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November 12, 2013

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
SOLAR EFFECTIVE LOAD CARRYING CAPABILITY (ELCC) STUDY
DOCKET NO. E002/CI-13-315

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the attached Reply to parties' Comments submitted in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact me at amy.a.liberkowski@xcelenergy.com or 612-330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI
MANAGER
REGULATORY ANALYSIS

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A RATE FOR LARGE
SOLAR PHOTOVOLTAIC INSTALLATIONS

DOCKET NO. E002/CI-13-315

REPLY COMMENTS

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments regarding our proposed interim solar Standby Service capacity credit for Large Solar Photovoltaic (PV) Installations that was submitted on October 1, 2013 in compliance with the Commission's May 13, 2013 Order. We received Comments from the Department of Commerce, the Solar Rate Reform Group (SRRG), Minnesota Solar Energy Industry Association (MnSEIA), Environmental Groups, and solar industry stakeholders.

Our Reply highlights the connection between the solar Standby Service capacity credit and the capacity component of Value of Solar (VOS) of the 2013 energy legislation. Additionally, we comment on the basis of the interim credit rate and our understanding that it was intended to be a placeholder until Effective Load Carrying Capability (ELCC) Study results were available. Based on the connection to the VOS methodology and the preliminary basis of the \$5.15 per kW/month interim solar Standby Service capacity credit, we confirm our position that the \$5.15 remain an interim rate and be subject to change based on the results of the VOS process being led by the Department.

We appreciate the Department's recommendation that the Commission approve our proposal to continue the existing interim solar Standby Service capacity credit of \$5.15 per kW/month until the Commission has made a determination on the VOS methodology. We respond to other parties' Comments below.

REPLY

A. Capacity Credits and VOS

Parties noted that the solar Standby Service capacity credit and VOS do not have to be related, and a final decision on the solar Standby Service capacity credit should be made at this time.

While we agree that an approved capacity credit and the VOS rate will be separate figures, they may both be applicable to a range of future Solar PV installations. The capacity credit calculation is a core element of the VOS portion of the 2013 energy legislation. Since this legislation directs the Department to develop a methodology for each element of the VOS, we believe the interim solar Standby Service capacity credit should remain an interim rate until the Commission approves a methodology for valuing capacity within the future VOS docket.

We appreciate that this interim credit creates a level of uncertainty within the solar industry and that there is a desire for a final credit determination. However, the current interim credit does significantly reduce Standby Service capacity charges for solar generators while allowing time for the VOS methodology to be developed and evaluated. The current interim solar Standby Service capacity credit was approved by the Commission after much discussion in the docket and supported by several parties to be a reasonable interim rate. The capacity credit was a mid-point value between parties' position and not the direct result of a specific methodology or cost basis, or ELCC Study result. While we believe this basis is reasonable for an interim rate, we do not believe it is an adequate basis for a final rate.

The capacity value of solar will be addressed in the Department's VOS methodology and is inherently related to our calculation of a large photovoltaic rate. Legislation requires that the Department develop the VOS methodology no later than January 31, 2014, and the Department has confirmed they are on track to meet this schedule.

B. Updated ELCC

If the Commission did want to set a final rate at this time, we think it would be more appropriate to set the new credit based on the updated ELCC Study as filed in this docket on October 31, 2013.

The updated ELCC Study modified modeling assumptions based on input from interested parties. The updated ELCC Study supports a credit in the range of \$1.72 to

\$4.75 for a fixed panel system, or \$2.17 to \$6.11 for a 1-axis system, as supported by Table 1 below.

Table 1

	Original ¹ Position	ELCC Study Update - Oct. 31, 2013			
		Fixed Panel ²		1-Axis	
		3-yr Avg.	2010	3-yr Avg.	2010
		34.5%	44.6%	43.5%	57.5%
Solar Rate Reform Group	\$7.13 - \$8.14	\$3.51	\$4.54	\$4.43	\$5.85
Department of Commerce	\$7.44 - \$9.57	\$3.67	\$4.75	\$4.63	\$6.11
Xcel Energy (Gen. Only - Low End)	\$2.14 - \$2.61	\$1.72	\$2.23	\$2.17	\$2.87
Xcel Energy (Gen. + Trans.- High End)	\$3.22 - \$3.93	\$2.59	\$3.35	\$3.27	\$4.32

¹ Based on estimated ELCC percentage ranges of 70%-80% (SRRG), 70%-90% (DOC) and 42.9% (fixed panel) to 52.3% (1-axis) (XCEL)

² Average of 180° Az.-10° tilt, 180° - 30° tilt, 180° Az.-45° tilt and 200° Az.-30° tilt

If the Commission did want to set a final rate at this point, we believe this updated credit would be more appropriate due to the fact that this ELCC Study incorporated much input from stakeholders. However, we have not yet had an opportunity to receive feedback on the updated ELCC Study results from parties, so we had not previously proposed to use these results to update the solar Standby Service capacity credit. Further, since parties may want to revisit the credit once the VOS capacity methodology is available, a final determination of the credit at this point would likely be duplicating work for parties.

C. Customer Size

Parties also suggested that the VOS is not relevant to the credit for large solar customers because the VOS will not apply to customers over 999 kW. However, we note that we currently have five solar customers on our Standby Service rate and only one of these customers is more than 999 kW. Thus, solar PV installations less than 999 kW are not unusual and future customers could qualify for the VOS rate, which provides further justification that the VOS rate and the solar Standby Service capacity credit are intermingled and a decision on one requires consideration of the other.

CONCLUSION

We appreciate parties' comments on our proposal. We respectfully request that the Commission approve our proposal to continue the existing interim solar Standby Service capacity credit of \$5.15 per kW/month. The Company proposes to revisit the capacity credit upon Commission approval of a Value of Solar methodology.

Dated: November 12, 2013

Northern States Power Company

Respectfully submitted by:

/s/

AMY LIBERKOWSKI
MANAGER
REGULATORY ANALYSIS

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

xx by depositing a true and correct copy or summary thereof, properly enveloped with postage paid, in the United States Mail at Minneapolis, Minnesota; or

xx via electronic filing

MPUC DOCKET No. E002/CI-13-315

Dated this 12th day of November 2013

/s/

SaGonna Thompson

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