



NOTICE OF COMMENT PERIOD

Issued: February 14, 2017

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: E-999/CI-16-521

****Comment Period:** Comment period closes March 16, 2017 at 4:30pm

Comments must be received by 4:30pm on the close date

Comments received after comment period closes may not be considered

** This initial round of comments will inform the Commission and the Commission-convened Distributed Generation Workgroup as we develop substantive updates to Minnesota's interconnection standards. The Commission will have additional comment periods on this docket; including an opportunity to give feedback on draft recommendations. See Notice Soliciting Distributed Generation Workgroup also filed in this docket on February 14, 2017 for information on the workgroup and tentative timeline; including how to apply to be a Workgroup Participant or Observer.

Project Background: Since Minnesota's interconnection process and requirements generic standards for distributed generation were established in 2004, the number of distributed generation systems (e.g. solar, wind, diesel) in the state has increased significantly. Likewise, the types of interconnections have changed as technologies have matured. In 2016, parties petitioned the Commission requesting an update to the state's standards.

The Commission issued its Order Establishing Workgroup and Process to Update and Improve State Interconnection Standards on January 24, 2017. The Commission's Order determined the Joint Movants' proposal¹ would serve as the general starting point for comments for a transition of Minnesota's Distributed Generation Interconnection Process and Requirements standards² to one

¹ Environmental Law and Policy Center, Fresh Energy, Interstate Renewable Energy Council May 12, 2016 filing in Docket No. 01-1023 ([cross-filed in Docket No. 16-521 on June 16, 2016](#)). Joint Movants also filed their proposed Minnesota Interconnection Process and Agreement as a red-line to the FERC SGIP and SGIA on February 1, 2017.

² established by Commission Order in 2004 (Docket No. 01-1023)

based on the [FERC Order No. 792 Small Generator Interconnection Agreement and Procedures \(SGIP/SGIA.\)](#)

The update will include 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 (Interconnection Process), 3 (Application), 4 (Engineering Data Submittal), and 5 (Interconnection Agreement); followed by Attachment 2 (Technical Requirements) of Minnesota's Interconnection Process and Requirements standards established by Commission order in Docket No. 01-1023. This docket will not address Attachment 6 (rates) at this time.

Development of recommendations for the update will be guided by statutory requirements and Commission Order, informed by national learnings, anchored with technical facts, and firmly grounded in the expertise, experience, and perspectives of Minnesota's utilities, businesses, advocates, and other interested parties.

Topic/s Open for Initial Comment:

1. What principles should the Distributed Generation Workgroup consider regarding updates to Minnesota's interconnection standards?
2. How should the Commission take into account differing distributed generation system requirements (e.g. hardware types, power generation characteristics, etc.) and differing situations of individual utilities (e.g. utility size, volume of interconnection requests, etc.) while continuing to set statewide generic standards?

For utilities, installer/developers, and other interested parties:

3. Below is a list of topics identified as areas of agreement by at least some of the parties in the record. Identify and explain any differences that remain, relative to the Joint Movants' proposal:
 - a. Inclusion of Energy Storage as eligible technology
 - b. Addition of a Pre-Application Report
 - c. Addition of an Interconnection Queue
 - d. Addition of Process for Material Modification
 - e. Addition of Fast Track/Expedited Process
 - f. Updates to Engineering Screens
 - g. Removal of No Construction and Feasibility Studies
 - h. Other areas of general agreement
4. Identify and explain the impacts of and differences in how best to approach the topics below in comparison to what is recommended in the Joint Movants' proposal:
 - a. Pre-Application Report Details
 - b. Application Requirements

- c. Online Application Process
 - d. Queue Type and Process
 - e. Material Modification Definitions
 - f. Fast Track/Expedited Process Thresholds and Eligibility
 - g. Thresholds, Types, Details of Engineering Screens
 - h. Study Process
 - i. Process Timelines and Extensions
 - j. Dispute Resolution
 - k. Site Control
 - l. Insurance Requirements
 - m. Disconnect Switch
 - n. Commissioning, Inspection, Testing, Authorization
 - o. Design, Procurement, Installation and Construction of Interconnection Facilities and Upgrades
 - p. Interconnection Agreement
 - q. Other areas of disagreement
5. What other revisions should be considered, such as, lessons learned or changes in the interconnection process in Xcel Energy's Community Solar Garden Program or other dockets currently before the PUC?
 6. What issues should be considered regarding the transition to the updated processes that will replace the current versions of Attachments 1, 3, 4, and 5?

Technical Requirements will be discussed in the second phase of the update process anticipated to begin in December 2017.

7. What, if any, technical requirement topics should be addressed during Phase 1 rather than waiting until after draft recommendations from Phase 1 are complete?
8. What national technical standard updates should be reviewed and evaluated in Phase 2?
9. How should Minnesota's technical requirements address and incorporate utilization of advanced technologies (e.g. advanced inverters)?
10. What should be the process for updating the Minnesota Interconnection Process and Requirements generic standards going forward and on what schedule? What should be the criteria requiring a compliance filing and the process for updating utility tariffs to comply with new standards and technical requirements?
11. Are there other project-related issues or concerns?

Attachment 6 on Rates is not within the scope of the update occurring in this docket.

Additional Background: In 2001, the Minnesota Legislature enacted [Minn. Stat. §216B.1611](#) requiring the Commission to establish generic standards for interconnection and operation of distributed generation (10 megawatts or less.) The purpose of the standards were:

“1) to establish the terms and conditions that govern the interconnection and parallel operation of on-site distributed generation;
2) provide cost savings and reliability benefits to customers;
3) establish technical requirements that will promote the safe and reliable parallel operation of on-site distributed generation resources;
4) enhance both the reliability of electric service and economic efficiency in the production and consumption of electricity; and
5) promote the use of distributed resources in order to provide electric system benefits during periods of capacity constraints.”
(§216B.1611, Subd. 1).

“At a minimum, the standards must:

1) to the extent possible, be consistent with industry and other federal and state operational and safety standards;
2) provide for the low-cost, safe, and standardized interconnection of facilities;
3) take into account differing system requirements and hardware, as well as the overall demand load requirements of individual utilities;
4) allow for reasonable terms and conditions, consistent with the cost and operating characteristics of the various technologies, so that a utility can reasonably be assured of the reliable, safe, and efficient operation of the interconnected equipment; and
5) establish (i) a standard interconnection agreement that sets forth the contractual conditions under which a company and a customer agree that one or more facilities may be interconnected with the company’s utility system, and (ii) a standard application for interconnection and parallel operation with the utility system.” (§216B.1611, Subd. 2 (1-5)).

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!*, find this docket (16-521), and add your comments to the discussion.

- *If you wish to include an exhibit, map or other attachment, please send your comments via U.S. Mail.*

Send U.S. Mail to Public Utilities Commission, 121 7th Place East, Suite 350, St. Paul MN 55101. Please include the Commission’s docket number in all communications.

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

Subscribe to receive email notification when new documents are filed in this docket at mn.gov/puc, select *Subscribe*, and follow the prompts.

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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