

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
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IN THE MATTER OF IMPLEMENTATION OF 2023
LEGISLATION CHANGES TO XCEL ENERGY’S
COMMUNITY SOLAR GARDEN PROGRAM

DOCKET NO. E-002/CL-23-335

COMMENTS OF INTERESTED STAKEHOLDERS

Nokomis Energy and Cooperative Energy Futures (“Interested Stakeholders”) jointly submit these comments to the Public Utilities Commission for consideration in the above-styled docket.

In light of the Commission hearing on November 7, 2024, and the discussion of “capacity” in MINN. STAT. 216b.164 Subd. 2a(c), the undersigned have been in contact with Northern States Power Company, d/b/a Xcel Energy (“Xcel”) and are working to resolve one or more of the outstanding items discussed below prior to consideration by the Commission.

I. Introduction

On May 30, 2024, the Commission filed an Order (hereinafter the “Order”) in the above-styled docket, directing Xcel to take several actions regarding the new Community Solar Garden Program (“LMI-Accessible CSG Program”).¹ Among them, Xcel was directed to develop and file a power purchase agreement between interested stakeholders and Xcel, and submit that “standard contract” to the Commission for approval.² Specifically, the Order called for the following steps to take place:

“Xcel and interested stakeholders must develop and file a standard contract governing the terms and conditions for the purchase of power exported by the CSG operator to Xcel

¹ Minnesota Public Utilities Commission, *Order*, Doc. No. E-002/CI-23-335 (May 30, 2024) (hereinafter the “*Order*”). The legislature created the LMI-Accessible CSG Program by amending MINN. STAT. § 216B.1641 on May 24, 2023, to replace the prior “Legacy CSG Program.” The amended statute directed the Department of Commerce (“Department”) to create and administer the LMI-Accessible CSG Program beginning January 1, 2024. The name “LMI-Accessible CSG Program” is the name given to the program by the Department.

² *Id.* at 6 (Order Point 3).

under the non-legacy CSG program **for Commission approval** within 30 days of this order.”³

On June 7, 2024, Xcel filed its updated tariff incorporating Xcel’s version of the standard contract.⁴ The undersigned did not believe this fulfilled either mandate: to develop the standard contract with interested stakeholders, or to file it with the Commission for approval.⁵

Thereafter, the undersigned and Xcel agreed to a stakeholder meeting on the standard contract, and agreed that Xcel would file any disputed, and undisputed, revisions of the standard contract with the Commission for resolution and approval. Xcel filed a letter with the Commission on July 23, 2024, announcing the stakeholder meeting, which was held on August 28, 2024.⁶

Xcel filed a letter with disputed and undisputed updates to the standard contract, requesting a comment period, on September 26, 2024.⁷ Xcel identified three broad areas of remaining disagreement between Xcel and stakeholders:

- Use of the term nameplate capacity which appears across the LMI Standard Contract;
- Addition of Battery Energy Storage System (BESS); and
- Relationship between the Tariff and Contract

The Commission filed a notice of comment period on October 11, 2024, seeking comment on the following issues:

- Should the Commission approve the changes agreed upon by Xcel and stakeholders?
- How should the Commission address the addition of a definition of “Battery Energy Storage System” as proposed by stakeholders?
- How should the Commission address the non-consensus item regarding the use of the term “nameplate capacity” which appears across the LMI Standard Contract?
- How should the Commission address the non-consensus items regarding the relationship between the Tariff and the Contract?
- Are there other issues or concerns related to this matter?

II. The Commission Should Approve the Agreed-Upon Changes

The undersigned urge the Commission to approve the consensus changes reflected in Xcel’s September 26, 2024 filing. The proposed changes reflect differences between the LMI-

³ *Id.* (emphasis added).

⁴ Xcel, *Compliance Filing*, Doc. No. E-002/CI-23-335 (June 7, 2024).

⁵ Some of the undersigned were in contact with Xcel before the Order was issued. Those parties exchanged redlines of a potential standard contract with Xcel, in an attempt to narrow disagreements before the Commission issued its Order. Some changes were agreed on, but other disagreements remained when the Order was issued.

⁶ Xcel, *Letter – Stakeholder Meeting Notice*, Doc. No. 23-335 (July 23, 2024).

⁷ Xcel, *Letter – Request for Comment Period*, Doc. No. 23-335 (Sept. 26, 2024).

Accessible CSG Program and the Legacy CSG Program, and technical changes the parties' deemed fair and appropriate.

III. The Statute Explicitly Rejects "Nameplate Capacity"

Xcel insists that the word "nameplate" be included in the standard contract. The undersigned believe this is incorrect as a matter of law. The Commission should follow the intent of the legislature and eliminate the word "nameplate."

The statute governing the Legacy CSG Program limited the size of the CSGs created under that program by "nameplate capacity."⁸ The legislature amended that statute to create the LMI-Accessible CSG Program. The new statute specifically does not use the phrase "nameplate capacity," and instead links to the definition of "capacity" in MINN. STAT. § 216B.164 Subd. 2a(c).⁹ This plain language should be determinative.¹⁰ Further, in the context of the entire statute, this use of "capacity" was intended to be different from the use of "nameplate capacity" in the Legacy CSG Program.¹¹

The standard contract must also avoid an interpretation of the statute that renders a word or phrase superfluous, and ensure that each word in the statute is given effect.¹² Xcel has proposed defining "Capacity" to mean "Nameplate Capacity" in the new standard contract. This would render the word "nameplate" meaningless, and add words to the statute that the legislature specifically excluded. Nowhere in the amended statute governing LMI-Accessible CSG Program, or the definition in MINN. STAT. § 216B.164 (c), does the word "nameplate" appear. The Legacy CSG standard contract used "nameplate" because that followed the statutory language. The same logic holds true here.

IV. Battery Energy Storage Systems Are Good Public Policy

The undersigned propose that battery energy solar systems should be permitted in the new LMI-Accessible CSG Program. Although the statute does not mention batteries, we believe this addition should not be controversial.

⁸ MINN. STAT. § 216B.1641 Subd. 1(b) ("The solar garden must have a **nameplate capacity** of no more than one megawatt.") (emphasis added).

⁹ Minn. Stat. § 216B.164 (c) (eligible projects must "have a **capacity**, as defined under section 216B.164, subdivision 2a, paragraph (c), of no more than five megawatts") (emphasis added).

¹⁰ See, e.g., *State v. Cummings*, 2 N.W.3d 528, 533 (Minn. 2024).

¹¹ See, e.g., *State v. Pakhnyuk*, 926 N.W.2d 914, 920 (Minn. 2019); *State v. Riggs*, 865 N.W.2d 679, 682–83 (Minn. 2015); *State v. Gaiovnik*, 794 N.W.2d 643, 647 (Minn. 2011).

¹² See, e.g., *State v. Thompson*, 950 N.W.2d 65, 69 (Minn. 2020); *Hagen v. Steven Scott Mgmt., Inc.*, 963 N.W.2d 164, 170 (Minn. 2021); *Shire v. Rosemount, Inc.*, 875 N.W.2d 289, 292 (Minn. 2016); *Allan v. R.D. Offutt Co.*, 869 N.W.2d 31, 33 (Minn. 2015); *Amaral v. Saint Cloud Hosp.*, 598 N.W.2d 379, 384 (Minn. 1999).

The State of Minnesota has broadly enacted policies to encourage the adoption of renewable resources.¹³ One of the limitations of many renewable sources is intermittency. For example, the sun can only provide energy to photovoltaic cells for a portion of each day. Batteries can help solve these limitations, increasing the amount of renewable energy that can be deployed to the grid and improving the utility of renewable capacity on the grid.

This addition would not contravene any statutory obligation, nor contravene any program parameter. Rather, this appears consistent with the statute, the program and public policy.

V. The LMI-Accessible CSG Program Is Not Administered By Xcel, So The Standard Contract Should Not Be Tied To Xcel's Tariff

Among the major differences between the Legacy CSG Program and the LMI-Accessible CSG Program, is that the former is managed by Xcel and the latter is overseen by the Department of Commerce. Appropriately, the form standard contract for the Legacy CSG Program was contained in Xcel's tariff. In this case, however, the program is overseen by the Department, and therefore the standard contract for that program should not be contained in Xcel's tariff.

Xcel wishes to retain language from the old contract that says, inter alia, "This Contract is Part of the Associated Tariff."¹⁴ That no longer reflects the status of the program. The new LMI-Accessible CSG Program is dictated by statute and overseen by the Department. The standard contract for that program should not be shoehorned into Xcel's tariff.

Moreover, changes to the tariff should not and cannot impact executed contracts. Financing parties and project buyers require certainty to extend financing. For example, project zoning permits and site control cannot be revocable at will. The same is true of the offtake contract. Executed standard contracts cannot be fundamentally altered when Xcel updates its tariff.

VI. Interested Stakeholders Propose One Clarifying Change

One section of disputed language in Xcel's letter is unclear, and the undersigned propose an alternative. Specifically, the end of the definition of "Bill Credit Rate" contains the following sentence:

"Once a bill credit applies, that Bill Credit applies for the term of the Contract."¹⁵

The undersigned believe that this sentiment is better expressed using the following sentence in its place:

"Upon execution of the Contract, the methodology used to calculate the Average Retail Rate shall not change for the term of the Contract."

¹³ See, e.g., Solar Energy Standard, Carbon Free Standard, Distributed Solar Energy Standard

¹⁴ Xcel, *Letter – Request for Comment Period*, Doc. No. 23-335 at 4 (Sept. 26, 2024).

¹⁵ *Id.*

The undersigned will further discuss this change with Xcel, to see if resolution is possible before consideration by the Commission.

VII. Conclusion

The Commission should approve the consensus changes to the standard contract, eliminate the word “nameplate” from Xcel’s proposed version, add “BESS” to Xcel’s proposed version, and direct Xcel to adopt the changes proposed by the undersigned to disentangle the standard contract from Xcel’s tariff.

[Signature Page Follows]

NOKOMIS ENERGY



By: Matthew Melewski
Its: General Counsel

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Pursuant to Minn. R. 7829.0400 Subp. 3, I have electronically filed the foregoing with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

/s/ Matthew Melewski

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