annual energy production kilowatt hours alternating current is limited to 120 percent of the customer's on-site annual electric energy consumption. The stated statutory basis for the language defining the term "customer-sited" above is Minn. Stat. § 216B.164, which addresses individual system capacity limits for systems sized 40kW or larger.[21] While this statute does not apply to projects in the priority queue, which are <40 kW, we support MnSEIA's proposal to establish a 200% "sized to load" guideline for the priority queue.

There are additional two reasons that priority queue applications should not be limited by Xcel's 120% rule. First, Xcel's current production calculation methodology is arbitrary and overestimates production when compared to real world outcomes. An example of Xcel's 120% calculation overestimating BTM solar production can be found in Solar Rewards production data, where actual incentives have on average totalled 18% less than allocated incentives. [22] The second reason to set a "size to load" at 200% of historical usage is that residential load is expected to grow due to EV's and heat pumps; 120% does not factor in potential increases in usage.

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[20] Addendum I, Xcel Energy IR Responses 1-4, Data Request No. 2, Page 2.

[21] Minn. Stat. § 216B.164, Subd. 4c.

[22] *In The Matter Of The Program Proposal For Solar*Rewards,* Xcel Energy, 2022 ANNUAL REPORT, Docket No. E002/M-13-1015, (June 1, 2023), at Pages 19- 20. The Company awards Solar Rewards rebates to applications based on its calculation that the system will produce less than 120 percent of the previous annual (12-month) electric energy consumption at the Service Address. Solar Rewards incentives are awarded on a per kWh of production basis. Table 10 shows on average across Solar Rewards program vintages 2014-2021, actual incentives were 18% less than allocated incentives, meaning that actual production was an average of 18% less than estimated by Xcel's 120% calculation.

Storage

Xcel Energy's proposal overlooks how battery energy storage would fit into the paradigm of a "size to load" limitation. Today, battery energy storage in Minnesota is installed for the purposes of "Self Consumption" and a solar array with a battery attached will rarely if ever export energy to the grid.

A <40 KW customer installing a battery to store their excess generation would export less energy and have a lesser impact on grid capacity than a customer installing a system sized to 120% of their usage. Installing battery storage requires additional investment on the part of the interconnecting customer, and it also reserves capacity for others using the system. Minimization of grid impact by investment in non-exporting technology will benefit all ratepayers and this type of behavior should be rewarded in MN DIP.

The Company's current proposal also precludes some customers seeking to add non exporting capacity to their existing solar array from doing so in the priority queue. As pointed out by Dakota Electric in its program proposal, treating energy storage and DER capacity on a combined basis impacts eligibility for retail net metering and eligibility to move through the Priority Queue for interconnecting <40KW projects.

The MN DIP's current treatment of storage and solar does not assist with issues in capacity constrained areas. Interconnection applicants in Chisago and Scandia have been waiting for three years to add non exporting storage to their existing solar array so that they may self consume their own energy and reduce their export. Unless improved, MN DIP will continue to prevent the beneficial deployment of BESS technology that could be used to reduce strain on the grid in capacity constrained areas.

We encourage amending the MN DIP to equitably give priority to those consumers limiting their export on to the grid with battery storage by including a tier for Non-Exporting interconnections in the priority queue.

Recommendations In Response To Xcel's Proposal

Xcel's proposed 120% "Sized to load" rule has no basis in statute and should be rejected. If the Commission and stakeholders believe a "size to load" limitation is necessary, we support defining "sized to load" as 200% of the last 12 months of consumption, as proposed by MnSEIA.

All Energy Solar supports the Commision rejecting Xcel Energy's "capacity reservation" modification to MN DIP because it exceeds the language of the statute. Without guardrails, any utility in the state could claim it is necessary to reserve any amount of capacity on their grid, for any reason, at any time. Millions of dollars of investment in grid upgrades will be created as a result of the proposed 50% capacity reservation, these investments will shape the DG market in Minnesota for years to come and they will make it economically unfeasible to implement the DG programs created by the 2023 legislature.

Alternatively, if a "capacity reservation" modification to MN DIP is approved, All Energy Solar supports the use of firm language requiring capacity reservations be approved by the Commissioners on a feeder by feeder basis, and only in limited circumstances where the distribution utility can demonstrate through accurate forecasting and apparent need that such capacity reservation is required for that particular location on the grid.

In addition, pursuant to Minn.Stat § 216B.2425, Subd. 9, and Minn. Stat. § 216C.378, All Energy Solar supports the Commission directing Xcel to initiate pilot programs to develop and advance innovative solutions that will increase capacity utilization, including the use of advanced inverter settings and storage.

B. Dakota Electric Association's Proposal

DEA proposed a process in which utilities maintain at least two queues for DER interconnections; one queue for systems which are smaller than 40kW, and one for systems larger than 40kW. The utility continues to process the under 40kW DER applications as they come in for all portions of their system which are not already capacity constrained.

DEA notes that its proposal does not help in a situation where a large DER has already "taken up" available capacity (perhaps years in the past) and no capacity is available or in a situation where a feeder or substation is at capacity and requires significant system upgrades.

On the topic of energy storage: DEA raised that the current MN DIP and interconnection standards treat energy storage and DER capacity on a combined basis and this treatment of storage causes two issues. This treatment creates two issues: first, it impacts eligibility for retail net metering and second it may negatively impact the Legislature's intent regarding interconnection of DER under 40kW in capacity.

DEA also opened discussion on the topic of DER interconnection costs and current manner in which the cost causation method for recovery of upgrade expenses drives the need to maintain the current, strict, queue management to avoid a shift in upgrade costs between consumers. DEA raised that longer-term solutions may be needed to improve allocation methodology for grid upgrade expenses and proposed that one such approach to updating allocation is the introduction of a "Make Ready" grid fee for DER customers. Dakota Electric proposes three methods for formulating a "Make Ready" fee, all of which socialize the cost of grid upgrades across DG customers.

Comments: MN DIP Modifications

In the near term, DEA's proposal should operate to create the queue requested by the legislature. In the long term, as more DG interconnects to the grid, we believe that DEA's proposal to maintain two separate administrative queues will be challenging to manage. As Dakota electric states in its proposal, maintaining two separate queues won't aid priority queue interconnections in capacity constrained areas and it will add administrative burden for small utilities.

We agree that long term solutions should address allocation issues, however improvements to allocation methodologies should be accompanied by changes to MN DIP to improve capacity utilization.

Storage

We applaud Dakota Electric Association for raising the issue of addressing storage as it relates to its impact on the Legislature's intent regarding interconnection of DER under 40kW in capacity. AES agrees with Dakota Electric that the Commission may wish to address the issue of storage further as it relates to the Legislature's request and how energy storage may impact the Legislature's intent regarding interconnection of DER under 40kW in capacity. The current MN DIP and interconnection standards treat energy storage and DER capacity on a combined basis. A customer with 25 KW of solar who installs 20 KW of energy storage should not be penalized for reducing their export on to the distribution grid.

We support amending MnDIP to no longer treat energy storage and DER capacity on a combined basis, so that small BTM solar and storage interconnection applications may be processed in a manner that does not conflict with Net Metering and enables processing in the priority queue.

"Make Ready" Fee for DG Customers

All Energy Solar applauds Dakota Electric Association for initiating discussion on the issues of allocation and optimized solutions for planning for grid upgrades. Looking ahead at the future of DG interconnection, we agree with DEA that now is the time to begin developing processes to ensure that interconnection costs are adequately and fairly allocated, that costs are minimized, and that DER interconnections can occur in an efficient and cost effective manner.[23]

Amending the MN DIP to include a "Make Ready" fee is not De Minimis in nature and would require extensive discussion of alternative fee structures with stakeholders. We agree with DEA that there are many possible allocation methods and cost recovery methods which should be explored. For this reason, we do not support modifying the interconnection process to support a "Make Ready" fee until stakeholders have had the opportunity to understand and comment on the pros and cons of different allocation methods and cost recovery methods.

We support initiating investigation of DEA's "Make Ready" proposals in a separate proceeding with the purpose of developing equitable allocation methodologies for DG customers to share the costs of updating the grid with other ratepayers who will also enjoy the benefits of increased grid capacity.

C. MnSEIA's Proposal

MnSEIA's proposal described the major trends in other states with aggressive clean energy goals similar to Minnesota's: (1) advanced interconnection processes assign screening tests based on the appropriate level of review for a system's impact on the grid; and, (2) the starting queue position may differ from the ending queue position because a system with a lesser impact on the grid requires fewer screens and studies to cross the finish line and achieve interconnection approval.

Based on these trends, MnSEIA recommended that the MN DIP should be updated: (1) To allow the creation of a different level of screening review for non-exporting or net metered facilities; (2) In the event that a screen is not passed - obtaining interconnection approval through the usage of advanced inverter settings for curtailment to mitigate export in excess of grid capacity; (3) For small projects that are not sized to load, the impact of the smaller project or projects on the larger projects in the queue should be determined so that those costs can be offset or otherwise compensated so that the larger projects are not prejudiced.

MnSEIA also proposed a 200% "sized to load" guideline for access to the priority queue.

MN DIP Modifications

MnSEIA's proposal introduces advanced interconnection procedures being utilized in other states positioned similarly to Minnesota in that they have a 100% clean energy goal in statute and anticipate the need to interconnect a high penetration of DG to meet the goal.

States such as New Mexico and Illinois, tasked with aggressive targets for DG deployment to meet clean energy goals, have found it to be in the public interest to make the updates interconnection to procedures suggested by MnSEIA. We support modeling Minnesota's interconnection procedure updates to resemble

[23]Addendum II, DEA IR Responses 1-3, IR No. 1, Page 8.

interconnection procedures in states with similar clean energy targets. The states where advanced interconnection procedures have been implemented are demonstrating it is possible to reliably and affordably connect a high penetration of renewable energy to the distribution grid by introducing measures to mitigate the cost of and need for grid upgrades. All Energy Solar also supports MnSEIA's 200% "sized to load" guideline if it is determined that such a guideline is required for access to the priority queue.

VI. Conclusion & Summary of Recommendations.

We thank the Commission for the enormous amount of time and resources it has dedicated to dealing with the issues that arise when projects seeking to interconnect are prevented from doing so by capacity constraints and prohibitively expensive grid upgrades. To resolve these issues going forward, All Energy Solar supports:

1. Rejecting Xcel Energy's "capacity reservation" modification to the MN DIP.

   Or, Alternatively, if the "capacity reservation" modification is approved, require that capacity reservations must be approved by the commission on a feeder by feeder basis, in limited circumstances where the distribution utility can demonstrate through accurate forecasting and apparent need that such capacity reservation is required for that particular location on the grid.

2. Directing Xcel to initiate pilot programs to develop and advance innovative solutions that will increase capacity utilization, including the use of advanced inverter settings and storage.

3. Addressing the issue of storage as it relates to its impact on the Legislature's intent regarding interconnection of DER under 40kW in capacity by amending MnDIP to no longer treat storage and DER capacity on a combined basis.

4. Structuring the MnDIP "Priority Queue" to include storage and non-exporting systems.

5. If it is determined that Priority Queue projects must be "sized to load", approving a maximum of 200% of past usage for a "size to load" rule.

6. Initiating investigation of Dakota Electric's "Make Ready" proposals in a separate proceeding with the purpose of developing equitable allocation methodologies for DG customers to share the cost of updating the grid with other ratepayers who will also enjoy the benefits of increased grid capacity.

7. Updating the MN DIP in a manner consistent with advanced interconnection policies being utilized in other states with similar climate goals.

All Energy Solar appreciates the opportunity to comment and looks forward to continuing to work with the Commission and other stakeholders on this important issue. Respectfully submitted,

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