

Date January 22, 2024

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

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

Dear Mr. Seuffert:

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

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

The Minnesota Department of Commerce (Department) offers the attached reply comments regarding Xcel's filing. The Department continues to recommend a **rejection of Xcel's proposal**. The Department recommends the Commission **reject the request of the Solar Energy Advocates for a contested case hearing**. The Department also recommends the Commission **reject Fresh Energy's** proposal. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Louise Miltich  
Assistant Commissioner of Energy Regulatory Affairs

LM/ad  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-13-867

#### I. INTRODUCTION

The Department appreciates the contributions of all that submitted comments and takes note of the volume and passion of those comments. The bulk of the comments received support the Department's position that the proposed rate change for community solar gardens (CSGs) deemed complete prior to January 1, 2017 to be moved from the applicable retail rate (ARR) to the 2017 vintage value of solar (VOS) should be rejected.

Some parties recommend that if changes are made to subscription rates, those changes should only apply to general service subscribers. The Department recommends against that change, both because a significant percentage of those subscribers are non-profits, schools, and local governments, to which the financial burden would be against the public interest, and also because the administrative burden to Xcel would require an increase to tariffed annual Participation Fee for CSGs.

The Department also recommends against a contested case hearing, as there are no contested issues of fact.

The Department continues to hold its position that a carve-out in the fuel clause adjustment (FCA) rider to shield income-qualified ratepayers from the costs of the Solar\*Rewards Community (S\*RC) program would be in the public interest.

#### II. COMMENTS FROM OTHER PARTIES

##### A. FRESH ENERGY

Fresh Energy proposes two modifications to Xcel's proposal: (1) the subscription rate change to the 2017 VOS only applies to general service subscribers, and (2) that 2017 VOS be enhanced with a \$.01 per kWh adder.<sup>1</sup>

Fresh Energy gives four reasons to support this proposal: (1) ARR-era gardens are the bulk of the S\*RC program and the ARR is currently higher than the VOS, therefore switching bill credit rates will reduce the program cost;<sup>2</sup> (2) ARR rates will continue to rise as Xcel's retail electricity rates continue to rise;<sup>3</sup>

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<sup>1</sup> Fresh Energy, Comments at 1 and 9-10 (January 8, 2024) (eDocket No. [20241-201980-01](#)).

<sup>2</sup> *Id.* at 3-4.

<sup>3</sup> *Id.* at 4-5.

(3) the ARR is not tied to the value that the gardens provide to the electric system;<sup>4</sup> (4) the mix of ARR subscribers skews toward general service class subscribers.<sup>5</sup>

*B. OFFICE OF THE ATTORNEY GENERAL, RESIDENTIAL UTILITIES DIVISION*

The Office of the Attorney General, Residential Utilities Division (OAG-RUD) concludes that Xcel's proposal is not in the public interest, and if the Commission were to approve it, changes should be made to protect residential and small commercial subscribers.

OAG-RUD notes the cost of the program,<sup>6</sup> and takes the position that:

The Commission should use all reasonable means available to reduce the impact of solar gardens on nonparticipating customers. That said, migrating existing residential and small commercial subscribers to a much lower compensation rate than the one that induced them to sign up for the program, without adequate protections, would not be in the public interest.<sup>7</sup>

OAG-RUD offers "actions that the Commission could reasonably take to reduce nonsubscriber impacts,"<sup>8</sup> which include: (1) if a change to the bill credit is to be made, then it should only apply the rate change to VOS to general service subscribers, and not to residential and small commercial subscribers; (2) modifications to the ARR methodology including (a) removal of customer charges from the ARR,<sup>9</sup> (b) reducing the demand-charge costs in the ARR,<sup>10</sup> and (c) reducing the value of the renewable energy credits [RECs] paid out in the enhanced ARR;<sup>11</sup> and, (3) ensuring that residential and small commercial customers can cancel subscriptions more easily, in the case that "the Commission makes changes that substantially reduce bill credits"<sup>12</sup> for those subscribers, which the OAG-RUD characterizes as "the *minimum* protection that these customers deserve."<sup>13</sup>

*C. JOINT SOLAR ASSOCIATIONS*

The Joint Solar Associations (JSA), a group consisting of the Coalition for Community Solar Access and Minnesota Solar Energy Industries Association, recommends a rejection of Xcel's proposal. The JSA support this position through several arguments. First, the JSA argue that the governing statute does

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<sup>4</sup> *Id.* at 5-7.

<sup>5</sup> *Id.* at 8.

<sup>6</sup> Office of the Attorney General, Residential Utilities Division, Comments (January 8, 2024) (eDocket No. [20241-201968-01](#)).

<sup>7</sup> *Id.* at 12.

<sup>8</sup> *Ibid.*

<sup>9</sup> *Id.* at 19-20.

<sup>10</sup> *Ibid.*

<sup>11</sup> *Id.* at 20-21.

<sup>12</sup> *Id.* at 21-23.

<sup>13</sup> *Id.* at 22 (emphasis original).

not mandate a shift from ARR-based bill credits to VOS-based bill credits.<sup>14</sup> Second, the JSA argue that prior Commission decisions met statutory obligations, and because no material change in fact has occurred, that Xcel's proposal "is thus an invitation for arbitrary and capricious Commission action and the Commission should refuse it."<sup>15</sup> Third, the JSA argue that the proposal interferes with established contracts, and that case law prohibits Xcel from doing so unless a statute grants such authority.<sup>16</sup> Fourth, the JSA argue that contractual stability in the market is in the public interest,<sup>17</sup> and that Xcel's proposal would harm the public interest through financial harm to subscribers<sup>18</sup> and, beyond CSG developers specifically, to "the solar industry in Minnesota more generally."<sup>19</sup>

#### D. SOLAR EQUITY ADVOCATES

The Solar Equity Advocates (SEA), "a Minnesota-based coalition composed of Cooperative Energy Futures, Minneapolis Climate Action, Institute for Local Self Reliance, Minnesota Interfaith Power and Light, Vote Solar, Solar United Neighbors, Saint Paul 350, Climate Generation, Sierra Club, and Community Power,"<sup>20</sup> asserts that "this proposal is not in the interest of the public and would cause an inordinate amount of harm to residential subscribers (especially LMI [low- and moderate-income] residential subscribers), cities, counties, schools, community solar developers, the distributed generation market in MN as a whole, and efforts to achieve Minnesota's clean energy goals."<sup>21</sup> The SEA gives some specificity to the claim, noting that the proposed bill-credit switch "would affect over 700 member-subscribers [of Cooperative Energy Futures], about half of them low income," who "would be paying more for energy than they would without being part of a community solar garden."<sup>22</sup> The SEA also assert that approval of this proposal would harm the "new LMI CSG program" by sowing distrust of clean energy programs among "communities that are often taken advantage of and are rightfully skeptical of offers to save money."<sup>23</sup> SEA also notes the harm this proposal would do to "public institutions such as counties, cities and schools," and "all households served by these institutional subscribers."<sup>24</sup> SEA cites the comments of seventeen such institutional subscribers, which "only represent the institutional subscribers that have taken the time to write letters to the PUC opposing this proposal, which represents a small subset of institutional subscribers that have had the time or capacity at this moment to write into the PUC."<sup>25</sup>

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<sup>14</sup> Coalition for Community Solar Access and Minnesota Solar Energy Industries Association, Comments at 4-8 (January 8, 2024) (eDocket No. [20241-201991-01](#)).

<sup>15</sup> *Id.* at 8.

<sup>16</sup> *Id.* at 10.

<sup>17</sup> *Id.* at 17-20

<sup>18</sup> *Id.* at 21-23

<sup>19</sup> *Id.* at 24.

<sup>20</sup> Solar Equity Advocates, Comments at 1 (January 8, 2024) (eDocket No. [20241-201961-01](#)).

<sup>21</sup> *Id.* at 3.

<sup>22</sup> *Id.* at 3-4.

<sup>23</sup> *Id.* at 4.

<sup>24</sup> *Id.* at 5.

<sup>25</sup> *Id.* at 5-7.

The SEA also argues that the proposal would do harm to the distributed solar market by adding to the “risk profile” of the market:

This would mean mission-driven developers, like CEF and MCA, would have a much more difficult time obtaining tax equity partners and lenders to contribute to the development costs of CSGs. Tax equity financiers and lenders rely on consistent projections of future income in order to make loans and tax equity investments, and are much less likely to invest in future projects in Minnesota if they do not trust the reliability of the rate structures set in contract for a project - thereby making the development of future CSGs less likely.<sup>26</sup>

The SEA argue that that developmental risk impedes the ability of the state to meet “the goals set out by the 2040 law passed in 2023.”<sup>27</sup> The SEA also argue that the proposal would contravene the financeability and accessibility requirements of the CSG statute, and similarly impact the “new LMI CSG program.”<sup>28</sup>

The SEA also argue “that \$.0975 per customer per month (or less than 0.1% of the average monthly bill) is a minimal cost and does not justify the potential harms we have already illustrated”<sup>29</sup>; moreover, the SEA “believes that the method that Xcel Energy uses to calculate the net cost of CSGs is fundamentally flawed and thus the projected number of \$249 [million] in net costs for 2024 is deeply misleading.”<sup>30</sup>

Lastly, the SEA, “pursuant to Minn. R. 7829.1400 subparts 3 and 9 and Minn. R. 7829.100, [...] would like to request that the Commission grant a more formal proceeding for this issue through a contested case.”<sup>31</sup> The SEA supports this recommendation with the claim that “there are material facts that are in dispute regarding this issue including who is actually being harmed and how much harm is being done if this proposal is approved.”<sup>32</sup>

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<sup>26</sup> *Id.* at 8.

<sup>27</sup> *Ibid.*

<sup>28</sup> *Id.* at 12.

<sup>29</sup> *Id.* at 8.

<sup>30</sup> *Id.* at 10.

<sup>31</sup> *Id.* at 12-13.

<sup>32</sup> *Id.* at 12.

### *E. COMMENTS OF OTHER PARTIES*

In addition to the hundreds of public comments regarding this matter—many of which came from municipality- and nonprofit-subscribers—the Commission received comments from National Grid Renewables,<sup>33</sup> NextEra Energy Resources, LLC and United States Solar Corporation filing jointly,<sup>34</sup> and Clean Energy Economy MN.<sup>35</sup> These commenters broadly echo arguments made by others, including representatives of the solar industry, the JSA and SEA: (1) citing the history of the Commission’s decision to place pre-2017 CSGs under the ARR for the duration of the twenty-five year contract, and the reasonable reliance on that order by CSG developers, operators, and subscribers;<sup>36</sup> (2) asserting that “neither the facts supporting the Commission’s adoption of the ARR in its Approval Order nor the distribution of ARR-related costs have changed since the Approval Order”;<sup>37</sup> (3) warning of the regulatory uncertainty that would result from a move to the VOS, which would chill future clean energy development and hamper efforts to meet clean energy mandates and goals;<sup>38</sup> and (4), arguing that the proposal conflicts with contract law<sup>39</sup> or that the Commission lacks authority to modify the contracts between Xcel and CSG developers.<sup>40</sup>

Operating Engineers Local 49 and North Central States Regional Council of Carpenters also offered comments, which are alone in offering unconditional support to Xcel’s “proposed change which would amount to significant savings for Minnesota customers.”<sup>41</sup>

### **III. THE REPLY OF THE DEPARTMENT**

The Department has reviewed the entirety of the Comments received in response to the Notice of Comment Period on this matter, including each of the hundreds of public comments. The Department reiterates the positions taken in its Initial Comments.

In addition, the Department recommends against proposals to modify the bill-credit rate for general service subscribers, recommends against a contested case hearing on this matter, and continues to propose a method to shield non-participating LMI ratepayers from the cost of the program.

#### *A. SUBJECTING ONLY GENERAL SERVICE SUBSCRIBERS TO THE RATE CHANGE WOULD NONETHELESS HARM THE PUBLIC INTEREST*

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<sup>33</sup> National Grid Renewables, Comments (January 8, 2024) (eDocket No. [20241-201976-01](#)).

<sup>34</sup> NextEra Energy Resources, LLC and United States Solar Corporation, Comments (January 8, 2024) (eDocket No. [2024-201988-01](#)). *Hereinafter*, “NextEra and US Solar.”

<sup>35</sup> Clean Energy Economy Minnesota, Comments (January 8, 2024) (eDocket No. [20241-201964-01](#)). *Hereinafter*, “CEEM.”

<sup>36</sup> See NextEra and US Solar at 2-3; CEEM at 4.

<sup>37</sup> NextEra and US Solar at 7.

<sup>38</sup> See National Grid Renewables at 8; NextEra and US Solar at 2; CEEM at 3.

<sup>39</sup> See CEEM at 2-4.

<sup>40</sup> See NextEra and US Solar at 8-9 *and* National Grid Renewables at 12.

<sup>41</sup> IUOE Local 49 and NCSRC of Carpenters, Comments (January 8, 2024) (eDocket No. [20241-201956-01](#))

Fresh Energy offers modifications to Xcel's proposal that the VOS only apply to General Service subscribers, and that that rate include a \$.01 per kWh adder, which would increase the year seven 2017 VOS rate to a rate "marginally higher than the 2018-2022 average ARR bill credit these customers received."<sup>42</sup> OAG-RUD recommends that the Commission protect residential and small commercial subscribers by exempting them from "any major changes to the applicable retail rate," or if the rate change would affect them, then require CSG operators to restructure subscription contracts to offer the same net benefit as before, or else require CSG operators to release those subscribers from their subscription contracts without penalty.<sup>43</sup>

The Department appreciates the willingness of both of these parties to contemplate different approaches to mitigate the impact the bill-credit change may have on residential and small commercial subscribers to ARR-era gardens on grounds of fairness and equity. However, the Department also asserts that general service subscribers are no less deserving of fair treatment, regardless of whether those subscribers are "public interest subscribers" by the definition of the new LMI accessible CSG program<sup>44</sup> or large corporations. All customers deserve equal protection and the certainty and predictability provided by a stable regulatory environment.

Furthermore, as the Department showed, governments, public schools, and various nonprofits—all of whom are general service subscribers—comprise *55 percent* of the subscribed capacity to ARR-era gardens.<sup>45</sup> Were ARR-era CSGs as a whole applicants to the new LMI accessible program, then this subset of public interest subscribers would already meet the requirements of that program, before LMI subscribers or affordable housing providers are counted.<sup>46</sup> As the Department has argued,<sup>47</sup> *the public policy of the state* has prioritized the participation of these entities in clean energy programs through various programs in recent legislation, even aside from the non-Legacy CSG program,<sup>48</sup> and it would be contrary to public policy to disincent their future participation by altering past contracts for bill-credit rates entered into in good faith. The Department is unmoved from this position and recommends against any application of the bill-credit change to general service subscribers, however modified from Xcel's proposal.

The Comments of both Fresh Energy and OAG-RUD miss the broader impact to both the overall regulatory environment and the financial health of the existing gardens. These risks cannot be bifurcated by customer class. Even if the rate is changed only for general service customers, as these stakeholders suggest, such a change would (1) place existing gardens at risk of foreclosure by creditors, and (2) increase regulatory risk to the sector, thereby impacting the financeability of future CSGs and

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<sup>42</sup> Fresh Energy Comments at 10.

<sup>43</sup> OAG-RUD Comments at 23.

<sup>44</sup> Minn. Stat. § 216B.1641, Subd. 2 (e).

<sup>45</sup> See Department of Commerce, Division of Energy Resources, Comments, Table 1. at 10 (January 9, 2024) (eDocket No. [20241-201996-02](#)).

<sup>46</sup> Minn. Stat. § 216B.1641, Subd. 7 (c)(2)(ii).

<sup>47</sup> Department Comments at 10.

<sup>48</sup> See [Minnesota Laws 2023, Ch.60](#), Art. 11, Sec. 2, Subd. 12 (the solar for schools program) and Art. 11, Sec. 2, Subd. 7 (the solar on public buildings program).

all other energy investments subject to Commission jurisdiction. Many of these general service customers are the anchor tenants of the CSGs to which they subscribe, meaning that if their participation were imperiled, then the financial health of those CSGs would be imperiled—and the residential and small commercial customers that Fresh Energy and OAG-RUD seek to protect from this rate-change may *still* be impacted. Generally, regulatory uncertainty increases the cost of capital for energy investments, which then increases rates. These attempts to limit the impact of a potential bill-credit change to “vulnerable” residential and small commercial subscribers would thereby fail to do so.

Lastly, Fresh Energy’s proposal would add administrative burden to Xcel, which would pass that cost along to solar gardens. Xcel states: “If the Commission requires a methodology more complicated than our compliance proposal, the administrative expenses could be significant and could outpace the existing administrative expenses included in the annual Participation Fee on tariff sheet 9-77. The Company may request to increase that fee.”<sup>49</sup> Such further financial imposition on ARR-era CSGs would only further imperil them.

*B. A CONTESTED CASE HEARING REGARDING THIS MATTER IS INAPPROPRIATE*

The SEA request a contested case hearing on the grounds that “material facts [...] are in dispute regarding this issue including who is actually being harmed and how much harm if this proposal is approved.”<sup>50</sup> There is no such dispute regarding material facts. The Department has provided the Commission with a list of subscribers to ARR-era gardens, who would be actually harmed by the approval of this proposal.<sup>51</sup> Many of those that would be harmed, through public comments—and Xcel through its proposal<sup>52</sup>—have provided in detail how much harm there would be.

*C. THE COMMISSION COULD NONETHELESS PROTECT INCOME-QUALIFIED RATEPAYERS FROM THE FINANCIAL IMPACT OF THE SOLAR\*REWARDS COMMUNITY PROGRAM*

The Department continues to recognize the ratepayer impact of the legacy CSG program and the ARR-era subset of that program. The Department also continues to propose an option for the Commission to shield non-subscribing income-qualified ratepayers from its impacts—even as LMI subscribers, public interest subscribers, and all others that subscribed to ARR-era CSGs in good faith continue to benefit the program. The new LMI accessible CSG program creates a carve-out from the FCA for non-subscribing income-qualified ratepayers, as Xcel noted in its compliance filing for this proposal.<sup>53</sup> The Commission could adopt this provision for the Legacy CSG program as well, without the attendant consequences Xcel’s proposal would, as shown above, create.

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<sup>49</sup> Xcel Compliance Filing, at 5-6 (September 25, 2023) (eDocket No. [20149-103417-02](#)).

<sup>50</sup> SEA Comments at 12-13, *supra* note 31.

<sup>51</sup> Department of Commerce, Division of Energy Resources, Comments, Attachment A (January 9, 2024) (eDocket No. 20241-201996-01).

<sup>52</sup> Xcel Compliance Filing, Table 3, at 4.

<sup>53</sup> *Id.* at 8.

#### **IV. CONCLUSION**

For the reasons shown above, the Department continues to recommend against approval of Xcel's proposal to alter the bill-credit rate of ARR-era CSGs. Furthermore, the Department recommends against altering the bill-credit rate of only general service subscribers to ARR-era CSGs. The Department does not find a reasonable basis to resolve this matter through a contested case hearing. And finally, the Department continues to recommend that non-participating LMI ratepayers be exempted from the costs attributable to the Solar\*Rewards Community program in the FCA rider. The Department appreciates the input of all those that submitted comments for consideration.

## **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  
Reply Comments**

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

**Dated this 22<sup>nd</sup> day of January 2024**

**/s/Sharon Ferguson**

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