



Minnesota Solar Energy Industries Association

We Move Minnesota Solar + Storage Forward

February 10, 2025

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

**Re: In the Matter of a Formal Complaint and Petition for Relief by SunShare LLC
Against Northern States Power Co. d/b/a Xcel Energy Regarding Settlement
Agreements
Docket No. E002/C-25-76**

Executive Secretary Seuffert,

The Minnesota Solar Energy Industries Association (“MnSEIA”) writes in support of SunShare’s request for relief opened in the above-referenced docket. MnSEIA is a nonprofit association of over 170 members that represents Minnesota’s solar and storage industry, whose membership ranges from rooftop installers to non-profit organizations, manufacturers, community solar developers, and many others, all of whom collectively employ over 5,000 Minnesotans.

While MnSEIA cannot comment specifically about the settlement terms between Xcel and SunShare referenced in the request for relief, MnSEIA can convey the widespread frustration by its members related to the confusion, excessive costs, and unnecessary delays in Xcel executing interconnection agreements with community solar developers. The recent implementation of Xcel’s internal study process, combined with the MISO screening process, has indefinitely delayed the deployment of community solar capacity otherwise authorized by Minn. Stat. § 216B.1641.

SunShare’s request for relief is the latest manifestation of Xcel’s interconnection issues. As detailed in a December 2024 letter from Nokomis Energy LLC, Enterprise Energy, Novel Energy Solutions LLC and Sunrise Energy Ventures, LLC letter to the Distributed Generation Working Group:

In 2021, Northern States Power Company, d/b/a Xcel Energy (“Xcel”) proposed a new transmission study process for interconnection applications on Xcel’s distribution grid. Pursuant to an agreement with the Midwest Independent System Operator (“MISO”), Xcel would refer interconnection applications to MISO under certain conditions, to evaluate impacts to the transmission system. When Xcel presented the agreement to the Minnesota Public Utilities Commission (the “Commission”), the Commission expressed concern that Xcel had not sought input on the agreement, nor explained how it was

consistent with the Minnesota Distributed Energy Resources Interconnection Process (“MN DIP”). The Commission ordered the agreement stayed pending a full comment period.

Seemingly chastened, Xcel proposed potential changes to MN DIP and abandoned the most burdensome trigger for a transmission study, exceedance of daytime minimum load. Instead, Xcel explained to the Commission that it would rely solely on MISO’s screening criteria and study processes, as contemplated in MN DIP. This would ensure that only projects with the potential to impact the transmission system would be subjected to an expensive and time-consuming transmission study.

A little over a year later, however, Xcel came up with a new transmission study process, again outside of the timelines, costs and negotiated steps of MN DIP. In this version, MISO would continue to rely on its screening criteria and study processes, as contemplated in MNDIP. Xcel, however, would run a parallel transmission study on projects that MISO does not believe are likely to impact the transmission system: projects that merely exceed daytime minimum load.

MnSEIA and other industry representatives sought to work with Xcel to address unnecessary screening and interconnection delays to no avail thus far. On December 13, 2024, MnSEIA, CCSA, and CCEM filed a letter in docket number 16-521 questioning Xcel’s compliance with the MN DIP and requesting a stay of Xcel’s new internal study process and for the PUC to initiate an investigation into the matter.

In addition, MISO released the results of its study screen on December 16, 2024, and the results indicate virtually every community solar project going forward will either be caught in the MISO or Xcel internal screen processes, thus causing excess unforeseen costs and unreasonable delays in interconnection agreements between Xcel and community solar developers. MnSEIA notes, as a result of the confusion and delays caused by the Xcel study process, 18 MW of 2024’s 100 MW of allocated community solar development will be unfulfilled, unless the screening study and interconnection process can be adequately addressed.

The screening process currently employed by Xcel has caused confusion, excess costs, and unreasonable delays in interconnection agreements and community solar development. MnSEIA believes the Commission should intervene at this point to address the interconnection issues, including but not limited to SunShare’s request for relief.

Sincerely,

/s/ Curtis P. Zaun, Esq.

Director of Policy & Regulatory Affairs

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