

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

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

MINNESOTA SOLAR ENERGY INDUSTRIES ASSOCIATION’S (MnSEIA) COMMENTS

August 5, 2020

Docket No. E999/CI-16-521

MnSEIA’s COMMENTS

The Minnesota Solar Energy Industries Association (MnSEIA) is a 501(c)(6) nonprofit trade association that represents our state’s solar businesses, with over 110 member companies, which employ over 4,000 Minnesotans.

BACKGROUND

On July 22, 2020 the Minnesota Public Utilities Commission posted a request for members of the Distributed Generation Workgroup to provide feedback on what MN DIP / MN DIA review topics require a review after 1 year of implementation.¹ MnSEIA will provide additional commentary on those topics in the following section.

¹ NOTICE - OF WORKGROUP MEMBERS SOLICITATION AND COMMENT PERIOD, PUC, Docket No. E999/CI-16-521, Doc. Id. 20207-165174-01 (July 22, 2020).

COMMENTS

With a year of MNDIP's implementation behind the working group what has become increasingly apparent is that the timelines are too long when taken holistically. Most of the utilities in Minnesota do not take the total number of days that are allotted for various steps in the interconnection process, and we do acknowledge that at the formulation of the MNDIP process each individual step seemed a reasonable duration of time. Affording individual utilities, especially small staffed utilities, a little leniency on various timelines seems fair.

However Xcel Energy tends to take the entirety of the timeline durations and still frequently is tardy on returning work product. This is evidenced by their most recently filed compliance report, which showed that in the second quarter of this year the utility has only issued Interconnection Agreements on time 12% of the time.² As such, 60% of the queue is apparently "on hold" and only 2% of the gardens have outstanding interconnection agreements.³

The permissible durations when implemented correctly result in timelines that are longer than the pre-MNDIP applications, yet seem to be resulting in more frequently missed Interconnection Agreement delivery dates. In that service territory project timelines have grown greatly. Something seems to be broken with the process once certain project volumes are reached, and we hope to work collaboratively with the DGWG to fix the problem for Xcel's service territory, but also for other territories that might one day experience higher project volumes. All of our requested discussion items pertain to issuing Interconnection Agreements faster and on time.

First and foremost, we are requesting that the workgroup re-evaluate the MNDIP timelines.

Second, we are requesting that the DGWG reconsider the topics already posted in Attachment A titled "Penalty for utilities missing timeframes," "Treatment of small, later in queue projects while awaiting results of larger projects," and "cluster studies." Consideration should also be given to whether the current MNDIP language permits "batch studies" to be implemented when appropriate or perhaps this concept should be considered a new topic for discussion.

Lastly, we are requesting that the DGWG discuss how to treat projects that are being mediated. Currently, if a developer needs to mediate with Xcel Energy over a legitimate dispute, the project queue is effectively put on hold. All the projects behind the mediated project are paused until the dispute is resolved, but there is no time bound around that dispute resolution process. This needs to be addressed, so that other projects can continue forward.

² COMPLIANCE FILING - 3RD QTR. 2020 COMPLIANCE FILING, XCEL ENERGY, Docket No. E002/M-13-867, Doc. Id. 20207-165179-01 at 4-5 (July 22, 2020).

³ *Id.*

We look forward to discussing the above items with the DGWG.

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