



# Minnesota Solar Energy Industries Association

November 24, 2014

Dr. Burl W. Haar  
Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: Request for Extension of Time to File Community Solar Garden Adder Reply Comments In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Garden Program Docket No. E002/M-13-867**

Dear Dr. Haar:

Pursuant to MN 7829.1400, Subp. 7, the Minnesota Solar Energy Industries Association (MnSEIA) respectfully requests an extension of time to file its reply comments, regarding the Public Utilities Commission's (the "Commission's") Community Solar Garden ("CSG") Adder reply comment period. The period began on October 9, 2014 and currently ends on December 1, 2014. Based on our arguments below, MnSEIA believes there is good cause to extend the existing deadline until February 1, 2015.

There are three reasons the Commission should grant our request for an extension. First, as of today, the installers we represent can only provide the requested data in the form of modeling and projections. If given sufficient time, however, our installers could provide project-specific, real-world information about the program. Data on CSG costs, consumer requests, etc. may only be two months away. This market data will help the Commission develop an accurate and transparent adder.

Next, MnSEIA is interested in learning more about what Minnesota's CSG fleet will entail. Before making a statement about tiered adders, or boosts based on the number of subscribers, we would like to know what percentage of filed CSGs are Residential, Industrial and Commercial. Allowing CSG development to go forward under the Applicable Retail Rate ("ARR") with RECs added will inform our organization, and the other stakeholders, on how well a tiered system works.

Lastly, although a CSG inducement may be necessary to bolster the Value of Solar rate, there is currently no need to institute an adder. CSGs will be built using the ARR, and our installers are willing to try the ARR while market data develops. The solar industry believes that the Commission, in-conjunction with the relevant stakeholders, should develop a transparent and well-designed adder. This requires sufficient data and time. Fortunately, there is no need to expedite the process now that the ARR is in place, and the Commission should not feel compelled to address the adder question immediately.

For the three above reasons, we ask the Commission today to accept our request for an extension. If MnSEIA still feels more information is required after our extension is considered, then we will, at that time, mention it again in our reply comments. Thank you for considering MnSEIA's variance inquiry.

Sincerely,

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