



414 Nicollet Mall  
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October 30, 2020

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: COMMENTS  
UPDATING GENERIC STANDARDS FOR UTILITY TARIFFS FOR  
INTERCONNECTION AND OPERATION OF DISTRIBUTED GENERATION  
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611  
DOCKET NOS. E999/CI-16-521 & E999/CI-01-1023

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Commission's August 28, 2020 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](mailto:amber.r.hedlund@xcelenergy.com) or (612) 337-2268 or me at [holly.r.hinman@xcelenergy.com](mailto:holly.r.hinman@xcelenergy.com) or (612) 330-5941 if you have any questions concerning this filing.

Sincerely,

/s/

HOLLY HINMAN  
REGULATORY MANAGER

Enclosure  
c: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. 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

DOCKET NO. E999/CI-16-521

E999/CI-01-1023

**COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the Commission's August 28, 2020 Notice of Comment Period. The Company appreciates the opportunity to provide these comments and further develop the public record on possible updates to Attachment 6 of the Commission's September 28, 2004 Order in Docket No. E999/CI-01-1023.

In these Comments, we specifically respond to the Notice's request for comments on the following issues:

- I. *Updates to distributed generation rate guidance provided in Attachment 6 (DG rate guidance) that include, but are not limited to the following issues:*
  - A. *The consistency of Attachment 6 with existing statute and rules (e.g. Minn. Stat. §§ 216B.1611 and .164 and Minn. R. ch. 7835);*
  - B. *For facilities between 1 and 10 MW, guidance on ensuring adequate transparency of negotiated rates and availability or consideration of Attachment 6 credits;*
  - C. *Better alignment of avoided capacity costs with Integrated Resource Planning and other regulatory proceedings;*
  - D. *Guidance that recognizes technology, location and time-specific avoided cost considerations.*

- II. *Are any changes to the DG rate guidance warranted based on the Federal Energy Regulatory Commission's (FERC) updates to Public Utilities Regulatory Policy Act (PURPA) rules [(citing to: Qualifying Facility Rates and Requirements, Order No. 872, 172 FERC ¶ 61,041 (2020))]?*
- III. *Are the calculations of DG tariff rates for DG projects between 1 and 10 MW submitted by the rate-regulated utilities appropriate and reasonable?*
- IV. *Are there other issues or concerns related to this matter?*

As background, the Company has most recently submitted comments on this topic on September 19, 2018, and reply comments on October 3, 2018 following the Commission's Notice seeking procedural input from parties. The Company also made a compliance filing on June 17, 2019 with supplemental information. Our prior comments highlighted that, as contemplated in the 2004 Order, the Company has implemented Attachment 6 through tariff filings. These tariffs generally provide the current guidance on implementing the Company's numerous DG programs.

The Commission declined to "reopen" Attachment 6 when the matter went to hearing on January 17, 2019 but authorized a notice and comment process to consider possible updates in its March 19, 2019 ORDER AUTHORIZING FURTHER PROCEEDINGS. We also appreciate the Commission's instruction in that Order that establishing fixed rates is not within the scope of this process. Since the time the Commission previously considered this matter, FERC has issued an Order relevant to the implementation of Attachment 6 as acknowledged in the Commission's August 28, 2020 Notice.

We note that since the time that Attachment 6 was developed in 2004, there have been several changes to applicable law and regulation by state statute, state rules, MPUC orders and FERC regulations that directly relate to the subjects addressed in Attachment 6. The Company's approved tariffs which post date Attachment 6 in many cases provide a level of detail not reflected in Attachment 6 and continue to provide sufficient guidance on implementation questions.

The Commission's August 28, 2020 Notice in this docket referenced the new FERC order, *Qualifying Facility Rates and Requirements Implementation Issues Under the Public Utility Regulatory Policies Act of 1978*, Order No. 872, 172 FERC ¶ 61,041 (2020). On September 2, 2020, this order was published at 85 Fed. Reg. 54,638 (<https://www.govinfo.gov/content/pkg/FR-2020-09-02/pdf/2020-15902.pdf>), and the corresponding revised rules in this order will go into effect on December 31, 2020. In response to the Notice, we identify areas where the 2004 language of

Attachment 6 may not fully align with current state rules, statutes, FERC Orders, or other sources of authority.

Consistent with the prior Commission orders in this docket, we provide our comments here with the following understandings:

- Attachment 6 applies to Qualifying Facility (QF) Distributed Energy Resources (DER) systems from 1 to 10 MW.<sup>1</sup>
- Attachment 6 does not apply to merchant plants.<sup>2</sup>
- Attachment 6 provides guidelines<sup>3</sup>, and implementation of the guidelines in Attachment 6 is through any distributed generation tariffs that a utility may have which that order refers to as “DG tariffs”.<sup>4</sup>
- Establishing fixed rates is not within the scope of the current process.<sup>5</sup>

## **I. UPDATES TO DISTRIBUTED GENERATION RATE GUIDANCE PROVIDED IN ATTACHMENT 6 (DG RATE GUIDANCE)**

### **A. The consistency of Attachment 6 with existing statute and rules (e.g. Minn. Stat. §§216B.1611 and .164 and Minn. R. ch. 7835)**

In this Section, we discuss where Attachment 6 is not consistent with existing statute and rules, including Minn. Stat. §§ 216B.1611 and .164, and Minn. R. Ch. 7835. These inconsistencies include (1) the size of resources to which Attachment 6 should apply; (2) the costs and benefits that should be considered in setting rates; (3) the methodology for calculating avoided energy and capacity costs; (4) the terms relevant to standby service; and (5) whether specific renewable avoided cost rates must be offered.

1. *Attachment 6, when applied to Small Power Production Facilities, should be limited to DER below 5 MW where the presumption of access to markets has not been overcome.*

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<sup>1</sup> See caption to Attachment 6 which is limited to DER of no more than 10 MW, along with the March 19, 2019 order which focused on Attachment 6 applying to DG projects between 1 and 10 MW.

<sup>2</sup> See, 2004 Order at pages: 9, 10, 12, 22, 24, and 26.

<sup>3</sup> The terms “guidelines” or “guidelines for tariffs” are used extensively throughout the 2004 Order, and this order at p. 29 specifically references the provisions in Attachment 6 as being guidelines.

<sup>4</sup> There are several references to this in the 2004 Order. An example is on page 21, footnote 5, that refers to a pre-existing Xcel Energy tariff as being a DG tariff.

<sup>5</sup> See, August 28, 2020 Notice at page 2.

As an initial matter, Attachment 6 applies to QF DER with sizes up to 10 MW. We believe that this broad, unqualified, range is not consistent with Minn. Stat. § 216B.164, Subd. 2, when read in conjunction with the revised FERC PURPA rules which are currently expected to go into effect on December 31, 2020, and under which, small power production facilities with a net power production capacity over 5 MW are presumed to have nondiscriminatory access to markets.

Minn. Stat. §216B.164, Subd. 2, applies the FERC regulations to the Commission and all Minnesota electric utilities, and states:

*Subd. 2. Applicability; rights maintained.*

*(a) This section as well as any rules promulgated by the commission to implement this section or the Public Utility Regulatory Policies Act of 1978, Public Law 95-617, Statutes at Large, volume 92, page 3117, as amended, and the Federal Energy Regulatory Commission regulations thereunder, Code of Federal Regulations, title 18, part 292, as amended, shall, unless otherwise provided in this section, apply to all Minnesota electric utilities, including cooperative electric associations and municipal electric utilities.*

*(b) Nothing in this section shall be construed to alter the rights and duties of any person pursuant to the Public Utility Regulatory Policies Act of 1978, Public Law 95-617, Statutes at Large, volume 92, page 3117, as amended, and the Federal Energy Regulatory Commission regulations thereunder, Code of Federal Regulations, title 18, part 292, as amended.*

We note that FERC Order No. 872 emphasized that states have “great latitude in determining the manner of implementation” of the FERC regulations, provided that the manner chosen is “reasonably designed to implement” the federal regulatory scheme. FERC Order No. 872 at ¶ 93. In this order, FERC revised 18 CFR 292.309(d) to reduce the net power production capacity level at which the presumption of nondiscriminatory access to a market attaches for small power production facilities, but not for cogeneration facilities.

Under the final rule, small power production facilities with a net power production capacity over 5 MW will be presumed to have nondiscriminatory access to markets. Although this limitation does not automatically apply (to do so, a utility must file a petition with FERC to terminate the mandatory purchase obligation above this level, and FERC must so rule), were it to apply, as we believe it should, where a QF has access to markets (like the MISO market), a utility has no purchase obligation and the guidelines in Attachment 6 should not apply. Accordingly, Attachment 6, when applied to Small Power Production Facilities, should be limited to DER below 5 MW where there is no mandatory purchase obligation above this level.

2. *Attachment 6, Par. 4 does not address costs caused by the DER, and emission credits should not be part of avoided costs.*

To gain further alignment, the “principles” in Paragraph 4 of Attachment 6 could be revised to address the other considerations in statute, including cost causation. Paragraph 4 of Attachment 6 states as follows:

*4. PRINCIPLE OF SETTING RATES FOR SERVICES PROVIDED BY DG CUSTOMERS TO UTILITIES*

*Rates should reflect the value of the distributed generation to the utility, including any reasonable credits for emissions or for costs avoided on the generation, transmission, and/or distribution system.*

The language of Minn. Stat. §216B.164, Subd. 8 requires consideration of additional costs caused by the DG:

*(b) Nothing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers, or from any fixed charges normally assessed such nongenerating customers.*

We further address in Section I.A.5 below how emission credits are not part of the avoided costs under the FERC regulations.

3. *Attachment 6, Pars. 5 and 6, which address setting rates and calculation of avoided costs do not align with statute or rule.*

As discussed above, under Minn. Stat. §216B.164, Subd. 2, once the revised FERC regulations go into effect, they apply to all Minnesota electric utilities as a matter of state statute. The revised FERC rules set out how states are to calculate the rate(s) that are used to pay for production from a QF. The current Attachment 6 Guidelines on calculation of avoided energy and avoided capacity rates do not provide for the range of options as set forth in the revised FERC rules.

Under revised FERC rule 292.304(d), each QF has the option to either:

- (i) provide **energy** “as available” and the rates shall be based on the utility’s avoided cost for energy calculated at the time of delivery; or
- (ii) provide **energy or capacity** pursuant to a Legally Enforceable Obligation (LEO)<sup>6</sup> over a specified term, and the rates shall be based on the following methodology:

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<sup>6</sup> Where the avoided cost is based on when a LEO is established or incurred, the parties would need to look at MPUC rulings on standards to be used to determine when a LEO has been established or incurred. See, for example, the MPUC ruling applying LEO standards in *In the Matter of the Petition by Highwater Wind LLC and Gadall Wind LLC for Resolution of a Cogeneration and Small Power Production Dispute with Minnesota Power*,

- a. If the MPUC so requires, **energy** rates will vary through the life of the LEO obligation and be set at the electric utility's avoided cost of energy calculated at the time of delivery. See, 292.304(d)(2).
- b. If the MPUC does not so require, then rates shall be based on either the avoided costs calculated at the time of delivery or at the time the LEO is incurred.<sup>7</sup>

Additionally, under the revised FERC rule, and specifically 292.304(e)(1), in determining avoided costs, the MPUC may establish:

- **energy rates** based on LMP at time of delivery (as explained in 292.304(b)(6) and 292.304(d)(2)), or
- **energy and/or capacity rates** based on a Competitive Solicitation Price (as explained in 292.304(b)(8)).

Were the MPUC to not set **energy and/or capacity** rates pursuant to 292.304(e)(1), then, under 18 C.F.R. 292.304(e)(2), it should follow the substance of the longstanding FERC rules on how to set these rates. These long-standing rules have been reformatted with different paragraph numbers within the revised 292.304(e)(2) but are fundamentally unchanged.

It is our understanding that the avoided **energy** Guidelines in Attachment 6 are general enough to not conflict with the longstanding FERC rules. But, at the same time the detailed provisions in Attachment 6, which set 24 rates for a given year as the avoided cost energy rates, are different from how the Commission set PPA avoided energy prices simply based on the tariffed rates in the Otter Tail Small Power Production tariff for a 4.6 MW hybrid solar/wind generation project in *In the Matter of a Complaint by Red Lake Falls Community Hybrid LLC Regarding Potential Purchase Power Agreement Terms and Pricing with Otter Tail Company*, Docket Nos. E017/CG-16-1021 and E017/CG-17-464.

The Attachment 6 guidelines on how to determine avoided capacity and energy costs differ from that set forth in Minn. R. 7835.4020. For example, the Attachment 6 guidelines are formulaic and require consideration of a number of factors, but do not

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Docket No. E015/CG-11-1073, order of February 25, 2013. In general, the standards to establish a LEO show when a QF project has progressed sufficiently to indicate project viability and that the QF it is ready, willing, and able to make meaningful commitments to enter into a PPA and includes consideration of factors such as performance guarantees, financing being finalized, commitments for supply of the major components, easements, site permits, and interconnection plans.

<sup>7</sup> Under 18 C.F.R. 292.304(d)(1)(iii), in this situation the rate for delivery of **energy** calculated at the time the LEO is incurred may be based on estimates of the present value of the stream of revenue flows of future LMP prices.

address many other pertinent factors detailed in this rule. The details from Minn. 7835.4020 are set forth below, and Attachment 6 only addressed issues set forth in pars. B and C from this rule.

*7835.4020 AMOUNT OF CAPACITY PAYMENTS; CONSIDERATIONS.*

*The qualifying facility which negotiates a contract under part 7835.4019 must be entitled to the full avoided capacity costs of the utility. The amount of capacity payments must be determined through consideration of:*

- A. the capacity factor of the qualifying facility;*
- B. the cost of the utility's avoidable capacity;*
- C. the length of the contract term;*
- D. reasonable scheduling of maintenance;*
- E. the willingness and ability of the qualifying facility to provide firm power during system emergencies;*
- F. the willingness and ability of the qualifying facility to allow the utility to dispatch its generated energy;*
- G. the willingness and ability of the qualifying facility to provide firm capacity during system peaks;*
- H. the sanctions for noncompliance with any contract term; and*
- I. the smaller capacity increments and the shorter lead times available when capacity is added from qualifying facilities.*

Separate from this, the Attachment 6 guidelines on how to determine avoided **capacity and energy** costs are not consistent with that set forth in Minn. Stat. §216B.164, Subd 4. Attachment 6 has a detailed methodology for determining avoided energy and capacity costs, but this methodology differs from the statute's direction that the full avoided capacity and energy costs for a renewable energy resource should be based on are the utility's least cost renewable energy facility or the bid of a competing supplier of a least cost renewable energy facility, whichever is lower.

- 4. Attachment 6, Pars. 7.b and 7.e, which address Standby Rates, applies a different size exemption than statute.*

State statute provides direction that the standby provisions are to be as provided for in a utility's tariff approved by the Commission. These statutory provisions state:

Minn. Stat. 216B.164, Subd. 2a:

*(l) "Standby charge" means a charge imposed by an electric utility upon a distributed generation facility for the recovery of costs for the provision of standby services, as provided for in a utility's tariffs approved by the commission, necessary to make electricity service available to the distributed generation facility.*

Minn. Stat. 216B.164, Subd. 3a:

*(b) A public utility may not impose a standby charge on a net metered or qualifying facility:*  
*(1) of 100 kilowatts or less capacity; or*



*(2) of more than 100 kilowatts capacity, except in accordance with an order of the commission establishing the allowable costs to be recovered through standby charges.*

In compliance with the requirements of the state statute, standby service has been implemented in the tariffs of Xcel Energy. See, for example, the Standby Service Rider at company tariff sheets 5-101 through 5-114. Attachment 6 exempts DER facilities of 60 kW or less from standby service, while the standby tariff (consistent with current state statute) exempts systems of 100 kW or less.

5. *Attachment 6, Par. 8, which has guidelines on various credits does not align with statute or rule.*

Par. 8 (e), addresses renewable credits and states:

*e. Renewable Credits*

*A DG customer who installs a renewable DG facility should be paid the avoided cost of "green power" to the extent that installation of the DG facility allows the utility to avoid the need to purchase "green power" elsewhere. Otherwise a renewable DG facility should be paid the utility's regular avoided costs.*

This differs from Minn. R. 7835.5950, and also conflicts with the recent FERC order.

Minn. R. 7835.5950 states:

*7835.5950 RENEWABLE ENERGY CREDIT; OWNERSHIP.*

*Generators own all renewable energy credits unless:*

*A. other ownership is expressly provided for by a contract between a generator and a utility;*

*B. state law specifies a different outcome; or*

*C. specific commission orders or rules specify a different outcome.*

Here, the Minnesota rule is consistent with the FERC order, but Attachment 6 is not consistent with the FERC order.

The recent FERC order notes that non-energy benefits are not part of the PURPA avoided costs.

*123. Finally, although we are sympathetic to the claims of certain QFs that they provide non-energy benefits (such as environmental benefits, waste reduction benefits, and economic development benefits) that are not reflected in avoided cost rates, PURPA section 210(b) prohibits the Commission from requiring QF rates to be set above full avoided costs. Because the Commission already requires states to set QF rates at full avoided costs, it is barred from requiring QF rates set higher than that based on the nonenergy benefits that QFs may also provide. However, nothing in PURPA, the PURPA Regulations as they currently exist, or this final rule would prevent states from rewarding QFs for such non-energy benefits so long as that is done outside of PURPA, such as is now done for*

*renewable energy credits (RECs) to compensate QFs for providing unique environmental or other non-PURPA benefits.<sup>190</sup> ...*

*176. We provide the following clarification in response to the Solar Energy Industries' request that the Commission make clear that payments based on LMP do not relieve the purchasing utility of the requirement to compensate the QF for any values in addition to electricity (e.g., RECs, etc.), and that the state's flexibility to allow utilities to set QF payment rates for available energy at the applicable LMP does not in any way limit QFs' rights to establish a LEO or contract for a longer term sale at fixed, full avoided costs.<sup>269</sup> In Windham Solar LLC,<sup>270</sup> the Commission summarized its precedent concerning RECs. The Commission stated that the states have the authority to determine who owns RECs in the initial instance and how they are transferred, and that the automatic transfer of RECs within a sale of power at wholesale must find its authority in state law, not PURPA. But the Commission also held that a state may not assign ownership of RECs to utilities based on a logic that the avoided cost rates in PURPA contracts already compensate QFs for RECs in addition to compensating QFs for energy and capacity, because under PURPA the avoided cost rates are, in fact, compensation just for energy and capacity.<sup>271</sup> We see no reason to disturb that precedent in this final rule. With regard to the right of QFs to establish a LEO, that right is neither limited nor expanded by a state's choice of LMP as the measure of avoided costs for energy.*

As shown above, the revised FERC regulations, once they go into effect, apply to all Minnesota electric utilities as a matter of state statute. Per the FERC order, there is no "avoided cost" for green power. Yet Attachment 6 requires payment of the avoided cost for green power. We recognize that the FERC order allows states to reward QFs for such non-energy benefits so long as that is done outside of PURPA and not called an "avoided cost" rate. In other words, if a state wants to include non-energy benefits in QF rates, it can, it just cannot do so by treating the non-energy benefit as part of the "avoided cost." As currently written, Attachment 6 is not consistent with this.

There are various other guidelines on other credits set forth in Par. 8, such as distribution credit and line loss credit. In no event should any such credit be applied as part of an avoided cost analysis where to do so would be inconsistent with the revised FERC avoided cost rules. For example, the FERC order at pars. 125 and 126 also explained how LMP-based pricing already takes the location value into account.

**B. For facilities between 1 and 10 MW, guidance on ensuring adequate transparency of negotiated rates and availability or consideration of Attachment 6 credits;**

In our June 17, 2019 filing in this docket, we provided a letter template on how we generally respond to a solar or wind QF request for a PPA. We also submitted responses to MnSEIA IRs No. 5 through 10 on July 6, 2020 on this subject. The

Company would revise its letter to reflect how the Commission implements the revised FERC regulations.

**C. Better alignment of avoided capacity costs with Integrated Resource Planning and other regulatory proceedings;**

In concept there would be some appeal to align the avoided capacity costs used in IRP proceedings with those rates that are offered to QFs once they have established a LEO. But there may be some legal restrictions on this. For example, once the Commission has issued its order on an IRP, the avoided cost-type data upon which it relied may be stale and may not represent the then-current avoided cost data once a QF has established a LEO.

We note that the IRP includes forward price curves for both market energy and capacity that provide insight into our system avoided costs. These key pricing assumptions serve as the basis for our system dispatch and future resource additions and help drive the selection of the optimal portfolio of generation resources. As a result, IRPs appropriately use these assumptions to provide a reasonable assessment of avoided costs.

In the IRP process, surplus capacity credit is an assumption used by the Company to represent the market cost of capacity and is assumed to be the price at which we can sell any excess capacity to the market. This value is estimated based on the economic carrying charge of a combustion turbine or CT as the CT represents the lowest cost firm capacity resource available today. This value is a good proxy for our avoided capacity cost for purposes of the IRP.

It is not clear whether this type of methodology would be consistent with the outcomes of the various avoided cost methodologies approved by FERC that would be used for purposes of determining that rates to be paid to QFs. The main challenge with using forward pricing assumptions from the IRP is that IRPs are only filed every 2-3 years whereas forward energy and capacity prices change on a daily basis. As a general matter, the most recent vintages of energy and capacity price forecasts should be used so that valuations are consistent with current market price expectations.

We also note that the availability of tax credits is an issue that complicates the pricing approach used in the IRP process. Because wind and solar resources currently receive an additional revenue stream in the form of tax credits that most other resources do not receive, it is not necessarily fair to simply value them with the forward energy and capacity curves. If the least costs that these types of facilities are willing to bid into a RFP is less than the forward energy and capacity curves, then this should be reflected

in the avoided costs for this type of generation. Put differently, it is unlikely a utility's avoided costs would ever be higher than the market rate for a particular type of resource.

In addition, the forward capacity value of renewables is difficult to determine as it is a function of resource penetration and other factors. Therefore, we believe it is more appropriate to value renewables based on the lowest cost, most recently procured wind and/or solar resources procured via a competitive RFP. As renewables, and particularly wind, can be priced below our average system cost with the availability of tax credits, resource procured via RFP will yield the best price signal available in the market. The RFP could be consistent with the FERC regulations on Competitive Solicitation Price referenced above, and at the same time better align with state statute that requires renewable avoided capacity and energy costs be set at the least cost renewable energy facility. Minn. Stat. §216B.164, Subd. 4.

**D. Guidance that recognizes technology, location and time-specific avoided cost considerations.**

We have no further comments on this topic.

**II. ARE ANY CHANGES TO THE DG RATE GUIDANCE WARRANTED BASED ON THE FEDERAL ENERGY REGULATORY COMMISSION'S (FERC) UPDATES TO PUBLIC UTILITIES REGULATORY POLICY ACT (PURPA) RULES**

FERC rules already apply as a matter of state statute. That being said, the Commission might give consideration as to how it intends to implement these revised FERC rules – whether it be via changes to Attachment 6, or some other method.

**III. ARE THE CALCULATIONS OF DG TARIFF RATES FOR DG PROJECTS BETWEEN 1 AND 10 MW SUBMITTED BY THE RATE-REGULATED UTILITIES APPROPRIATE AND REASONABLE?**

The Company filed its response to the Commission's request for a detailed description of how these rates are calculated on June 17, 2019 in the current docket (E999/CI-16-521). As discussed there, the Company's rates are reasonable and appropriate.

**IV. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?**

No.

**CONCLUSION**

We appreciate the opportunity to provide these Comments and look forward to continued discussion.

Dated: October 30, 2020

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**Docket No.            E999/CI-16-521**  
**E999/CI-01-1023**

Dated this 30<sup>th</sup> day of October 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pat	Carruth	pat@mnvalleyrec.com	Minnesota Valley Coop. Light & Power Assn.	501 S 1st St. PO Box 248 Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Michael	Coddington	Michael.Coddington@nrel.gov		15013 Denver West Blvd MS: ESIF 200 Golden, CO 80401-3393	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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James	Darabi	james.darabi@solarfarm.com	Solar Farm, LLC	2355 Fairview Ave #101  St. Paul, MN 55113	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-521_Official Service List PUC
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kristi	Robinson	krobinson@star-energy.com	STAR Energy Services, LLC	1401 South Broadway Pelican Rapids, MN 56572	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel	Rogers	dan@nokomispartners.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Matthew	Schuerger	matthew.schuerger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59  Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455  Spring Lake, MN 56680	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-521_Official Service List PUC
David	Shaffer	dshaffer@mNSEIA.org		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC	5411 Bartlett Blvd  Mound, MN 55364	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-521_Official Service List PUC



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Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529  Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Braden	Solum	braden.solum@idealenergies.com	iDEAL Energies	5810 Nicollet Ave  Minneapolis, Minnesota 55419	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719  Baudette, MN 56623	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas P.	Sweeney III	tom.sweeney@easycleaneenergy.com	Clean Energy Collective	P O Box 1828  Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr  Rockford, MN 55373	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201  Minneapolis, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West  Farmington, MN 550249583	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE  Blaine, MN 55449	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Wendy	Vorasane	wendy.vorasane@idealenergy.com		N/A	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N  St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_16-521_Official Service List PUC
Brian	Zavesky	brianz@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive P.O. Box 88920 Sioux Falls, SD 57108-8920	Electronic Service	No	OFF_SL_16-521_Official Service List PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Anderson	jainstp@q.com	-	1799 Sargent  St. Paul, MN 55105	Electronic Service	No	OFF_SL_1-1023_1
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_1-1023_1
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_1-1023_1
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_1-1023_1
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	No	OFF_SL_1-1023_1
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_1-1023_1
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_1-1023_1
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_1-1023_1
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_1-1023_1
Renee	Doyle		Doyle Electric Inc.	PO Box 295  Amboy, MN 56010	Paper Service	No	OFF_SL_1-1023_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_1-1023_1
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_1-1023_1
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	OFF_SL_1-1023_1
Steve	Korstad	swkorstad@comcast.net	Korridor Capital LLC	20 Red Fox Road  St. Paul, MN 551276331	Electronic Service	No	OFF_SL_1-1023_1
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_1-1023_1
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_1-1023_1
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_1-1023_1
Richard	Macke	macker@powersystem.org	Power System Engineering, Inc.	10710 Town Square Dr NE Ste 201  Minneapolis, MN 55449	Electronic Service	No	OFF_SL_1-1023_1
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_1-1023_1
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_1-1023_1

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Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_1-1023_1
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_1-1023_1
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_1-1023_1
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_1-1023_1
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_1-1023_1
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_1-1023_1
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_1-1023_1
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_1-1023_1
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West  Farmington, MN 550249583	Electronic Service	No	OFF_SL_1-1023_1

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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_1-1023_1