

Commission Decision Options

A. Multiple CSG development projects (co-location)

1. Is Xcel's plan for implementing the CSG program, and limiting proposed co-located gardens to an aggregate capacity of no greater than one MW, in compliance with past Commission Orders and Minn. Statutes?
 - a. Find Xcel's proposed implementation of the CSG program as set out in its April 28, 2015 Supplemental Comments complies with the CSG statute and prior Commission Orders.
 - b. Find Xcel's proposed implementation of the CSG program as set out in its April 28, 2015 Supplemental Comments does not comply with the CSG statute and prior Commission Orders.
 - c. Order Xcel Energy to process applications consistent with the Commission's Orders in this docket, in particular its decision to allow multiple solar gardens to be installed in close proximity to each other, and reject any scaling to one MW proposed co-located gardens with an aggregate capacity greater than one MW
 - i. **New Decision Alternative (SGC):** Order Xcel to process applications consistent with the Commission's Orders in this docket, with the understanding that parties that have filed applications and paid the requisite deposit prior to the Commission's June 25 hearing will voluntarily scale down CSG Sites located in close proximity to one another to no more than 20 1-MW CSG Sites (applying the same "Aggregation Limit" definitions contained in the new decision option set forth in 1.c.iii. below, but modified to permit aggregation of up to 20 1-MW CSG Sites) by the time of CSG Solar*Rewards Contract execution. **[SGC clarification alternative to 1.C]**
 - ii. **New Decision Alternative(SGC):** Order Xcel to process applications consistent with the Commission's Orders in this docket, with the understanding that parties that have filed applications and paid the requisite deposit prior to the Commission's June 25 hearing, will voluntarily scale down CSG Sites located in close proximity to one another to no more than 10 1-MW CSG Sites (applying the same "Aggregation Limit" definitions contained in the new decision option set forth in 1.c.iii. below) by the time of CSG Solar*Rewards Contract execution with the following condition:
 - 1) Applicants with co-located 1 MW CSG Sites in excess of 10 MW in the aggregate, but no more than 20 MW, must be at least 50% subscribed by residential customers (e.g. 12 1-MW co-located CSG Sites would require at least 6 MW of residential subscriptions).**[SGC alternative to 1.C,]**

- iii. **New Decision Alternative (SGC):** For project applications that have been filed and submit deposits after the Commission’s June 25, 2015, hearing but prior to the Commission’s written order following the June 25, 2015, hearing:
- 1) Multiple Community Solar Garden Sites may be situated in close proximity to one another, so long as the combined generating capacity would not exceed, in the aggregate, the generating capacity under Section 10 of the Company's Electric Rate Book This combined generating capacity shall be referred to as the “Aggregation Limit,” which is defined as follows:
 - a) The power production capacity on the single Community Solar Garden Site will be added to the power production capacity of any other single Community Solar Garden Site that are all owned by the same Person(s) or its Affiliates and are located within one mile of each other.
 - b) For the purposes of making this Aggregation Limit determination, the distance between Community Solar Garden Sites shall be measured from any electrical generation unit of one CSG to any electrical generation unit of another CSG.
 - c) The Aggregation Limit will be measured at the time of CSG Solar*Rewards Contract execution.
 - 2) The term “Affiliate” used above is defined as follows:
 - a) Any Person that directly or indirectly owns or holds with power to vote 10 percent or more of the outstanding voting securities of the owner of a Community Solar Garden Site (“Specified Company”).
 - b) Any Person that is under common control or management with the Specified Company.
 - c) Any Person owning, controlling or holding with the power to vote less than 10 percent of the outstanding voting securities of a Specified Company creates a rebuttable presumption of a lack of control.
 - d) The definition of Affiliate is not intended to adversely affect financing arrangements commonly used with respect to renewable energy (hereby, tax equity financings) whereby a substantial portion of the return to the investor is derived from the allocation of tax benefits and the investor is not otherwise involved in the day-to-day management of the Specified Company.
 - 3) Person is defined in MINN. STAT. § 216B.02, subd.3 (“‘Person’ means a natural person, a partnership, or two or more persons having a joint or common interest, and a corporation as hereinbefore defined.”).

- d. **New Decision Alternative (SGC):** Impose a temporary moratorium on Aggregation (or Co-location) of 1 MW CSGs after the Commission’s written order following the June 25 hearing and until June 1, 2016, upon which time the proposal described below should be before the Commission for approval. After June 1, 2016, applicants will be allowed to begin submitting applications anticipating the new rules, but in no event should any CSGs under the new rules be in operation until January 1, 2017. During the moratorium, parties will work with the Department of Commerce and Commission staff to develop a proposal including aggregation, overall rate design and the use of the Value of Solar. This proposal should consider design elements aimed at encouraging residential and low income subscriber participation and accommodating development on marginal lands owned by governmental or quasi-governmental entities and other recommendations. [The SGC would recommend this decision alternative replacing the need for decision alternatives 3 through 8.] [SGC, ____]
- e. Issue an an Order to Show Cause to Xcel requiring the Company to show why the Commission should not find that Xcel Energy’s proposal contained in its April 28, 2015 Supplementary Comments to stop processing co-located solar garden applications under its Solar*Rewards Community Program to one MW or less is in violation of the Commission’s Orders in this docket.

2. **New Decision Alternative (Xcel and Parties¹):** Approve Partial Settlement Agreement between Xcel and Parties

3. **New Decision Alternative (Fresh Energy):** Find that Xcel’s Section 10 Tariff limit of 10 MWs applies to co-located gardens.

4. **New Decision Alternative (the Department):**

a. Retroactive Co-Location

- i. Find that CSG applications deemed complete as of the Commission’s Order in this docket will be allowed to co-locate up to 10 MW AC.
- ii. Find that CSG applications deemed complete within 90 days after the Commission’s Order in this docket will be allowed to co-locate up to 5 MW AC.
- iii. Find that Application deficiencies that reflect design issues that are engineering in nature shall not prevent an application from being deemed

¹ Partial Settlement Agreement filed June 22, 2015. “This Settlement Agreement (“Agreement”) is made and entered into as of the 25th day of June 2015, (the “Effective Date”), by and between Northern States Power Company, doing business as Xcel Energy (“Xcel Energy” or “Company”), Innovative Power Systems; MN Community Solar, LLC; Novel Energy Solutions LLC; Renewable Energy Partners; SolarStone Partners, LLC; Sundial Solar; and TruNorth Solar LLC (each individually a “Party” and collectively “the Parties”). Staff notes the future effective date of the agreement and that the representative of Sundial Solar stated that it was not a party to the agreement.

complete; such design issues are better addressed in the preliminary engineering review step of the Section 10 interconnection process rather than in the program application completeness determination step. Application deficiencies of this type, that shall not prevent an application from being deemed complete include but are not limited to:

- Improper placement of gardens behind existing service,
 - Lack of separate service for each 1 MW garden,
 - Omitted production meters,
 - Omitted grounding transformer specifications,
 - Improper placement of external utility disconnect switches,
 - Improper placement of customer owned facilities; and
 - Primary meter design deficiencies.
- iv. Find that CSG applications made non-compliant due to this determination (i.e., that are larger than 10 MW AC) may transfer remaining megawatts to a new site up to 5 MW AC per site without resubmitting a Section 9 application during the period 90 days from the Commission's Order. This one time transfer does not permit the application to bypass other projects in the queue.
- b. Find that CSG projects deemed complete within 90 days from the Commission's Order shall be paid the Applicable Retail Rate plus the REC adder as required in the Commission's April 7, 2014 Order.
- c. Find that CSG applications deemed complete after 90 days from the Commission's Order must be limited to 1 MW AC until such time as the Commission determines that a different co-location limit is in the public interest.
- d. Find that CSG applications deemed complete after 90 days from the Commission's Order shall be paid the Applicable Retail Rate plus the REC adder until such time as the Commission determines that a different rate (or rates) is in the public interest.
- e. Future Project Size Limits and Rates
- i. Find that solar developers must submit information to the Department on CSG financing requirements by project size by March 1, 2016 for the purpose of informing a Department recommendation on co-location limits after January 1, 2017.
 - ii. Find that all parties must provide recommendations on future co-location limits and other program changes to the Commission by July 1, 2016.
 - iii. Direct the Department to evaluate co-location limits, future rates, and other program design changes to provide maximum encouragement to residential and low income subscriber participation.

B. Bill Credit Rates

1. Whether to approve Xcel's calculation of the Applicable Retail Rate filed in its March 2, 2015 ARR Compliance Filing.
 - a. Approve Xcel's calculation of the Applicable Retail Rate filed in its March 2, 2015 ARR Compliance Filing; or
 - b. Do not approve Xcel's calculation of the Applicable Retail Rate filed in its March 2, 2015 ARR Compliance Filing.
2. Whether Xcel's calculation of the Value of Solar Rate as filed in its March 2, 2015 VOS Compliance Filing, and as updated according to the Department's April 30, 2015 Reply Comments is correct
 - a. Find Xcel's calculation of the Value of Solar Rate as filed in its March 2, 2015 VOS Compliance Filing, and as updated according to the Department's April 30, 2015 Reply Comments is Correct;
 - b. Find Xcel's calculation of the Value of Solar Rate as filed in its March 2, 2015 VOS Compliance Filing, and as updated according to the Departments April 30, 2015 Reply Comments is not correct.
 - c. **New Decision Alternative (SGC):** Direct parties to continue developing the appropriate Value of Solar Rate consistent with decision alternative 1.d.
3. Whether to transition from an ARR rate to a VOS rate
 - a. Transition to a VOS rate for all projects on a going forward basis beginning in 2016;
 - b. **New Decision Alternative (Fresh Energy):** Transition to a VOS rate for new CSG applications filed after July 1, 2016 or
 - a. Take no Action
4. What is an appropriate Adder, if any, to apply in conjunction with a proposed VOS rate to ensure compliance with the community-solar-garden statute, including, but not limited to, a requirement that the community-solar-garden plan approved by the Commission reasonably allow for the creation, financing, and accessibility of community solar gardens?
 - a. Determine that the adder should be set at a level needed to bring it at least as high as the current enhanced bill credit rate as found in Xcel's tariff (ARR + REC);
 - b. Set the adder at some other level;

- c. **New Decision Alternative (Fresh Energy):** Direct parties to file recommendations on community solar program design for projects coming online after the Investment Tax Credit decrease in 2017. Parties should address garden co-location and potential rate adders used in conjunction with the value of solar, along with other program elements, which encourage residential and low income customer participation in community solar gardens. Comments should be filed to support a Commission decision by early 2016; or
 - d. Take no action
5. Whether to adjust the current Applicable Retail Rate.
- a. Adjust the Applicable Retail Rate going forward by eliminating the customer charge from the formula; or
 - b. Take no Action
6. Whether to introduce an incentive design framework to bill credits rates going forward
- a. Require competitive bidding in its rate structure, including its REC incentive, to find market-based solutions to the question of minimally financeable rates (Xcel Option).
 - b. Set a declining incentive schedule under which the incentive levels decline over time and/or as capacity or budget targets are met (Xcel and the National Groups “capacity block” option); or
 - c. Adopt variable rate bill credits based upon amount of CSG capacity that the Commission determines is consistent with the public interest (OAG option);
 - d. Solicit further Comments on an appropriate incentive design framework to be introduced at a later time; or
 - e. Take no Action
7. Bill Credit rates for co-located projects going forward
- a. Change the bill credit for new projects co-locating multiple one MW gardens to a VOS-based rate (Joint Commenters Option);
 - b. allow Xcel to review co-locating multiple one MW gardens that are greater than 10 MW total through a competitive bid process similar to the competitive solicitation process used by Xcel for large utility-scale solar procurements and its Colorado Solar*Rewards Community program for larger CSGs (TruNorth Option); or
 - c. Take no Action.

8. Other Incentive Designs

- a. Modify the CSG program to reward and incentivize projects that are located in highly desirable locations on Xcel's distribution grid or that provide additional public benefits, such as the revitalization of urban brownfield areas, through bill credit adders (the National Groups); or
- b. Solicit further Comments on an appropriate bill credit adder to incentivize projects that are located in highly desirable locations on Xcel's distribution grid to be introduced at a later time;

C. Interconnection Issues

1. Require Xcel to develop a pre-application report and process, by a specified date, under which CSG applicants have the option to pay Xcel for a snapshot (or pre-screen/pre-application report) similar to that described in FERC Order 792, of the current available substation capacity, the number of DG interconnection applications (and requested MW capacity) currently in line for a given substation and/or feeder, the status of these interconnection requests, and other relevant information, including transformer loading. (*SunShare, SGC and other developers*)

[**Note:** The implementation workgroup is currently working on a pre-application option so the Commission may wish to receive input from the workgroup and Xcel on the specific wording of this decision option, including the timing for offering the option and the specific information to be included. **SGC Comment:** SGC requests the Commission establish July 31, 2015, as the "specified date" referenced in this decision alternative]

2. Require Xcel to complete engineering studies and interconnection cost estimates for program applicants within the timeframes set forth in the Commission's September 28, 2004 Order in Docket No. E-999/CI-01-1023. Require Xcel to clarify the process set out in Sections 9 and 10 of its tariffs by: (*MnSEIA, SGC, DOC, Fresh Energy, ELPC, ILSR, and other parties*)
 - a. reconciling overlaps and confusion between Section 9 and Section 10 that have led to ambiguity in timelines and schedules (as described by the parties)
 - b. providing more precise engineering requirements, including more precise requirements for Section 10, Step 2 of the interconnection process
 - c. setting out clearer expectations of the documents applicants are requested to submit at each step in the CSG application completeness process and in the interconnection process by providing standardized requirements or forms for each step, including providing a model one-line diagram to all CSG applicants and a clear list of all information required for both a one-line diagram and a site plan.
 - d. providing more timeline transparency, including the anticipated date by which the Company will complete the Step 4 engineering analysis for projects ahead of other projects in the queue.

- e. providing the most accurate interconnection cost estimates available at the end of Section 10, Step 4 of the interconnection process.
3. Require Xcel to show cause as to why it is not in violation of the Commission's April 7, 2014 Order requiring Xcel to "complete engineering studies and interconnection cost estimates for solar garden applicants" within 40 working days. (*MnSEIA*)
4. Require Xcel to offer to proceed with the necessary Step 4 engineering studies for the less advanced applicant projects in the queue in parallel with studies for the more advanced applicant projects in the queue. If the less advanced applicant in the queue agrees (or had already requested parallel study), clarify that Xcel will have 40 working days to complete the necessary Step 4 engineering study analysis. (*MnSEIA*)
5. Require Xcel to work with the implementation stakeholder group to begin to develop a cluster or group study process and method for distribution upgrade cost sharing among applicants. The development timeline for the study should allow for project completion by fall 2016. (*Staff's interpretation of SGC recommendation*)

[**Note:** It is not clear if a group study process would be part of Xcel's tariffs or if it would require formal Commission approval, since it may be driven by applicants with the assistance of Xcel.]

6. Require Xcel to make changes to its interconnection process as proposed by IREC and the National Group, including:
 - a. reporting required information sooner or at more frequent intervals for CSG projects
 - b. developing an electronic, web-based platform for interconnection application processing and data tracking
 - c. providing information necessary to direct solar development to optimal locations on the grid, potentially via electronic maps

[**Note:** If the Commission adopts any of the decision options above (6a, 6b or 6c), it should indicate the timeframe within which they are to be completed.]

7. **New Decision Alternative (SGC):** For project applications that have been filed before the Commission's June 25, 2015 hearing, require those applicants proposing projects 250 kW or larger to demonstrate project viability including the following:
 - a. Applicants will have until August 1, 2015 to pay the required deposit.
 - b. Applicants will have 90 days from the date of the Commission's order to demonstrate two of the following: (i) evidence of control of the Community Solar Garden Site, (ii) permitting process underway or completed, (iii) sufficient project financing, (iv) equipment and panel procurement contracts, or (v) subscriptions for at least 50 percent of the project output.

8. **New Decision Alternative (SGC):** For project applications that file applications after the Commission’s June 25, 2015 hearing, require those applicants proposing projects 250 kW or larger to demonstrate project viability including the following:
 - a. Applicants will have 30 days from application submittal to pay the required deposit.
 - b. Applicants will have 90 days from application submittal to demonstrate two of the following: (i) evidence of control of the Community Solar Garden Site, (ii) permitting process underway or completed, (iii) sufficient project financing, (iv) equipment and panel procurement contracts, or (v) subscriptions for at least 50 percent of the project output.

9. Require Xcel to clarify precisely: (*SunShare*)
 - a. when the Section 10 six-month validity clock starts and stops
 - b. what the practical impact (e.g. on application queuing) is of Xcel deeming an approved Section 10 application to be no longer “valid” as the term is used in Section 10
 - c. which categories of Section 10 interconnection applications the 6-month clock applies to

10. Require Xcel to allow CSG developers the flexibility to change a project site location, for legitimate reasons, without having to submit a new CSG application. Clarify that once a CSG project application has been deemed initially “Complete,” Xcel cannot later revoke the finding of completeness. (*SunShare*)
 - a. **New Decision Alternative (SGC):** Provided that there is no change to the point of interconnection, Xcel must permit a project shift on one site/parcel of real estate and/or address change.

11. Require Xcel to meet MW capacity targets for contracted capacity for CSGs in 2015 and in 2016. Set a MW target capacity level of 43 MW (AC, nameplate) that Xcel must meet by December 31, 2015 and 45 MW (AC, nameplate) by December 31, 2016.

[**Note:** These MW targets come from Xcel’s IRP supplement filed March 16, 2015, Table 2, p. 7, and were recommended by the OAG. Other parties, however, have not recommended specific target levels, although some have proposed that the DOC do the analysis and propose a target level.]

12. Appoint a neutral third party observer, agreeable to all parties, placed in-house at Xcel to monitor and report on Xcel’s project interconnection progress. (*Fresh Energy, ELPC, ILSR*)
 - a. **New Decision Alternative (SGC):** Upon the request of any Community Solar Garden applicant, require Xcel to submit interconnection disputes materially affecting

the application to an independent engineer. The independent engineer shall, in order to ensure independence and competence, be selected by the Department of Commerce, promptly following the Commission's written order, and be available on a standing basis to resolve disputes on the study process, including material disputes related to the Company's determination of application completeness, timeliness of application and study processing, and the cost and necessity of required study costs and distribution system upgrades. The Community Solar Garden applicant shall share 50% of the costs of the independent engineer. Xcel Energy is required to waive the dispute resolution timelines under Section 10 and resolve any issues within 45 days of first being raised.

13. Require Xcel, as part of its monthly updates to the Commission in this docket, to:
 - a. identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information, the additional information being sought from the applicant, and the amount of additional time taken for processing the application as part of the Company's monthly CSG updates to the Commission
 - b. identify each instance in which the Company has not met a Section 10 tariff interconnection process timeline, or otherwise restarted the timeline (i.e. if the process grants Xcel 15 days for preliminary engineering review, and the Company requests additional information from the applicant on day 14, the time permitted for review is reset for another 15 days at that point), and the reason for not meeting or restarting the timeline.
(*Department*)
14. Require Xcel to provide weekly progress reports to the Commission on its progress meeting required timelines and how projects are progressing through each step of the Section 10 interconnection process. (*Fresh Energy, ELPC, ILSR*)
15. Require any modifications or clarifications that require a tariff filing to be filed within 30 days of the written Order issued in this docket, unless otherwise specified.
16. **New Decision Alternative (SGC):** Require Xcel to facilitate improved engineering coordination by allowing direct phone communication between developers with projects in the interconnection queue and the Xcel-side engineer performing the study work.
17. **New Decision Alternative (SGC):** Require Xcel to meet the following application processing timelines to ensure substantial development under the program by the end of 2016:
 - a. For those applications with 250 kW or less of aggregated CSG Sites, direct Xcel Energy to enter into an interconnection agreement with those applicants, and any applicants ahead of those projects in the interconnection queue, by August 15, 2015. No interconnection queue re-ordering is permitted under this decision alternative.

- b. By September 30, 2015, for 50% of all applications that have their application deposits paid prior to the Commission's written order, and that satisfy the Section 9 and 10 tariff requirements, Xcel Energy and the CSG developer will have executed Section 10 interconnection agreements.
- c. By March 31, 2016, for all applications that made their application deposits on or prior to the Commission's written order, and that satisfy the Section 9 and 10 tariff requirements, Xcel Energy and the CSG developer will have executed Section 10 interconnection agreements.
- d. Within 4 months of the executed interconnection agreement, and no later than July 30, 2016, Xcel Energy will have built out all required infrastructure required for a basic interconnection (*e.g.*, line-extension to the site) to energize the facilities with executed interconnection agreements. Xcel shall have an available one-month extension if necessary for a more complex interconnection (*e.g.*, resizing the conductor line).

18. New Decision Alternative (The Department)

- a. Require Xcel to complete engineering studies and interconnection cost estimates for program applicants within the timeframes set forth in the Commission's September 28, 2004 Order in Docket No. E-999/CI-01-1023. Require Xcel to clarify the process set out in Sections 9 and 10 of its tariffs by:
 - reconciling overlaps and confusion between Section 9 and Section 10 that have led to ambiguity in timelines and schedules (as described by the parties)
 - providing more precise engineering requirements, including more precise requirements for Section 10, Step 2 of the interconnection process
 - setting out clearer expectations of the documents applicants are requested to submit at each step in the CSG application completeness process and in the interconnection process by providing standardized requirements or forms for each step, including providing a model one-line diagram to all CSG applicants and a clear list of all information required for both a one-line diagram and a site plan.
 - providing more timeline transparency, including the anticipated date by which the Company will complete the Step 4 engineering analysis for projects ahead of other projects in the queue.
 - providing the most accurate interconnection cost estimates available at the end of Section 10, Step 4 of the interconnection process.
- b. Require the Company to continue to post queue information on a monthly basis on the CSG website including application ID number, county, substation, size, application deemed complete date, and queue position. The queue must also include other interconnection applications not part of the CSG program.

- c. Require Xcel to develop a pre-application report and process, by a specific date, under which a CSG applicant has the option to enter into non-disclosure agreement with the Company to receive (a) distribution infrastructure and load analysis on a per feeder basis, and (b) study results for previously studied projects. A response to such an information request must be fulfilled within 15 business days of the request. Information requests may include substation capacity, feeder specific voltage, concurrent minimum and peak loading analysis, existing distributed generation under operation, amount of distributed generation in the interconnection queue, and any other pertinent information for the purposes of interconnection.
- d. Direct Xcel Energy to submit interconnection disputes to an independent engineer. To ensure independence, the engineer shall be selected by the Department promptly following the Commission's Order. The engineer shall be available on a standing basis to resolve disputes on the study process, including disputes related to the Company's determination of application completeness, timeliness of application and study processing, and the cost and necessity of study costs and distribution upgrades.
- e. Direct the Department to devise an application tracking process in cooperation with the Company and all CSG applicants, and to provide the Commission and parties with an application processing schedule in a compliance filing within 30 days of the Commission's Order. The Department is authorized to investigate situations in which application processing timelines are not reasonably met.

D. REC payment for Unsubscribed energy

1. Require Xcel to pay CSG operators for the RECs associated with unsubscribed energy if an operator opts to sell these RECs to Xcel.
2. Require Xcel to purchase RECs associated with unsubscribed energy under a REC payment as follows:
 - a. \$0.01/kWh for unsubscribed energy regardless of garden size
 - b. the same payment amounts designated by the Commission for the purchase of RECs associated with subscribed energy
 - c. another payment amount or size-differentiated payment amounts to be determined by the Commission
3. Find it appropriate to place an upper limit of 10 percent on the amount of unsubscribed energy that Xcel is required to purchase from a CSG at the bill credit rate plus REC rate established for unsubscribed energy.

4. Find that Xcel is not required to purchase the RECs associated with unsubscribed energy and that CSG developers have the option to set up an account in M-RETS in order to receive transfer from Xcel of RECs associated with unsubscribed energy.
5. Take no action.

E. REC payments for Solar*Rewards (S*R) and Made in Minnesota (MiM) gardens in years 11-25

1. Require Xcel to make a compliance tariff filing within 15 days of the Order date in this matter that reflects the resolution of this issue by the parties, as follows: require Xcel to provide the option of paying the current REC pricing for RECs generated after year 10 for those CSG gardens receiving S*R and MiM incentives. OR;
2. Take no action.

F. Assignment of Deposit

1. Pursuant to Minn. Stat. § 216B.25, modify the Commission's April 7, 2014 Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan to allow CSG developers may assign deposit returns to the deposit lender. (SunShare)
2. Pursuant to Minn. Stat. § 216B.25, modify the Commission's April 7, 2014 Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan to allow for the use of an escrow agreement for deposits made and facilitate the transfer of deposits currently held by Xcel into escrow upon the applicant's request and at the applicant's cost. (SGC)
3. Pursuant to Minn. Stat. § 216B.25, amend the Commission's April 7, 2014 Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan to require the deposits for projects under 250 kilowatts AC capacity be equal \$10,000 or \$100 per kilowatt, whichever is less and the deposits for projects from 250 kW to 1.0 MW be equal to \$25,000. (Kandiyo)
4. Take no Action

G. Reporting Requirements

1. Require Xcel in place of its current reporting requirements to provide quarterly reports to the Commission through eDockets that contain: (*Xcel Energy*)
 - a. Application process detail for the CSG program including the number of applications and associated MW by county for all applications submitted to-date

- b. Interconnection status of CSG projects including application ID, rated AC output, substation, date the project paid all necessary fees, date the application was deemed complete, date the Scope of Work is provided to the applicant for the interconnection study, date payment was received for the interconnection study, and the date the interconnection study started and was completed
 - c. Application issues and causes of delay
 - d. Implementation Stakeholder Workgroup approved meeting minutes
2. Require Xcel to continue its current set of monthly reporting requirements but to add those recommended by the DOC, as follows: (*Department*)
- f. identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information
 - g. additional information being sought from the applicant
 - h. amount of additional time taken for processing the application
 - i. identify each instance in which the Company did not meet a Section 10 tariff interconnection process timeline, or otherwise restarted the timeline
 - j. the reason for not meeting/restarting timeline
3. Require Xcel to provide a breakdown by customer class of CSG subscribers and update this breakdown quarterly. (*Department*) [**Note:** This could be added to the filing requirements in #21 below]
4. Clarify that Xcel is still required to meet the compliance reporting required beginning 18 months after the first garden begins operation (from the April 7 Order, Ordering Point 23) and the requirement to report back to the Commission by September 1, 2015, on the progress toward certification of smart inverters and other relevant barriers to the broader installation and use of smart inverters for solar gardens (from the April 7 Order, Ordering Point 24).

H. New Decision Alternative (Fresh Energy): Prohibit Xcel from contacting potential community solar garden subscribers to discourage the customer from signing a subscription agreement with a solar developer.

I. Compliance filings: Require Xcel to make compliance filings and/or tariff proposals for any decision options adopted above within 30 days of the Commission's Order in this docket.

