



414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

October 13, 2017

—Via Electronic Filing—

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

RE: COMMENTS
RENEWABLE*CONNECT PILOT PROGRAM REVISIONS
DOCKET NO. E002/M-17-695

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Comments in response to the Commission's September 29, 2017 Notice of Comment Period on the Company's Petition for Approval of Revisions to the Renewable*Connect Pilot Program.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on all parties on the attached service list. If you have any questions regarding this filing, please contact Holly Hinman at (612) 330-5941 or holly.r.hinman@xcelenergy.com.

Sincerely,

/s/

AAKASH CHANDARANA
REGIONAL VICE PRESIDENT, RATES AND REGULATORY AFFAIRS

Enclosure

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF REVISIONS TO THE
RENEWABLE*CONNECT PILOT PROGRAM

DOCKET No. E002/M-17-695

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission’s September 29, 2017 Notice of Comment Period on the Company’s Petition for Approval of Revisions to the Renewable*Connect Pilot Program.

COMMENTS

I. Current Breakdown of Subscribers by Customer Class That Have Committed to the Pilot Tranche

As described in our informational update filed August 23, 2017 in Docket No. E002/M-15-985, the Renewable*Connect Pilot Program has over 110 million kWh of active subscriptions including Residential, Small General Service, and large Commercial and Industrial (C&I) customers.

The specific breakdown of customer subscriptions and classes is listed in Table 1 below:

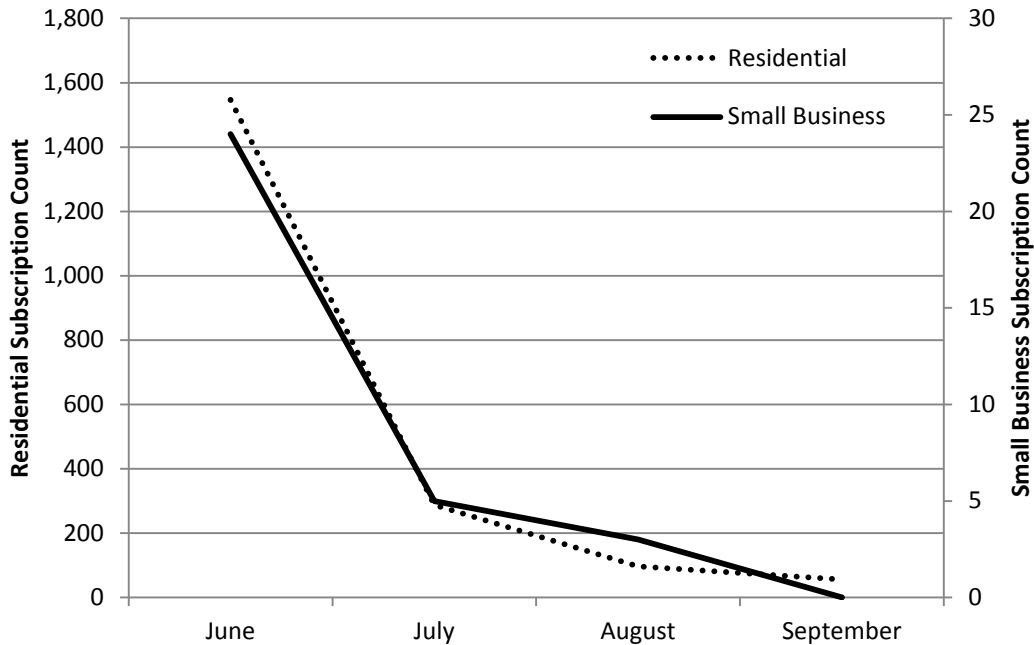
Table 1 – Customer Subscriptions

	Residential	Small General	C&I	Total
Participant Count	1,988	32	71	2,091
% of Commitments*	95.1%	1.5%	3.4%	
Energy (kWh)	13,377,426	460,337	96,872,824	110,710,587
% of Subscribed Energy	12.0%	0.4%	87.6%	

* Formal commitment is demonstrated by receipt of a signed copy of the Subscriber Agreement from the customer

In addition, it has become clear that the rate of subscription uptake has diminished over time. This reinforces the conclusion that a rule limiting the maximum subscription size is no longer necessary to enable all customers an opportunity to participate in the pilot.

Figure 1 - Residential and Small Business Subscriptions to R*C Pilot by Month



II. Impact of 10 Percent Per Customer Limit to Committed Subscribers on Subscription Size and By Customer Class

There are three C&I customers who have shown a commitment to the pilot tranche and have subscribed to the maximum amount of energy allowed by the 10 percent per customer limit. Of these three customers, one has expressed interest in a subscription amount above the 10 percent per customer limit.

In addition to the three customers mentioned above, one customer has committed to the pilot tranche at less than the maximum allowable subscription size, but has indicated an interest in a larger subscription if the 10 percent per customer limit was removed. There is also one other customer who chose not to enroll due to their concern about the uncertainty in energy availability during the enrollment period and the maximum subscription size limit.

III. Customer Interest in Pilot Program as Modified

Please see the response to Section II which addresses our current understanding of the potential for customers to join the Renewable*Connect Pilot Program if the 10 percent per customer limit is removed.

IV. Potential Impact of Proposed Revisions by Customer Class

As described in our September 21, 2017 petition, the City of Minneapolis has indicated a desire to subscribe to an additional 50 to 60 million kWh of the Renewable*Connect Pilot if it were made available to them. Increasing the City's subscription level by an additional 60 million kWh would result in about a 62 percent increase (from 96.8 million kWh to 156.8 million kWh) for the energy subscribed by the C&I customer class. Overall, total program subscriptions would then be about 170.7 million kWh, and we would still have about 7.5 million kWh available for other possible customer subscriptions. Thus, we anticipate minimal impact to either the rate or size of subscriptions among Residential or Small General Service customers as a result of the proposed revisions.

CONCLUSION

We appreciate the opportunity to provide this information and believe it is reasonable at this stage to enable modifications consistent with our learnings to date. We believe the Commission could reasonably lift the 10 percent per customer restriction because the limit has served its public interest purpose of providing all customers with an opportunity to subscribe. As the Company strives to better understand customer demand, we know that some customers are prepared to take more of the Renewable*Connect Pilot Program's first tranche and we would like to accommodate such interest. We appreciate the Commission's consideration of this request.

Dated: October 13, 2017

Northern States Power Company

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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-17-695

Dated this 13th day of October 2017

/s/

Lynnette Sweet

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