



A Work of Art Solar Sales
A Division of Work of Art Landscapes

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To: MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger, Chair
Nancy Lange, Commissioner
Betsy Wergin, Commissioner

David Boyd, Commissioner
Dan Lipschultz, Commissioner

**Comments - In the Matter of Xcel Energy's Proposed plan for a *Community Solar Garden Program*
Docket No. E002/M-13-867 Pursuant to Minn. Stat. §216B.1641**

Date: October 1, 2014

Dear Commissioners,

I wish to add my comments to the collection of many other like minded companies and individuals who are closely following, and awaiting the official roll out of the community solar garden model. I realize that many solar gardens are currently being planned and constructed at the current applicable retail rate. These gardens are small in scope, or are priced so high for the solar shares that the clients won't realize a return on investment for near 15 years or more. As long as this kind of return on investment remains the norm, the Community Solar Garden model will never hold much of a market share of solar installations in Minnesota. The average client that would truly benefit from purchasing shares in a Solar Garden will shy away from the amount of effort and time required to go through the process because it will not be worth doing. From a pure sales stand point, if I tell you, that you will break even in 15 years or more on a 25 year contract, it is not worth the effort. If I tell you that you can break even in ten years or less on a 25 year contract, now that is something worth investing in. This threshold is directly tied to the rate that VOST will pay to Community Solar Gardens. \$0.15/kwh is the minimum rate needed to make the difference in the ten year payback mark. It is the difference between having a market for Community Solar in our state, and pretending to have a market. I truly hope the commission, in its wisdom, will see this difference and set the rate for Community Solar at \$0.15 with a reasonable escalator of at least 2% to keep pace with electrical rate inflation, so the Community Solar Market can be a worthwhile investment.

I firmly believe that the VOST rate must remain optional to all types of clients as market certainty with both current and future projects will be irrevocably damaged if a client is forced into something that changes their rate of return on their investment for the worse. Should a client lose money because they have already built or entered into a solar contract, that loss of money and uncertainty in the solar market would set the entire Solar industry back to the dark ages and its infancy.

Thank you for your consideration,
Arthur Crowell
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