



Minnesota Solar Energy Industries Association

November 8, 2017
Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, suite 350
St. Paul, MN 55105

**Re: Expedited Treatment Request of November 2, 2017 Xcel Energy Compliance Filing
Published in Docket No. E-999/CI-15-115**

On November 2, 2017, Xcel Energy, the Minnesota Department of Commerce, and the Minnesota Solar Energy Industries Association filed an agreement regarding Xcel Energy's PV Rider. MnSEIA writes today to request expedited treatment of the agreement to whatever extent the Commission is willing and able.

Sincerely,

David Shaffer
MnSEIA
Policy and Development Director
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Letter Enclosed

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Daniel Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of a Commission
Inquiry into Standby Service
Tariffs**

**MINNESOTA SOLAR ENERGY
INDUSTRIES ASSOCIATION’S
LETTER REGARDING XCEL
ENERGY’S NOVEMBER 2, 2017
COMPLIANCE FILING**

November 8, 2017

Docket No. E999/CI-15-115

**LETTER OF THE MINNESOTA
SOLAR ENERGY INDUSTRIES ASSOCIATION**

In response to the joint Xcel Energy (Xcel), Minnesota Department of Commerce (DOC), and the Minnesota Solar Energy Industries Association’s (MnSEIA) November 2, 2017 filed agreement, MnSEIA humbly requests the Minnesota Public Utilities Commission (the “Commission”) provide expedited treatment of the PV Rider in whatever manner the Commission deems appropriate. MnSEIA understands that requests for expedited treatment are - for good reason - often requested but rarely granted. We believe, however, that this situation uniquely warrants consideration.

The PV Rider should be approved quickly. When first postulated, this issue centered around moving a section of Xcel’s Standby Tariff to a new stand-alone PV rider. This transition was intended to be primarily procedural and to not take a significant period of time. But it has resulted in an industry-wide pause on Commercial and Industrial (C&I) solar projects due to the uncertainty of what the credit amount will be and whether there will be one at all. This pause has remained in place for well over a year.

The current situation is precluding customers from installing solar to reduce their demand charges and/or to provide Xcel with additional capacity. With the recent elimination of the Made in Minnesota program, this pause is also applying pressure to local solar businesses that were looking to take advantage of this credit to remain in the Minnesota market. This pause is resulting in customers that want to go solar paying more, because they currently cannot do so

without substantial risk, and it is threatening the C&I solar economy through lost projects due to delay and a slowed cash-flow. Our understanding is that the capacity credit program has been stuck at or near 24 projects for the duration of this proceeding.

Part of why MnSEIA agreed to this deal is the hope that an agreement, instead of further contention, will accelerate the Commission approval process. We understand that the lower credit amount may hinder project economics, but the current situation is so untenable that the industry just needs to move on. We believe this agreement coupled with expedited treatment will accomplish this end.

Furthermore, our understanding is that all three parties to the agreement – MnSEIA, Xcel, and DOC – all have their own reasons for hoping that this docket moves quickly. With parties in agreement, and a significant societal and customer impact that stems from further delay, MnSEIA contends that the public interest and the affected groups would be best served through expedited treatment.

While there are other stakeholders that may weigh in, our understanding is that this agreement is sufficient to meet the needs of other participants, or it is not something they seek to further comment upon. MnSEIA, however, does not wish for its request to supersede the Commission's standard practices to the extent that it is detrimental to the Commission's due process requirements. Nor do we wish to suggest we know what all other parties may feel on this issue.

In lieu of the above, MnSEIA suggests the Commission advance this process in whatever way it feels is fit and fair. One such example could be a reply-comment period that is contingent upon other parties providing an opinion that is adverse to the three-party deal, but would otherwise be skipped. Another approach could be providing an early hearing date if this deal receives no adverse comments, because this item is no longer contentious. Any help to this end would be appreciated by the C&I solar sector, their future customers and the industry broadly.

Thank you for your consideration of this request for expedited treatment.

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