



414 Nicollet Mall
Minneapolis, MN 55401

April 2, 2014

—Via Electronic Filing—

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

RE: IN THE MATTER OF A RATE FOR LARGE SOLAR PHOTOVOLTAIC
INSTALLATIONS
DOCKET NO. E002/CI-13-315

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits these brief comments in response to the Commission's Notice Seeking Comments issued March 20, 2014 in this docket.

The Department of Commerce's March 17, 2014 filing recommended that the Commission approve a solar Standby Service capacity credit of \$5.15 per kW/month. The Department also recommended the Commission approve a starting date of June 1 for each customer's grace period, unless the customer chooses another date. We offer our response to these recommendations and comments from other parties below.

While we continue to believe our calculation is reasonable and appropriate, we agree with the Department that there are various approaches to calculating the Solar Standby Capacity credit, and that the credit will likely change in the future as more data becomes available and/or MISO establishes specific solar capacity values. Therefore, we agree to the Department's recommendation of a solar Standby Service capacity credit of \$5.15 per kW/month.

We note that when we implement this capacity credit, we will apply the \$5.15 per kW/month rate to the Standby Service Agreement amount. The Standby Service Agreement demand amount is equal to or less than the customer's actual demand

as Standby is a backup service and Xcel Energy does not provide backup for generation larger than the customer's actual demand.

For the record, we would like to provide details related to our final capacity credit of \$4.28 per kW/month as well as the underlying assumptions and calculation. Our approach to a solar Standby capacity credit used existing embedded demand costs for Standby capacity charges multiplied by the Midcontinent Independent System Operator (MISO) method for accreditation of intermittent resources.

Average Primary Service Demand Charge - No Grace Period	\$9.37
Impact of Adding a June Grace Period on Average Demand Rate	<u>\$0.52</u>
Average Primary Service Demand Charges - June 1st Grace Period	\$8.86
MISO Accreditation	<u>48.3%</u>
Demand Charge Driven Credit	\$4.28

In addition, we would also like to clarify that in Information Request Nos. C20 and C22 in Docket No. E002/GR-10-971 as referenced in the Department comments on page 6, we stated that the annual retail transmission related revenue requirement was \$2.81 per kW/month for demand-metered customers. However, we clarify that this \$2.81 per kW/month rate is an embedded cost, not necessarily an avoided cost.

Finally, we respond to Sundial Solar's March 17, 2014 Comments that recommended the capacity credit should track along with our demand charges and change when those charges fluctuate. , The Department's proposed calculation does not link to our demand charge, and therefore it would be inappropriate to link solar standby capacity credit changes to the demand charge. The solar Standby Capacity credit will be reviewed in the future along with other rates and credits.

Lastly, we have no objection to the Department's recommendation that the Commission approve a starting date of June 1 for each customer's grace period, unless the customer chooses another date. We would like to clarify that existing customers can elect a change; however they cannot receive more than the allowed amount of grace period hours in a 12 month period, so a change may require a rebill.

We appreciate the efforts put forth by stakeholders to work together to determine the appropriate solar capacity credit for our large customers. Through this collaborative process, we were able to narrow the differences in our approaches and ultimately support the Department's recommendation.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact me at amy.a.liberkowski@xcelenergy.com or (612) 330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI
MANAGER
REGULATORY ANALYSIS

Enclosures
c: Service Lists

CERTIFICATE OF SERVICE

I, SaGonna Thompson, 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. E002/CI-13-315

Dated this 2nd day of April 2014

/s/

SaGonna Thompson
Records Analyst

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James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 315_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 315_Interested Parties
Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 315_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 315_Interested Parties
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13- 315_Interested Parties