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September 23, 2013

—Via Electronic Filing—

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

RE: RESPONSE TO MINNESOTA GO SOLAR LLC'S PETITION TO INTERVENE AND
REQUEST FOR A CONTESTED CASE PROCEEDING
RENEWABLE DEVELOPMENT FUND - CYCLE 4
DOCKET NO. E002/M-12-1278

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits this Response to the September 12, 2013 Petition to Intervene and Request for a Contested Case Proceeding of Minnesota GO Solar LLC in the above-referenced docket.

We have electronically filed this document, and served copies on the parties on the attached service lists.

If you have any questions regarding this filing please contact me at (612) 330-7529 or paul.lehman@xcelenergy.com.

Sincerely,

/s/

PAUL J LEHMAN
MANAGER, REGULATORY COMPLIANCE AND FILINGS

/s/

MARA N. KOELLER
ASSOCIATE ATTORNEY

Enclosures
cc: Service List
Applicants

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF A REQUEST BY XCEL
ENERGY TO ISSUE RENEWABLE DEVELOPMENT
FUND CYCLE 4 REQUESTS FOR PROPOSALS
AND PETITION FOR APPROVAL OF A STANDARD
GRANT CONTRACT

DOCKET NO. E002/M-12-1278

**RESPONSE TO
MINNESOTA GO SOLAR LLC'S
PETITION TO INTERVENE AND
REQUEST FOR A CONTESTED CASE
PROCEEDING**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Response to the September 12, 2013 Petition to Intervene and Request for a Contested Case Proceeding of Minnesota GO Solar LLC in the above-referenced docket.

Xcel Energy submits this Response pursuant to Minn. R. 7829.0800 to address Minnesota GO Solar's request to intervene in the instant proceeding and Minnesota GO Solar's request for a contested case proceeding in this Docket. Xcel Energy intends to fully address the comments of Minnesota GO Solar in its reply comments.

While we do not object to Minnesota GO Solar's request to intervene in this proceeding, we do not believe that such intervention is necessary to preserve Minnesota GO Solar's rights and believe it would set problematic precedent. As a "participant" in this proceeding, Minnesota GO Solar has been afforded an opportunity to provide comments in this proceeding and may also be granted an opportunity to address the Commission as it deliberates on our Selection Report.

Therefore, only if the Commission grant's Minnesota GO Solar's request for a contested case is its formal intervention in the proceeding relevant.

We do not believe that a contested case is necessary in this proceeding. There are no issues of material fact that need to be developed to assist the Commission in its deliberation in this matter. Xcel Energy has fully complied with Minn. Stat. 116C.79 (the RDF Statute) and the Commission's February 6, 2013 Order in this proceeding and has fully documented its selection process in our July 29, 2013 Selection Report and our supplements thereto. Our filings, comments received by the Commission and our reply comments will provide a full and complete record upon which the Commission can make a decision with respect to the projects we are recommending for funding.

RESPONSE

A. Minnesota Go Solar's Request to Intervene

Xcel Energy acknowledges that as a bidder into the Cycle 4 RFP, Minnesota GO Solar is an interested participant in this proceeding and has interests that would allow it to rightfully intervene.¹ Consequently, Xcel Energy does not object to Minnesota GO Solar's request to intervene in this proceeding.² However, we are concerned that Minnesota GO Solar's intervention in this proceeding may send a signal that could imply that all bidders must intervene in the proceeding to preserve their rights. We believe such an outcome would be unduly burdensome to persons who have become or plan to become participants in this proceeding or subsequent proceedings related to the RDF. Unless a contested case is commenced in this proceeding, we do not believe intervention in this docket by bidders is necessary or useful.

1. Burden on Bidders

Granting Minnesota GO Solar's request to intervene could imply that all bidders for funding from the RDF are required to intervene in the Commission's proceeding. We are concerned that this could be burdensome to certain bidders with fewer resources or who are not familiar with the Commission's procedures. We do not believe this is necessary.

¹ Minn. R. 7829.0800, Subp. 2 (providing the grounds for intervention).

² Pursuant to Minn. R. 7829.0800, Subp. 5,

[i]f there is no objection to intervention and a petition to intervene is not denied or suspended within 15 days of filing, the petition to intervene must be considered granted, unless the matter is referred to the Office of Administrative Hearings for contested case proceedings before the expiration of the 15-day period.

The Commission's current procedures are sufficient to provide reasonable rights to bidders and has served the RDF well for the previous three cycles. For Cycle 4 we have had a robust comment period as outlined in the Notice of Extended Comment Period and Informational Meeting issued on September 3, 2013. To date, the Commission has received many comments from various bidders. Those bidders did not need to petition to intervene in order to participate in this proceeding and we similarly see no need for Minnesota GO Solar to intervene in order to participate in this proceeding.

2. *All Bidders Have an Opportunity to be Heard*

If Minnesota GO Solar becomes a formal party to this proceeding, it will have no better or worse opportunity to be heard by the Commission. Pursuant to Minn. R. 7829.0900, a participant "may also be granted an opportunity for oral presentation." Should this opportunity be granted, we expect some bidders may choose to make an oral presentation when the Commission deliberates on our Cycle 4 project recommendations. Consequently, unless the Commission grants Minnesota GO Solar's request for a contested case, formal party status confers no superior rights on Minnesota GO Solar than if it were merely a participant.

B. Request for Contested Case

A contested case is not necessary for this proceeding as there are no issues of contested facts. In fact, Minnesota GO Solar raises no issues of contested facts in its comments that would need to be addressed by a contested case. A contested case would merely burden this proceeding and other bidders.

The Commission may refer this matter to the Office of Administrative Hearings for contested case proceedings if (1) there are "contested material facts," or (2) the Commission "finds that all significant issues have not been resolved to its satisfaction."³

GO Solar has the burden, "as the party requesting a contested case hearing, to demonstrate the existence of material facts that would aid the agency [*i.e.*, Commission] in making a decision."⁴ Minnesota GO Solar's Petition does not identify a contested material fact that warrants a contested case proceeding. Therefore, Minnesota GO Solar's request should be denied.

³ Minn. R. 7829.1000 (2013).

⁴ *In re Petition of N. States Power Co.*, 676 N.W.2d 326, 335 (Minn. App. 2004).

The Company has met its obligations in bringing the Cycle 4 project selection report to the Commission for approval and has fully explained its selection methodology. No comments have raised issues of material fact but instead raise issue with the Company's selection of projects it is recommending for funding. We recognize that those bidders, including Minnesota GO Solar, who were not recommended for funding may want to raise concerns with the Commission but these concerns do not rise to the level of requiring a contested case.

The Company believes that the Commission's February 6, 2013 Order in this proceeding and the comments period will provide for a full and complete record upon which the Commission may decide. Order point 6 of the Commission's February 6 Order provides:

The final selection report shall include a detailed explanation of any deviations from the rankings for EP, RD and institutions of higher education projects provided by an independent third-party evaluator or other evaluator.

This information is detailed in our Selection Report and its Supplements. A contested case will not produce any additional information or more fully inform the record in this proceeding.

If, after the comment period has closed the Commission finds that all significant issues have not been resolved to its satisfaction, then the Commission may choose to refer this matter for a contested case proceeding. We respectfully suggest that this matter can and should be resolved to the Commission's satisfaction without the delay and expenditure of resources necessitated by a contested case proceeding.

CONCLUSION

For all of the foregoing reasons, the Company requests that Minnesota GO Solar's request for a contested case be denied.

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**Docket No. E002/M-12-1278 and
 Special Service List-4th Cycle List**

Dated this 23rd day of September 2013

/s/

SaGonna Thompson
Records Analyst

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