



ENVIRONMENTAL LAW & POLICY CENTER
Protecting the Midwest's Environment and Natural Heritage

September 25, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Office of Administrative Hearings
121 7th Place East, Suite 350
St. Paul, MN 55101

**RE: In the Matter of the Petition of Northern States Power Company, dba Xcel Energy,
for Approval of Customer Access Joint Pilot Program**

Docket No. E-002/M-17-527

Dear Mr. Wolf,

On behalf of Environmental Law & Policy Center, enclosed please find the *Reply Comments of the Environmental Law & Policy Center*. These documents have been electronically filed and served through the eFiling system.

Please feel free to contact with any questions you may have regarding this filing.

Respectfully submitted,

/s/ MeLena Hessel

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In the Matter of the Petition of Northern States
Power Company, dba Xcel Energy, for
Approval of a Customer Access Joint Pilot
Program

DOCKET NO. E-002/m-17-527

REPLY COMMENTS OF THE ENVIRONMENTAL LAW & POLICY CENTER

The Environmental Law & Policy Center (“ELPC”) respectfully submits these Reply Comments regarding the parties’ comments on Xcel Energy’s (“Xcel”) proposal for its Customer Access Joint Pilot Program, pursuant to the Public Utilities Commission’s (“Commission”) Notice of Extended Comment Period dated August 16, 2017.

ELPC appreciates the thoughtful comments made by other parties. Parties were generally in agreement that the Commission should approve the Xcel pilot with some additional requirements and modifications. In particular, a number of parties brought up concerns regarding:

- 1) The limited scope of the Xcel pilot program to a small project in one neighborhood and the need to expand low-income community solar access more broadly,
- 2) The lack of transparency created by the proposed net bill credit and the issue of fairness that arises if the utility and non-utility community solar garden (“CSG”) projects are not subject to the same billing requirements, and
- 3) The importance of allowing all CSG providers access to the on-bill CSG payment/consolidated billing approach Xcel proposes.

A number of parties also suggested additional reporting requirements.

Given this, ELPC continues to believe the Commission should approve Xcel's pilot with the additional requirements already discussed in ELPC's initial comments, as well as a few additional requirements suggested by other parties and discussed further below. ELPC respectfully submits the following specific Reply Comments for the Commission's consideration:

- 1) The Commission should require Xcel to modify the proposed tariff to provide both the full subscription cost of CSG program delivery as well as the full bill credit, in addition to the net credit. The Commission should also require Xcel to make on-bill CSG payment available to non-utility projects.**

Requiring the first modification would be in line not only with ELPC's recommendation, but also the recommendations of Clean Energy Access Coalition ("CEAC"), Joint Commenters, Fresh Energy, and Ampion. ELPC continues to view this modification as important and agrees with other parties that providing complete information on both the cost and value of the CSG on the bill is important for project transparency, to avoid customer confusion, and to ensure the same requirements apply to both utility and non-utility CSG projects as required by Minn. Stat. § 216B.1641, (e)(3). ELPC further notes that while the Minnesota Department of Commerce, Division of Energy Resources ("DOC DER") concluded that a "single line item on-bill credit" was a "simple, reasonable method for handling billing" (DOC DER filing at 3), the DOC DER fails to address how this method ensures either adequate transparency or the same requirements for utility and non-utility providers. Requiring the second modification would align with the recommendation of several commenters (ELPC, CEAC, Joint Commenters, and Ampion), would ensure non-utility-owned CSG's had access to the same payment mechanisms as utility-owned

projects, and would help to address existing barriers to low-income customer CSG access (e.g. credit scores and complexity).

2) As part of the ongoing docket on the Solar*Rewards Community (“S*RC”) program (13-867), comments should be solicited to explore what more can be done within the S*RC program to overcome barriers to low-income customer participation in CSGs.

Xcel’s pilot proposal, while an important and laudable step toward low-income CSG access, lacks scale. ELPC has already discussed this issue in our initial comments and continues to endorse the requirement that Xcel submit a Scaling Plan within 6 months of Commission approval of the proposal, detailing how it will expand the proposal and increase economic value to low-income participants. However, the various comments from other parties on this issue underscore the importance of not only scaling the Xcel program, as discussed in our initial comments, but more broadly addressing the structural and programmatic issues that limit low-income participation in community solar. ELPC agrees with the Interstate Renewable Energy Council (“IREC”) that competitive offerings in the low-income CSG market are important to ensure broad, inexpensive access to community solar for low-income customers. Furthermore, while ELPC may not agree with the specifics of every single suggestion made by the Joint Commenters, we agree with the implication that more can and should be done at a program level within the S*RC program to encourage low-income customer participation. Therefore, ELPC recommends that the Commission solicit comments in the open docket on the S*RC program (13-867) on the Joint Commenters’ suggestions regarding the implementation of the Institute for Local Self-Reliance’s Principles for low-income program design, as well as solicit additional suggestions for overcoming barriers and encouraging the competitive market to provide low-income CSG access.

3) The Commission should hold Xcel to the requirement that its VOS credit be fixed for the term of customers' subscription except in instances where customers would receive additional net benefits, as recommended by IREC.

ELPC agrees with IRECs observation that: "the Commission required in its September 6[, 2016] Order that the value-of-solar (VOS) credit should be fixed for the term of CSG," (IREC at 7).

ELPC therefore supports IRSC's suggestion "that the Commission should only allow Xcel to depart from the Commission's prior directive and adjust the VOS rate if the VOS rate increases, such that low-income subscribers would receive additional net benefit on their bill" (IREC at 8).

This would ensure adherence to the Commission's previous requirements and consistency with requirements on non-utility CSG projects while preserving potential value to low-income customers.

4) In addition to the reporting requirements already suggested in our initial brief, ELPC generally supports the reporting requirements suggested by other parties and specifically endorses the following:

- a. Fresh Energy's recommendations to report on: actual participation numbers by year, specific actions undertaken by organizations who are partnering with Xcel, program costs (including specific CSG program costs), customer interest and disinterest.
- b. IREC's recommendations to identify (where appropriate) and report on: the cost of delivering the proposed pilot offering (administration, outreach, equipment, and delivery labor), the non-energy benefits delivered to the neighborhood (employment, education, vacancy losses, or health and safety benefits), drivers and barriers to participation in low-income community solar garden, compliance with its three principles related to non-discrimination.

ELPC further notes that while reporting on program-specific CSG costs will be important both to evaluation and replication of the Xcel pilot, it is not a substitute for Xcel filing detailed information on anticipated program costs in its program proposal to in order to ensure transparency and allow for public review.

5) ELPC also endorses a number of IREC's recommendations to keep in mind as the program scales, specifically:

ELPC endorses recommendations around revisiting the non-discrimination principles as the program scales. In particular, the Commission should consider pro-actively addressing some of these principles through directing Xcel to facilitate appropriate CSG provider access to data collected and maintained with public funds around the grid system and to help with customer targeting, as the program grows (IREC at 13-14). Furthermore the Commission should direct Xcel to investigate and report on the potential for cost savings created by new technology, specifically energy storage (IREC at 18-19).

In summary, ELPC believes the Commission should approve Xcel's pilot with the modifications discussed in ELPC's initial comments as well as a few additional requirements. These include requiring that Xcel's VOS credit be fixed for the term of customers' subscription except in instances where customers would receive additional net benefits and the addition of reporting requirements detailed by other parties. Furthermore, ELPC suggests that Docket 13-867 is the appropriate docket in which to further explore overcoming barriers to and program-level facilitation of low-income customer access to community solar.

Respectfully Submitted,

DATED: September 25, 2017

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CERTIFICATE OF SERVICE

Docket No. E-002/M-17-527

I, John Agada, hereby certify that I have this day, served a true and correct copy of *Reply Comments of the Environmental Law & Policy Center* to all persons at the addresses indicated on the attached service list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Chicago, Illinois.

September 25, 2017

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