

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Daniel Lipschultz	Commissioner
Matthew Schuenger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of Establishing Generic
Standards for Utility Tariffs for
Interconnection and Operation of
Distributed Generation Facilities under
Minnesota Laws 2001, Chapter 212**

Docket No. E-000/CI-16-521

January 17, 2018

**MnSEIA COMMENTS REGARDING PHASE II OF THE COMMISSION
INTERCONNECTION STANDARDS WORKING GROUP**

I. COMMENTS

A. MnSEIA Would Like To Alter Our Participants For Phase II

The Minnesota Solar Energy Industries Association (MnSEIA) participated in the Phase I portion of the Interconnection Standards working group with David Shaffer as the primary participant and Elizabeth Lucente as the alternate. Moving into Phase II of the process, MnSEIA would like to appoint John Dunlop as the MnSEIA representative, and Chris Jarosch as the alternate. They will serve as the MnSEIA technical experts.

David Shaffer and Elizabeth Lucente would like to participate in an observer only capacity for the Phase II process. One of them will be present at each technical standards meeting and will be able to discuss issues on an as needed basis or at the Commission's request.

B. MnSEIA Feels That The Scope Of The Proposed Phase II Will Cover The Vast Majority Of Our Member's Concerns Except A Probe Into Xcel Energy's New Storage Interconnection Standards Is Necessary.

The attached Appendix A to the Notice for Commentary outlines a prospective timeline for the Phase II working group. MnSEIA feels that timeline will sufficiently encapsulate the important industry needs and wants but with one exception. MnSEIA requests that Xcel Energy's storage interconnection standards process is brought forward for group discussion.

On the issue of the Topic Outline, during the discussions about the various scope of work, MnSEIA anticipates our members will have the greatest desire to discuss 1) types of interconnections; 2) technical specifications; and 3) metering, monitoring and control. We

highlight this now to ensure staff has adequate notice that these may be “hot-button” topics requiring additional discussion time.

Regarding types of interconnections, our members would like a discussion about both standard applications and behind the meter generation. On the topic of technical specifications, our members have expressed frustration with one-line diagram requirements, inconsistency and incomplete engineer specifications and requirements, disconnect switches and other unnecessary switchgear, witness testing requirements, and labeling requirements. On the issue of Metering, Monitoring & Control, members have highlighted challenging aspects of telemetry, bidirectional metering requirements and more.

Additionally, one general concern that MnSEIA is hoping to address is the general inconsistency for approval of interconnection by unnecessary specificity and complexity of application instructions. On occasion developers have complained about situations where one engineer may state one issue with a one-line diagram or other technical component, the developer then fixes this problem, and then the application is kicked out by a new engineer questioning the exact item that was fixed. Similar issues happen throughout the interconnection process, and often trigger elongated application periods due to no fault of the developer. This topic of inconsistency seems like it could fit under a wide swath of topics outlined in the Phase II timeline, but it will be a point MnSEIA advocates for going forward.

Finally, we do not wish to preclude the workgroup’s analysis of other issues that may arise as this process continues. One of the great parts of this collaborative, multi-meeting working group is it allows new ideas to be generated. We hope that throughout the duration of Phase II, issues can be brought up and discussed in a similar fashion to how they were addressed in Phase I. We look forward to discussing all of these issues and more as they arise.

One such issue that is outside of the current topics outlined is the issue of Xcel Energy’s energy storage application process, which Xcel has devised and implemented without sufficient stakeholder input. This process must be vetted and Commission approved. We understand and respect that Xcel needed to implement something as a stop-gap measure for an influx of recent storage applications, however, this new process is causing substantial industry frustrations, because it is overly restrictive and time intensive. We feel that the National Electrical Code already encapsulates all the requirements that should be placed on Energy Storage interconnections, and that Xcel’s approach is overly protective in some areas and not protective enough in others.

However, at this time MnSEIA takes no issue with Xcel’s current storage standards remaining in place until this group has had ample opportunity to review the storage standards, make recommendations and receives Commission approval. We will discuss the content of our position on Energy Storage when it is appropriate to do so in the course of Phase II. It should be noted, however, that applications are already being unduly hampered by this process, and as such, an expedient look into these standards is necessary.

C. The Interconnection Standards Process Portion From Phase I Should Be Adopted As Soon As The Commission Is Able, And Phase II Should Be Adopted As Soon As It Is Able.

Because Commission staff and members of the committee have worked so diligently, MnSEIA suggests that the Phase I of the Interconnection Standards should be adopted this summer even if Phase II is not yet complete. The adoption of Phase I should not be contingent upon Phase II, as the process portion is not very reliant upon the technical portion, and there is no need to hold up a well devised policy. Furthermore, Phase II may take longer than anticipated and unduly delay the implementation of Phase I work.

During the interim period, if there are issues because of the deviation between the technical standards and the procedural standards, those issues could be decided in the newly formed DG Work Group formulated from Docket 17-284. Nothing else must be considered at this time, as that subgroup will have the ability to assist in the unlikely event that issues arise.

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Respectfully submitted,

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