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February 7, 2014

**VIA E-FILING**

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of a Commission Inquiry  
Into Ownership of Renewable  
Energy Credits Used to Meet  
Minnesota Requirements  
Docket No. E999/CI-13-720

Dear Dr. Haar:

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period on Commission Inquiry (“Notice”) on December 30, 2013 in the above referenced docket. Minnesota Power respectfully submits its Comments in response to the Notice.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

Lori Hoyum

Attachment  
cc: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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In the Matter of a Commission Inquiry  
Into Ownership of Renewable  
Energy Credits Used to Meet  
Minnesota Requirements

Docket No. E999/CI-13-720

**MINNESOTA POWER'S  
COMMENTS**

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**I. Introduction**

Minnesota Power appreciates the opportunity to submit Comments to the Minnesota Public Utilities Commission (“Commission”) in response to the December 30, 2013 Notice of Comment Period on Commission Inquiry (“Notice”). The Notice requests Comments on the Commission’s inquiry into ownership of renewable energy credits (“RECs”) used to meet Minnesota requirements.

There are many facets to the issue of REC ownership and very little formal direction within the associated tariffs. With a growing number of small power systems and a new State standard for solar photovoltaic (“PV”) systems, the clarification of REC ownership is a pressing and pertinent matter. Minnesota Power welcomes the Commission’s inquiry and is poised to be an active participant in the process.

**II. Minnesota Power’s Response to the Notice**

Response to Topics Open for Comment:

- *What categories of Renewable Energy Credits (RECs) need clarity on ownership?*

Minnesota Power believes that all categories of RECs need clarification on the question of ownership. Neither the current Uniform Statewide Contract for Cogeneration

and Small Power Production Facilities (“Statewide Contract”) nor the Rider for Parallel Generation specifies which entity owns the RECs from a particular system when a customer is contracting with the utility. The two contracts mentioned are very similar in nature and therefore both are in need of clarification when it comes to the issue of REC ownership.

- *Who owns the RECs from net metered customers? Does it matter whether the QF is being paid the average retail rate or avoided cost rate?*

In the case of a customer contracted under either the Rider for Parallel Generation or Rider for Distributed Generation, if a customer is being reimbursed for excess energy at the retail rate, or any rate at or in excess of avoided cost, then the utility should become the owner of the associated RECs.

Clarification should also be issued in the case of ownership of REC’s for energy that is generated and consumed onsite. It is important to note that most residential customers are not demand metered and the associated monthly service charges are insufficient to cover the utility’s fixed cost and investment. Currently, the only other source of recovery for this fixed cost is the kWh charge for a customer’s usage. Even if Minnesota Power were to never reimburse a DG customer for excess generation, if the DG provides a significant portion of the onsite needs, the cost of serving the DG customer will be shifted to the rest of the customer base. This is due to the fact that the combination of no demand charge, limited monthly charges, and very little energy usage will result in very little revenue to offset the cost of service. In these situations Minnesota Power’s standard metering would need to be changed to include a meter on the generator.

For the reasons stated in the preceding paragraphs, it is likely most practical at this juncture for the utility to hold ownership of the RECs for energy generated and used onsite.

- *Who owns the RECs if a third party owns the PV equipment and leases to the homeowner/business?*

Third party ownership can occur with any form of small power production (wind, PV, etc). As such, Minnesota Power suggests the clarification for this issue not be solely limited to PV systems. When a customer begins a contract under one of the aforementioned tariffs, the utility is not generally concerned with whether a system is leased or owned by the customer. As mentioned above, if a customer is being reimbursed at the retail rate or avoided cost rate, then the utility should become the owner of the associated RECs regardless of who owns the system.

- *Are there special considerations on REC ownership related to REC aggregators/marketers?*

Minnesota Power suggests that a standardized process be formalized through which utilities are notified of REC aggregation. A standardized process will foster transparency of REC transfers and aggregations. Creating a process that is transparent for all stakeholders will serve to provide a clear picture of how RECs are being utilized in Minnesota and will eliminate the risk of double counting or other possible errors.

- *What factors should the Commission take into account when determining REC ownership?*

Similar to past dockets, the Commission should take into account benefits to ratepayers, compensation for the energy coming from the source, risks undertaken by the utility and the generator, any legal and contractual rights, and other factors that lead to a public interest determination.

- *Should the Commission make decisions on REC ownership?*

Minnesota Power believes that the current tariffs under which DG systems are contracted do not provide clear direction on REC ownership. Consequently, the Company welcomes Commission clarification on this matter.

- *If the Commission should issue decisions on REC ownership, for which utilities or parties to a transaction should the Commission's decision apply?*

The decisions issued should ultimately apply to the utility and any customer contracted under any associated DG tariff. The corresponding tariffs should then be modified to reflect any clarifications issued through this process.

### III. Conclusion

Minnesota Power appreciates the opportunity to provide Comments on the important issue of REC ownership. Minnesota Power believes it is important to clearly delineate which entity ultimately owns RECs in the host of differing circumstances which arise with small renewable power production. The Company is prepared to be an active participant in this important discussion.

Dated: February 7, 2014

Respectfully submitted,

A handwritten signature in cursive script that reads "Lori Hoyum".

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                                  ) ss  
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AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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Kristie Lindstrom of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 7<sup>th</sup> day of February, 2014, she served Minnesota Power's Comments in Response to Commission Notice in Docket No. E-999/CI-13-720 to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.

/s/ Kristie Lindstrom

Subscribed and sworn to before  
me this 7<sup>th</sup> day of February, 2014.

/s/ Jodi Nash

\_\_\_\_\_  
Notary Public - Minnesota  
My Commission Expires January 31, 2015

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