

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Daniel Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of a Commission
Inquiry into the Creation of a
Commission Subcommittee under
Minn. Stat. § 216A.03, subd. 8**

**MINNESOTA SOLAR ENERGY
INDUSTRIES ASSOCIATION'S
COMMENTS ON THE
COMMISSION'S PROPOSED
CONSUMER COMPLAINT
SUBCOMMITTEE**

July 21, 2017

Docket No. E999/CI-17-284

**COMMENTS OF THE MINNESOTA
SOLAR ENERGY INDUSTRIES ASSOCIATION AND THE MINNESOTA SOLAR
ENERGY INDUSTRIES PROJECT**

On July 6, 2017, the Minnesota Public Utilities Commission (PUC or the "Commission") staff filed a Notice of Supplemental Comment Period On Possible Distributed Generation Subcommittee Under Minn. Stat. § 216A.03, Subd. 8. The notice included and Attachment A-1, which outlined further options for consideration. The Commission sought commentary on the additional options. The comment deadline for the notice was set as July 21, 2017.

On July 17, 2017, the Minnesota Department of Commerce (DOC or the "Department") filed their comments on the Attachment A-1 further options for consideration.

While these comments were intended to be initial comments on the Attachment A-1 options for consideration, DOC's commentary was submitted sufficiently early and they mimic the opinions of MnSEIA and MnSEIP. As such, we will keep our commentary brief, noting our broad and emphatic support for the Department's July 17, 2017 commentary.

In general, MnSEIA & MnSEIP feel that there should be something between the Consumer Affairs Office and a Commission complaint filed under Minn. Stat. § 216B.164, subd. 5 or through the Interconnection Standards' current dispute resolution process. We are amenable to a wide-variety of approaches and trials to come up with a process that works for both

Qualifying Facility customers and utilities. For instance, a “pilot program,” as Xcel suggested, would be sufficient, so long as the Commission does not need to reapprove the pilot at the end of the test period. Instead, the Commission should continue to the program and determine what, if any, modifications should be made as it feels necessary or at a predetermined date.

We are also in favor of complaint posting or an advisory group, so long as it is in addition to the committee’s implementation. In our experience, the same issues crop up around the state. Having a resource where utilities and customers can see how it has been handled equitably in other service territories, or a place where the items can be debated in a group setting, would be useful.

But while we want to stress flexibility and inclusiveness of ideas, there is an immediate need. Something must be done for aggrieved customers that have complaints that are too administratively, procedurally or technically challenging for CAO staff, but who do not want to effectively file suit against their utility. So we cannot support further delay of this subcommittee by forgoing it to evaluate other state approaches to handling this issue. If research into other states is important to the Commission, we recommend the sub-committee be established and modified as the Commission determines is necessary.

Respectfully submitted,

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