

September 10, 2015



VIA ELECTRONIC FILING

Daniel Wolf
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: Comments
SunShare Formal Complaint and Petition
Docket No. E002/M-15-786

Dear Mr. Wolf,

SunShare respectfully submits the attached *Comments by SunShare, LLC* in response to the Commission's September 1, 2015 Notice of Comment Period filed in the above-mentioned docket.

Please do not hesitate to contact me if you have any questions.

Sincerely,

s/ Ross Abbey

Ross Abbey
SunShare, LLC
Director, Regulatory & Legal – MN

On behalf of SunShare, LLC

cc: Appended Service List

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

September 10, 2015

**In the Matter of a Formal Complaint and Petition by
SunShare, LLC for Relief under Minn. Stat. § 216B.1641 and
Sections 9 and 10 of Xcel Energy’s Electric Tariff Book**

Docket No. E-002/M-15-786

SUNSHARE, LLC COMMENTS IN RESPONSE TO THE COMMISSION’S
SEPTEMBER 1, 2015 NOTICE FOR COMMENTS

SunShare, LLC respectfully submits these comments in response to the Commission’s September 1, 2015 Notice for Comment (requesting comment on SunShare’s August 28, 2015 signed and amended Formal Complaint and Petition (“formal complaint”) in this docket).

Topic I. Does the Commission have jurisdiction over this matter?

Yes, the Commission has jurisdiction to hear, investigate, and order relief as requested in SunShare’s formal complaint in this docket. The Commission has general jurisdiction over the violations described in SunShare’s complaint against Northern States Power Company, a Minnesota Corporation d/b/a Xcel Energy (“NSP”), in this docket under its broad authority to regulate utilities under Minn. Stat. Chapter 216B.¹ In addition, the Commission has specific jurisdiction over this matter under several provisions of Minnesota Statutes, including Minn. Stat. §§ 216B.09, 216B.14, 216B.17, and 216B.164.

Minn. Stat. § 216B.09 gives the Commission authority to “ascertain and fix just and reasonable . . . practices to be observed and followed by any or all public utilities with respect to the service to be furnished.” The Commission has applied its jurisdiction under this statute to, for example, require all Minnesota electric and gas utilities to comply with a federal identity theft prevention statute,² “investigate whether Xcel Energy’s handling of the Monticello Life Cycle Management/Extended

¹ See, e.g., Commission March 25, 2014 Order, 12-1344, at 4; *Schermer v. State Farm Fire & Cas. Co.*, 721 N.W.2d 307, 312 (Minn. 2006) (“In Chapter 216B the Minnesota Legislature vested extensive power in the MCommission . . . to ‘ascertain and fix just and reasonable’ policies for all public utilities”).

² Commission Mar. 25, 2014 Order, 12-1344, at 1.

Power Uprate Project (“LCM/EPU”) was prudent,”³ and investigate a joint powers organization’s complaint against NSP regarding NSP’s billing practices for damage claims to NSP equipment.⁴

The Commission also has jurisdiction to hear complaints against NSP under Minn. Stat. § 216B.14, which allows the Commission to “investigate and examine the condition and operation of any public utility or any part thereof” upon complaint (or on its own initiative), and grants the Commission latitude to undertake an investigation and subsequent hearings “whenever it may deem it necessary.”

The Commission likely has additional jurisdiction under Minn. Stat. §§ 216B.17 and 216B.164. Minn. Stat. § 216B.17 gives the Commission authority to hear a complaint against a public utility on grounds that its service is inadequate if, *inter alia*, the Commission chooses to hear the complaint on its own motion or a complaint is brought by any 50 customers of the particular utility.⁵ If the Commission chooses to hear our complaint under Minn. Stat. § 216B.17, we respectfully request that the Commission do so on its own motion. The scale of the tariff and program-rule violations documented in SunShare’s complaint should be grounds for concern on the Commission’s part. In addition, SunShare is bringing our complaint on our behalf as well as for the benefit of our contracted subscribers, all NSP customers, who already number over 100. Each of our subscribers is an NSP customer harmed by NSP’s “unreasonable” and “insufficient” practices that fail to satisfy its Section 10 obligations.⁶

Finally, Minn. Stat. § 216B.164, subd. 5 gives the Commission authority to hear SunShare’s complaint by granting the Commission jurisdiction over disputes between an electric utility and a qualifying facility.⁷ Minn. Stat. § 216B.164, subd. 5 states:

*In the event of disputes between an electric utility and a qualifying facility, either party may request a determination of the issue by the commission. In any such determination, the burden of proof shall be on the utility. The commission in its order resolving each such dispute shall require payments to the prevailing party of the prevailing party's costs, disbursements, and reasonable attorneys' fees, except that the qualifying facility will be required to pay the costs, disbursements, and attorneys' fees of the utility only if the commission finds that the claims of the qualifying facility in the dispute have been made in bad faith, or are a sham, or are frivolous.*⁸

Topic II. Are there reasonable grounds to investigate the allegations? Please include a

³ Commission Dec. 18, 2013 Order, 13-754, at 3-4.

⁴ Commission June 10, 2013 Order, 12-1369, at 1-2.

⁵ Minn. Stat. § 216B.17, subd. 1.

⁶ *Id.*

⁷ NSP itself characterized CSGs as such (“each [CSG] project is a qualifying facility”) in its May 18, 2015 Comments in docket 13-867, at p. 3, and Minnesota law incorporates the PURPA definition by reference to its own definition of “qualifying facility.” Minn. Rule 7835.0100, subp. 19. The Commission’s jurisdiction over disputes between a utility and qualifying facility is echoed in Minn. Rule 7835.4500 and Minn. Rule 7835.0100, subp. 24(A).

⁸ Emphasis added.

discussion of Minn. Stat. § 216B.17 in your comments.

Yes, there are reasonable grounds for the Commission to investigate the allegations as discussed at length in our formal complaint, including to determine the extent of NSP's tariff and rule violations described therein. An investigation is necessary because NSP has of yet been unable or unwilling to meet its obligations as imposed by the Commission's orders,⁹ NSP's tariffs, and related S*RC program rules (including reasonable interconnection timelines and "completed" interconnection studies for SunShare's and our affiliates' CSGs). This type of investigation falls under the Commission's duty to ensure NSP compliance with the Commission's orders and NSP's Commission-approved tariffs. In addition, the Commission has a duty to enforce the statutory requirement that NSP's CSG program reasonably allow for the financeability of CSGs.

Under Minn. Stat. § 216B.17, the Commission has "substantial discretion to determine the necessity of" an investigation and a subsequent hearing so long as the investigation is within the public interest.¹⁰ It is in the public interest for the Commission to ensure NSP's compliance with its tariffs and the Commission's orders to improve utility performance, reduce unnecessary delay and costs, and enable private-sector reliance. In addition, allowing NSP to, in effect, delay and/or deny subscriber benefits under the CSG program through its failures to meet its obligations is "contrary to the public interest" because it would "delay the growth of solar gardens and limit opportunities for subscribers to participate in the program."¹¹

Topic III. If the Commission decides to investigate the complaint, what procedure should be followed to carry out the investigation, given the large number of claimed tariff violations? For example, could the issues raised by the complaint be addressed as part of a contested case proceeding in Docket No. E-002/M-13-867, through direction to the Department of Commerce or some other entity to investigate the potential violations, or within the scope of grid modernization?

As noted in our initial complaint in this docket, SunShare requests an expedited proceeding under Minn. Rules 7829.1700-1900. Under this process, the Commission serves the complaint on the respondent if the Commission determines that it has jurisdiction and there are reasonable grounds to hear the complaint. Upon service, NSP has 20 days to file an answer with the Commission "either stating that it has granted the relief the complainant requests, or responding to the allegations of the complaint."¹²

As the Commission granted in complaint docket 10-1249,¹³ SunShare requests that the Commission also require any comments on our complaint to be filed during the same 20-day period given the

⁹ Including the Commission's Sept. 28, 2004 Order in 01-1023 and July 14, 2006 Order in 04-2055.

¹⁰ MPIRG v. NSP, 360 N.W.2d 654, 657 (1985); Minn. Stat. § 216B.17.

¹¹ Commission Apr. 7, 2014 Order, 13-867, at 7.

¹² Minn. Rule 7829.1800.

¹³ Commission Dec. 27, 2010 Order, 10-1249, at 2 (part 1, appears as filed on Dec. 28, 2010 in eDocket) (regarding a telecommunications complaint).

acute development timeline pressure noted in our complaint (at pp. 5-7) and by the Commission and numerous other stakeholders in docket 13-867.

As noted in our complaint, we do not believe a 90-day mediation period is appropriate or likely to be useful in this case. In addition, our complaint alleges NSP violations of Section 9 and other program-related rules, making the Section 10 mediation process inadequate, as a formal matter, to fully address our concerns. Indeed, a 90-day waiting period could exacerbate our timeline concerns and have a chilling effect on other CSG developers that may considered filing complaints of their own.

The Minn. Rules 7829.1700-1900 expedited proceeding would allow SunShare to bring its concerns before the Commission in a timely manner for investigation and resolution. In addition, this would allow additional stakeholders to participate through the notice and comment process, giving the Commission opportunities to hear from other stakeholders rather than narrowing the scope of its hearing to a (presumably) confidential mediation proceeding.

For similar reasons, a contested case proceeding would also not be appropriate. Our concerns over having the Commission hear our complaint quickly and through a public process are even more pronounced when faced with the prospect of such a proceeding, which the Commission itself has noted imposes “significant expense and delay” on participating parties.¹⁴ This would harm SunShare’s ability to develop our projects by creating more avoidable timeline delay, risk, and carrying costs. It would also hinder the ability of stakeholders with limited resources (such as MnSEIA) to participate via comments and may have a chilling effect on other CSG developers’ complaints.

While Minn. Rule 7820.1000 provides for referral of disputes involving contested material facts to the Office of Administrative Hearings (OAH) for contested case proceedings, the Commission is not required to so refer a dispute if, *inter alia*, the Commission finds that informal or expedited proceedings would be in the public interest or if “a different procedural treatment is required by statute.”¹⁵

The length and cost of a contested case proceeding would be harmful to the public interest. In its Order in docket 99-888, for example, the Commission declined to refer a dispute regarding a hydroelectric plant to the OAH under Minn. Rule 7820.1000 because a contested case proceeding would “substantially delay the project” and “add unnecessary administrative expenses to the state agencies involved and litigation expenses for all parties,” and was therefore not in the public interest.¹⁶ Similar concerns make an expedited proceeding more appropriate for SunShare’s complaint in this docket.

Additionally, if the Commission chooses to hear our complaint under Minn. Stat. §§ 216B.17 or 216B.164, subd. 5, for example, the procedures outlined in those statutes provide “different procedural treatment” under which the Commission could hear and investigate SunShare’s complaint without referral to the OAH.

¹⁴ Commission Feb. 25, 1991 Order, 90-184. *See also* Commission Mar. 18, 2003 Order, 99-888.

¹⁵ Minn. Rule 7820.1000.

¹⁶ Commission Mar. 18, 2003 Order, 99-888, at 8-9.

In terms of the appropriate role for the Department of Commerce, while we believe that the Department may have an important role to play in the investigation and resolution of this matter, we defer to the Department as to its most appropriate role. Finally, while consideration of whether Section 10 can be improved is essential for the grid modernization conversation happening before the Commission in docket 15-556 and elsewhere, the timeframe for this conversation is far too lengthy for SunShare to be able to obtain relief for the timeline delays and other tariff and rule violations currently causing us harm. In addition, we are requested individual and particularized relief in our complaint based on fact-specific violations of existing tariffs and rules rather than requesting that the Commission take a larger-scale look at how to best achieve policy goals such as streamlined interconnection.

We also note that the Commission's September 1, 2015 Notice of Comment Period in this docket does not call for comments on the scope of potential remedies that could be awarded to SunShare, or the penalties and incentives that could be imposed on NSP to resolve its tariff and rule violations as described in our complaint.¹⁷ For example, the Commission may want to consider financial incentives tied to NSP's performance in meeting tariff timelines, similar to statutory incentives that the Commission may grant to utilities for encouraging customer participation in on-site distributed generation.¹⁸ We look forward to being able to comment on these matters in this docket at a future date.

Topic IV. How will an investigation of the allegations be coordinated with the process established in the Commission's August 6, 2015 Order (in Docket No. E-002/M-13-867) to investigate interconnection disputes?

SunShare defers to the Commission and the Department of Commerce as to how best coordinate resolution of our our complaint with the process established in the Commission's August 6, 2015 Order. We do believe, however, that the Department's participation could help with efficient and timely investigation and resolution of our complaint. Regardless of the Department's role, we request that no process be adopted that prevents, hampers, or delays the consideration and resolution of SunShare's individualized complaints as set forth in this docket.

Topic V. How will the timing of an investigation be coordinated with other filings already pending in the Community Solar Garden Docket No. E-002/M-13-867?

SunShare's complaint does not involve the matters recently raised in docket 13-867 by the Department of Commerce in its August 26, 2015 Request for Clarification, or by Sunrise Energy Ventures in its Petition for Rehearing and Reconsideration and Motion to Stay. Rather, SunShare is asking the Commission to review NSP's violations of its existing tariffs and rules, which had already been considered and approved by the Commission prior to its August 6, 2015 Order in the CSG docket.

¹⁷ See SunShare Aug. 27, 2015 Formal Complaint and Petition, 15-786, at p. 11, item 3.

¹⁸ Minn. Stat. § 216B.1611, subd. 2.

s/ Ross Abbey

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s/ Jenny Monson-Miller

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CERTIFICATE OF SERVICE

I, Ross Abbey, hereby certify that on September 10, 2015, I served copies of the preceding document on the attached list of persons by electronic filing, certified mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail in Minneapolis, Minnesota.

SUNSHARE, LLC COMMENTS IN RESPONSE TO THE COMMISSION'S SEPTEMBER 1, 2015 NOTICE FOR COMMENTS

Docket No. E002/M-15-786

Certified this 10th day of September, 2015

s/ Ross Abbey

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On behalf of SunShare, LLC

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