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March 2, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2198

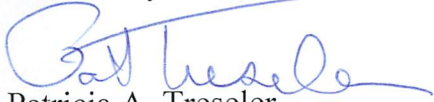
Re: MN Community Solar, LLC
PUC Docket No. E002/M-13-867

Dear Mr. Wolf:

We represent MN Community Solar, LLC and are eFiling and eServing the attached Additional Reply Comments of MN Community Solar LLC and Certificate of Service on their behalf in the above-captioned matter.

Please feel free to contact me with any questions you may have.

Yours truly,



Patricia A. Treseler
Legal Assistant to Jeffrey C. Paulson

cc: Parties; MN Community Solar, LLC

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for approval of its proposed Community Solar Gardens Program

Docket No. E-002/M-13-867

ADDITIONAL REPLY COMMENTS OF MN COMMUNITY SOLAR, LLC

INTRODUCTION

This docket commenced with the filing of Northern States Power Company (“NSP”) seeking approval of its proposed community solar garden (“CSG”) program pursuant to Minn. Stat. Section 216B.1641 (2013). Over the ensuing months, extensive comments were filed by numerous parties, including many prospective developers of CSGs. During the same time period, the Department of Commerce developed a value-of-solar (“VOS”) methodology for determination of a price for solar energy in Minnesota pursuant to Minn. Stat. Section 216B.164, subd. 10(c) (2013). Again, numerous comments were received with respect to the proposed VOS methodology and resulting pricing. MN Community Solar, LLC (“MNCS”), a developer of CSGs, participated actively in the various proceedings.

On April 7, 2014, after comment and argument, the Minnesota Public Utilities Commission (“Commission”) issued an order in this docket which resolved many of the issues related to NSP’s proposed CSG program. NSP filed a Motion to Show Cause with respect to CSG pricing on May 1, 2014, and after another round of comments and argument, on September 17, 2014 the Commission issued another order resolving the remaining issues as to NSP’s proposed program (“September Order”). NSP submitted its compliance filing, and no objections, motions for reconsideration or appeals were filed with respect to the Commission’s orders or NSP’s compliance filing. TruNorth Solar filed a motion for clarification of one item in the September Order which was denied in a February 13, 2015 order.

On October 9, 2014, the Commission, on its own initiative, issued a Notice of Reply Comment Period (“Notice”) in which it encouraged the parties to again revisit certain issues in this docket and the VOS dockets, as well as a lengthy list of questions seeking data or information about the possible costs or economic performance of CSGs. The Notice cast a wide net requiring extensive work to answer the questions adequately. Many of the questions about potential costs and financial performance will be difficult to answer without the benefit of more time for CSGs to actually reach advanced development or operation, and answers will also change as the constituent markets change and evolve. For smaller developers, the ability to answer the questions sufficiently also requires resources otherwise devoted to such actual CSG development.

The comment period was extended twice by the Commission to March 2, 2015. In the interim, other requests for clarification and filings were made in this docket with respect to specific issues deemed important to NSP or other parties. Initial CSG applications were received by NSP totaling over 431 MW in the aggregate. The implementation work group, consisting of representatives of NSP, developers and other interested parties, met numerous times to discuss and resolve various detailed program issues, as reflected in NSP’s filing of meeting minutes on February 27, 2015.

Clearly, the CSG program has attracted a large number of prospective projects and participants, which indicates that the Commission’s initial decisions on program design and implementation appear to have accomplished the statutory objective of creating a program capable of supporting viable CSGs (including suitable bill credit rates). The sheer magnitude of activity has also generated more questions and some participants seem to prefer the Commission address these. The Notice also seems premised on the idea that extensive additional research is needed and that program reconfiguration is needed, even though the CSG program and proposed projects are in very early stages yet.

MNCS generally believes, as suggested in its February 24, 2015 comments as to NSP’s program concerns, that the vast majority of such concerns and possible Commission activity is premature, and that the program and evolving CSG market should be allowed to continue to develop without interference for a meaningful period of time, especially given the high level of interest to date, before any conclusion is reached about program deficiencies requiring Commission involvement. MNCS, however, provides certain information and perspective on issues by the Notice for Commission consideration.

DISCUSSION

I. Adequacy of ARR Bill Credit.

The initial issue presented by the Notice asks for additional evidence as to the adequacy of the \$0.15/kWh bill credit adopted by the Commission for residential customers of NSP who subscribe to CSGs. On June 19, 2014, MNCS submitted Reply Comments to the Commission with respect to NSP’s pending motion to show cause

which directly addressed this issue. The filing included certain trade secret financial models showing the economics of using the \$0.15/kWh rate as well as the lower VOS rate then proposed by the Department of Commerce. The models clearly showed that the \$0.15/kWh rate was necessary, at a minimum, to provide sufficient benefits to attract subscribers. MNCS also demonstrated that the \$0.15/kWh rate needed to be established as a minimum and adjusted to reflect future rate increases received by NSP to preserve subscriber benefits over time.

At this time, MNCS has not seen material changes in its analyses which would alter these conclusions. Neither do the final decisions of the Commission in the September Order provide additional financial benefits which significantly exceed expected application, management and compliance costs for CSGs. Until such time as actual experience is gained with CSGs in development there will not be data available which might allow a meaningful reanalysis. As a result, MNCS reiterates its June 19 conclusions in support of the \$0.15/kWh rate and other CSG rates. MNCS believes the volume of CSG applications suggests that the ARR is believed by developers, on its face, to be appropriate and sufficient to support CSG financing. While many proposed projects will probably disappear for any number of reasons, it seems likely that the current rate will support viability of many proposed CSGs. Until CSGs are approved and actually receive financing, a definitive conclusion cannot be reached.

MNCS notes that parties to this docket tend to refer to the applicable ARR rate as \$0.15/kWh. Actually, only the 2014 CSG rate for residential customers in CSGs less than 250 kW in size using the \$0.03/kWh REC adder will receive a bill credit in the vicinity of \$0.15/kWh (\$0.15033). The rates for other customers are lower (eight other classes), as reflected in the CSG rate table in Section 9 of NSP's CSG tariff. In reviewing and considering possible rate adders it is necessary to look at all these rates.

II. Necessary Escalation Rate.

MNCS provided several sets of comments in this matter as to the necessary escalation in rates needed to sustain subscriber benefits and CSG viability over the life of the CSG. In general, the initial CSG rates (ARR or VOS) and associated REC prices must not be susceptible to uncertainty or possible future reduction; in addition, any escalator must be adequate over time to cover expected increases in CSG operating and management expenses. MNCS believes the rate adjustments required by the Commission with respect to the ARR rate, combined with the applicable initial CSG rates, will be adequate using reasonable assumptions about expected NSP rate increases over time.

If a VOS rate were to be used in the future, assuming the initial VOS rate were adequate, an equivalent escalator would be minimally needed to meet expected cost increases. Whether a particular escalator would work depends on the VOS rate structure, and MNCS would need to model required escalator rates against its project cost profiles to assess adequacy. In general, however, VOS rates are substantially lower than ARR, so if the CSG rates set by the ARR are needed, at a minimum, to support CSGs, substantial

riders to each CSG rate using VOS would be needed, along with an escalator that produces increases comparable to those expected under the ARR mechanism. Table 1, attached, shows the necessary adders.

III. Subscriber Preferences.

Utilities and other parties with CSG programs or similar utility programs allowing customers to subscribe specifically to renewable energy resources for their load have done research on why customers opt to participate in such programs. Historically, many such programs required the customer to pay a premium for renewable power over and above the cost of their retail tariff; as a result, it was easy to conclude that such customers were motivated by environmental consciousness, not economic factors. As the cost of renewable energy have declined and, in some cases, compares favorably to retail power rates, additional participants may enroll to capture the new economic benefits.

Studies by Sacramento Municipal Utility District (“SMUD”) of participation in its shared solar program confirm this assumption. As described in a September 30, 2014 presentation to the Iowa Association of Municipal Utilities, SMUD’s program participants are driven primarily by environmental concerns by a wide margin. The costs and uncertainties associated with installing their own net metering system also contributed to customers choosing participation in a communal facility rather than owning a system. This combination of solar environmental benefits while avoiding direct costs and risks seemed to be the key factors driving enrollment.

A survey conducted in July 2014 for MNCS by the University of St. Thomas supports this basic dynamic, but explores in more detail a CSG program, rather than a utility program. Hoffman, Steven M. and High-Pippert, Angela, “Results of Community Solar Survey for Minnesota Community Solar,” July 2014. General environmental benefits and the likelihood that a CSG would provide local “community” benefits were significant motivators. Much like the SMUD survey, the complication, cost and uncertainty of owning an individual system (for those with such an option) contributed to strong consideration of a CSG option. The prospects for a positive economic return, while not trivial, did not seem to be a critical factor for most respondents. However, it makes sense that the prospect for such a positive result can only help overcome any other hesitation potential participants may have.

Based on interactions with potential and actual subscribers to date, MNCS is finding a strong preference for pay-as-you-go payment models, again, for reasons that are obvious. In such a program, subscribers are risking very little over time; they only pay for energy actually received. The long-term risks of system performance are shifted to the CSG developer/owner, along with credit and collection risks. While MNCS’s initial small, local CSGs in south Minneapolis were fully subscribed using a pay-in-advance model, and some subscribers may be willing to still move forward on that basis, the competitive market seems to be moving toward pay-as-you-go as the dominant model, which will drive developers to use that approach to compete. This appears to be

especially true among larger customers. The pay-as-you-go model, by incorporating a positive margin in favor of the customer for each kWh, is clearly better for subscribers, and they will migrate to this approach.

In general, while subscribers are initially attracted by the positive environmental impact arising from a CSG and the subscriber's ability to contribute to the construction of a tangible, local, renewable facility, the ultimate investment decision is often ultimately dependent on the ability to offer the prospect of at least a break-even economic proposition over time. As with many environmentally-positive products, there are always early adapters and altruistic investors whose decision is motivated less by economics. However, there is not likely to be a substantial percentage of NSP customers who fit this description; as a result, for any kind of meaningful participation rate among such customers, the opportunity for an economically positive result must also be offered. The pay-as-you-go approach will best support this possibility.

As is probably intuitively obvious, the fact that a subscription involves a locally situated project makes a positive difference in investment decisions as noted by the St. Thomas survey. Unlike NSP's Windsource Program, for example, participation in a visible array in their community, especially if there is also a separate relationship with the host for the array, makes a significant difference in promoting subscription levels.

Answers to other questions in the Notice in this respect will require additional experience and data collection.

IV. Solar Garden Costs.

The June 19 model data presented by MNCS incorporates a cost profile for both capital and operating expenses. Capital costs vary by specifics of each array and market circumstances at the time; a generic estimate stable across projects and times is not possible. MNCS does not see a need to amend its June 19 model at this time before building its actual CSGs; the cost profiles for its CSGs will change and be modified over time until construction.

Operating expenses for CSGs will be greater than utility-scale solar arrays due to (i) subscriber management costs, and (ii) CSG program compliance costs. The Commission's CSG orders establish an application process and subscriber disclosure and protection requirements which impose additional professional and management costs prior to construction, and the documentation of subscriber agreements for CSGs with any significant number of subscribers also involves more costs. On an ongoing basis, the regular data flow with subscribers and NSP, together with management of subscriber relocations, deaths and other transitional events, including any substitute or transferee subscribers, mandates ongoing customer service database management and service, with employee costs, that are unique to CSGs. NSP has often documented the costs of such events for its own customer service obligations even with its extensive customer service infrastructure. We expect the costs for smaller CSGs to be incrementally greater.

More detailed cost data will be developed in conjunction with actual projects. The questions in the Notice as to more industry-wide costs, financing, equipment and the like are too broad for a meaningful response.

V. Project Financing.

There are a large number of potential investors, suppliers, and contractors.

The structure of most projects prior to expiration of the federal investment tax credit (ITC) pursuant to Section 48 of the Internal Revenue Code will involve an ITC investor whose rights are repurchased after the ITC and other tax benefits elapse for the particular CSG.

Financier requirements depend on specific projects, project size, and the investor's particular return and other requirements, which often will differ depending on the overall capital market.

A complete answer to these questions would involve a lengthy full market analysis.

VI. State and Federal Programs.

The ITC and MACRS depreciation provide the principal benefit currently available to solar projects.

Made-in-Minnesota incentives are available but may not prove to offer meaningful net benefits over and above program costs.

There are no other grants or benefits currently available which offer substantial and consistent benefits to projects.

VII. Trends in Solar Costs.

Again, this is a topic which would require extensive analysis and discussion and shall be subject to change over time. In general, as noted in this docket at times, capital costs for equipment and installation of solar arrays in the United States have declined substantially over the last few years. There will be a limit to how far such reductions may go with existing technology, and MNCS believes such limits with respect to current technology and equipment may be near. The positive effects of improved technology on performance or reduced costs prospectively are too uncertain at this time to structure a business model or regulatory parameters for a CSG program. The June 19 model by MNCS is still reasonably representative of a cost profile for an expected CSG.

A positive effect from the large volume of proposed CSG projects, alongside new utility scale projects and a burgeoning Iowa market, has been improvement in procurement and installation costs. Equipment suppliers and installers are offering better pricing and logistic services in Minnesota because of much larger overall volumes in the area. The extent to which this will translate into overall reduction in CSG cost profiles especially for smaller projects, remains to be seen.

VIII. Differentiated Financial Adder.

Because of the variation in costs between arrays based on size and based on the number of subscribers, for example, it would be theoretically possible to devise a financial adder using different amounts based on the difference in cost profiles. However, there are a large number of factors which contribute to the performance and economics of any particular array or CSG, including: equipment used, market circumstances, location, ground or roof mount, size, competence and costs of developer and installer, financing, grants and incentives, and a myriad of others. The combination of factors might accentuate or undermine the other cost differences. MNCS believes it would be too difficult to design a fair and reasonable differentiated adder.

In addition, such a differentiated adder could be expected to drive developers to design CSGs most likely to attract the most favorable adder rather than other desired objectives. It would also be important not to structure an adder mechanism that indirectly rewards less competent or less efficient CSGs. All of these factors suggest such a mechanism is too difficult to design and implement.

IX. Potential Incentive Designs.

It is simply premature to expend considerable efforts on complicated alternative designs when developers such as MNCS are vigorously working on making CSGs work in the context of the current regulatory structure. While MNCS appreciates the continuing desire to find mechanisms that will minimize costs to ratepayers, there is no evidence to suggest yet that the CSG program as currently structured will be inefficient or unduly expensive. Until a reasonable period of time elapses in which a number of CSGs under the current scheme are developed it is not reasonable to expend any resources on exploring other alternatives.

MNCS does not believe any form of competitive solicitation process is appropriate until the market develops and a number of CSG developers and operators exist to populate such a process. In addition, it would only serve a purpose if total program capacity were capped and available capacity needed to be allocated in a way that the market or subscriber behavior could not.

X. Funding Source.

Since 1996, NSP's renewable energy purchases have generally been recovered through its fuel adjustment clause. MNCS believes this is the appropriate mechanism for any incremental costs to NSP of CSGs as well.

One alternative, the Renewable Development Fund (RDF), has been susceptible to various political processes over the years which hinder its stability as a funding source. In addition, the RDF has a distinct purpose separate and apart from the CSG statute; had the legislature wanted to use RDF funds for CSGs, it could have structured the CSG legislation in that fashion. It did not do so, and there is no reason to take RDF funds for that purpose now. Further, CSG obligations will last at least twenty (20) years; it is difficult to assume the RDF will survive that long. Finally, if CSGs are very successful, the amount of the corresponding obligations may ultimately exceed available RDF funds; this happened with Minnesota production incentives for small wind under Minn. Stat. Section 216C.41. There is no reason to adopt a funding source that could inadvertently cap CSG capacity.

XI. Incentive Budget.

There should be no cap on the incentive budget. The Commission's existing CSG orders clearly rejected a cap on the aggregate amount of CSGs. Imposing an incentive cap would have the effect of potentially limiting the amount of CSG capacity, which is inconsistent with existing rulings. This issue was also raised by NSP in its February 13 filing and separately addressed by MNCS on February 24.

Again, until the CSG program matures, it is premature to assume that any such limitation might be appropriate.

XII. Proposed Timeline.

MNCS believes there is no need to race to a decision on any of these issues. The Commission has determined that the ARR is suitable for CSG development at this time, and CSG development is successfully under way on that basis. While there have been some parties who expressed a preference for use of a VOS with adder, that preference was not based on the superior economics of a VOS. Instead, it was demonstrated that the ARR, as adopted, provides superior economics for early CSG development. It would make sense to allow CSGs to be developed under the ARR model for some meaningful period of time to develop an adequate operational data base for analysis. There is no substantive reason to jettison this model before it has a chance to succeed, or to manifest deficiencies which will inform the development of a VOS model.

Since any current CSGs are not likely to be installed until mid-to-late 2015 at this point, it would be reasonable to reassess the status of CSG development during early 2016 for possible changes or program modifications in 2016. Any earlier effort would be premature and a waste of resources.

XIII. Legal Issues.

There are a number of legal issues which might be relevant, including most significantly the effect of any incentive on taxation of individual subscribers. Further detail would need to be developed before an adequate analysis can be done. In any event, this is not an exercise the Commission need undertake at this time.

XIV. Timing for Adjustment of Solar REC Value.

Applications for CSGs opened December 12, 2014. A review of applicable values (other than adjustments to the ARR otherwise scheduled) would be premature for at least a year. MNCS suggests that the Commission request comments with respect to CSG viability and successes under the current CSG rate schedules in January 2016 for possible adjustment thereafter.

XV. Other Issues.

The work group has been productive. MNCS believes it is counterproductive for parties to bring every issue and question regarding the CSG program to the Commission for review and resolution. Requiring parties to pursue resolution of implementation issues through the work group or otherwise first should be a prerequisite to Commission involvement. The basic policy issues have already been addressed adequately by the Commission, and there is little or no benefit in allowing parties to revisit those under the guise of “implementation” problems. It is important to stop arguing about the program and focus on continuing to make it successful for subscribers.

CONCLUSION

The efforts of NSP, the Commission and all other parties over the past year or more to develop a workable CSG program involved the dedication of considerable resources and time, and delayed installation of CSGs to 2015. MNCS believes that it is sensible and appropriate to allow the development of CSGs under the adopted rules for some time before commissioning a new and sizable regulatory effort to design a substitute approach, especially since there is no operational data yet to suggest the existing program will be unsuccessful. To the contrary, the volume of applications suggests the current program will work. The resources of developers and NSP would be better spent making CSGs work, rather than in an unending argument about theoretically better approaches. Allowing development to occur will create a set of operational data that will better inform the Commission as to whether any changes are actually needed, and what those changes might actually need to be. It is presumptuous to simply speculate or assume such a need. MNCS recommends that the Commission defer any additional action at this time.

Respectfully Submitted,

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By 

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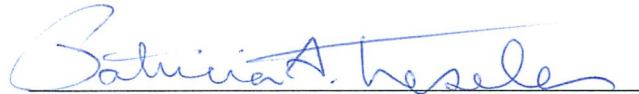
TABLE 1

*Rate that reasonably allows for the creation of CSG
 **Adder required to meet reasonable CSG Rate

CSG Rate Table Sec 9			VOS V3-Xcel 6/19/14			
Customer Class	Bill Credit Type	2014 CSG Rate*	Levelised	Infl Adj Year 1	2014 CSG Rate Adder**	2014 CSG Rate*
Residential Service	Standard	0.12033	0.1208	0.0940	0.0263	0.12033
	Enhanced – Solar Gardens > 250 KW (AC)	0.14033	0.1208	0.0940	0.0463	0.14033
	Enhanced – Solar Gardens ≤ 250 KW (AC)	0.15033	0.1208	0.0940	0.0563	0.15033
Small General Service	Standard	0.11783	0.1208	0.0940	0.0238	0.11783
	Enhanced – Solar Gardens > 250 KW (AC)	0.13783	0.1208	0.0940	0.0438	0.13783
	Enhanced – Solar Gardens ≤ 250 KW (AC)	0.14783	0.1208	0.0940	0.0538	0.14783
General Service	Standard	0.09456	0.1208	0.0940	0.0006	0.09456
	Enhanced – Solar Gardens > 250 KW (AC)	0.11456	0.1208	0.0940	0.0206	0.11456
	Enhanced – Solar Gardens ≤ 250 KW (AC)	0.12456	0.1208	0.0940	0.0306	0.12456

CERTIFICATE OF SERVICE

I, Patricia A. Treseler, hereby certify that I have this 2nd day of March, 2015, served a true and correct copy of Additional Reply Comments of MN Community Solar, LLC with Respect to Commission Notice Dated October 9, 2014 in\ Docket No. E002/M-13-867, on all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same in an envelope with postage paid in the United States mail at Edina, Minnesota.



Patricia A. Treseler

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Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325 Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew J.	Schuenger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel