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Lori Hoyum
Policy Manager
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December 20, 2013

VIA E-FILING

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Implementation of
Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1619
Docket No. E-999/CI-13-542

Dear Dr. Haar:

The Minnesota Public Utilities Commission (“Commission”) issued a Notice for Comment on Customer Exclusions from the Solar Energy Standard - Phase 2 (“Notice”) on December 3, 2013, in the above referenced docket. Minnesota Power respectfully submits its Comments in response to the Notice.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

A handwritten signature in black ink that reads "Lori Hoyum". The signature is fluid and cursive, with the first and last letters of each word being capitalized and prominent.

Lori Hoyum

Attachment
cc: Service List


STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Jodi Nash of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 20th day of December, 2013, she served Minnesota Power's Comments on Customer Exclusions from Solar Energy Standard – Phase 2 on the Minnesota Public Utilities Commission via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.



Subscribed and sworn to before
me this 20th day of December, 2013.



Notary Public - Minnesota
My Commission Expires 1/31/2015



Print Close

Service List Member Information

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Abbey	Ross	abbey@fresh-energy.org	Fresh Energy	Electronic Service	No
Alien	Michael	michael.alien@allenergysolar.com	All Energy Solar	Electronic Service	No
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Beithon	Peter	pbeithon@otpc.com	Otter Tail Power Company	Electronic Service	No
Bergan	Sara	sebergan@stoel.com	Stoel Rives LLP	Electronic Service	No
Blazar	William A.	bbblazar@mnchamber.com	Minnesota Chamber Of Commerce	Electronic Service	No
Burdette	Jessica	jessica.burdette@state.mn.us	Department of Commerce	Electronic Service	No
Cannon	Joel	jcannon@tenksolar.com	Tenk Solar, Inc.	Electronic Service	No
Carroll	John J.	jcarroll@newportpartners.com	Newport Partners, LLC	Electronic Service	No
Davis	Chris	christopher.davis@state.mn.us	Department of Commerce	Electronic Service	No
Denison	Dustin	dustin@appliedenergyinnovations.org	Applied Energy Innovations	Electronic Service	No
Dobson	Ian	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Engelking	Betsy	betsy@geronimoenergy.com	Geronimo Energy	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Franzen	Nathan	nathan@geronimoenergy.com	Geronimo Energy	Electronic Service	No
Gerber	Benjamin	bgerber@mnchamber.com	Minnesota Chamber of Commerce	Electronic Service	No
Gerhardson	Bruce	bgerhardson@otpc.com	Otter Tail Power Company	Electronic Service	No
Goodpaster	Elizabeth	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No
Grant	Bill	Bill.Grant@state.mn.us	Minnesota Department of Commerce	Electronic Service	No
Grooms	Lloyd	lgrooms@winthrop.com	Winthrop and Weinstine	Electronic Service	No
Haar	Burl W.	burl.haar@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Hainault	Tony	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	Electronic Service	No
Hamilton	J Drake	hamilton@fresh-energy.org	Fresh Energy	Electronic Service	No
Hays	Jack	jack.hays@westwoodps.com	Westwood Professional Services	Electronic Service	No
Heath	Brandon	bheath@misoenergy.org	MISO Energy	Electronic Service	No
Hinman	Holly	holly.r.hinman@xcelenergy.com	Xcel Energy	Electronic Service	No
Hodnik	Margaret	mhodnik@mnpower.com	Minnesota Power	Electronic Service	No
Hunt	Anne	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	Electronic Service	No
Jelle	Dwight	dkjelle@gmail.com	Best Power International, LLC	Electronic Service	No
Jenkins	Alan	aj@jenkinsallaw.com	Jenkins at Law	Electronic Service	No
Jensen	Linda	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	No
Johnson	Richard	Rick.Johnson@lawmoss.com	Moss & Barnett	Electronic Service	No
Koeller	Mara	mara.n.koeller@xcelenergy.com	Xcel Energy	Electronic Service	No
Kramer	Jon	jk2surf@aol.com	Sundial Solar	Electronic Service	No
Krug	Allen	allen.krug@xcelenergy.com	Xcel Energy	Electronic Service	No
Liberkowsky	Amy	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	Electronic Service	No
Lindell	John	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Lundberg	Rebecca	rebecca.lundberg@powerfullygreen.com	Powerfully Green	Electronic Service	No
Mackenzie	Susan	susan.mackenzie@state.mn.us	Public Utilities Commission	Electronic Service	No
Maini	Kavita	kmmaini@wi.rr.com	KM Energy Consulting LLC	Electronic Service	No
Marshall	Pam	pam@energycents.org	Energy CENTS Coalition	Electronic Service	No
Miller	Stacy	stacy.miller@state.mn.us	Department of Commerce	Electronic Service	No
Moeller	David	dmoeller@allete.com	Minnesota Power	Electronic Service	No
Moratzka	Andrew	apmoratzka@stoel.com	Stoel Rives LLP	Electronic Service	No
Morud	Martin	mmorud@trunorthsolar.com	Tru North Solar	Electronic Service	No
Noble	Michael	noble@fresh-energy.org	Fresh Energy	Electronic Service	No
Nordstrom	Rolf	mordstrom@gpsid.net	Great Plains Institute	Electronic Service	No
O'Connell	Kate	kate.oconnell@state.mn.us	Department of Commerce	Electronic Service	No
Pickard	Charlie	cpickard@aladdinsolar.com	Aladdin Solar	Electronic Service	No
Pickard	Donna	dpickard@aladdinsolar.com	Aladdin Solar	Electronic Service	No
Ragsdale	Kent	kenragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	Electronic Service	No
Saveikoul	Richard	rsaveikoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service	No
Schedin	Larry L.	Larry@LLSResources.com	LLS Resources, LLC	Electronic Service	No
Schuerg P. E.	Matthew J.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	Electronic Service	No
Shaddix Eling	Janet	jshaddix@janetshaddix.com	Shaddix And Associates	Electronic Service	No
Shea	Erin	eshea@silicon-energy.com	Silicon Energy	Electronic Service	No
Stojan Ruccolo	Erin	ruccolo@fresh-energy.org	Fresh Energy	Electronic Service	No
Strommen	James M.	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	Electronic Service	No
Sundin	Deb	deb.sundin@xcelenergy.com	Xcel Energy	Electronic Service	No
Thompson	SaGonna	Regulatory.Records@xcelenergy.com	Xcel Energy	Electronic Service	No
Trudeau	Lise	lise.trudeau@state.mn.us	Department of Commerce	Electronic Service	No

Willett	Jason	jason.willett@metc.state.mn.us	Metropolitan Council	Electronic Service	No
Woeste	Robyn	robynwoeste@alliantenergy.com	Interstate Power and Light Company	Electronic Service	No

Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Aune	John	Blue Horizon Energy	7246 Washington Ave S, Eden Prairie, MN-55344	Paper Service	No
Bull	Michael J.	Center for Energy and Environment	212 Third Avenue North, Suite 560, Minneapolis, MN-55401	Paper Service	No
Chriss	Steve W.	Wal-Mart	2001 Southeast 10th St., Bentonville, AZ-72716-5530	Paper Service	No
Coleman	Steve	Applied Energy Innovations	4000 Minnehaha Ave S, Minneapolis, MN-55406	Paper Service	No
Daniels	Lisa	Windustry	201 Ridgewood Avenue, Minneapolis, MN-55403	Paper Service	No
Donkers	Dan	Saint Paul - Ramsey County Public Health	Environmental Health Section, 2785 White Bear Ave., Suite 350, Maplewood, MN-55109	Paper Service	No
Droessler	Bill	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202, Saint Paul, MN-55104	Paper Service	No
Hanson	Samuel	Briggs And Morgan, P.A.	2200 IDS Center E, 80 South Eighth Street, Minneapolis, MN-55402	Paper Service	No
Hinkle	Lynn	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2, Minneapolis, MN-55406	Paper Service	No
Hubbard	Jan	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South, Minneapolis, MN-55406	Paper Service	No
Jacobson	Ralph	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1, Saint Paul, MN-55109-1555	Paper Service	No
Long	Bob	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza, 7900 Xerxes Ave S, Bloomington, MN-55431	Paper Service	No
Maccabee	Paula	Just Change Law Offices	1961 Selby Avenue, St. Paul, MN-55104	Paper Service	No
Maccullum	Casey	Applied Energy Innovations	4000 Minnehaha Ave S, Minneapolis, MN-55406	Paper Service	No
McIntire	Natalie	Wind on the Wires	570 Asbury St Ste 201, St. Paul, MN-55104-1850	Paper Service	No
Millberg	Brian	City of Minneapolis	350 South 5th St, #315, Minneapolis, MN-55415	Paper Service	No
Prest	Gayle	City of Mpls Sustainability	350 South 5th St, #315, Minneapolis, MN-55415	Paper Service	No
Ricci	Enio	Invenergy LLC	17830 New Hampshire Ave Ste 300, Ashton, MD-20861	Paper Service	No
Rosier	Michelle	Sierra Club	2327 E. Franklin Avenue, Minneapolis, MN-554061024	Paper Service	No
Shaver	Gary	Silicon Energy	3506 124th St NE, Marysville, WA-98271	Paper Service	No
Shoemaker	Doug	MRES	2928 5th Avenue South, Minneapolis, MN-55408	Paper Service	No
Sourignavong	Chanti	Honeywell	1985 Douglas Drive North, MN10-111A, Golden Valley, MN-55422-3992	Paper Service	No
Williams	Daniel	Powerfully Green	11451 Oregon Avenue N, Champlin, MN-55316	Paper Service	No

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Implementation of
Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1619

Docket No. E-999/CI-13-542

**MINNESOTA POWER'S
COMMENTS**

I. Introduction

The Minnesota Public Utilities Commission (“Commission”) issued a Notice for Comment on Customer Exclusions from the Solar Energy Standard – Phase 2 (“Notice”) on December 3, 2013 (Docket No. E-999/CI-13-542). Minnesota Power (or “the Company”) respectfully submits its Comments in response to the Notice.

II. Response to Topics Open for Comment

What specific NAICS codes should be used to screen customers who are potentially eligible for exclusion from the Solar Energy Standard (SES), and why?

- *The list included in the Department of Commerce’s August 29, 2013 comments?*
- *The list included in Minnesota Power’s August 15, 2013 filing?*
- *Some other set of NAICS codes?*

In its August 15, 2013 filing Minnesota Power offered a list of NAICS codes for general guidance in determining customer exclusions. The Company is not opposed to utilizing this

initial list, along with any additional categories included in the Department of Commerce – Division of Energy Resources (“Department”) August 29, 2013 Comments. Minnesota Power believes the NAICS code categories should be expansive enough to encompass all customers eligible for exclusion and also not place limitations that may unintentionally not cover those customers eligible for the exclusion.

What criteria other than NAICS codes, if any, should be used to make a final determination of customer eligibility?

- *Size or rate schedule criteria, such as having a minimum kW demand or being on a demand-metered or large C&I rate?*
- *A certain percentage of customer activity being in a qualified NAICS code?*
- *The specific statutory activity tied to a facility, account, and/or meter? For example, if a customer who qualifies by NAICS code has its manufacturing facility on one meter and its headquarters office on a different meter, does the latter qualify? Does it matter if the headquarters office is at a different site than the manufacturing facility?*
- *Some other criteria?*

The Solar Energy Standard statute¹ does not give direction on limiting customer exclusion eligibility by size, rate schedule or any other miscellaneous specification. Also, since the statute specifically states “there shall be excluded retail electric sales to customers,” Minnesota Power views “customer” as the definitional criteria for exclusion and, as such, all locations and facilities associated with that customer would be excluded as part of the eligibility process. Minnesota Power believes there should not be any further requirements created for exclusion beyond meeting the definition under the NAICS code categories. It may, however, be prudent to have the customer list all applicable accounts as part of their application for exemption.

¹ Minn. Stat. §216B.1691 Subd. 2f

What information should customers who apply for exclusion be required to provide?

Customers applying for exclusion should provide general information such as business name, purpose and the NAICS code which is the basis for the possible exclusion. It is incumbent that the business be responsible for correctly determining the NAICS on which to base their possible exclusion. Minnesota Power has begun an informal dialogue with Large Power customers that clearly meet the exclusion categories and is jointly developing a letter request template that would apply the Commission's orders in this Docket including specifying the applicable NAICS code, the statutory basis for the customer's exclusion, and customer contact information.

III. Conclusion

Minnesota Power appreciates the opportunity to provide input on the requirements for customer exclusions. Creating an inclusive process that does not hinder the customer's ability to apply or be included is imperative. The Company looks forward to further clarification on the customer exclusion eligibility requirement process.

Dated: December 20, 2013

Respectfully submitted,

A handwritten signature in cursive script that reads "Lori Hoyum". The signature is written in black ink and is positioned to the right of the date and the phrase "Respectfully submitted,".

Lori Hoyum
Policy Manager
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Duluth, MN 55802
(218) 355-3601
lhoyum@mnpower.com