



Sundial Solar

A Brighter Idea

Feb. 21, 2014

Burl Haar

Public Utilities Commission

121 7th Place East, Suite 350

St. Paul, MN 55101

PUC Docket Number: E999/CI-13-720

**In the Matter of a Commission Inquiry into Ownership of Renewable Energy
Credits used to Meet Minnesota Requirements**

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

Sundial agrees with the Department of Commerce and ELPC that the renewable generator (or the generator's assignee) should own the RECs generated by the system.

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

Only the owner/generator of the renewable power should own the RECs and be free to do with the RECs as it chooses.

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

The only factor that should be considered is who owns or leases the generating system.

Sincerely,

Jon Kramer, CEO
Sundial Solar