



414 Nicollet Mall
Minneapolis, MN 55401

January 19, 2021

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS ON THREE ISSUES FROM JANUARY 4, 2021 NOTICE
IN THE MATTER OF A FORMAL COMPLAINT AND REQUEST FOR EXPEDITED
RELIEF BY SUNRISE ENERGY VENTURES LLC AGAINST NORTHERN STATES
POWER COMPANY
DOCKET NO. E002/C-20-892

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company), submits its Reply Comments On Three Issues From the January 4, 2021 Commission's Notice of Comment Period regarding SUNRISE ENERGY VENTURES LLC (Sunrise) Formal Complaint and Request for Expedited Relief regarding SolarClub 11 LLC (SC 11), SolarClub 26 LLC (SC 26) and SolarClub 34 LLC (SC 34) projects.

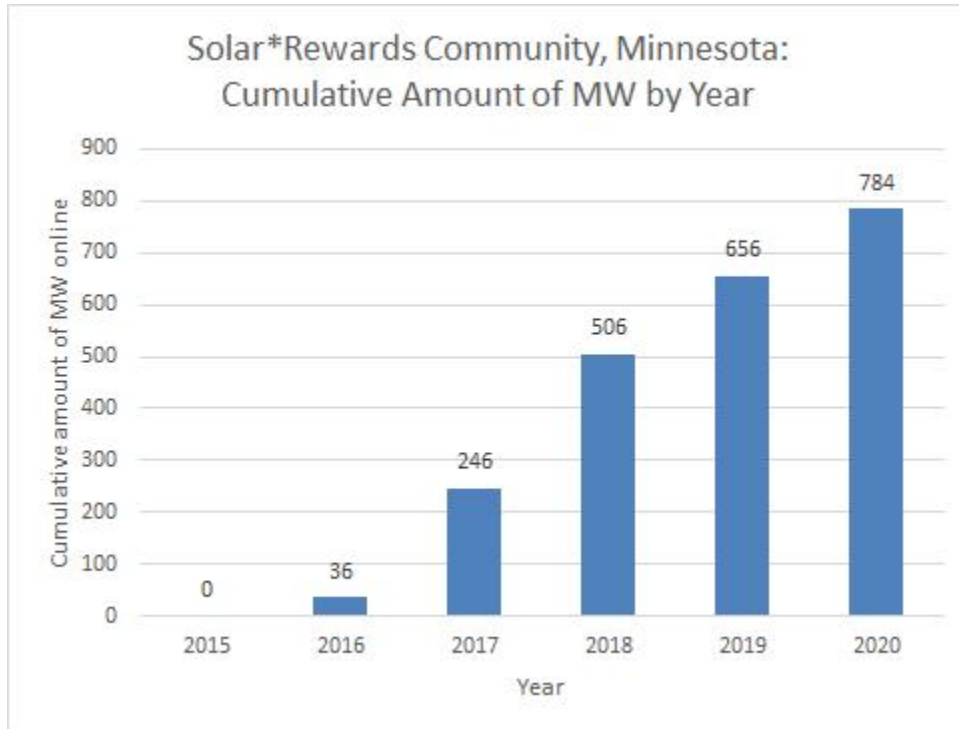
Initial comments were filed by the Company, Department of Commerce (Department) and Nokomis Energy (Nokomis). We do not reply to the Department comments. The comments of Nokomis focus on our policy on the use of 556 AL and note a Nokomis project that was allowed to interconnect using 556 AL. We provide brief comments in response to Nokomis, discussing the history surrounding this interconnection, which highlights one of the benefits of our policy on use of 556 AL.

When we first studied this Nokomis project, there was already substantial DER on the feeder at issue, which had been fully reconductored to 336 AL. Accordingly, we believed it was not appropriate to further reconductor the feeder to 556 AL in order to accommodate their new proposed DER. But, in the course of studying the DER applications that were prior in queue, we noticed that our legacy records

of installed DER on this feeder did not include an older wind turbine. By the time we had discovered this discrepancy in our records, we had already signed interconnection agreements with prior-in-queue projects. In order to honor the expectations of interconnection in those contracts, and to also provide reliable and quality service to our customers, we decided to use our emergency parachute – reconductoring with 556 AL – in order to allow the DER with signed interconnection agreements to proceed. It is because of our prudent policy that we were able to address this unexpected issue. If we had allowed all proposed DER to be studied with 556 AL replacing 336 AL, and had fully reducted to 556 AL before we discovered this issue, we would not have been able to effectively address allowing interconnection for the prior-in-queue DER projects.

After we provided the results to Nokomis along with the explanation of our 556 AL policy, Nokomis informed us that it had ordered a pre-application report that had more recent data than we used in our study and that showed that we had reducted to 556 AL on this line. Because the 556 AL was already installed, we were able to use that 556 AL, as well as additional line segments we reducted using 556 AL, to accommodate the Nokomis DER application.

In reviewing our treatment of Nokomis’s application, it is important to note that, at that time, in January 2019, many of our policies related to DER, including our 556 AL policy were still in their nascent stages. In just the past five years, we have had to make notable adjustments in procedures to incorporate the rapid development of DER on our system. As shown in the chart below, since 2016, our Solar*Rewards Community program has grown from just 36 MW of capacity to 784 MW. Our program remains the largest in the nation by a wide margin and continues to grow, and all of the interconnections in the program are on fewer than 15 percent of our feeders.



As this program has been rapidly growing to unprecedented levels, we have had to adopt to manage our system with prudent practices including our 556 AL policy.

Although we allowed the use of 556 AL for the Nokomis project, we have since looked at the implications of using 556 AL on a broader level and determined that the better practice is to reserve 556 AL as a safety valve for reliability purposes. Therefore, were we to face a similar situation now, we would not allow additional reconductoring with 556 AL to interconnect new DER applications.

Finally, we note that there are many real-world examples in which having 556 AL reserved for emergency purposes would be valuable. For example, in 2020, New York City saw decreases in load and changes to energy usage throughout day that were quantified to be around 15-20 percent. Such a loss of load could decrease a feeder's ability to host DER, and in that situation, 556 AL could be used to help mitigate potential system changes. This situation involving Nokomis, and the system changes we have seen with rapidly expanding DER, highlights the importance and public interest in allowing utilities the flexibility to develop their own processes and best practices relating to quality of service to customers.

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 Jessica Peterson at Jessica.k.peterson@xcelenergy.com or (612) 330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

JAMES DENNISTON
ASSISTANT GENERAL COUNSEL

Enclosures
c: Service List

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx by electronic filing.

Docket No.: E002/C-20-892

Dated this 19th day of January 2021.

/s/

Mustafa Adam
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-892_20-892
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-892_20-892
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-892_20-892
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	Yes	OFF_SL_20-892_20-892
Matthew	Melewski	matthew@theboutiquefirm.com	Nokomis Energy	2639 Nicollet Ave., Suite 200 Minneapolis, Minnesota 55408	Electronic Service	No	OFF_SL_20-892_20-892
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-892_20-892
Angie	Schreiner	angie@sunrisenrg.com	Sunrise Energy Ventures, LLC	315 Manitoba Avenue Suite 200 Wayzata, MN 55391	Electronic Service	Yes	OFF_SL_20-892_20-892
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-892_20-892
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-892_20-892
Joseph	Tierney	joe@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Wayzata, MN 55391	Electronic Service	Yes	OFF_SL_20-892_20-892

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Curtis	Zaun	curtis@cpzlaw.com		3254 Rice Street Little Canada, MN 55126	Electronic Service	Yes	OFF_SL_20-892_20-892