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September 25, 2017

—Via Electronic Filing—

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

RE: REPLY COMMENTS
CUSTOMER ACCESS JOINT PILOT PROGRAM
DOCKET NO. E002/M-17-527

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the August 15, 2017 Comments of the Institute for Local Self-Reliance (ILSR) and Clean Energy Access Coalition; the August 16, 2017 Comments of Cooperative Energy Futures, Minnesota Solar Connection and Novel Energy Solutions/Minnesota Community Solar (Joint Commenters) and the September 15, 2017 Comments of the Department of Commerce, Division of Energy Resources (the Department), Environmental Law & Policy Center (ELPC), Interstate Renewable Energy Council (IREC), and Fresh Energy regarding our proposed Customer Access Joint Pilot Program. The pilot is also referred to as Rehabilitation and Efficiency: Neighborhood Energy Works (RENEWs).

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me or Rebecca Eilers at Rebecca.d.eilers@xcelenergy.com or 612-330-5570 if you have any questions regarding this filing.

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 ITS CUSTOMER ACCESS
JOINT PILOT PROGRAM

DOCKET No. E002/M-17-527

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the August 15, 2017 Comments of the Institute for Local Self-Reliance (ILSR) and Clean Energy Access Coalition; the August 16, 2017 Comments of Cooperative Energy Futures, Minnesota Solar Connection and Novel Energy Solutions/Minnesota Community Solar (Joint Commenters) and the September 15, 2017 Comments of the Department of Commerce, Division of Energy Resources (the Department), Environmental Law & Policy Center (ELPC), Interstate Renewable Energy Council (IREC), and Fresh Energy regarding our proposed Customer Access Joint Pilot Program. The pilot is also referred to as Rehabilitation and Efficiency: Neighborhood Energy Works (RENEWs).

The comments received in this docket appear receptive to the concepts underlying this pilot program and agreed in unison that RENEWs meets the Commission's direction from their September 6, 2016 Order in Docket No. E002/M-13-867, which requires the Company to file a proposal or proposals to develop a solar garden specifically for low-income customers. We are excited to bring the innovative RENEWs pilot to the Railroad Island community. By pairing a community solar garden (CSG) development with energy efficiency activities, we expect to deliver bill reductions to low income customers, as well as deliver more access to the Solar*Rewards Community[®] program to low income customers.

1. *Pilot Program will benefit the Railroad Island community*

The Railroad Island community in St. Paul is well-situated to gain a multitude of participant benefits from this type of pilot. With the community consisting of a large number of LIHEAP eligible customers with aging, inefficient homes, the energy efficiency component of the pilot will deliver meaningful benefits to customers. Having a targeted process for low income customers in the community to receive energy efficiency services for their homes will improve housing stock, reduce customer energy usage, and preserve limited household income for families and individuals.

Having a locally-driven project with supportive community champions is also key to developing this pilot. The CSG is being developed on a tax-forfeited parcel in the neighborhood, redeveloping an underused piece of property and providing a long-term improvement to the community's property base. Further, the location has the added benefit of fostering customer interest in the Solar*Rewards Community program due to community members being able to physically see the adjacent facilities.

The Company is exploring other partnership opportunities to help foster job creation, economic development, and further investment in the community. For example, the Company is evaluating an apprenticeship program to leverage the garden's ongoing O&M activities, and a potential partnership with local beekeepers.

2. *Pilot Program provides learning opportunity*

RENEWs will represent an important opportunity to learn about the benefits and viability of a low income program delivering energy efficiency improvements and access to the Solar*Rewards Community program. We will share our learnings in our annual filings.

This pilot will also provide a learning opportunity about developing a targeted, low income solar garden using the Value of Solar (VOS) rate. With the continued support of our community partners we are committed to making this pilot program work under the VOS. This first-of-its-kind proposal leaves open the possibility for any developers and community partners to use learnings from the pilot to pursue the goal of a more inclusive approach to CSG participation.

REPLY

In this Reply, we respond to the Department of Commerce, who recommended approval and included additional recommended reporting requirements. There were a few high-level themes expressed in the other Comments submitted, which we address below.

A. The Department of Commerce recommends approval

The Department recommends approval of this Petition, finding that the proposal is reasonable. We appreciate their review of our proposal and are pleased to provide the additional reporting requested in their comments, specifically the estimated annual energy savings for the program, the estimated annual energy savings per subscriber, and the actual bill savings benefits that accrued to participants.

B. Other Issues

1. Scale of Pilot

Among the Company's goals in coming forward with this proposal is to expand program access and to do so while staying within the program rules. We also want the pilot to be successful and a positive experience for participants. Additionally, we believe there is a lot to learn about this model for serving customers. When viewing the proposal through that lens, we believe we struck the right balance sizing the pilot.

Some comments suggested that the pilot limits the subscription size of subscribers and ultimately restricts the potential savings of participants. The proposed RENEWs tariff will allow customers to subscribe in 200 watt increments, consistent with program rules for other participants.

Some parties also expressed concern that no plan to fully scale this proposal was presented at the time of filing. As with any pilot, it is appropriate to start with a focused scope and then consider the appropriate next steps once operational experience is gathered. Accordingly, any discussion of further scaling of this pilot or some other related program would be most constructive after the pilot program is approved and underway generating learnings.

2. Pilot participant billing

An additional topic to address is how participating customers will be billed. Some commenters stated that a single line-item bill credit for customers, as proposed by the

Company, obscured the true costs and benefits of a subscription and made it hard for customers to gauge the value against offerings by other developers. This pilot program is directed at making participation in our Solar*Rewards Community program as easy as possible for low income customers. Ultimately, what matters to customers is how a subscription affects their final electricity bill. A net bill credit reflects this final, bottom line impact in simple, easy to understand terms.

Some parties again suggested that the Company should provide On Bill Financing (OBF) or On Bill Repayment (OBR) services through the Solar*Rewards Community program. We addressed this in more depth in our April 29, 2016 Reply Comments in Docket No. E002/M-13-867. We do not believe the Commission needs to address the rules of OBR or OBF as part of this pilot.

Some comments recommended including a 1.5-cent/kWh bill-credit adder for qualified low income subscribers. At this time, there is no support in the record showing that any adders on-top of the VOS rate are necessary to spur low income participation with this pilot program. As the Company has previously acknowledged, all Solar*Rewards Community energy purchases put upward pressure on the Company's fuel clause rates given that SRC Bill Credit rates are substantially above current system fuel rates, and that will include energy purchases from this garden as well. Adders to the VOS bill credit rate would increase this pressure. Other than the potential fuel price increases from additional SRC energy purchases, the Company's proposal does not seek any additional non-participant recovery.

Finally, some comments suggest the Company be prevented from setting the pricing for its pilot at will. The Company has already guaranteed it will not set a negative net price (incurring costs for participants), and that it will also provide written notice to customers for any pricing change, providing transparency to customers. It would be asymmetrical to deny the Company the band of flexibility in marketing a subscription offer that any other garden operator enjoys. Some parties wrongly assert that the Company would unilaterally modify the VOS rate through this pilot. The Company does not have authority to modify the VOS and has not proposed any such modification.

3. Transparency

The transparency of the RENEWS pilot was an additional topic of discussion within the comments. We have provided the level of information to be expected at this stage of the process, which is a high level estimate which will be refined more when we have Commission approval.

Parties submitting comments were interested in the Company's choice of development partner. The Company believes that the benefits of working with THOR to develop the facilities are important to making this pilot a success. THOR has unique knowledge of the technical, design, and engineering issues associated with the site and has been engaged in other neighborhood construction projects and public meetings in the community, bringing benefits that could not have been gained by working with a different developer.

Also on the topic of transparency, comments addressed potential reporting requirements for the Company as learnings are generated in this pilot. We appreciate the Department's feedback in this regard, and as stated above are open to providing the additional information they request.

We are partnering with the Energy CENTS Coalition (ECC) to learn from the community about the benefits and impacts of the RENEWs pilot. ECC will strive to strike a balance of administrative feasibility when engaging within the community to determine the impact of the pilot without being overly burdensome to program participants. Our annual report will include a qualitative analysis of customer preference information collected during the installation and/or enrollment process. We believe recommended requirements suggested in comments could be burdensome to program participants in this community (annual interviews, for example) and could remove the focus of this pilot from helping customers manage their energy costs.

Finally, some comments suggested the Company provide quarterly reports during this pilot. The Company does not believe this recommendation is reasonable and is unlikely to deliver any additional benefit. An annual reporting schedule will be sufficient to provide timely information about the benefits and impacts of the pilot.

CONCLUSION

As we have expressed throughout our initial proposal and these Reply Comments, we expect that the RENEWs pilot can deliver value by bringing a new, innovative type of development to a low income community currently underserved by renewable energy programs. We are looking forward to getting started on this pilot and we respectfully request that the Commission approve our customer access joint pilot program and associated RENEWs tariffs.

Dated: September 25, 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-17-527

Dated this 25th day of September 2017

/s/

Lynnette Sweet

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