

NOTICE OF COMMENT PERIOD

Issued: August 23, 2019

In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611

PUC Docket Number(s): **E999/CI-16-521**
 E999/CI-01-1023

Comment Period: Initial comment period closes September 24, 2019 at 4:30pm
 Reply comment period closes October 11, 2019 at 4:30pm

Comments received after the close of the comment period may or may not be considered by the Commission.

Issue: Should the Commission approve, modify or remand to the Technical Subgroup the proposed statewide Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements and associated implementation plan?

Topic(s) Open for Comment:

- Should the Commission approve the Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (Minnesota DER TIIR) as submitted by the Distributed Generation Workgroup's Technical Subgroup? (Attached to this notice.)
- Interim Implementation
Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on implementation of the statewide technical requirements in the interim as IEEE 1547-2018 implementation to UL 1741 certified equipment is complete (anticipated in 2021)? What, if anything else, should the Commission address related to interim implementation?
- Utility Technical Specification Manuals
Is the language in the Technical Subgroup's recommended draft sufficient and appropriate on the scope of an individual utility's Technical Specification Manual (TSM) and the Commission's oversight? What, if anything else, should the Commission address related to the rate-regulated utilities' TSMs?
- Are there other issues or concerns related to this matter?

Background

The Commission issued its January 24, 2017 Order Establishing Workgroup and Process to Update and Improve Statewide Interconnection Standards in Docket No. E999/CI-16-521. The update includes two phases: 1) transition Minnesota’s distributed generation interconnection process to one based upon the FERC Small Generation Interconnection Procedures (SGIP) and Agreement (SGIA); and 2) update Minnesota’s distributed generation interconnection technical requirements. In all, it is anticipated this update will replace first Attachments 1,3,4,5¹; followed by Attachment 2 of Minnesota’s Interconnection Process and Requirements standards established by the Commission’s September 28, 2004 Order in Docket No. E999/CI-01-1023. These standards apply to all distributed generation, including storage, which is no more than 10 MW and operated in parallel with a Minnesota utility’s electric distribution grid pursuant to Minn. Stat. §216B.1611.

On December 15, 2017, the Commission sought input on the scope and process for the Phase II update of statewide interconnection technical requirements. Several utilities jointly offered a Minnesota Distributed Energy Resource Technical Interconnection and Interoperability Requirements (TIIR) proposal to serve as the starting point for discussion.² The DGWG- identified membership of the TSG included³:

Jeff Schoenecker/Craig Turner, Dakota Electric	Tam Kemabonta/Professor Mahmoud Kabalan	Dean Pawlowski, Otter Tail Power
Lise Trudeau, Dept of Commerce	Robert Jagusch, MMUA	Patrick Dalton/John Harlander/Alan Urban, Xcel Energy
Mike McCarty/Katie Bell, EFCA	Kevin McLean/Jenna Warmuth, MN Power	Natalie McIntire, Wind on the Wires
Brian Lydic/Sky Stanfield, IREC	Kristi Robinson, MREA	Laura Hannah, Fresh Energy

On March 12, 2018, the Commission hosted with the Organization of MISO States an IEEE 1547 Workshop featuring National Renewable Energy Laboratory, Institute of Electric and Electronic Engineers (IEEE), Electric Power Research Institute, and North American Electric Reliability Corporation representatives. TSG members participated in this workshop.

¹ Phase I was completed with the Commission’s *Order Establishing the Updated Interconnection Process and Standard Interconnection Agreement* (August 13, 2018) and *Order Approving Tariffs with Modifications and Requiring Compliance Filings* (April 19, 2019). The newly revised, statewide Minnesota Distributed Energy Resource Interconnection Process and Agreement (MN DIP and MN DIA) went into effect on June 17, 2019.

² Xcel Energy on behalf of “Minnesota Regulated Utilities”, which included Otter Tail Power, Minnesota Power and Dakota Electric Association, filed the draft on January 17, 2018.

³ Other participants: Commissioner Schuerger, Michelle Rosier/Cezar Panait, MN PUC. Michael Coddington/Michael Ingram, NREL; Tom Key/Jens Boemer/Nadav Enbar, EPRI; Pam Johnson, Solar Energy Innovator Fellow. Technical assistance is not a participant or party to the docket and does not advocate for specific outcomes in the proceeding. The role of technical assistance is to support Commission staff in the process for these proceedings, and to provide an objective source of information or data, as requested, by Commission staff to understand areas of disagreement amongst participants.

Between March 2018 and September 2018, the Commission convened seven web meeting discussions and sought feedback on the draft TIIR following the outline provided in the December 15, 2017 Notice. The TSG added two additional web meetings for further needed discussion.

On September 21, 2018, the Technical Subgroup (TSG) met in person to reconcile and prioritize feedback from the first seven TSG meetings. The TSG also chose a writing subgroup comprised of Dakota Electric Association, Fresh Energy, Interstate Renewable Energy Council, Minnesota Rural Electric Cooperative Association, and Xcel Energy representatives to attempt to reconcile these suggestions in the draft TIIR.

Between April 2019 and July 2019, the Writing Subgroup offered three rounds of feedback incorporation to the Writing Subgroup’s updated Draft TIIR⁴ for the DGWG, shared with both Participants and Observers. On August 9, 2019, the TSG met to discuss the attached further updated Draft TIIR before it was issued for public comment with this notice. Only one edit to the document was suggested and is reflected in the attached. Continued consideration was flagged for this comment period on the following: interim implementation issues and the interplay between the TIIR and utility-specific TSMs; including scope and Commission oversight of rate-regulated utilities. Agendas and slides for the full Phase II process have been electronically filed in this docket. The current membership of the TSG includes:

Craig Turner, Dakota Electric	Robert Jagusch, MMUA	Alan Urban, Xcel Energy
Lise Trudeau, Dept of Commerce	Cody Gustafson/Jenna Warmuth, MN Power	Allen Gleckner, Fresh Energy
Brian Lydic/Sky Stanfield, IREC	Kristi Robinson, MREA	
Professor Mahmoud Kabalan	Dean Pawlowski, Otter Tail Power	

Upon request, Commission staff will provide individuals with an editable word document version of the Draft TIIR. Agendas and slides for each of the Phase II TSG meetings has been compiled and electronically filed in this docket.

Filing Requirements: Utilities, telecommunications carriers, official parties, and state agencies are **required** to file documents using the Commission’s electronic filing system (eFiling). All parties, participants and interested persons are encouraged to use eFiling: mn.gov/puc, select *eFiling*, and follow the prompts.

Submit Public Comments: Visit mn.gov/puc, select *Speak Up!* to find this docket, and add your comments to the discussion or email your comments to consumer.puc@state.mn.us.

⁴ Phase II Sub Work Group filed the updated draft TIIR on April 10, 2018 in this docket.

Full Case Record: See all documents filed in this docket via the Commission's website at mn.gov/puc, select *Search eDockets*, enter the year (16) and the docket number (521), select *Search*.

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Questions about this docket or Commission process and procedure? Contact Commission staff, Michelle Rosier, at michelle.rosier@state.mn.us or 651-201-2212.

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