



January 29, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-13-867

Dear Mr. Wolf:

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

In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of its Proposed Community Solar Gardens Program

On January 4, 2019, the Minnesota Public Utilities Commission (Commission issued a *Notice of Comment Period* requesting comments on whether the Commission should approve Xcel Energy's proposed Section 9 tariff revisions and to further clarify the Community Solar Garden program.

The Department recommends that the Commission **approve the tariff changes, with modifications**. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

Susan L. Peirce
Public Utility Rate Coordinator

SLP/jl



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. Docket No. E002/M-13-867

I. BACKGROUND INFORMATION

On December 14, 2018, Northern States Power d/b/a Xcel Energy (Xcel or the Company) requested approval of tariff changes to its Solar*Rewards Community Program (CSG Program). The Company proposed changes to its CSG tariffs including the following:

- Removing language requiring 12-month accrual of bill credits before a customer may receive the credits
- Altering the timeframe for release of deposits;
- Basing subscription size on the last 12 months of historical data, rather than 24 months as currently required;
- Increasing the annual participation fee from \$300 to \$500; and
- Requiring only a single meter per solar garden, instead of two meters.

In addition, Xcel made tariff revisions to reflect standard contract amendments that were adopted through a negative check-off. These revisions include:

- Language permitting a Garden Operator with multiple solar gardens to combine annual reporting in a single report;
- Language addressing insurance for co-located projects;
- Language permitting the use of the applicable retail rate (ARR) bill credit under certain conditions for applications deemed complete by April 15, 2017;
- Language extending the 24-month deadline of mechanical completion for a late fee; and
- Language allowing a parent company to file a single Annual Report for gardens owned by its corporate affiliates.

Xcel's proposed revisions to its CSG Tariff are in addition to the changes proposed in Docket No. E002/M-18-714 to reflect changes made to comply with the Minnesota Distribution Interconnection Process (MN DIP) and Minnesota Distribution Interconnection Agreement

(MNDIA). The Department reviews the changes made to comply with the MN DIP in a separate filing.

II. DEPARTMENT ANALYSIS

The Department has reviewed Xcel's proposed changes to its CSG Tariff, and has no concerns with one exception. As noted above, when reviewing whether CSG subscriptions are no more than 120 percent of the average annual consumption of the subscriber, the Company proposed to base its assessment on 12 months of data rather than 24 months. However, under the redlined version of the Terms and Conditions (Section 9, Sheet 65), the language continues to reflect that Xcel will review 24 months of historical data. The Department recommends that Xcel submit a corrected tariff page for its Terms and Conditions in a compliance filing.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends the Commission approve Xcel's proposed Solar*Rewards Community Program tariff revisions, and require the Company to file a revised Terms and Conditions page reducing basis for the determination of CSG subscription size from 24 months to 12 months of historical data.

/jl

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. E002/M-13-867

Dated this 29th day of January 2019

/s/Sharon Ferguson

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