

August 10, 2020

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

Re: Docket Nos. CI-02-2034/M-12-383

Dear Mr. Seuffert,

All Energy Solar (“AES”) hereby submits these reply comments regarding the Minnesota Public Utilities Commission (“PUC”) review of the petition filed by Northern States Power Company (“Xcel Energy” or “Xcel”) asking the PUC to omit 129 customer complaints from the Quality Service Plan (QSP) docket (CI-02-2034/M-12-383) that were effectively submitted to the PUC’s Consumer Affairs Office (“CAO”) in December 2019.

The PUC should deny Xcel Energy’s request for the following two reasons:

- I. AES is authorized to submit complaints on behalf of its customers; and
- II. The complaints are directly related to Xcel Energy’s provision of services to its customers and do not qualify as an exclusion.

Background

AES is one of Minnesota’s largest residential solar installation providers, completing nearly 2,000 solar projects within Xcel Energy’s in-state territory since 2009. Additionally, AES operates in five other states across the country - in over 170 different utility territories. Working directly and personally with thousands of utility customers, AES has a unique perspective into the quality of service electric utilities provide to their consumers. Utility customers regularly provide feedback to AES regarding their experience connecting their newly installed solar systems to the utility-owned electrical grid.

In Minnesota, AES continuously receives complaints from Xcel Energy’s customers experiencing inadequate service by Xcel Energy that results in unnecessary delays in connecting their AES-installed solar investments to the grid. Between January 2019 and December 2019, AES identified 128 complaints related to delayed interconnections (See Appendix I).

These complaints represent a systemic failure within Xcel Energy’s operational management and administration of the Solar*Rewards program, resulting in deficient customer service. As a consequence of this service failure, Xcel Energy’s and AES’s shared customer-clients have experienced avoidable financial harms.

Starting in July 2019, AES began to proactively recognize service issues on behalf of its customers and attempted to resolve these issues over a period of 3-4 months directly with Xcel Energy. Despite AES contacting Xcel staff daily, those attempts were unsuccessful. AES then contacted Department of Commerce (“DOC”) staff who recommended AES reach out directly to PUC staff (See Appendix II). Submitting the complaints to the CAO in December 2019 was AES’s last effort to resolve the issues impacting its customers.

AES submitted the complaints on its customers’ behalf to the CAO in accordance with the procedural guidance AES received directly from PUC staff (See Appendix III). Due to these 128 filed customer complaints, Xcel Energy has exceeded the permissible QSP metric standard and is facing a potential fine of \$1 million.

On May 1, 2020, Xcel Energy filed its annual QSP report with the PUC. This filing also included a petition by Xcel Energy requesting the PUC omit the entirety of the customer complaints submitted in December 2019 from the QSP metric.

The PUC subsequently opened a formal comment period for parties to respond to Xcel’s petition. AES provided initial comments on July 1, 2020 and includes its reply comments below.

I. AES is authorized to submit complaints on behalf of its customers

In its May 1, 2020 filing documents, Xcel Energy stated that the PUC should omit the 128 complaints submitted by AES from its customer complaints metric because the complaints were

submitted without “the necessary authorizations required under the definition of ‘Customer’” in the QSP tariff.

The *Xcel Energy Minnesota Electric Rate Book, Section 6* states the following:

“For purposes of Customer Complaints, ‘Customer’ is defined as . . . a representative of that customer. A representative includes . . . an individual authorized by the Customer to act on his/her account.”

The PUC should deny Xcel Energy’s petition because AES was not required to obtain direct customer authorizations as suggested by Xcel and, even if they were, AES did have the requisite authorizations through its contracts with its customers and as an authorized agent acting on behalf of its clients.

A. AES was not and is not required to obtain direct customer authorizations

According to PUC staff, AES was not required to obtain direct customer authorizations for the 128 customer complaints AES submitted in December 2019. Authorizations may be - but are not required to be - obtained directly, through individual affirmation by the customer (such as an explicit email asking the customer to expressly approve the action). Alternatively, authorizations can be indirectly obtained by placing the customer on notice (such as copying the customer on email communications between AES and PUC staff). Therefore, AES is not required to obtain direct, express permission from the customer to be an authorized representative - according to PUC staff. This is evidenced by AES’s in-person and electronic communications with PUC staff related to the proper submission of customer complaints. A chronology of these interactions is below:

AES staff met with PUC staff, in-person on January 16, 2020. At this meeting, PUC staff asked if AES obtained customer consent to submit complaints on customers’ behalf. AES staff informed PUC staff that no separate customer consents were obtained for the 128 already-submitted complaints. PUC staff then recommended that AES obtain customer consents going forward. AES staff explicitly asked PUC staff if AES should go back to customers included in the 128 December submissions to obtain retroactive approval from each customer. PUC staff stated that it was *not* required.

AES relied on this direct guidance from PUC staff in determining whether to procure customer authorizations for the 128 previously submitted complaints. Based on the advice and recommendations from PUC staff, AES did not attempt to obtain any additional consents from any of the complaints already submitted. Instead, AES developed an internal procedure for collecting individual customer authorizations for future complaints.

On January 20, 2020, AES staff sent an email to PUC staff requesting responses to questions regarding the procedures for admissibility of new complaints submitted by AES on behalf of its customers (See Appendix II). One of the questions submitted to PUC staff was the following:

“We are happy to move forward with providing a customer consent with our complaint submissions. This would include an email to and from the Customer and All Energy Solar that would state something along the lines of "Do you give All Energy Solar permission to submit a complaint to the Consumer Affairs Office on your behalf?". [sic] You do not need separate consents for each complaint we may submit on one customers [sic] behalf, correct?”

PUC staff responded on January 21, 2020, stating the following:

“We do not need a separate consent sign off for each complaint filed on behalf of a customer; however, we recommend keeping the customer copied on the email chain discussing their complaint.”

Again, PUC staff was directing AES staff that direct, stand-alone authorizations are not required to submit complaints to the CAO on account of customers. AES was prepared to implement all necessary procedures to ensure the CAO obtained what was necessary to process the complaints and is currently complying with all recommended procedures.

Because AES was directed by PUC staff that AES was not and is not required to obtain direct customer authorizations, the PUC should reject Xcel Energy’s petition to omit the 128 customer complaints AES submitted in accordance with PUC staff directives.

B. AES had the necessary authorizations required under the definition of “Customer” in the QSP tariff language through its contracts

Even if the PUC determines that AES was required to obtain direct authorizations from individual customers to act on their accounts and submit complaints to the CAO, the PUC should still deny Xcel Energy’s request because AES had the necessary authorizations through its contracts with customers.

All AES contracts define the Scope of Work needed for AES to complete the installation of a solar photovoltaic (“PV”) system for a customer. The customer agrees to this Scope of Work before work begins on any project. The Scope of Work is intended to cover the entirety of the work necessary to make a solar array operational for a customer. Each Minnesota Purchase Contract between AES and a customer includes the following language:

“This Agreement is between You, the Customer and All Energy Solar, Inc. Under this Agreement “All Energy” or any of their recognized sub-contractors shall perform the installation of the specified PV System . . . All Energy Solar Inc. and Sub-contractors shall have the right to determine method, details, and means of performing the work.”

This Scope of Work definition is sufficient to show the authorization required in the language of the QSP tariff and AES is, therefore, authorized to submit complaints to the PUC’s CAO on its customers’ accounts as long as the actions taken by AES fall within this definition.

AES was acting within this Scope of Work when it submitted complaints on behalf of its customers. AES exerted its right, as outlined in the Scope of work, to determine the method, details, and means to perform the installation work to completion. AES determined that, based on the number service problems it identified and the known, negative reputation within the industry of Xcel Energy’s administration of the Solar*Rewards program, the best course of action was to submit complaints to the PUC in an attempt to expedite the process for the customers.

All 128 AES customers were experiencing delays that prevented their new systems from becoming operational. But for AES’s determination that submitting complaints on its customers’ accounts was required to provide a fully operational system to its customers, customers would

have experienced further, unnecessary and costly delays preventing AES's full performance on its contract.

Because the submission of complaints to the PUC by AES on behalf of AES customers falls under AES's Scope of Work as defined within its customer contracts, AES had the requisite authorization to submit all 128 complaints in December 2019 and the PUC should reject Xcel Energy's petition to omit those complaints.

C. AES had the necessary authorizations because AES acted as an agent of its customers in submitting the complaints to the CAO

Even if the PUC determines that AES did not have the requisite authorizations through its contracts with customers, AES still had the necessary authorizations because AES acted as an authorized agent of its customers.

“Agency is the fiduciary relationship that results from the . . . consent by one person to another that the other shall act on his behalf.” (*Jurek v. Thompson*, 308 Minn. 191, 241 N.W.2d 788 (1976)). To have an agency relationship between an agent (the person who is acting for another) and a principal (the person for whom the agent is acting), three elements must exist:

- 1.) Consent by the principal and the agent;
- 2.) Action by the agent on behalf of the principal; and
- 3.) Control by the principal. (*Restatement (Third) Of Agency* § 1.01 (2006)).

These three essential elements are present in all of AES's relationships with its customers making AES an authorized agent of its customers, lawfully permitted to act on their behalf.

1.) Consent by the Principal and the Agent

AES and all 128 customers whose complaints were duly submitted to the CAO by AES in December 2019 provided the proper consent to enter into an agency relationship. To properly consent to an agency relationship, both parties must manifest their intents to create an agency relationship to each other through writing, oral communication, or by their actions. (*Id* at § 1.03)

In this case, AES and its customers consented through writing. As discussed above, executed contracts between AES and its customers outlining an inclusive Scope of Work that permits AES to determine the method, details and means of installing a fully operational solar array is an express document memorializing the intent of the parties. This shared intent is sufficient to show mutual consent of each customer acting as the principal and AES acting as the agent.

Additionally, each customer is required to complete and submit to Xcel Energy an Interconnection Application (“Application”) that designates AES as the customer’s agent (See Appendix IV). This agreement refers to AES as the “Application Agent” and states the following:

“I [customer] designate the individual or company listed as my Application Agent to serve as my agent for the purpose of coordinating with the Area EPS Operator on my behalf throughout the interconnection process.”

The Application provides all contact information, including the contact details for a specific, named individual at AES. A customer finalizes the Application with his/her signature and submission to Xcel, and AES obtains a copy for its records.

Thus, the contractual relationship between AES and its customers, and the express designation by customers naming AES as an agent of the customer in the Interconnection Application prove that AES and its customers adequately consent to an agency relationship.

2.) Action by the Agent on Behalf of the Principal

When AES submitted the 128 customers complaints to the CAO in December 2019, it did so on behalf of those customers. To effectively act on behalf of a principal, the agent must be acting primarily for the benefit of the principal and not for the benefit of the agent or another party. (*Id* at § 8.01).

Here, AES did not benefit from the submission of complaints to the PUC. The sole purpose of submitting the complaints was to assist the customers in resolving delays that were preventing the customer from using an operational PV system that those customers already paid for. The submission of these complaints were an extension of AES’s role as a customer’s chosen installer.

Customers pay AES to perform a specific, beneficial service: the installation of a fully operational PV system on their properties that interconnects to the electrical grid to provide consumable energy for their use. When fully operational, a PV system lowers a customer's utility bills, potentially saving a user hundreds of dollars each year. These installation projects involve numerous components involving several trades and workers with differing skills. As part of their relationship with AES, Customers expect AES to coordinate all the elements of an installation project for them. This includes interacting and coordinating with the customers' utility provider and any other party necessary for AES to timely complete a project.

When a utility provider's poor customer service causes unnecessary delays to a project, the PUC's CAO becomes an involved party, necessary for the customer to receive their fully operational PV systems. AES's submission of complaints to the PUC is simply an extension of AES's role as the customer's representative and provides no additional benefit to AES. Therefore, AES was acting on behalf of customers when it submitted complaints on their accounts to the CAO which is sufficient to show the existence of an agency relationship.

3.) Control by the Principal

AES was under the control of its customers when it submitted the complaints in December 2019. To be under the control of a principal, the agent does not need to be under physical control of a principal at all times during the relationship. (*Restatement (Second) of Agency* § 14 (1958)). Instead, "there must be at least some element of control and a fiduciary relationship before agency can be established." (*Jurek v. Thompson*, 308 Minn. 191, 199, 241 N.W.2d 788, 792 (1976)).

In this case, although customers may not be directly involved and controlling the specific actions of each worker on site during the installation process, or making decisions related to every, detailed element of the PV system. Customers direct and control the overall outcome by expressing their desires to AES at the beginning of the process. The requisite level of control exists because the customer has specified the task that AES was to perform, even though the customer did not prescribe the details of how the task was to be completed.

Thus, customers have control over AES because customers direct AES to accomplish a specific goal (the installation of an operational PV system). AES implements whatever means necessary to complete that directive for the customer.

Overall, all three requisite elements of an agency relationship existed when AES submitted 128 customer complaints to the CAO in December 2019. Both AES and its customers consented to the relationship via writing, AES acted on behalf of the customers for the customers' benefits, and AES was under the control of their customers by carrying out the task as specified by the customers. Therefore, the submission of the complaints by AES to the CAO was authorized by the customers and the PUC should not omit these complaints from the QSP metric.

II. The complaints are directly related to Xcel Energy's provision of services to its customers and do not qualify as an exclusion

In its May 1, 2020 filing documents, Xcel Energy states that the PUC should omit the 128 customer complaints submitted by AES from its customer complaints metric because the complaints are "mostly technological," and unrelated to Xcel's customer service as required in the QSP tariff. The PUC should deny this request because the complaints are related to Xcel Energy's provision of services to its clients and Xcel can only request to exclude comments that are related to an event beyond Xcel's control.

The *Xcel Energy Minnesota Electric Rate Book Section 6* states the following:

"Customer complaints will be recorded and reported with no exclusions. The Company [Xcel Energy] may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address."

In this case, Xcel Energy is attempting to exclude customer complaints, but provides no demonstration that this exclusion qualifies under the above tariff language. None of the 128 complaints submitted to the CAO are the result of an event beyond the Company's control.

Of the complaints AES submitted on its customers accounts:

- 22 were because Xcel Energy failed to meet a deadline;
- 17 were because Xcel Energy failed to timely order a utility meter;
- 53 were because Xcel Energy failed to move projects to completed status within its records system.

Failing to meet deadlines, submit orders, and move projects to completed status is a service problem within Xcel's control and should, therefore, not be excluded from the QSP metric.

A. Xcel Energy Failed to Meet a Deadline

In 22 of the complaints AES received from customers, Xcel Energy did not meet a required deadline. These deadlines include: initial screens, deemed complete dates, supplemental reviews, and facility study reviews. According to Minnesota Distributed Energy Resource Interconnection Process ("MN DIP") timelines, Xcel has specific deadlines ranging from ten to 45 business days, giving Xcel generous timeframes to complete each step of the interconnection process. These deadlines exist to keep Xcel Energy on track to on-board new PV systems and make their services predictable for customers.

Failing to meet a deadline that Xcel Energy knows it must meet is a failure of service within Xcel's direct control. These complaints should be counted in the QSP metric to prevent this failure from happening for other customers.

B. Xcel Energy Failed to Timely Order a Utility Meter

Once AES submits final documentation, Xcel Energy has ten days to submit a meter order to its own meter department. Xcel did not submit meter orders in accordance with this requirement for 17 customers. In all 17 instances, AES completed all necessary paperwork and submitted it to Xcel. Xcel informed AES that it would submit the order to its meter department. When AES contacted the meter department ten days later, the meter department had not received the order.

Failing to place an order on behalf of a customer after all requisite paperwork has been submitted is a failure of service to that customer. Xcel Energy has full control over its departments and its internal communications. The meter orders were required to be placed within ten days and were

not. The QSP metric should include such a service failure to prevent this unnecessary delay for other customers.

C. Xcel Energy Failed to Deem Projects Complete

Finally, 53 of the customer complaints submitted to the CAO by AES were for Xcel Energy's failure to move projects to completed status in their internal system. By not classifying a project as complete, customers did not receive the final, Permission to Operate ("PTO") letter from Xcel. Xcel is required to provide the PTO within three business days and it failed to do so. For some customers, their applications were left inactive for months, resulting in the cancellation of rebates that expired during the customers' wait for the PTO letter.

Xcel Energy's failure to deem a project complete is an internal service failure. All paperwork and installation work was done on a project that could have been, but was not made operational. Because of Xcel's poor customer service the systems were left inactive. The QSP metric should note this failure to prevent future problems for customers trying to utilize their fully operational PV systems.

Conclusion

It is common knowledge within the Distributed Energy Resources ("DER") industry that Xcel Energy's administration of the Solar*Rewards program is fraught with problems related to poor quality of service. AES is not the only installer forced to work through unnecessary delays caused by Xcel's service failures. AES's submission of 128 customer complaints in December 2019 was a direct response on behalf of AES customers, to the challenges its customers were facing when working with Xcel to activate their PV systems. AES was acting within the scope of its agreements with customers to perform the necessary work outlined in its contracts when it submitted complaints on behalf of its customers.

Xcel Energy's petition to omit the customer complaints is an attempt to avoid a \$1 million fine that was established for a reason. The PUC should hold Xcel accountable for its persistent quality of service problems. Denying Xcel's request to omit the customer complaints will create an important precedent that solar customers should receive the same quality of service than any other Xcel customer.

In its May 1, 2020 filings, Xcel Energy argues that all of the 129 complaints submitted to the PUC's CAO in December 2019 fail to meet certain qualifying standards to be included in its annual QSP metric. Xcel Energy's stated standards include: obtaining direct customer authorizations and the relatability of the complaints to Xcel's provision of services.

The PUC should deny Xcel's petition based on these standards because, according to PUC staff, direct customer authorizations are not required for AES to submit the complaints on its customers' accounts and even if direct authorizations are required, AES had them through its contracts with its customers and was authorized as an agent of its customers.

Finally, the complaints submitted are directly related to the provision of services under Xcel Energy's control. Meeting deadlines, submitting orders, and moving projects to completed status is an essential component of the delivery of assistance to its customers working to interconnect a PV system. These complaints may only be excluded from the QSP metric if Xcel can show that the complaints were a result of an event out of its control. Since the complaints are a product of the systemic failures within Xcel Energy's administration of the Solar*Rewards program and not an outside event, these complaints should not be omitted by the PUC.

Sincerely,

Michael R. Allen
President
All Energy Solar

APPENDIX I



1264 Energy Lane
St. Paul, MN 55108

Customer Name	OID or Case #	Premise Address	Issue Type	Email subject	Date complaint sent	Date acknowledged	Date resolved	MN PUC Case ID	Consent received
	OID389929		Technical Issue - Finalize not populating	Issue OID389929 - PS	12/16/2019	12/17/2019	2019-12-17	74345	
	OID3834256		Past Due - Project not moved to complete	Issue OID3834256 - PS	12/17/2019	12/17/2019	1/3/2020	74346	
	OID3834265		Past Due - Project not moved to complete	Issue OID3834265 - PS	12/17/2019	12/17/2019	1/3/2020	74348	
	OID3833924		Past Due - Project not moved to complete	Issue OID3833924 - PS	12/17/2019	12/17/2019	1/3/2020	74349	
	OID3833937		Past Due - Project not moved to complete	Issue OID3833937 - PS	12/17/2019	12/18/2019	1/3/2020	74353	
	OID3834235		Past Due - Project not moved to complete	Issue OID3834235 - PS	12/17/2019	12/18/2019	1/3/2020	74355	
	OID3834147		Past Due - Project not moved to complete	Issue OID3834147 - PS	12/17/2019	12/18/2019	1/3/2020	74357	
	OID3834008		Past Due - Project not moved to complete	Issue OID3834008 - PS	12/17/2019	12/18/2019	1/3/2020	74358	
	OID3833879		Past Due - Project not moved to complete	Issue OID3833879 - PS	12/17/2019	12/18/2019	1/3/2020	74359	
	OID3834229		Past Due - Project not moved to complete	Issue OID3834229 - PS	12/17/2019	12/18/2019	1/3/2020	74360	
	OID3834281		Past Due - Project not moved to complete	Issue OID3834281 - PS	12/17/2019	12/18/2019	1/3/2020	74361	
	OID3834279		Past Due - Project not moved to complete	Issue OID3834279 - PS	12/17/2019	12/18/2019	1/3/2020	74362	
	OID3834211		Past Due - Project not moved to complete	Issue OID3834211 - PS	12/17/2019	12/18/2019	1/3/2020	74363	
	OID3834267		Past Due - Project not moved to complete	Issue OID3834267 - PS	12/17/2019	12/18/2019	1/3/2020	74364	
	OID3834218		Past Due - Project not moved to complete	Issue OID3834218 - PS	12/17/2019	12/18/2019	1/3/2020	74365	
	OID3950630		Multiple Attempts to Contact but No Response	Issue OID3950630 - PS	12/17/2019	12/18/2019	1/3/2020	74366	
	OID3927638		Past Due - Initial Screens	Issue OID3927638 - PS	12/17/2019	12/18/2019	1/3/2020	74367	
	OID4016099		Multiple Attempts to Contact but No Response	Issue OID4016099 - PS	12/17/2019	12/18/2019	1/3/2020	74368	
	OID3877273		Past Due - Supplemental Review	Issue OID3877273 - PS	12/17/2019	12/19/2019	1/14/2020	74369	
	OID3927597		Technical Issue - 120% block for Meter Install	Issue OID3927597 - PS	12/18/2019	12/19/2019	1/3/2020	74370	
	OID3836023		Past Due - Supplemental Review	Issue OID3836023 - PS	12/18/2019	12/20/2019	1/8/2020	74421	
	OID3861807		Technical Issue - Meter not ordered	Issue OID3861807 - PS	12/18/2019	12/19/2019	1/3/2020	74371	
	OID3835568		Past Due - Project not moved to complete	Issue OID3835568 - PS	12/18/2019	12/19/2019	1/3/2020	74372	
	OID3835281		Past Due - Project not moved to complete	Issue OID3835281 - PS	12/18/2019	12/19/2019	1/3/2020	74373	
	OID3835666		Past Due - Project not moved to complete	Issue OID3835666 - PS	12/18/2019	12/19/2019	1/3/2020	74377	
	OID3835542		Past Due - Project not moved to complete	Issue OID3835542 - PS	12/18/2019	12/19/2019	1/3/2020	74379	
	OID3835693		Past Due - Project not moved to complete	Issue OID3835693 - PS	12/18/2019	12/19/2019	1/3/2020	74381	
	OID3836012		Past Due - Project not moved to complete	Issue OID3836012 - PS	12/18/2019	12/19/2019	1/3/2020	74382	
	OID3835673		Past Due - Project not moved to complete	Issue OID3835673 - PS	12/18/2019	12/19/2019	1/3/2020	74383	
	OID3836009		Past Due - Project not moved to complete	Issue OID3836009 - PS	12/18/2019	12/19/2019	1/3/2020	74384	
	OID3835714		Past Due - Project not moved to complete	Issue OID3835714 - PS	12/18/2019	12/19/2019	1/3/2020	74385	
	OID3834997		Past Due - Project not moved to complete	Issue OID3834997 - PS	12/18/2019	12/19/2019	1/3/2020	74386	
	OID3834445		Past Due - Project not moved to complete	Issue OID3834445 - PS	12/18/2019	12/19/2019	1/3/2020	74391	
	OID3834887		Past Due - Project not moved to complete	Issue OID3834887 - PS	12/18/2019	12/20/2019	1/3/2020	74393	
	OID3834979		Past Due - Project not moved to complete	Issue OID3834979 - PS	12/18/2019	12/20/2019	1/3/2020	74394	
	OID3834824		Past Due - Project not moved to complete	Issue OID3834824 - PS	12/18/2019	12/20/2019	1/3/2020	74395	
	OID3834865		Past Due - Project not moved to complete	Issue OID3834865 - PS	12/18/2019	12/20/2019	1/6/2020	74396	
	OID3834681		Past Due - Project not moved to complete	Issue OID3834681 - PS	12/18/2019	12/20/2019	1/6/2020	74397	
	OID3835006		Past Due - Project not moved to complete	Issue OID3835006 - PS	12/18/2019	12/20/2019	1/6/2020	74398	
	OID3834913		Past Due - Project not moved to complete	Issue OID3834913 - PS	12/18/2019	12/20/2019	1/6/2020	74399	
	OID3834946		Past Due - Project not moved to complete	Issue OID3834946 - PS	12/18/2019	12/20/2019	1/6/2020	74400	
	OID3835251		Past Due - Project not moved to complete	Issue OID3835251 - PS	12/18/2019	12/20/2019	1/6/2020	74401	
	OID3835557		Past Due - Project not moved to complete	Issue OID3835557 - PS	12/18/2019	12/20/2019	1/6/2020	74402	
	OID3834974		Past Due - Project not moved to complete	Issue OID3834974 - PS	12/18/2019	12/20/2019	1/6/2020	74403	

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Customer Name	OID or Case #	Premise Address	Issue Type	Email subject	Date complaint sent	Date acknowledged	Date resolved	MN PUC Case ID	Consent received
	OID3835563		Past Due - Project not moved to complete	Issue OID3835563 - PS	12/18/2019	12/20/2019	1/6/2020	74404	
	OID3834445		Past Due - Project not moved to complete	Issue OID3834445 - PS	12/18/2019	12/20/2019	1/6/2020	74405	
	OID3834458		Past Due - Project not moved to complete	Issue OID3834458 - PS	12/18/2019	12/20/2019	1/6/2020	74406	
	OID3834455		Past Due - Project not moved to complete	Issue OID3834455 - PS	12/18/2019	12/20/2019	1/6/2020	74407	
	OID3834370		Past Due - Project not moved to complete	Issue OID3834370 - PS	12/18/2019	12/20/2019	1/6/2020	74408	
	OID3834855		Past Due - Project not moved to complete	Issue OID3834855 - PS	12/18/2019	12/20/2019	1/6/2020	74409	
	OID3836022		Past Due - Project not moved to complete	Issue OID3836022 - PS	12/18/2019	12/20/2019	1/6/2020	74410	
	OID3836021		Past Due - Project not moved to complete	Issue OID3836021 - PS	12/18/2019	12/20/2019	1/6/2020	74411	
	OID3836019		Past Due - Project not moved to complete	Issue OID3836019 - PS	12/18/2019	12/20/2019	1/6/2020	74412	
	OID3836020		Past Due - Project not moved to complete	Issue OID3836020 - PS	12/18/2019	12/20/2019	1/6/2020	74413	
	OID3836013		Past Due - Project not moved to complete	Issue OID3836013 - PS	12/18/2019	12/20/2019	1/6/2020	74414	
	OID3835874		Past Due - Project not moved to complete	Issue OID3835874 - PS	12/18/2019	12/20/2019	1/6/2020	74415	
	OID3835884		Past Due - Project not moved to complete	Issue OID3835884 - PS	12/18/2019	12/20/2019	1/6/2020	74416	
	OID3836016		Past Due - Project not moved to complete	Issue OID3836016 - PS	12/18/2019	12/20/2019	1/6/2020	74417	
	OID3836018		Past Due - Project not moved to complete	Issue OID3836018 - PS	12/18/2019	12/20/2019	1/6/2020	74418	
	OID3834448		Past Due - Project not moved to complete	Issue OID3834448 - PS	12/18/2019	12/20/2019	1/6/2020	74419	
	OID3834383		Past Due - Project not moved to complete	Issue OID3834383 - PS	12/18/2019	12/20/2019	1/6/2020	74420	
	OID3867400		Technical Issue - CoC not populating	Issue OID3867400 - PS	12/19/2019	12/20/2019	1/6/2020	74425	
	OID3924659		Technical Issue - 120% block for Meter Install	Issue OID3924659 - PS	12/19/2019	12/20/2019	1/6/2020	74426	
	OID3899939		Technical Issue - Meter not ordered	Issue OID3899939 - PS	12/19/2019	12/20/2019	1/6/2020	74427	
	OID3834474		Technical Issue - 120% block for Meter Install	Issue OID3834474 - PS	12/19/2019	12/20/2019	1/6/2020	74428	
	OID4015940		Technical Issue - Misc.	Issue OID4015940 - PS	12/19/2019	12/20/2019	1/6/2020	74422	
	OID3890061		Technical Issue - Meter not ordered	Issue OID3890061 - PS	12/19/2019	12/20/2019	1/6/2020	74429	
	OID3834916		Technical Issue - Unable to upload documents	Issue OID3834916 - PS	12/19/2019	12/20/2019	1/7/2020	74434	
	OID3835626		Past Due - Supplemental Review	Issue OID3835626 - PS	12/19/2019	12/20/2019	1/6/2020	74435	
	OID3991532		Technical Issue - 120% block for Interconnection	Issue OID3991532 - PS	12/19/2019	12/20/2019	1/6/2020	74423	
	OID3991532		Technical Issue - Misc.	Issue OID3991532 - PS	12/19/2019	12/20/2019	1/6/2020	74462	
	OID4020479		Technical Issue - 120% block for Interconnection	Issue OID4020479 - PS	12/19/2019	12/20/2019	1/6/2020	74424	
	OID4020479		Technical Issue - Misc.	Issue OID4020479 - PS	12/19/2019	12/20/2019	1/6/2020	74461	
	OID3835615		Technical Issue - CoC not populating	Issue OID3835615 - PS	12/19/2019	12/20/2019	1/7/2020	74436	
	OID3875108		Technical Issue - Meter not ordered	Issue OID3875108 - PS	12/19/2019	12/20/2019	1/6/2020	74430	
	OID3891328		Technical Issue - Meter not ordered	Issue OID3891328 - PS	12/19/2019	12/20/2019	1/6/2020	74431	
	OID3285044		Multiple Attempts to Contact but No Response	Issue OID3285044 - PS	12/19/2019	12/20/2019	3/25/2020	74432	
	03493778		Technical Issue - Not registering signed document	Issue 03493778 - PS	12/20/2019	12/27/2019	1/7/2020	74452	
	OID3895870		Past Due - Supplemental Review	Issue OID3895870 - PS	12/20/2019	12/27/2019	1/7/2020	74453	
	OID3927424		Past Due - Supplemental Review	Issue OID3927424 - PS	12/20/2019	12/27/2019	1/7/2020	74454	
	OID3924103		Past Due - Supplemental Review	Issue OID3924103 - PS	12/20/2019	12/27/2019	1/7/2020	74455	PUC resolution
	OID3949083		Past Due - Initial Screens	Issue OID3949083 - PS	12/20/2019	12/27/2019	1/7/2020	74456	
	03505191		Technical Issue - Not registering signed document	Issue 03505191 - PS	12/20/2019	12/27/2019	1/7/2020	74457	
	OID3888723		Technical Issue - Meter not ordered	Issue OID3888723 - PS	12/20/2019	12/27/2019	1/15/2020	74458	
	OID3834895		Technical Issue - Meter not ordered	Issue OID3834895 - PS	12/20/2019	12/27/2019	1/9/2020	74459	
	OID3835615		Technical Issue - Meter not ordered	Issue OID3835615 - PS	12/20/2019	12/27/2019	1/6/2020	74460	



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Customer Name	OID or Case #	Premise Address	Issue Type	Email subject	Date complaint sent	Date acknowledged	Date resolved	MN PUC Case ID	Consent received
	OID4002061		Technical Issue - Misc.	Issue OID4002061 - PS	12/23/2019	12/27/2019	1/7/2020	74463	PUC resolution
87	03507571		Technical Issue - Not registering signed document	Issue 03507571 - PS	12/23/2019	12/27/2019	1/7/2020	74464	
88	03508492		Technical Issue - Not registering signed document	Issue 03508492 - PS	12/23/2019	12/27/2019	1/7/2020	74465	
89	03509533		Technical Issue - Not registering signed document	Issue 03509533 - PS	12/23/2019	12/27/2019	1/7/2020	74466	
90	OID3912227		Past Due - Supplemental Review	Issue OID3912227 - PS	12/23/2019	12/27/2019	1/7/2020	74467	
91	OID3916022		Past Due - Supplemental Review	Issue OID3916022 - PS	12/23/2019	12/27/2019	1/7/2020	74470	
92	OID3845001		Past Due - Initial Screens	Issue OID3845001 - PS	12/23/2019	12/27/2019	1/7/2020	74471	
93	OID3976129		Past Due - Initial Screens	Issue OID3976129 - PS	12/23/2019	12/27/2019	1/7/2020	74472	
94	OID3997267		Past Due - Initial Screens	Issue OID3997267 - PS	12/23/2019	12/27/2019	1/15/2020	74473	
95	OID389068		Past Due - Initial Screens	Issue OID389068 - PS	12/23/2019	12/27/2019	1/7/2020	74474	
96	OID3834916		Multiple Attempts to Contact but No Response	Issue OID3834916 - PS	12/24/2019	12/27/2019	1/7/2020	74477	
97	03509738		Technical Issue - Not registering signed document	Issue 03509738 - PS	12/24/2019	12/27/2019	1/7/2020	74478	
98	03509754		Technical Issue - Not registering signed document	Issue 03509754 - PS	12/24/2019	12/27/2019	1/7/2020	74479	
99	03509559		Technical Issue - Not registering signed document	Issue 03509559 - PS	12/24/2019	12/27/2019	1/7/2020	74480	
100	03493612		Technical Issue - Not registering signed document	Issue 03493612 - PS	12/24/2019	12/27/2019	1/7/2020	74481	
101	03496962		Technical Issue - Not registering signed document	Issue 03496962 - PS	12/24/2019	12/30/2019	1/8/2020	74483	
102	03507766		Technical Issue - Not registering signed document	Issue 03507766 - PS	12/24/2019	12/30/2019	1/8/2020	74484	
103	03509773		Technical Issue - Not registering signed document	Issue 03509773 - PS	12/24/2019	12/30/2019	1/8/2020	74485	
104	OID3949654		Technical Issue - Not registering signed document	Issue OID3949654 - PS	12/24/2019	12/30/2019	1/8/2020	74487	
105	OID3951196		Technical Issue - Not registering signed document	Issue OID3951196 - PS	12/24/2019	12/30/2019	1/8/2020	74488	
106	OID4018236		Technical Issue - Not registering signed document	Issue OID4018236 - PS	12/24/2019	12/30/2019	1/8/2020	74489	
107	OID3835237		Technical Issue - 120% block for Meter Install	Issue OID3835237 - PS	12/26/2019	12/30/2019	1/9/2020	74490	
108	OID3964996		Past Due - Initial Screens	Issue OID3964996 - PS	12/27/2019	12/30/2019	1/15/2020	74493	
109	OID3993047		Past Due - Initial Screens	Issue OID3993047 - PS	12/27/2019	12/30/2019	1/8/2020	74494	
110	OID3942601		Past Due - Initial Screens	Issue OID3942601 - PS	12/27/2019	12/30/2019	1/15/2020	74495	
111	OID3898210		Technical Issue - Meter not ordered	Issue OID3898210 - PS	12/27/2019	12/30/2019	1/9/2020	74500	
112	OID3899212		Technical Issue - Meter not ordered	Issue OID3899212 - PS	12/27/2019	12/30/2019	1/9/2020	74501	
113	OID3924250		Technical Issue - Meter not ordered	Issue OID3924250 - PS	12/27/2019	12/30/2019	1/9/2020	74502	
114	OID3892548		Technical Issue - 120% block for Meter Install	Issue OID3892548 - PS	12/27/2019	12/30/2019	1/9/2020	74504	
115	03512067		Technical Issue - Not registering signed document	Issue 03512067 - PS	12/27/2019	12/30/2019	1/8/2020	74498	
116	OID3637032		Multiple Attempts to Contact but No Response	Issue OID3637032 - PS	12/27/2019	12/30/2019	1/9/2020	74491	
117	03509521		Technical Issue - Not registering signed document	Issue 03509521 - PS	12/27/2019	12/30/2019	1/8/2020	74499	
118	OID3875077		Technical Issue - 120% block for Meter Install	Issue OID3875077 - PS	12/27/2019	12/30/2019	1/9/2020	74505	
119	OID3927429		Technical Issue - 120% block for Meter Install	Issue OID3927429 - PS	12/27/2019	12/30/2019	1/9/2020	74503	
120	03505123		Technical Issue - Not registering signed document	Issue 03505123 - PS	12/27/2019	12/30/2019	1/8/2020	74506	
121	OID3882225		Technical Issue - 120% block for Meter Install	Issue OID3882225 - PS	12/30/2019	12/31/2019	3/3/2020	74512	
122	OID3942587		Technical Issue - Misc.	Issue OID3942587 - PS	12/31/2019	12/31/2019	3/4/2020	74514	
123	03498665		Rebate Approval - Misc.	Issue 03498665 - PS	12/31/2019	12/31/2019	3/4/2020	74515	
124	OID3934893		Technical Issue - Misc.	Issue OID3934893 - PS	12/31/2019	12/31/2019	1/15/2020	74516	
125	OID3835602		Technical Issue - 120% block for Meter Install	Issue OID3835602 - PS	12/31/2019	1/2/2020	1/9/2020	74520	
126	OID4020479		Technical Issue - Misc.	Issue OID4020479 - PS	12/31/2019	1/2/2020	1/8/2020	74518	
127									



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Customer Name	OID or Case #	Premise Address	Issue Type	Email subject	Date complaint sent	Date acknowledged	Date resolved	MN PUC Case ID	Consent received	
128	03495716		Technical Issue - Misc.	Issue 03495716 - PS	12/31/2019	1/2/2020	1/15/2020	74519		

APPENDIX II



Michael Allen <michael.allen@allenergysolar.com>

Xcel Energy Issues

10 messages

Michael Allen <michael.allen@allenergysolar.com>

Thu, Aug 15, 2019 at 8:28 PM

To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Cc: Brian Allen <brian.allen@allenergysolar.com>, "Martin, Benjamin (COMM)" <benjamin.martin@state.mn.us>

Jack,

Hope you are well. I would like to know who at the Department we would voice concerns with regards to Xcel Energy. We are coming up against many issues here and don't know who to turn to. We are experiencing major delays with engineering and metering. Who can we talk to at the Department to make sure they are aware of these issues and then followed up with Xcel on.

Your help is greatly appreciated.

Thank you,

Michael R. Allen
President

Cell: (612) 545-8033
Office: (800) 620-3370



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[Referral Bonus Program](#)

Download our latest eBook

[Home vs. Community Solar](#)

Kluempke, Jack (COMM) <jack.kluempke@state.mn.us> Fri, Aug 16, 2019 at 6:51 AM
To: Michael Allen <michael.allen@allenergysolar.com>
Cc: Brian Allen <brian.allen@allenergysolar.com>, "Martin, Benjamin (COMM)" <benjamin.martin@state.mn.us>

Hey Michael,

What are the delays relating to specifically? Were you on the MNDIP call the other day? A few others expressed concerns about some delays with Engineering. Specifically around the one-line diagrams.

If you can provide some samples of projects that were delayed and why they were delayed that would be very helpful.

Jack Kluempke

Solar Financing Specialist

651-539-1676

Jack.Kluempke@state.mn.us

mn.gov/commerce

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



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Michael Allen <michael.allen@allenergysolar.com>

Mon, Aug 19, 2019 at 3:15 PM

To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Cc: Brian Allen <brian.allen@allenergysolar.com>, "Martin, Benjamin (COMM)" <benjamin.martin@state.mn.us>

Jack,

We have a very long list of things that we are always dealing with, but our biggest/most common issue would have to do meters not getting ordered. Most of our customers are having to wait 2-3 weeks for the meter to get ordered and then they schedule the witness test which is usually another 1-2 weeks. It's not uncommon to have a customer get their system inspected and then not be able to turn it on for another 3-5 weeks. Many of the people below have been now been waiting for over 4 weeks and the meter is still not here. Once the meter comes in we then can schedule the witness test, which again is typically 2 weeks out. Here is a list of the existing customers that we have right now dealing with this.

Meters that have not yet been ordered for over 2 weeks:

1. **OID3638666** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
2. **OID3602618** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
3. **OID3624802** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
4. **OID3730219** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
5. **OID3636506** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
6. **OID3633988** - Emailed requesting the meter to be ordered, told it would be by the Solar Rewards dept and it still hasn't been ordered - I was told it was "re-entered" but it obviously hasn't been
7. **OID3628984** - All forms signed 7/9. Emailed requesting the meter be ordered. It has not been ordered as of 7/23.

-
8. **OID3637351** - All forms signed 7/8. Emailed requesting the meter be ordered. It has not been ordered as of 7/23.
 9. **OID3630528** - All forms signed on 7/19. Emailed requesting the meter be ordered twice. It has not been ordered as of 8/7.

Our initial belief is that Xcel has not increased their employee count but has taken on a lot of extra work. This is really slowing things down.

Let me know what you think and if there is more information on speeding up the process.

Thanks

[Quoted text hidden]
[Quoted text hidden]

Kluempke, Jack (COMM) <jack.kluempke@state.mn.us>
To: Michael Allen <michael.allen@allenergysolar.com>

Mon, Aug 26, 2019 at 12:53 PM

Hey Michael,

Just wanted to let you know that I have not forgot about this. Stacy used to deal with these, the process is new to me. I am meeting with Michelle this afternoon, but my guess is that it will have to go to the PUC. I'll keep you informed.

Jack Kluempke

Solar Financing Specialist

651-539-1676

Jack.Kluempke@state.mn.us

mn.gov/commerce

Minnesota Department of Commerce

85 7th Place East, Suite 280 | Saint Paul, MN 55101



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From: Michael Allen <michael.allen@allenergysolar.com>
Sent: Monday, August 19, 2019 3:15 PM
To: Kluempke, Jack (COMM) <jack.kluempke@state.mn.us>
Cc: Brian Allen <brian.allen@allenergysolar.com>; Martin, Benjamin (COMM) <benjamin.martin@state.mn.us>
Subject: Re: Xcel Energy Issues

Jack,

We have a very long list of things that we are always dealing with, but our biggest/most common issue would have to do meters not getting ordered. Most of our customers are having to wait 2-3 weeks for the meter to get ordered and then they schedule the witness test which is usually another 1-2 weeks. It's not uncommon to have a customer get their system inspected and then not be able to turn it on for another 3-5 weeks. Many of the people below have been now been waiting for over 4 weeks and the meter is still not here. Once the meter comes in we then can schedule the witness test, which again is typically 2 weeks out. Here is a list of the existing customers that we have right now dealing with this.

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8. **OID3637351** - All forms signed 7/ 8. Emailed requesting the meter be ordered. It has not been ordered as of 7/23.
9. **OID3630528** - All forms signed on 7/19. Emailed requesting the meter be ordered twice. It has not been ordered as of 8/7.

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[Quoted text hidden]

Michael Allen <michael.allen@allenergysolar.com>
To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Mon, Aug 26, 2019 at 4:59 PM

Jack,

Thanks for the follow up. Yes we are interested in understanding the correct process on how to deal with issues that don't seem like they should be going to the PUC for. We are not interested in being a tattletale but we are interested in improving the programs that our people work within. Many of these issues have a direct affect on the solar installer community and only builds a bad name for us when in reality it is the utility delaying things to create confusion and frustration to the point that the end user simply has a negative attitude towards solar in general. Again thank you for looking more into this and look forward to hearing your thoughts.

[Quoted text hidden]
[Quoted text hidden]

Michael Allen <michael.allen@allenergysolar.com>
To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Wed, Sep 4, 2019 at 8:21 AM

Good Morning Jack,

Any further follow up on this? We have a hand full of other items we would like to get out in the open so that we can start improving them.

[Quoted text hidden]
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Kluempke, Jack (COMM) <jack.kluempke@state.mn.us>
To: Michael Allen <michael.allen@allenergysolar.com>

Wed, Sep 4, 2019 at 9:41 AM

I turned it all over to the CAO at the PUC, Anne Thom. She said she would be reaching out. Let me know if you don't hear from her, she may reach out directly to the consumer.

[Quoted text hidden]

Michael Allen <michael.allen@allenergysolar.com>
To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Wed, Sep 4, 2019 at 9:53 AM

Jack,

Thanks for the follow up. If you have Anne's info, I would like to get it. I'm not sure we want her reaching out to the customers just yet. She certainly can but not sure how she will get their info. The issue here is a consumer issue but it is more of a Xcel Solar Rewards program issue. Most likely by the time anyone gets to deal with the consumer, the issue will be fixed for the individual customer, but the issues will continue with the Xcel and the many others.

Thanks for your help on this.

[Quoted text hidden]
[Quoted text hidden]

Michael Allen <michael.allen@allenergysolar.com>
To: "Kluempke, Jack (COMM)" <jack.kluempke@state.mn.us>

Fri, Sep 6, 2019 at 6:28 PM

Jack,

So I have about 20 more Xcel Solar Rewards issues that I would like to go over, but I'm still not sure who I or all the other solar companies should be going to. Am I supposed to go to the consumer affairs office for each of these??? As I mentioned in my earlier email, I'm not looking to get resolution to these issues individually, rather help improve the program for the long term. This seems like we are treating the symptom, and not the core problem.

Maybe a phone call this next week would work out?

[Quoted text hidden]
[Quoted text hidden]

Kluempke, Jack (COMM) <jack.kluempke@state.mn.us>
To: Michael Allen <michael.allen@allenergysolar.com>
Cc: "Gransee, Michelle (COMM)" <michelle.gransee@state.mn.us>

Mon, Sep 9, 2019 at 12:19 PM

Hey Michael,

These should be going to the CAO's office, we like to hear about them but it is in there wheelhouse.

[Quoted text hidden]

APPENDIX III



Danielle DeMarre <danielle.demarre@allenergysolar.com>

A Few Follow-up Items

Rosier, Michelle (PUC) <michelle.rosier@state.mn.us>
To: Danielle DeMarre <danielle.demarre@allenergysolar.com>
Cc: "Staff, CAO (PUC)" <consumer.puc@state.mn.us>, "Rebholz, Michelle (PUC)" <michelle.rebholz@state.mn.us>

Tue, Jan 21, 2020 at 1:18 PM

Hi Danielle,

Responses in your email below.

Thanks for your prompt follow up (you beat us to it)!

Michelle

Michelle Rosier

Distributed Energy Resources Specialist | Economic Analysis

Pronouns: She/Her

Minnesota Public Utilities Commission

121 7th Place E, Suite 350
Saint Paul, MN 55101-2147

O: 651-201-2212

mn.gov/puc



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From: Danielle DeMarre <danielle.demarre@allenergysolar.com>
Sent: Tuesday, January 21, 2020 9:57 AM
To: Rosier, Michelle (PUC) <michelle.rosier@state.mn.us>
Subject: A Few Follow-up Items

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Good morning Michelle,

I hope your week has started off well. I am reaching out in regards to a few items I wanted to follow up on.

On Thursday, after our meeting I emailed you an electronic version of our CAO Complaints Tracking spreadsheet, and wanted to make sure you received it? I thought it may be easier to do any cross-referencing with that versus a paper copy.

Yes this was received and Pa has the electronic copy.

Also, the document provided during our meeting last week titled "Xcel Major Issues with Resolutions" includes an email chain that corresponds with each issue and I wanted to let you know we can forward those to you as well if you would like?

Please limit email communication chains to specific complaints filed with CAO (whether they have been marked as resolved/closed or are still open.)

I
We are happy to move forward with providing a customer consent with our complaint submissions. This would include an email to and from the Customer and All Energy Solar that would state something along the lines of "Do you give All Energy Solar permission to submit a complaint to the Consumer Affairs Office on your behalf?". You do not need separate consents for each complaint we may submit on one customers behalf, correct?

We do not need a separate consent sign off for each complaint filed on behalf of a customer; however, we recommend keeping the customer copied on the email chain discussing their complaint.

During the meeting, we discussed the change in how we would send over our complaints to Pa, such as forwarding the Xcel emails. After further review, this may not be easy for some of our complaints and wanted to follow up. Should I email Pa at the consumer.puc@state.mn.us directly or discuss the submissions in detail with you?

Complete email chains are preferred, but if that is an issue, the most helpful is to have a record of the first time All Energy Solar contacted Xcel on each customer's specific complaint (whether by email or phone.) We most likely can get this record from Xcel, so your record would be to help verify.

In regards to All Energy Solar joining the DG Workgroup and/or the DG Advisory group, this is still under discussion but may be interested. Particularly more so with the Workgroup than the Advisory Group, but would like to confirm the time commitment. I believe you stated that the work group meets annually at minimum, in which the meeting could range from 2.5 hours to a full day. Recently however, or due to increased topics needed to be addressed, the number of meetings could increase to 2 to 3 times a year.

- Would you say those additional meetings may be just as long - 2.5 hours to a full day?

Yes. You can decide if you want to participate in the DGWG only or also the Technical Subgroup (TSG). The TSG meets more frequently right now for shorter time periods. I'll forward you an example of the materials for the TSG when I send them out later today. The DGWG is now at "at least annual" and may have periods of more frequent or long meetings, but overall, I'd ESTIMATE won't be over 10-20 hours/year.

- Would we be able to participate in the technical subgroup meetings? You stated recently they have been meeting frequently and via web. Would you advise, how often are those meetings taking place?

I will need to propose this to the TSG and our Lead Commissioner (Matt Schuerger). At a minimum, you would be able to observe the meetings. The TSG has an aggressive schedule this Spring (highlighted are 2.5 hour web meetings unless otherwise stated):

Mar 1, 2020	Temporary Reporting on MN DIP due
-------------	-----------------------------------

Apr 1, 2020	Draft TSMs shared with TSG
Apr 3, 2020	Walkthrough Draft TSMs – Flag concerns, ID plan to address
Apr 14, 2020	Feedback/Progress on TSMs (if needed). Possible in-person.
Apr 17, 2020	Update for TSG on TSMs (if needed)
May 1, 2020	Rate-regulated utilities file TSMs triggering 30-day opportunity to object
July 1, 2020	TIIR goes into interim effect. TSMs go into effect.

TBD – Full Day; In-person	Full DGWG Meeting: Review of MN DIP Implementation, Outstanding Issues
~2Q 2021	Certified Equipment "Readily Available" pending PUC Notice and TIIR goes into full effect

- The Technical Subgroup has a goal/deadline to have the TIIR complete by 7/1/2020, correct?

Yes, and then will meet as needed to address IEEE 1547-2018 related issues like the finalization of testing procedures (1547.1), certification (UL 1741) and availability of certified equipment in the Minnesota market (anticipated around ~2Q 2021). The TSG may also be tasked with addressing emerging technical issues and implementation of the new statewide TIIR as needed.

I appreciate you looking into my questions. Again, we thank you and your team for taking the time to meet with us last week and hear our concerns. We look forward to the update on Xcel's resolutions.

Kind Regards,

Danielle DeMarre

Interconnection and Rebate Liaison

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APPENDIX IV



1264 Energy Lane
St. Paul, MN 55108

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

**MINNESOTA DISTRIBUTED ENERGY RESOURCES
INTERCONNECTION PROCESS (MN DIP)
(Continued)**

Section No. 10
Original Sheet No. 214

AC Rated Nameplate Rating: 6.090(kWac) 6.090(kVAac) Single Phase (or) Three Phase: One Phase

Export Capability Limited (e.g. through use of control system, power relay(s), or other similar device settings of adjustments):

If yes, describe:

DER capacity (as described in MN DIP 5.14.3): 6.090 (kWac)

Is equipment certified (i.e. UL 1741 Listed)?: Yes (Certification is a Simplified Process Requirement)

Installed DER System Cost (before incentives): \$

Estimated Installation Date: 2020-04-25

Interconnection Customer Signature [This Section must be completed by the Customer]

The simpler Uniform Statewide Contract replaces the longer Interconnection Agreement (MN DIA) if the conditions of MN DIP 1.1.5 are met. A qualifying customer signing a Uniform Statewide Contract may elect to be additionally provided the MN DIA. Request a MN DIA?: No

Disclaimer: The Area EPS Operator shall notify the Interconnection Customer with an opportunity to request a timeline extension (See MN DIP Section 1.8.2 and 5.2.2.) Failure by the Interconnection Customer to meet or request an extension for a timeline outlined in the MN DIP could result in a withdrawn queue position and the need to re-apply. INITIAL: _____

I designate the individual or company listed as my Application Agent to serve as my agent for the purpose of coordinating with the Area EPS Operator on my behalf throughout the interconnection process (see MN DIP 1.3.2.) INITIAL: _____

I hereby certify that, to the best of my knowledge, the information provided in this Application is true, and that I have appropriate Site Control in conformance with the MN DIP. I agree to abide by the Terms and Conditions for Interconnecting an Inverter-Based Distributed Energy Resource No Larger than 20 kW (Simplified Process) (see Exhibit A – Terms and Conditions for Interconnecting an Inverter-Based DER No Larger than 20 kW) and return the Certificate of Completion (see Exhibit C – Certificate of Completion) when the DER has been installed.

Interconnection Customer Signature: _____

Name (print): _____ Date: _____

Send a completed and signed copy of this form with attachments to (Northern States Power Company through its online portal available at www.xcelenergy.com or other applicable URL). Send application fee in electronic format as instructed by the online portal. Only if the online portal or electronic method of sending payment is not available, then mail materials to Xcel Energy, Distributed Energy Resources, 414 Nicollet Mall, Minneapolis, MN 55401.

(Continued on Sheet No. 10-215)

Date Filed: 12-14-18

By: Christopher B. Clark

Effective Date: 05-09-19

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-18-714

Order Date: 05-09-19