

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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Betsy Wergin	Commissioner

**In the Matter of the Implementation of
Solar Energy Standard Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1691**

Docket Number/s: E999/CI-13-542

Date: 1/31/2014

**COMMENTS OF THE MINNESOTA SOLAR ENERGY
INDUSTRIES ASSOCIATION**

We provide these comments on behalf of the Minnesota Solar Energy Industries Association (MnSEIA). As a membership association comprised of 58 organizations involved in photovoltaic and solar thermal energy production, MnSEIA promotes the development and use of solar energy to create a sustainable future for the state.

Five questions were attached to the request for comments for E999/CI-13-542. MnSEIA comments at this time are focused on response to question (2) although we may respond in the reply period to concerns raised about the other four questions.

Essentially, question (2) seeks clarification on the extent to which provisions in Subd. 7 **Compliance** under Minn. Stat. 216B.1691 relate to compliance of the Solar Energy Standard (SES) in Subd. 2f. “The commission must regularly investigate whether an electric utility is in compliance with its good faith objective under subdivision 2 and standard obligation under subdivision 2a” Subd. 7 further authorizes the PUC to impose non-compliance penalties. “If an electric utility fails to comply with an order under this subdivision, the commission may impose a financial penalty on the electric utility in an amount not to exceed the estimated cost of the electric utility to achieve compliance.”

It is MnSEIA’s opinion that the SES provisions in Subd. 2f are clearly part of subdivision 2 and therefore subject to the compliance provisions of Subd. 7. To help clarify the relationship to the standard obligation under subdivision 2a, Subd 2f (b) states “The solar energy standard established in this subdivision is subject to all the provisions of this section governing a utility's standard obligation under subdivision 2a”. Further, Subd 2f (g) calls for compliance reports that would support the PUC’s compliance investigative authority in Subd.7. “Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision.”

MnSEIA believes this report should remain on an annual cycle due to the shorter period for implementation of the SES than the RES. While the SES currently has no interim benchmarks, it is important to track the solar electric aggregate and market segment development annually to assure the full SES deployment by 2020.

MnSEIA appreciates the Minnesota PUC's creation of this S-RECs Docket and looks forward to working with the PUC and other stakeholders to realize the multiple benefits from growing the solar industry in Minnesota.

Sincerely,

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