

From: [Damon Sonnek](#)
To: [Staff_CAO \(PUC\)](#)
Subject: Re: MN PUC Case ID 76018 PS- Xcel Energy Solar
Date: Wednesday, November 18, 2020 8:06:05 PM

Dear Ms. Pa Stelzner

I think we have two objectives in this complaint. Both are directed towards the utility and MN PUC.

It is my understanding that :

1. placing solar reduces greenhouse gases and also provides peak generation potential for the utility reducing instantaneous generation loads on the grid.
2. The MN State^a, MN PUC and utilities^b have advocated and advertised the use of renewable energy sources to curb greenhouse gas emissions.
 - a. <https://mn.gov/commerce/consumers/your-home/energy-info/solar/>
 - b. https://www.xcelenergy.com/staticfiles/xcel/Corporate/Corporate%20PDFs/2008_Xcel_Energy_Corporate_Responsibility_Report.pdf

My complaints are:

1. The location, size of solar system and solar generation potential are well known to the utility at the time of application (Aug 7, 2020). The system size in my case is 12.21 kW of DC solar and 10 kW of AC. Xcel or MN PUC must establish guidelines for small DG (<40 kW AC) wherein such approvals are not taking 5 months to approve and additional costs unknown. Why does it have to take 5 months to approve a residential system which is less than 40 kW which is the allowed by law net meter limit?
2. Had I decided to go buy a 115V / 140A DC welder (16 kW) from Home Depot or Menards or Lowes, I will not have to get approval from either the utility or MN PUC. This welder uses more continuous energy (16 kW) than the solar system (10 kW) I wish to install. And me and all of my neighbors could buy this same welder and none of us would have to pay for the grid upgrade. This welder** is available in any home improvement store. If the grid is vulnerable for the solar being added, the grid would be vulnerable for the welder being added too. What I am unable to understand is why the grid is able to take the load from an unknown larger load while unable to take the load from an unknown smaller load.

**140 Amp Weld Pak 140 HD MIG Wire Feed Welder with Magnum 100L Gun, Sample spools of MIG Wire and Flux Wire, 115V by Lincoln Electric

I wish to file a complaint based on the above. I believe MN PUC should clearly establish residential solar PV size limits. The limits as I understand is the 40 kW net meter size. If this is not the limit and must be lowered due to the grid infrastructure unable to handle this, that is the decision of the MN PUC and utility. I will appreciate if MN PUC and utility places a minimum residential solar size limit that reduces these steps. Afterall, the best location for solar is the roof to capture the abundance of its energy for free. Clearly one cannot place a coal plant, nuclear plant or hydro plant on a roof. And only a solar plant can be placed elegantly and safely on a roof without any transmission and distribution losses and additional land use. It would be my hope that solar distributed generation is given higher priority over other generation sources given the best place for solar is the roof given the overall environmental impacts.

It is not right for the utility to approve the application and add costs 4 months into the process especially for a small residential system. My complaint is that Xcel Energy and MN PUC should establish better guidelines for net metering for residential systems wherein the approval takes not more than 6 weeks, and does not add cost to the consumer. Perhaps this may require the net meter size limit for residential systems to be lowered (say 20 kW instead of 40 kW) and remove the additional burdens of interconnections as experienced by my application.

If I pay for upgrades to the Xcel system, am I a part owner now and get profits when people use my equipment. Like future people adding solar or new housing/buildings that now do not have to pay for these improvements. There are 2 empty lots in my development that would normally get 200 amp service, much more than my solar system project. How would I know if anyone is added to this equipment, otherwise Xcel could keep all the profits.

I am a Manufacturing Engineering Manager for Daikin Applied, we have 2 plants and North America HQ in Xcel's utility coverage. Over the years we have made additions to our power requirements and added a new \$50 million dollar plant. During this time we have never paid Xcel for transformers or powerlines upgrades for these additional power requirements. They own that equipment not Daikin Applied. They make more money/profits by selling us more electricity. Daikin is in the process of researching the addition of solar panels to all our plants/offices in MN. Daikin is a multi-billion dollar global company that has solar installations on many of its plants worldwide, Daikin is a very green company with ISO 14000 certification and goals of emission free plants. My personal experience with Xcel and MN PUC will be shared with top management in MN and globally.

I wish all of my correspondence to be made public and commissioners of the MN PUC and to provide a reasonable response as to why a welder of a larger size is allowed to be added without any approval while a smaller solar system requires so much more burdens.

Thanks

