



January 31, 2014

Dr. Burl Haar  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul MN 55101-2147

**RE: In the Matter of the Implementation of Solar Energy Standards Pursuant 2013  
Amendments to Minnesota Statutes, Section 216B.1691  
MPUC Docket E999/CI-13-542**

Dear Dr. Haar:

Geronimo Energy appreciates this opportunity to respond to the Commission's request for comments on implementation of Minnesota's recently passed Solar Energy Standard ("SES"). Geronimo believes that the Commission can use many of the lessons learned and the tools created while implementing the state Renewable Energy Standard ("RES") to create an easy means to for utilities to comply with the SES, in a manner that is also compatible with RES compliance. Specifically, Geronimo offers comments on two of the questions in the attachment to the Commission's December 30, 2013 notice: question 1, which deals with S-REC shelf life, and question 4, which discusses tracking systems.

1.a. Should the Commission clarify that an S-REC that meets the requirements under subd. 2f has no shelf life for purposes of meeting the SES?

As the legislature debated the Solar Energy Standard, it considered many times whether to include a small, interim solar requirement that would begin around 2016. Although the legislature eventually settled on a single standard of 1.5% by 2020, it was mindful of the opportunity to "jump start" the solar industry in Minnesota now, while federal tax credits for solar are certain to be available. As testified to by House Energy Committee Chair Melissa Hortman when she presented the bill on the House floor, the language allowing utilities to use all solar energy installed after the effective date of the bill to meet the SES was designed to encourage early acquisition of solar energy by ensuring that Solar Renewable Energy Credits ("S-RECs") generated by early installations would count toward the SES.

Geronimo believes that this language does not mean that S-RECs were never intended to expire. Instead, we believe the language was intended to allow utilities to hold on to early RECS long enough to be able to use them for compliance. Assuming the Commission maintains the same shelf life for S-RECs as it has for other RECs (year of generation + four years), then the first year that generated S-RECs would be available for 2020 compliance would be 2016. Thus, S-RECs generated between August 1, 2013 (the effective date of the law) and 2016 would expire

prior to the ability to use them for compliance. In order to rectify this situation and permit these S-RECs to be used toward compliance, the Commission needs to extend the shelf life of S-RECs generated between August 1, 2013 and December 31, 2015 such that they don't expire until 2020.

Geronimo recommends that the Commission find that S-RECs generated after August 1, 2013 through December 31, 2015 be allowed to be used for compliance in 2020. For S-RECs generated in 2016 and beyond, S-RECs should retain the same shelf life – year of generation + four years – as all other RECs.

4. Should the Commission consider an additional tracking system specifically for the SES? Should the Commission consider an additional tracking system for small units that are eligible for the RES?

Geronimo does not believe that the Commission requires a new tracking system to keep track of S-RECs and retire them for compliance. The Midwest Renewable Energy Tracking System (M-RETS) already contains all of the information that the utilities and the Commission need in order to ensure compliance with the SES. As a tracking tool, MRETS keeps track of all renewable energy generation and its specific characteristics include size, technology/fuel type and location of the generation. Thus, each MWh of renewable energy generated has a unique identifier that indicates the particular attributes of the REC. MRETS was designed this way in order to allow many different jurisdictions to use the tracker for compliance. For example, utilities can retire RECs generated by municipal solid waste (MSW) to meet their Minnesota standard, but cannot use them for compliance in other states. Some state renewable requirements have specific in-state generation requirements. MRETS tracks all of the information for each REC, but it is up to the utility to determine which RECs it can use for compliance in which states, and the various state regulatory authorities to ensure that the utility has made the appropriate retirements.

In the case of the SES, RECs in MRETS will be specifically identified as having come from solar generation. In Minnesota, those RECs could be used for compliance either with the SES or the RES. The utility simply has to designate for what the REC is being used. There is no need to track an S-REC differently; the difference comes in how the utility deploys them for compliance. Continuing to use MRETS will also save cost and administrative time, and will prevent double counting of S-RECs.

There is one feature of the SES that may require careful tracking: the requirement that at least 10% of the SES be met by facilities of 20kW or less. In this case, while MRETS will accurately track the solar generation by its size as well as other attributes, it may be burdensome and unnecessary for utilities to track each small solar project for which it owns the RECs. Many rooftop solar systems are 4-5 kW in size and will generate only 3-5 RECs per year. Geronimo believes that it would be reasonable to allow the utilities to aggregate generation from their very small solar units and track them as a single "small solar generation" account. Each year, utilities could include information in their annual report as to which generators are included in the small generation account. If need be, the Commission could allow for two small generation account, one for S-RECs from project less than 20 kW, and one for projects

between 20 kW and 1 MW. This would allow all solar that is eligible for net metering/Value of Solar tariff to be tracked as a group of projects, and would also permit easy compliance with the small solar provisions of the law.

Geronimo recommends that the Commission continue to use MRETS as the sole tracking system for renewable energy and compliance in Minnesota. However, we recommend that the Commission permit aggregation of S-RECs from small projects as a single generation unit within MRETS, so long as the generation being tracked in the account has similar attributes (fuel, location, etc.) and that the utility make a regular filing as to which projects are included in the small generation account.

Thank you for the opportunity to provide our comments in this matter. Geronimo may, as it sees necessary, also comment on other aspects of the Commission's request in reply comments.

Sincerely,

*/s/ Betsy Engelking*

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