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MINNESOTA PUBLIC
UTILITIES COMMISSION

May 15, 2015

Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101-2147

Re: Docket MPUC E-002/M-13-867

Dear Mr. Wolf:

I am writing today on behalf of the Saint Paul Area Chamber of Commerce. We are one of the State's largest Chambers of Commerce and our mission is to serve and advocate on behalf of the business community across the East Metro.

It has come to our attention that the Community Solar Garden program launched late last year by Xcel Energy has the potential to increase energy rates on our members who are not participating in a Solar Garden. We note with interest the statements of the Office of Attorney General which cite dramatic levels of customer impact that will result if this program is not fixed.

The Office of Attorney General points out the subsidy that flows between customers as a result of the program. They state, "the scale of the proposed CSG projects proposed thus far affords large companies the opportunity to offset their entire energy use and receive a bill credit that is currently designed to be greater than their full retail rate. The impact of this is that these subscribers may receive bill credits that are equal to, or possibly greater than their electric bills— and all of those costs would be paid for by Xcel's other ratepayers. The result is a direct subsidy from non-participants to pay for the program. "

We urge the Commission to consider working with all parties involved to enforce the 1 MW limit on gardens to make sure the program is implemented correctly and does not unfairly raise rates on our members who do not choose to participate in these gardens.

Thank you for your time and consideration.

Sincerely,

Matt Kramer, President

Saint Paul Area Chamber of Commerce



Rice, Robin (PUC)

13-867

From: Pat Mulqueeny <pat.mulqueeny@epchamber.org>
Sent: Friday, May 15, 2015 3:11 PM
To: #PUC_Public Comments
Subject: RE: MPUC Docket # E002/M-13-867
Attachments: Chamber Community Solar Garden Letter.docx

The Eden Prairie Chamber of Commerce is submitting the attached letter for discussion RE: MPUC Docket # E002/M-13-867.

If you need any additional information, or have any questions, please let me know.

Sincerely,

Pat MulQueeny, IOM
President
Eden Prairie Chamber of Commerce
(952) 944-2830

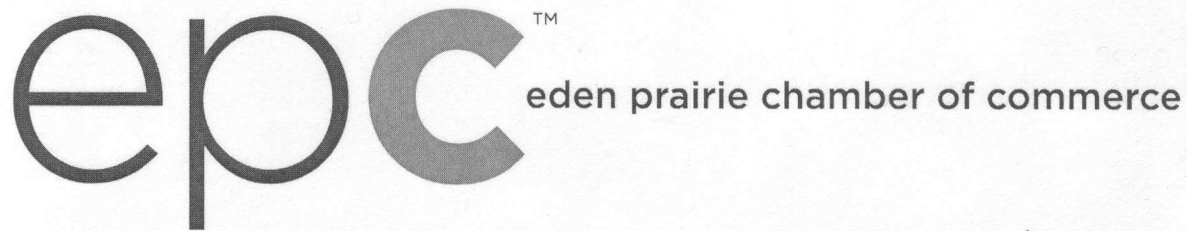
Get involved with the Chamber! Go to epchamber.org for program and event details – we want to see you at one of our 120+ programs and events this year!



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13-867



May 15, 2015

Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101-2147

RE: RE: MPUC Docket # E002/M-13-867

Dear Mr. Wolf:

The Eden Prairie Chamber of Commerce (Chamber) represents nearly 500 area businesses. Our organization supports efforts to add energy opportunities and green energy now and in the future for our businesses and community. However, these efforts and initiatives need to be done in such a way that they are fair to our businesses and stakeholders and do not place a burden on one for the benefit of another.

In reviewing documentation on the Community Solar Garden (CSG) program, the costs of these appear to be at the expense of others – especially for commercial and industrial properties as they use more electricity than residential customers and their rates tend to be greater than their cost of service.

The Chamber is in support of the Minnesota Chamber's position that the Commission, Xcel, and other stakeholders will work on creating a system that advances CSG's, but does so in a way that does not force other customers to subsidize CSG participants and that any new solar resources are acquired at the lowest cost possible.

Respectfully submitted,

Pat MulQueeney, IOM
President
Eden Prairie Chamber of Commerce

Rice, Robin (PUC)

13-867

From: Tom Drake <tfdmd@aol.com>
Sent: Sunday, May 17, 2015 8:12 PM
To: #PUC_Public Comments
Subject: Solar gardens

As a utility ratepayer I would like to register my opinion that I favor solar panels that generate no more than 1MW of electricity so as not to drive up utility rates too high, too quickly for us electric customers. Thank you for considering my opinion. Thomas Drake, 23 Sumner Hill Road, Mankato, MN 56001-3932.

Sent from my iPad

13-867

Rice, Robin (PUC)

From: Tom Snell <tom@whitebearchamber.com>
Sent: Friday, May 15, 2015 3:04 PM
To: #PUC_Public Comments
Cc: 'Tom Snell'
Subject: MPUC E-002/M-13-867

Document Information: MPUC E-002/M-13-867

Dear Public Utility Commission Members;

It has come to my attention that the current state of the community Solar Garden program could increase rates to Xcel ratepayers. Some estimates place that number at approximately \$60 million annually. For some Xcel customers that could result in a 6% increase in their energy costs. This increase directly impacts job growth and business expansion. Commercial and industrial customers typically use more electricity than residential users.

We encourage the expansion of alternative energy sources as a sound energy policy. Furthermore, the Community Solar Garden program as originally intended was a worthwhile endeavor. However, certain developers want to establish up to 40 1MW gardens next to each other. That seems to be a loophole not originally intended. We are concerned that this loophole will result in unintended higher electrical rates for our members. If the intent is to expand solar energy use we suggest researching if solar resources could be acquired from Xcel at a lower rate.

The White Bear Area Chamber urges the Utility Commission to seriously take our comments into account. Customers should not be forced to subsidize the Solar Garden proposed large scale projects. New solar resources should be acquired at the lowest cost possible rate. In our opinion; that will encourage more competition in the use of alternative energy. That competition will drive down prices and ultimately encourage greater use of solar energy

Tom Snell
Executive Director
White Bear Area Chamber
651.429.8593

Rice, Robin (PUC)

13-867

From: ellie matthees <breezy5862@yahoo.com>
Sent: Friday, May 15, 2015 12:57 PM
To: #PUC_Public Comments
Subject: DOCKET#(MPUC E-002/M-13-867

We are Donald & Elverna Matthees of Winona, MN.

I am concerned about Community Solar Garden Program being discussed at the Public Utilities Commission (PUC).

I encourage you to establish the program so that it follows the legislative intent that limits these solar gardens to 1 megawatt.

As an Xcel customer my electric bill will be increased if these gardens are allowed to significantly expand beyond these parameters.

I am not opposed to solar energy but I want to make sure the most cost effective projects are pursued since Xcel customers like me will have to pay the highest cost-subsidized for this energy.

We attended a meeting in Winona on Solar Gardens & not too many in the audience seemed very interested. The leaders of the meeting could not answer some questions to our satisfaction. To sign up for a 25 year commitment seemed long for someone that is 75.

May 15, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RECEIVED
MAY 18 2015
MINNESOTA PUBLIC
UTILITIES COMMISSION

RE: Reply Comments on Community Solar Garden (CSG) Discussion; Docket No. E002/M-13-867

Dear Mr. Wolf:

The Metropolitan Council (Council) appreciates the opportunity to submit *Reply Comments* in response to the Minnesota Public Utilities Commission's (Commission) May 18, 2015 *Notice of Comment Period* on Northern States Power Company's, dba Xcel Energy (Xcel or the Company), April 28, 2015 filing, and in particular to discuss the impact on the Council's constituencies

1. CSG and Financial Impact:

Differentiating regional cost/value from ratepayer impact is necessary, so as not to over burden rate-vulnerable electric ratepayers - especially those for which electricity is a big part of their household income and for trade-sensitive industries.

The benefits of solar to the grid and regional externalities as determined in the "Value of Solar" findings make clear the value of solar to the region. Moreover the reasoning around the state solar mandate and goal and the need for carbon and particulate matter emissions reductions further the desirability of solar development in the region.

As one of Xcel's largest Minnesota customers, we acknowledge that this CSG program does potentially mean a small adverse impact to rates for Xcel customers (as compared to larger competitive solar procurements without prescribed credits) and so some limits may be warranted. However, the societal benefit of solar in general is compelling and we suggest holding off on restrictions until Xcel has large scale solar proposals in hand and the incremental cost is clear.

2. CSGs and Council Facilities

Although the Council has opportunities to connect solar facilities directly to its facilities, those opportunities are often limited for technical or operational reasons.

Community Solar Gardens are an effective tool to help the Council bypass these limitations while contributing to the promotion of renewable energy in Minnesota. As we have discussed with the PUC, the Council has buffer land around its wastewater treatment plants well suited for Community Solar Gardens. Other marginal public land such as closed landfills, on brown fields, or around transportation corridors, are also an opportunity for a beneficial use of land that may otherwise not be used to its potential. Allowing multiple or bigger gardens on this land also allows for economies of scale and better

pricing benefitting for the public – who really are the communities. So if the public pays a bit more they get it back in another form. For example, better CSG subscription prices helps the Council maintain its competitive wastewater user fees which are good for the entire regional economy. We suggest consideration of a marginal public land exception to any eventual limitations.

Also, it is important to note that the Council and our rate and taxpayers will potentially be damaged if Xcel does not timely process garden applications, and move projects through the interconnection queue. We have projects in the queue, more for which proposals were received (after 2 years of effort) and another RFP, expected to be issued in July, in development with months or years of expenses by multiple parties. If changes are allowed to the interpretation of the rules, we request these projects be grand-parented and proceed under the original rule interpretation.

The Metropolitan Council appreciates this opportunity to submit *Reply Comments* and would be happy to participate in further discussion of the matter.

Sincerely,



Patrick P. Born
Regional Administrator

May 14, 2015

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MINNESOTA PUBLIC
UTILITIES COMMISSION

Mr. Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
St. Paul, MN 55101-2147

RE: **IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDENS PROGRAM**

MPUC DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

The St. Cloud Area Chamber of Commerce has become aware of issues surrounding the Community Solar Garden (CSG) program created by the Commission that will have potential major financial impacts on commercial and industrial customers of Xcel Energy.

On behalf of the 1,050 business members of our Chamber, we urge careful consideration of Xcel's March 4, 2015 Reply Comments submitted in this docket. We stand by Xcel's point that "there is a way to strike the right balance between moving forward with community solar garden projects while recognizing that approving utility scale projects at CSG rates is not in the best interest of our customers or sustainable for the long term."

The St. Cloud Area Chamber of Commerce hopes the Commission, Xcel and other stakeholders will work together to create a system that advances CSG's, but does so in a way that does not force other customers to subsidize CSG participants and ensures that any new solar resources are acquired at the lowest cost possible, given the status of solar technology. Such an approach should implement the CSG program without further eroding the competitiveness of Xcel and other affected utilities' rates.

Respectfully submitted,



Teresa Reed Bohnen
President