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January 31, 2014

—Via Electronic Filing—

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

RE: COMMENTS
SOLAR ENERGY STANDARDS
DOCKET NO. E999/CI-13-524

Dear Dr. Haar:

Enclosed for filing are the Comments of Northern States Power Company, doing business as Xcel Energy, in response to the Minnesota Public Utilities Commission's December 30, 2013 Notice of Comment Period.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI
MANAGER, REGULATORY ANALYSIS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF IMPLEMENTATION OF
SOLAR ENERGY STANDARDS PURSUANT
TO 2013 AMENDMENTS TO MINNESOTA
STATUTES, SECTION 216B.1691

DOCKET NO. E999/CI-13-542

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's December 30, 2013 Notice regarding Solar Energy Standard (SES) compliance, tracking, and reporting. We appreciate the opportunity to provide input as the Commission determines tracking and reporting requirements for solar renewable energy credits (RECs).

The Commission previously established general implementation, reporting, and tracking procedures related to the Renewable Energy Standards (RES) and RECs in Docket Nos. E999/CI-03-869 and E999/CI-04-1616. In general, for consistency and clarity, and because the SES was established under the RES statute, we believe it is appropriate to follow processes and procedures already established where possible. Below we provide our comments and respond to specific questions included in the Notice.

COMMENTS

1. Solar REC Shelf Life

RECs, which are used to demonstrate compliance with the RES, are created when renewable energy is uploaded to a registered generator in the Midwest Renewable Energy Tracking System (M-RETS). M-RETS does not assign an expiration date (or shelf life) to RECs. Once renewable energy has been generated and a renewable energy credit issued, its shelf life will determine how long it is available to be bought,

sold, or used for purposes of meeting Minnesota renewable energy standards. Minn. Stat. § 216B.1691, subd. 4(a) requires the Commission to determine the period of time in which renewable energy credits may be used to satisfy the RES, and requires that the REC program treat all eligible energy technology (including solar and wind) equally.

In Docket No. E999/CI-04-1616, the Commission in its December 18, 2007 Order adopted a four-year shelf life for RECs that are to be used for compliance with the RES. A four-year shelf life means the renewable energy credit is eligible for use in the year of generation, and the following four years. For example, renewable energy generated from a facility in-service as of June 2008 would be available for use in complying with the RES until December 31, 2012. Parties in that proceeding made various recommendations, from a three-, four-, or five-year shelf life (to coincide with RES goals that increased at various intervals) to no shelf life (providing an indefinite time period in which a utility could use a REC). The Commission determined the four-year shelf life provided a balance between the goals of encouraging new generation and allowing utilities to reap incentives and efficiencies from longer-range planning in the development of new renewable resources and compliance strategies. In addition, the four-year shelf life is consistent with the shelf life established in Wisconsin and is in line with those set in other regions.

The 2013 legislation amended the RES statute (Minn. Stat. § 216B.1691) by adding the following subdivision (in relevant part):

Subd. 2(f) **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 service 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.

...

2f(f) 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.

- a) Should the Commission clarify that an S-REC that meets the requirements under subd. 2(f) has no shelf life for purposes of meeting the SES?

For consistency with processes and procedures already established, we believe it would be appropriate for the Commission to adopt a four-year shelf life for solar

RECs, such that they would be treated no differently than other RECs. We believe this consistent treatment is supported by the fact that the SES was established as part of the RES statute, and subd. 2f(b) states that all provisions applicable to the RES are also applicable to the SES. Further, because the new legislation does not include a specific definition of a solar REC, it could be assumed that the legislative intent was to use the REC definition in subd. 4(a).

Our reading of subd. 2f(f) is that this provision intended to encourage new solar generation in Minnesota by establishing that energy generated by facilities installed after August 1, 2013 may be used to count toward compliance, which specifically excludes energy generated by solar facilities installed prior to enactment of the new law. However, we do not read this to mean that all solar RECs associated with energy generated after August 1, 2013 may be counted toward compliance in 2020 in a cumulative manner. Rather, we believe subd. 2f(f) provides direction about what solar energy will be eligible to count toward compliance in 2020 by specifically identifying which facilities can produce eligible energy.

In addition, because we understand the SES to be an annual standard, we believe establishing a shelf life for solar RECs is appropriate as it provides some flexibility that can account for the variability inherent in renewable energy production. Our understanding is that absent further legislative changes, for 2020 and each subsequent year, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota must be generated by solar energy. Xcel Energy expects it will require approximately 300 MW of solar capacity to produce the solar energy required to meet the 1.5 percent standard. Thus, we will plan to meet that target by installing or purchasing energy from such facilities. However, while this generating capacity could produce enough energy to meet the 1.5 percent requirement in 2019, weather in 2020 might be different enough such that the standard may not be met. Establishing a shelf life for solar RECs, which allows use of RECs from solar energy produced in prior years, provides some flexibility to cover this variability in energy production.

While the RES included intermediate incremental standards, which were considered in establishing the REC shelf life in Docket No. E999/CI-04-1616, we recognize that the current SES does not include intermediate standards. However, such incremental standards might be established at some point for SES standards after 2020. We believe establishing a shelf life for solar RECs now would set the right framework for the future. This mechanism would provide utilities the flexibility to stagger the use of solar RECs for SES compliance before the REC is retired.

Finally, we understand that any solar RECs a utility does not need or retire for SES compliance could be used for RES compliance instead, as solar energy is an eligible

energy technology under the RES statute. In that case, solar RECs would need to have the same shelf life schedule adopted by the Commission for other RECs used for RES compliance. Setting the solar REC shelf life equal to the REC shelf life of four years would provide consistency between solar RECs and non-solar RECs eligible for compliance with the SES and the RES and provide the flexibility for the utility to cover the energy production variability to comply with the SES.

- b) Subd. 2(f) is silent on the shelf life of an S-REC that is installed and generating after August 1, 2013 but before 2020 located outside of Minnesota also have no shelf life.

As discussed in part (a) above, we believe subd. 2f(f) intended to encourage solar installation in Minnesota by allowing energy produced by facilities installed in Minnesota after August 1, 2013 but before 2020 to count toward SES compliance. While we understand subd. 2f(f) to specifically exclude energy generated by facilities installed in Minnesota prior to enactment of the new law, it does not appear the same exclusion is intended or necessary for solar generation outside of Minnesota. Further, since a unique definition for solar RECs was not included in the legislation, we assume subd. 4 applies to solar RECs. Subd. 4(a) states that the REC program "... shall not give more or less credit to energy based on the state where the energy was generated or the technology with which the energy was generated." As such, we believe RECs associated with energy generated by solar facilities outside of Minnesota that serve our Minnesota retail customers may be counted toward compliance regardless of the facility's installation date. For the same reasons discussed in part (a), we believe it would be appropriate to adopt a four-year shelf life for RECs associated with solar generation both in Minnesota and outside of Minnesota.

2. Should the Commission issue a clarification on what provisions of Minn. Stat. § 216B.1691 apply to the SES?

We believe the new provision established as Minn. Stat. § 216B.1691, subd. 2f(b) is relevant to determining the intent of the new legislation. Subd. 2f(b) states: "The solar energy standard established in this subdivision is subject to all the provisions of this section governing a utility's standard obligation under subdivision 2a." We read this to mean all provisions applicable to the RES (subd. 2a) are also applicable to the SES, including but not limited to the regular monitoring, potential penalties, and the ability of the Commission to order a utility to install generation or purchase RECs to meet the standard apply to both the RES and the SES. The fact that the old part of the statute (subd. 7) states that these provisions are applicable to the RES (with no mention of the SES) does not appear to be an affirmative decision. Rather, we believe the intent of subd. 2f(b) is clear and can govern in this situation. As such, it would be

appropriate for the Commission to issue a clarification indicating that based on subd. 2f(b), all provisions in Minn. Stat. § 216B.1691 applicable to the RES are also applicable to the SES.

3. SES Reporting Requirements

- a) Should the SES be included or excluded from the established biennial RES compliance process at this time?
- b) What information should be included in the annual reports?
- c) Should utilities also be required to provide information for the SES similar to what is provided in the RES biennial reports?

Minn. Stat. § 216B.1691, subd. 2f(g) requires an annual SES report July 1 each year beginning in 2014. To comply with the statute, and given the RES reporting process and procedures already established, we believe it would be appropriate to provide both an annual report (including information for the prior year) and a biennial report (including more forward-looking information and a comprehensive discussion of progress toward meeting the SES).

We agree with the Department's recommendation that the annual filing should be filed with the utilities' annual RES reporting (due June 1 for the previous calendar year). We also agree that the annual report should include basic information such as annual Minnesota retail sales, annual excluded customer sales, and annual solar generation. This report would provide the information necessary to demonstrate a utility's progress toward meeting the SES.

Since the SES was established as part of the RES statute, we also believe it would be appropriate to include SES information as part of the biennial RES reports. Because the biennial report is more forward looking, it would be appropriate to include the same type of information that is provided related to the RES, including efforts to meet the SES, obstacles anticipated, and potential solutions to the obstacles, as well as comment on the anticipated mix of utility scale versus smaller solar projects that will be used to meet the standard. We have no objection to including SES information starting with the June 1, 2014 biennial report.

4. Solar REC Tracking

The process established by the Commission in Docket No. E999/CI-04-1616 for Minnesota REC tracking through the M-RETS system has worked well and we believe

could also be used for SES compliance purposes. However, we believe certain modifications or improvements to M-RETS could be beneficial to address the difficulties associated with the current process of aggregating smaller solar facilities. While other methods or systems could be used to track compliance with the SES, using M-RETS would be efficient. However, the Commission has the discretion to determine the appropriate processes and procedures related to REC tracking.

CONCLUSION

We appreciate the opportunity to provide input and participate in this process as the Commission establishes tracking and reporting requirements for solar RECs. We look forward to working with parties as processes and procedures are further developed.

Dated: January 31, 2013

Northern States Power Company

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

xx by depositing a true and correct copy or summary thereof, properly enveloped with postage paid, in the United States Mail at Minneapolis, Minnesota; or

xx via electronic filing

DOCKET No. E999/CI-13-542

Dated this 31st day of January 2014

/s/

SaGonna Thompson

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