

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF IMPLEMENTATION OF
2023 LEGISLATIVE CHANGES TO NORTHERN
STATES POWER CO. D/B/A XCEL ENERGY'S
COMMUNITY SOLAR GARDEN PROGRAM

DOCKET NO. E002/CI-23-335

NOKOMIS ENERGY COMMENTS

June 20, 2025

Nokomis Energy LLC submits these comments pursuant to the Notice of Comment Period issued by the Minnesota Public Utilities Commission on April 4, 2025, as extended by that Notice of Extended Comment Period, issued on June 6, 2025.

The Commission described the issues as follows:

1. Should the Commission approve Xcel Energy's request to increase the participation Fee for the Legacy CSG program and the LMI CSG program beginning in February 2026?
2. Is the current application fee for the LMI CSG program reasonable for Xcel Energy to recover actual costs?

The first issue relates to a Petition filed by Xcel Energy on December 19, 2024, seeking permission to increase the Participation Fee from \$500/MW/yr to \$800/MW/yr.¹ The second issue relates to Xcel's proposed Application Fee of \$4,125/MW that the Commission approved in its December 28, 2023 Order, with the caveat that a comment period be undertaken to evaluate the basis for the Fee.

The Commission first solicited comment from Xcel Energy, which filed a Response on May 5, 2025, addressing both the Application Fee and the Participation Fee.

I. Application Fee

In its Response, Xcel provided revenue it expects from the Application Fee through 2033 (\$3,223,069)² and total IT costs associated with creating the LMI-CSG Program (\$3,789,335). Xcel did not suggest a change to the Application Fee, but did state that it will ensure it is not double counted in its rate plan.³

¹ Northern States Power Company, d/b/a Xcel Energy ("Xcel"), *Petition*, Doc. Nos. 23-335; 13-867 (Dec. 19, 2024).

² This is the total of current revenue (\$335,569) and anticipated revenue (\$2,887,500).

³ Xcel, *Response*, Doc. No 23-335 at 5 (May 5, 2025).

In its Notice of Comment Period, the Commission asked three questions relative to the Application Fee:

- Is the initially determined application fee for the LMI CSG program of \$4,125 per MW reasonable for Xcel Energy to assess to recover actual costs?
- If not, is a refund necessary to cover the over collection of the LMI CSG application fees?
- Are there other issues or concerns related to this matter?

A. Xcel Has Not Provided Enough Information To Determine If \$4,125 is Reasonable

When Xcel initially proposed \$4,125/MW as an application fee, it was not clear how Xcel arrived at that number.⁴ Xcel did not provide any supporting information or calculation. At the hearing on November 11, 2023, Xcel indicated that the \$4,125 was calculated by dividing Xcel's estimate of the upfront IT costs necessary to implement the LMI-CSG program (\$3,300,000) by the total allowable MWs under the LMI-CSG Program over the first 10 years (800MW).⁵

In its Response, Xcel proposes essentially the same calculation, but with actual costs instead of forecasted costs. Whereas Xcel predicted \$3,200,000 in upfront IT costs, Xcel actually incurred \$3,789,335.⁶ Xcel proposes to keep the Application Fee at \$4,125 even though this will leave a shortfall over the next 10 years.⁷

Xcel has not, however, provided any more detail for those costs. This is worrisome because of the dramatic differences between Xcel's estimates and its actual costs. Whereas Xcel expected to spend \$800,000 on the application portal, this actually cost \$1,625,060, a difference of over 200%. Whereas Xcel expected \$2,200,000 for Integration of Systems, the actual cost was only \$553,802, barely 25% of the estimate. Whereas Xcel expected \$200,000 for consolidated billing, this actually cost \$1,610,473, an increase of over 800%. Xcel makes no attempt to explain these extraordinary differences, noting only that the overall increase from \$3,200,000 to \$3,789,335 was due to accelerating the timeframe for implementation.⁸

Xcel should provide more information about these costs and why they varied so wildly from estimate to actual.

B. Whether A Refund Is Due Depends On Whether the Application Fee Is Reasonable

If the cost to implement the IT changes for the LMI-CSG program met or exceeded the revenue to Xcel through the \$4,125 application fee, then no refund is appropriate. As noted above, we believe Xcel should provide more information about these costs and Xcel's calculations, before this

⁴ Xcel, Doc. Nos. 23-335; 13-867 (Aug. 28, 2023).

⁵ PUC, Hearing at 4:06:53-4:07:05 (Nov. 11, 2023). Xcel estimated in its August 28, 2023 filing that these costs would be \$3,200,000.

⁶ Xcel Response at 5.

⁷ *Id.*

⁸ *Id.* at 4.

determination is made.

C. Xcel's Explanation of Its Calculation Contains Minor Errors

Xcel's description of its calculation contains two minor errors.⁹ These errors do not affect the total revenue Xcel expects from the Application Fee, but they are confusing and should be clarified.

In its comments, Xcel writes that:

If the LMI Accessible CSG program continues to grow as allowed by statute, we can anticipate an additional 520 MW of projects (if the program continues through 2033). At this pace, we would receive an additional \$2,887,500 over the total 10-year period used to estimate cost recovery through the application fee.¹⁰

A footnote appended to Xcel's estimate of anticipated revenue then says: "53 remaining fees to be paid to date + 700 = 700*\$4,125 = \$2,887,500."¹¹

These two sections misstate (1) the MW remaining available in the program through 2033, and (2) double count the "53 remaining fees to be paid" in both the current and anticipated revenue. The LMI-CSG Program allows for 700 MW between 2025 and 2033, not 520.¹² As can be seen by comparing Table 4 and Table 1, Xcel has included the "53 remaining fees to be paid" in its estimate of current revenue (\$335,569).¹³ It should not also be in its estimate of anticipated revenue. To correct these issues, the paragraph and footnote should read as follows (bold added, strikethrough deleted):

If the LMI Accessible CSG program continues to grow as allowed by statute, we can anticipate an additional ~~520~~ **700** MW of projects (if the program continues through 2033). At this pace, we would receive an additional \$2,887,500 over the total 10-year period used to estimate cost recovery through the application fee.

~~53 remaining fees to be paid to date + 700 =~~ 700*\$4,125 = \$2,887,500

With that clarification, Xcel's math appears to be correct.

II. Participation Fee

In its comments, Xcel reiterated its request to increase the Participation Fee from \$500/MW/yr to

⁹ Xcel's chart at Attachment A also says that "Total Expenses" includes "Lines 1+2a+2b+2c." The calculation makes clear, however, that Total Expenses also includes Line 3, Subscriber Management. It is not clear to us what was intended here.

¹⁰ Xcel Response at 5.

¹¹ Xcel Response at n.5.

¹² See MINN. STAT. § 216b.1641 Subd. 7(a) ("(1) 100 megawatts in 2024, 2025, and 2026; (2) 80 megawatts in 2027, 2028, 2029, and 2030; and (3) 60 megawatts in 2031 and each year thereafter.")

¹³ 81.4MW multiplied by \$4,125/MW is \$335,775, but we assume Xcel is rounding actual MWs to one decimal place.

\$800/MW/yr, and provided an updated table showing its expenses and recovery, assuming the Commission increased the fee to \$800.

In its Notice of Comment Period, the Commission asked two questions relative to the Participation Fee:

- Should the Commission approve Xcel Energy's request to increase the annual participation fee for the Legacy CSG program and the LMI CSG program from \$500 per MW to \$800 per MW prorated by project size, to be applied beginning in February 2026, for recovery of program costs assessed by the Department of Commerce?
- Should the Commission approve a future process of updating the annual participation fee at least every two years through a motion filed in the above referenced dockets?

A. The Commission Should Reject Xcel's Request To Increase the Participation Fee

Xcel's proposal to increase the Participation Fee is more accurately described as a request for the Commission to rewrite Legislation so Xcel can reallocate the Department of Commerce's CSG Program costs, which the Legislature directed the Department to charge to Xcel. There is no lawful basis to alter the legislation in this manner. In furtherance of this objective, Xcel's presentation of its costs obscures the fact that the status quo leads to net income to Xcel. This shows that the Petition is just about reallocating the Department of Commerce's CSG Program Costs, and has nothing intrinsically to do with the Participation Fee.

1. The Legislature Requires The Department Program Costs To Be Paid By Xcel

In 2023, the legislature passed an appropriations law requiring the Department to assess its CSG program costs to Xcel:

\$961,000 each year is for activities required under Minnesota Statutes, section 216B.1641 for community solar gardens. This appropriation must be assessed directly to the public utility subject to Minnesota Statutes, section 116C.779.¹⁴

This provision does not, as Xcel states in its Petition, "allow" the Department to assess the costs to Xcel.¹⁵ Rather it says that the costs "must" be assessed to Xcel. Moreover, the legislation states that the costs "must be assessed **directly**" to Xcel. There is no optionality in this legislative directive. Xcel is required to cover the Department's CSG program costs.

Xcel's Petition asks the Commission to alter this law. Instead of being assessed to Xcel, the costs would be assessed to CSG owners. Only the Legislature has this authority, and the Legislature chose not to have CSG owners cover the Department's program costs. See *Billion v. Comm'r of Revenue*, 827 N.W.2d 773, 781 (Minn. 2013) ("administrative agencies may adopt regulations to implement or make specific the language of a statute, they cannot adopt a conflicting rule.") (cleaned up); *Hirsch v. Bartley-Lindsay Co.*, 537 N.W.2d 480, 486 (Minn. 1995) (stating that an applicable statute "prevails" to the extent that it conflicts with an administrative rule).

¹⁴ 2023 Minn. Laws ch. 60, art. 10, Sec. 2, Subd. 2(y).

¹⁵ Xcel Petition at 3.

Simultaneous with this appropriation, the Legislature created the LMI-CSG program, administered by the Department. The LMI-CSG program requires individual CSG owners to apply to the Department and submit annual reports to the Department; all perfectly opportune moments for the Department to collect program fees from CSG owners. But that is not what the Legislature intended or directed. If the state Legislature had wanted CSG owners to pay for the Department's program costs, they would have said so. Instead, they directed the Department to assess those costs to Xcel "directly."

2. Xcel's Chart Shows That This is Solely About The Department Program Costs

In its comments, Xcel included a table of costs, but it is misleading because it has no reference to the status quo. The table assumes both that the Participation Fee is increased to \$800/MW/yr in 2026 and that the Department's program costs are included.

If the Department program costs are excluded and the Participation Fee remains \$500/MW/yr – which is the status quo – Xcel would net \$366,933 at the end of 2029. In other words, based on its own projections, the current Participation Fee will create net income for Xcel. Xcel's Petition is just an attempt to shift a cost that the Legislature directed to Xcel onto CSG owners.

B. The Commission Should Maintain The Status Quo For The Participation Fee

As noted above, Xcel's Petition has no intrinsic connection to the Participation Fee itself, which based on Xcel's own projections more than covers Xcel's annual costs. As a result, there is no need to increase the Participation Fee, let alone make it easier to do so in the future. What Xcel appears to be doing is preparing for future appropriations directing the Department to assess its program costs directly to Xcel, so Xcel can pass those costs off on someone else not intended by the Legislature. Because the Participation Fee should not be changed for this purpose at any point, the Commission should not entertain this request.

Dated June 20, 2025

/s/ Matthew Melewski
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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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