

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 THE
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 3, 2013 Notice regarding customer exclusion from the Solar Energy Standards (SES). We appreciate the opportunity to provide input on the screening criteria and exclusion requirements. Below we provide our comments and respond to specific questions included in the Notice.

A. NAICS Codes for Determining Eligibility for SES Exclusion

We have reviewed the list of North American Industry Classification System (NAICS) codes identified by the Minnesota Department of Commerce in their August 29, 2013 and December 17, 2013 Comments. We have no objection to using this list of NAICS codes and believe it represents the customer groups identified as eligible for exclusion in the statute.

As we have noted in previous submission in the docket, Xcel Energy's billing system currently includes customer classification information based on Standard Industrial Classification (SIC) codes. To comply with the Commission's November 20, 2013 Order requiring the use of NAICS codes, we are in the process of determining how to identify customers potentially eligible for SES exclusion and reflect the NAICS codes for these customers in our system. Given the available conversion and NAICS information, we would be able to map SIC codes to the corresponding NAICS codes.

This process may also involve requesting additional information from certain customers to ensure we appropriately identify eligible customers in our system.

B. Other Screening Criteria

Because the statute only lists manufacturing activities but no other details related to SES exclusion, we believe the NAICS code provided by customers requesting exclusion should be used to determine eligibility. The statute does not provide any requirements related to a company's size, energy usage, or percentage of activity under a qualified NAICS code. We believe identifying companies for exclusion based on the broad categories listed in the statute complies with the statute, and not other screening criteria are necessary.

We recommend determining eligibility for exclusion by customer, or alternatively at the premise (location) level. We do not believe it would be beneficial of administratively feasible or to determine eligibility for exclusion by meter.

We note that some companies may report different NAICS codes by location, based on the primary activity at each location. While Xcel Energy's system may be able to track NAICS codes at the premise level, we believe the Commission should consider this option only if all utilities have this system capability and it is not administratively burdensome for any utility to comply with this method. We believe it is important to provide consistent treatment for every customer regardless of which utility serves that customer. Thus, it may be most appropriate to determine eligibility at the customer level even though NAICS codes for a specific enterprise customer may vary by that customer's activities at a specific location. If the Commission determines SES exclusion should be at the customer level, each customer should use only one NAICS code based on the NAICS code most closely associated with the primary purpose of the customer's overall business purpose in Minnesota.

C. Information Required from Customers

Based on the discussion above, we believe it would be appropriate to require the following information from customers requesting exclusion from the SES:

- Company name
- Customer and premise account information
- Business purpose
- NAICS code
- Customer contact information

We will work to develop the form for customers to request exclusion and the customer notice required by the Commission's November 20 Order based on the Commission's determinations in this proceeding.

CONCLUSION

We appreciate the opportunity to participate in the development of criteria and procedures for customer exclusion from the Solar Energy Standard. We look forward to working with parties as screening criteria and procedures are further refined and implemented.

Dated: December 23, 2013

Northern States Power Company

CERTIFICATE OF SERVICE

I, Jada Calhoun, 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 23rd day of December 2013

/s/

Jada Calhoun

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