MINNESOTA DEPARTMENT OF COMMERCE

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May 1, 2015

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

RE: Docket No. E002/M-13-867

Dear Mr. Wolf,

Attached please find the Minnesota Department of Commerce, Division of Energy Resources request for the Commission to issue an Order to Show Cause to Northern States Power Company, dba Xcel Energy in the above referenced Docket.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst

SLP/lt
Attachment

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION
SUITE 350
121 SEVENTH PLACE EAST
ST. PAUL, MINNESOTA 55101-2147

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

In The Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Garden Program	MPUC Docket No. E002/M-13-867

MINNESOTA DEPARTMENT OF COMMERCE

MOTION FOR

AN ORDER TO SHOW CAUSE

SUMMARY OF MOTION FOR ORDER TO SHOW CAUSE

Based on Xcel Energy's April 28, 2015, Supplemental Comments and Notice to Administer Program ("Supplemental Comments"), the Minnesota Department of Commerce, Division of Energy Resources ("Department"), requests on an expedited basis that the Minnesota Public Utilities Commission ("Commission") issue an Order to Show Cause to Northern States Power Company, dba Xcel Energy ("Xcel Energy" or "Company") requiring the Company to show why the Commission should not:

1. Find that Xcel Energy's retroactive proposal contained in its April 28, 2015 Supplementary Comments to stop processing co-located solar garden applications under its Solar*Rewards Community Program to 1 MW or less is in violation of the Commission's Orders in this docket;[1] and

2. 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,[2] and reject any scaling to 1 MW proposed co-located gardens with an aggregate capacity greater than 1 MW.

The Department urges the Commission to issue an Order to Show Cause, as described above, to place the burden on Xcel Energy to demonstrate, if it chooses unilaterally to stop processing co-located solar garden applications under its Solar*Rewards Community Program to 1 MW, why it should not be found to be in violation of the Commission's Orders in this matter, and to make clear that time is of the essence with respect to the Company's implementation of the Solar Rewards program in accordance with the Commission's Orders and the Company's approved tariffs.

FACTS

On April 7, 2014, the Commission issued its *Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan*, which required the Company to expand the definition of "community solar garden site" to allow a garden site based

[1] Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan, (April 7, 2014) ("April 7, 2014 Order"); Order Approving Solar-Garden Plan With Modifications, (September 17, 2014) ("September 17, 2014 Order"). *See also* Order Clarifying Solar-Garden Application Process, (February 13, 2015).

[2] April 7, 2014 Order at 12 and September 17, 2014 Order at 13-15.

on a point of interconnection. The Commission determined that "the operator should be able to install solar panels on multiple parcels [of land], connect them to the grid through a single interconnection point, and take advantage of the resulting economies of scale."[3]

On September 17, 2014, the Commission issued its *Order Approving Solar-Garden Plan with Modifications*, in which the Commission directed Xcel to replace its definition of "community solar garden site" with the following definition:

> "Community Solar Garden Site" is the location of the single point of common coupling located at the production meter for the Community Solar Garden associated with the parcel or parcels of real property on which the PV System will be constructed and located, including any easements, rights of way, and other real-estate interests reasonably necessary to construct, operate, and maintain the garden. Multiple Community Solar Garden Sites may be situated in close proximity to one another in order to share in distribution infrastructure.

The Commission specified "that the definition of 'community solar garden site' should expressly state that solar gardens may be sited near each other in order to share distribution infrastructure" because such a definition "will allow solar gardens to be built more cost-effectively and is consistent with the statutory mandate that the program reasonably allow for the creation, financing, and accessibility of solar gardens."[4]

On February 10, 2015 and March 4, 2015, Xcel Energy filed Comments and Reply Comments expressing its concern that the initial Community Solar Garden applications were "utility-scale" projects. The Company stated its belief that the siting of multiple 1 MW solar projects in close proximity to one another was contrary to statute, and would present significant rate impacts to its customers. The Company requested the Commission to confirm that its interpretation of the CSG statute precludes utility scale solar.[5]

On March 10, 2015, the Commission's Executive Secretary issued a letter to Xcel Energy stating it expected to address program and rate concerns in late spring or early summer 2015, and

[3] April 7, 2014 Order at 12.
[4] September 17, 2014 Order at 14-15.
[5] Xcel Energy's March 4, 2015 Reply at 15.

stated that the Commission's Orders remain unchanged. Consistent with those Orders, the letter observed that the Commission "expects Xcel to administer its program as set out in statute and related Commission Orders."

On April 2, 2015, the Department filed Comments setting forth its reasons for recommending denial of Xcel's retroactive proposal to process only Community Solar Garden applications for which the cumulative capacity is 1 MW or less as defined by the Company. Specifically the Department objected to Xcel's retroactive proposal because it was not a straight-forward approach, it was likely to have serious negative unexpected consequences, and it was contrary to the Commission's Orders, as follows:[6]

1. *Defining community solar garden site is not straight-forward.* The Commission addressed the difficulty in defining a community solar garden site in their September 17, 2014 *Order*, finding that:

> "Community Solar Garden Site" is the location of the single point of common coupling located at the production meter for the Community Solar Garden associated with the parcel or parcels of real property on which the PV System will be constructed and located, including any easements, rights of way, and other real-estate interests reasonably necessary to construct, operate, and maintain the garden. Multiple Community Solar Garden Sites may be situated in close proximity to one another in order to share in distribution infrastructure.

For Xcel to process applications in the manner the Company proposes, Xcel would need to determine the amount of physical space between gardens required to qualify garden applications for processing. The Company would also need to evaluate the financial and operational relationships between developers and the organization assigned to the gardens (*e.g.*, limited liability companies) to determine if they are the same company or separate entities. In addition, since most community solar gardens are expected to utilize the investment tax credit, the Department expects that the financial relationships in community solar garden ownership will change during the 25 year term. Xcel is already undertaking a similar analysis for large organizations interested in being a subscriber; it's the Department's understanding that this analysis can take up to 6 months depending on the complexity of the subscriber. If Xcel had to do similar analysis for all community solar gardens, the already lengthy timeline on this project would be further extended. The ability of the Department and Commission staff to verify Xcel's adherence to the Commission's orders and the Company's tariff on the application processing would be diminished under this proposal.

[6] Department Comments at 3-4 (April 2, 2015).

In our February 24, 2015 *Comments,* the Department wrote that the Commission could consider co-located solar gardens that collectively exceed 10 MW of nameplate capacity as out of scope with Xcel's distribution system interconnection requirements. However, after reviewing other parties' comments on Xcel's interconnection process and in considering the limitations described above, the Department no longer proposes a 10 MW site limit as a solution. The Department discusses below how size limits can be problematic.

2. *There are likely unintended consequences of Xcel's proposal.* Concerns similar to those aired by Xcel came up in the development of community wind projects. The Department's experience with those projects shows that attempts to place size and customer restrictions to solve one problem end up having unexpected results. The Department foresees situations where developers, trying to work around Xcel's 1 MW site limit, enter complex agreements with other companies that would submit solar garden applications as types of shell companies, while the main developer actually develops the project. There may be ways to work around restrictions on siting as well.

   The Department has considered other potential limits on project size, such as limits that could determine a project's eligibility for a possible financial adder used in conjunction with the value of solar, and arrived at similar challenges.

3. *Xcel's proposed retroactive program changes are inconsistent with the Commission's Orders.* Xcel proposes to apply their application processing plan to both existing and new applications. As of April 2, 2015, Xcel's Solar*Rewards Community program has received applications representing 487 MWs of proposed projects. Solar developers and communities have made significant investments in these projects. For example, if all of these projects submit the required deposits, Xcel will hold nearly 49 million dollars in deposits. Although the deposits are refundable, other project development costs are not.

   Providing current projects the certainty they need to move forward while the Commission evaluates potential changes for future projects was a prominent theme of past Commission meetings in this docket. The Commission addressed concerns about rate uncertainty by finding that community solar garden projects filing complete applications under the Applicable Retail Rate should be allowed to lock in the renewable energy credit (REC) price and be credited at the applicable retail rate in place at the time of energy generation for the duration of the 25-year contract. Regarding these rate clarifications, the Commission stated: These clarifications will improve the predictability of the applicable-retail-rate-plus-REC combination and aid solar-garden developers in securing financing while the Department, Xcel, and other stakeholders work to design an incentive for solar-gardens that will complement a value-of-solar rate.

On April 28, 2015, Xcel Energy filed Supplementary Comments that state the Company's intention unilaterally to limit all co-located gardens with an aggregate capacity greater than

1 MW to 1 MW, and process only applications for co-located gardens that do not exceed 1 MW. The Company further indicated that "if multiple developers arrange a host of garden swaps to aggregate a series of sites to establish utility scale solar efficiencies, we will treat the developers as affiliates or partners," and reject those applications. The Company stated it would refund program application fees, deposits, and interconnection fees solar developers have paid to the Company for projects greater than 1 MW.[7]

ANALYSIS

Xcel's retroactive proposal to limit processing of Community Solar Garden projects to 1 MW projects that are not co-located near each other violates the Commission's April 7, 2014 and September 19, 2014 Orders. Xcel argues incorrectly that the Commission did not intend to permit multiple 1 MW solar gardens to co-locate near each other. The Department disagrees, and the Commission's Orders do not support Xcel's argument.

Minnesota Statute section 216B1641(b) limits the nameplate capacity for a community solar garden to 1 MW alternating current (AC). The Commission's September 17, 2014 Order acknowledges this capacity size, but explicitly permits multiple gardens to co-locate in close proximity to one another. Since solar garden capacity is set at 1 MW, and the Commission's Order states specifically that "multiple Community Solar Garden Sites may be situated in close proximity to one another in order to share in distribution infrastructure," the Commission's Order clearly permits multiple 1 MW community solar gardens to be co-located. Xcel's proposal to limit processing of co-located community solar garden applications to 1 MW in aggregate is a clear violation of the Commission's September 17, 2014 Order.

Discussion of the ability to co-locate multiple 1 MW community solar gardens has occurred on multiple occasions as evidenced by the discussion in the Commission's April 7,

[7] Xcel Supplemental Comments at 8 (April 28, 2015).

2014 and September 17, 2014 Orders. No party sought reconsideration of those Orders.[8] In its February 10 and March 4, 2015 comments, Xcel laid out its concerns with community solar garden co-location and sought a Commission clarification that the statute precluded the treatment of "utility scale" solar projects as community solar gardens. In its letter dated March 10, 2015, the Commission notified Xcel that it was taking no action on the Company's request for clarification at that time and that the Commission's Orders remained in effect.[9]

In short, Xcel has had multiple indications of the Commission's findings on co-located community solar gardens, but now states its intention to act in violation of the Commission's Orders regarding co-location of solar gardens. The Department recommends that the Commission consider the Department's Motion on an expedited basis and issue to Xcel an Order to Show Cause consistent with the discussion herein.

CONCLUSION

For the reasons discussed above, the Department requests on an expedited basis that the Commission issue an Order to Show Cause to Xcel Energy requiring the Company to show why the Commission should not:

1. Find that Xcel Energy's retroactive proposal contained in its April 28, 2015 Supplementary Comments to stop processing co-located solar garden applications under its Solar*Rewards Community Program to 1 MW or less is in violation of the Commission's Orders in this docket;[10] and

2. 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,[11] and reject any scaling to 1 MW proposed co-located gardens with an aggregate capacity greater than 1 MW.

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[8] While not relevant to the co-location issue, Xcel did file a Motion to Show Cause following the April 7th Order regarding the Value of Solar (VOS) rate; the Commission's September 17th Order addressed the VOS rate as well as other issues including the co-location issue.

[9] The Executive Secretary's March 10, 2015 letter provided Xcel the courtesy of identifying the timing of when the Commission may schedule consideration of the Company's clarification request. The letter makes clear that the Commission's Orders remain in effect, which is an accurate and important statement of Commission process. The Department strongly disagrees with Xcel's veiled suggestion that the Commission may have violated the Open Meeting Law.

[10] *Order Rejecting Xcel's Solar-Garden Tariff Filing and Requiring the Company to File a Revised Solar-Garden Plan*, (April 7, 2014) ("April 7, 2014 Order"); Order Approving Solar-Garden Plan With Modifications, (September 17, 2014) ("September 17, 2014 Order"). *See also Order Clarifying Solar-Garden Application Process*, (February 13, 2015).

[11] April 7, 2014 Order at 12 and September 17, 2014 Order at 13-15.

Company compliance with the Commission's Orders in this docket is essential for the success of the Solar*Rewards Community Program, and time is of the essence with respect to the Company's implementation of the Solar Rewards program in accordance with the Commission's Orders and the Company's approved tariffs.

Dated: May 1, 2015

Respectfully Submitted,

/s/ JULIA E. ANDERSON
Assistant Attorney General

445 Minnesota Street, Suite 1800
St. Paul, MN 55101-2134

Attorney for DOC-DER

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Motion for an Order to Show Cause

Docket No. **E002/M-13-867**

Dated this 1st day of May 2015

/s/Sharon Ferguson

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