



Minnesota Rural Electric Association

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October 11, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Subject: Minnesota Rural Electric Association's Reply Comments
In the Matter of Updating the Generic Standards for the Interconnection and
Operations of Distributed Generation Facilities Established under Minn. Stat. §216B.1611
Docket No. E-999/CI-16-521

Dear Mr. Wolf:

Minnesota Rural Electric Association (MREA) was pleased to see other parties' initial comments also generally recommend the Commission to approve the Minnesota DER TIIR. MREA respectfully submits reply comments for Docket No. E-999/CI-16-521 to address some of the particular issues brought forward for consideration.

Proposal of a Standing DER Technical Committee

IREC and Fresh Energy discussed throughout their initial comments that future revisions of the Minnesota DER TIIR will be needed as DER technology changes and matures. MREA is in agreement with that line of thinking and is in support of a standing DER Technical Committee to address future changes to the TIIR. MREA envisions the DER Technical Committee would address the need for modification to the TIIR and then would recommend to the Commission specific changes to the Minnesota DER TIIR.

Specifically, the DER Technical Committee could discuss the appropriate timing associated with implementing UL 1471 certified equipment compliant with IEEE 1547-2018. MREA hesitates to agree with IREC and Fresh Energy's proposal of a specific cutover date determined now when there could be many unknown issues, such as limited inverter supply, at the time of the proposed cutover to the updated UL 1471 certified equipment. It would be preferable to assign the DER Technical Committee the responsibility for determining the changeover date once the updated UL 1741 certification is fully developed and a clearer picture of availability of equipment is known. This provides flexibility for Minnesota to adapt to issues that may arise in the future.

New Specificities for Energy Storage Systems and Voltage Regulation

MREA envisions the Minnesota DER TIIR to be a dynamic document that will be updated as national standards are fully developed and new DER technology becomes more common place. The current Minnesota DER TIIR document is the result of significant discussion amongst all parties with multiple draft versions circulated for comments and edits. It is discouraging that new topics on energy storage systems and voltage regulation recently proposed to be included in the Minnesota DER TIIR are being presented for the first time in the docket's comments. MREA suggest these new proposed topics be directed towards the proposed DER Technical Committee for future inclusion into the Minnesota DER TIIR.

Conclusion

MREA was pleased to see other parties' initial comments showed general agreement on the adoption of the Minnesota DER TIIR. MREA is recommending the creation of a standing DER Technical Committee to address future revisions to the Minnesota DER TIIR as it is a way to evolve the document to include developing national standards and address emerging technology. MREA appreciates the opportunity to submit these reply comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrick Moe", with a stylized, flowing script.

Darrick Moe
President/CEO
Minnesota Rural Electric Association