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June 30, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources  
Docket No. E999/M-14-321**

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard.

The Department's comments are filed in response to the Minnesota Public Utilities Commission's (Commission) April 21, 2014 *Notice of Reporting Requirement and Comment Period* in the above referenced docket.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ HOLLY LAHD  
Rates Analyst

/s/ SUSAN L. PEIRCE  
Rates Analyst

HL/SLP/lt  
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/M-14-321

I. INTRODUCTION

In the 2013 legislative session, Minn. Stat. §216B.1691 was amended to add a Solar Energy Standard (SES). In addition to the Renewable Energy Standard (RES), public utilities are required to generate or procure electricity from solar energy sufficient to serve 1.5 percent of the utility's Minnesota retail electric sales. Specifically, the statute states:

Subd. 2f. Solar energy standard. (a) In addition to the requirements of subdivisions 2a and 2b, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy. At least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kilowatts or less.

In Docket No. E999/CI-13-542, the Minnesota Public Utilities Commission (Commission) established content requirements for utilities' annual reports demonstrating compliance with the Solar Energy Standard (SES).<sup>1</sup> On April 21, 2014 in the present docket, the Commission issued a notice of comment period (Notice) on the completeness of the utilities' annual reports, whether the reports contain valuable information, and what process should be used to review these reports as they are filed.

Between May 30, 2014 and June 6, 2014, the Minnesota investor-owned utilities (IOUs) that are subject to the SES filed their first annual reports; the utilities filing reports were Interstate Power and Light Company (IPL), Minnesota Power (MP), Northern States Power d/b/a Xcel Energy (Xcel), and Otter Tail Power Company (OTP). In these comments the

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<sup>1</sup> See the Commission's April 25, 2014 *Order Clarifying Solar Energy Standard Requirements and Setting Annual Reporting Requirements*.

Department refers to these utilities collectively as the SES utilities. A copy of the reporting requirements is attached to these comments.

## II. DEPARTMENT ANALYSIS

The Department offers the following comments on all of the SES utilities' reports.

### A. REPORT COMPLETENESS

The Department concludes that the SES utilities' reports include the required information as defined in the Commission's April 25, 2014 Order in Docket No. E999/CI-13-542.

### B. SES CUSTOMER EXCLUSIONS

SES utilities were required to list annual excluded customer sales for 2013 and to identify customers requesting exclusion from the SES requirements.

In Docket No. E999/CI-13-542, the Commission found that the North American Industry Classification System (NAICS) codes should be used as an initial screen for determining customer exclusion from the SES. The Commission also found that customers must file requests with their utility for exclusion from the SES.

On December 3, 2013, the Commission issued a notice of comment period on, among other things, which specific NAICS codes should be used to screen customers who are potentially eligible for exclusion from the SES. The Department and other parties submitted comments identifying specific NAICS codes. To date, the Commission has not decided which NAICS codes should be used for the initial customer screening.

In their reports, the SES utilities indicated that no customers requested SES exclusion in 2013. However, IPL, OTP, and MP each listed estimated 2013 excluded customer sales.<sup>2</sup> It appears that these utilities listed the estimated excluded sales based on their initial screening of industrial customers by NAICS codes. The Department concludes that, for future reports, SES utilities should only list excluded sales associated with customers that have requested and been approved for exclusion from the SES requirements.

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<sup>2</sup> Consistent with its statement that no customers requested SES exclusion in 2013, Xcel did not list any excluded customer sales.

### C. SOLAR CAPACITY ASSUMPTIONS

The SES requires IOU utilities to generate or procure electricity from solar energy sufficient to serve 1.5 percent of the utility's Minnesota retail electric sales. Although the standard is in terms of energy sales, utilities must estimate the solar capacity needed to generate the required levels of solar energy for planning purposes.

Translating energy into capacity requirements requires making assumptions regarding solar photovoltaic capacity factors. In the SES utilities' reports, the solar capacity assumptions ranged from 15 to 20.4 percent.<sup>3</sup> As utilities gain more experience managing solar installations on their systems they should revisit the assumed capacity factor. The Department recommends that in the next annual SES report the utilities include more information supporting their assumed capacity factor.

### D. SOLAR CURRENTLY ON UTILITIES' SYSTEMS

The Commission's April 25, 2014 Order requires utilities to report the annual solar generation on the utilities' system for the previous calendar year. The SES utilities interpreted the reporting requirement in different ways, both in terms of SES eligibility and timing. Xcel listed first-generation Solar\*Rewards and Minnesota Bonus program projects installed after August 1, 2013.<sup>4</sup> MP identified 138 solar net-metered customers on their system, while noting that MP does not have production meters at these installations and the utility does not receive solar renewable energy credits (S-RECs) from these systems. OTP listed a total of 99 MWh of solar energy generated in 2013 from net-metered customers. IPL stated that they had no solar on their system, though later in the report the Company identified 10 Minnesota solar net-metered customers with a combined nameplate capacity of 73 kW.

The Department recommends that the Commission clarify the intent of this reporting requirement. The Department notes that one other reporting requirement is to list the breakdown of S-RECs generated under different tariffs and utility programs. Given that the S-REC breakdown reporting requirement will also indicate the annual SES-eligible solar generation each utility has on its system, the more general requirement noted above may be intended to establish a benchmark to enable the Commission to measure the impact of the SES on utility-connected solar generation. In any case, the Commission may want the

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<sup>3</sup> Xcel did not list their assumed capacity factor in their SES report.

<sup>4</sup> Minnesota Statute 216B.1691, Subd. 2f (f) states: Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after August 1, 2013, but before 2020 may be used to meet the solar energy standard established under this subdivision.

utilities to amend their reports, if necessary, with the information intended to be provided by the reporting requirement.

#### *E. SUMMARY OF ONGOING EFFORTS TO OBTAIN SOLAR ENERGY*

The Commission also ordered the SES utilities to report on their ongoing efforts to obtain solar energy. Xcel summarized their current incentive programs and on-going utility-scale request for proposals (RFP) process. The other utilities' responses to this reporting requirement were lacking in detail. The lack of detail is understandable, given the fact that the SES was passed last year and there are still implementation details being worked out. However, the Department recommends that all SES utilities provide more detailed information in next year's report to comply with the intent of this reporting requirement: assisting the Commission in understanding utilities' progress in complying with the SES and the mix of solar project types on the utilities' systems.

### **III. REPORT PROCESS**

In its Notice, the Commission sought comment on the process that should be used regarding the reports on SES compliance, and whether those reports should be reviewed and/or approved as part of the biennial RES compliance process.

The Department notes that the Commission's April 25, 2014 Order in Docket No. E999/CI-13-542 requires SES utilities to file SES annual reports each June 1. The Department intends to incorporate an analysis of the SES annual reports in its biennial report to the Legislature required by Minn. Stat. §216B.1691, subd. 3.

Because the specific solar generation requirements of the SES do not take effect until 2020, the Department does not think it necessary for the Commission to formally approve the SES compliance reports at this time, but does not object to the Commission doing so. The Department recommends the Commission accept the June 1, 2014 compliance reports, with the additional clarifications and modifications recommended in these comments.

#### **IV. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission:

1. Accept the 2013 SES utilities' reports as complete;
2. Clarify the intent of the annual solar generation on the utilities' systems reporting requirement; and
3. Direct the SES utilities to submit next year's reports by June 1, 2015 and include in these reports:
  - a. Excluded sales only from customers that have requested and been approved for exclusion from the SES requirements;
  - b. More information supporting their assumed solar capacity factor; and
  - c. More detailed information on their ongoing efforts to obtain solar energy on their systems.

### *SES Utility Reporting Requirements*

Utilities shall file the following information by June 1, 2014, and every June 1 thereafter through 2020:

1. Annual Minnesota retail sales for the previous calendar year;
2. Annual excluded customer sales for the previous calendar year;
3. A list of customers requesting exclusion from the requirements of the SES, the NAICS code associated with their manufacturing activity, and their annual kWh usage;
4. The total Minnesota retail sales for customers excluded from the SES requirement;
5. Annual solar generation on the utilities' system for the previous calendar year (including the total number of units registered in M-RETS to that utility and S-RECs generated in the past year from those units);
6. Estimated amount of solar generation (expressed as capacity) a utility would be required to obtain in 2020;
7. Estimated solar energy requirements to meet the SES in 2020;
8. Short summary of ongoing efforts to obtain solar energy (including a brief summary of the anticipated mix of project sizes for SES compliance);
9. Progress toward compliance with the ten (10) percent carveout for systems less than 20 kW;
10. Brief summary of the state(s) in which the solar generation is located or anticipated to be located; and
11. A breakdown of solar RECs generated in the previous calendar year under each of the following categories:
  - a. Facilities receiving a Value of Solar rate;
  - b. Community Solar Gardens;
  - c. Facilities under a Net metering tariff;
  - d. Utility-owned solar projects;
  - e. Solar facilities that have entered into a PPA with the utility;
  - f. Facilities receiving an incentive, such as Solar\*Rewards or Made in Minnesota.

To the extent that utilities do not have this information for their 2014 report, estimates may be made where relevant.

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## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. E999/M-14-321**

**Dated this 30<sup>th</sup> day of June 2014**

**/s/Sharon Ferguson**



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