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January 31, 2014



Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section 216B.1691
MPUC Docket No. E999/CI-13-542
COMMENTS**

Dear Dr. Haar:

Otter Tail Power Company submits the enclosed Comments in response to the Minnesota Public Utilities Commission's ("Commission's") Notice for Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES issued in its December 30, 2013 Notice regarding implementation of the Solar Energy Standards.

We have electronically filed this document with the Commission, which also constitutes service on the Minnesota Department of Commerce, Division of Energy Resources and the Office of the Attorney General, Antitrust and Utilities Division. A copy of this filing has been served on all parties on the official service list in this docket.

Please contact me at (218) 739-8956 or cstephenson@otpc.com if you have any questions.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

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Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

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

Docket No. E999/CI-13-542

**OTTER TAIL POWER COMPANY
COMMENTS**

On December 30, 2013, the Minnesota Public Utilities Commission (“Commission”) issued its Notice for Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES in the above-captioned matter. The Commission’s request for Comments included a list of General Topics Open for Comment along with more detailed questions for comment provided in Attachment 1. Otter Tail Power Company (“Otter Tail”) appreciates this opportunity to comment on these matters.

The Commission requested comment on the following General Topics:

- **Should the Commission issue any clarification on S-REC shelf life?**
- **What information should be provided in the utilities’ annual reports on the SES?**
- **Should the Commission authorize an additional tracking system to track compliance with the SES?**
- **Are there other clarifications to be made about the SES as it should be read within the RES statute?**

It is Otter Tail’s opinion that: (1) the Commission should not apply a shelf-life to S-RECs, (2) SES compliance progress should be included in the existing RES biennial compliance reporting structure using data points as recommended by the Department in their August 29, 2013 comments in this docket, and (3) that the Commission should not consider using a new or additional tracking system for S-RECs; the existing M-RETS should be used for tracking S-RECs for compliance with the SES. Otter Tail’s responses to the more detailed questions in Attachment 1 explain these positions in greater detail.

Attachment 1, Question 1:

The Commission determined that the shelf life of a REC is the first year of generation plus an additional four years. However, a 2013 addition to Minn. Stat. §216B.1691, subd. 2f(f) states: “Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after August 1, 2013, *but before 2020 may be used to meet the solar energy standard* established under this subdivision.”

- a) Should the Commission clarify that an S-REC that meets the requirements under subd. 2(f) has no shelf life for purposes of meeting the SES?
- b) Subd. 2(f) is silent on the shelf life of a S-REC that is installed and generating after August 1, 2013 but before 2020 located outside of Minnesota. Should the Commission consider clarifying that S-RECs that meet the timeframe in Subd. 2(f) but are located outside of Minnesota also have no shelf life? Why or why not?

Otter Tail’s Response: Otter Tail believes that Subd. 2f “Solar energy standard” is sufficiently clear on this issue. There is no expiration date on S-RECs for solar facilities. The terminology “[n]otwithstanding any law to the contrary” and the express reference to the period of time S-RECs are available for use underscore this point. Also noteworthy is the Legislature’s decision to preclude public utilities from using solar energy under Subd. 2f to satisfy obligations under subdivision 2a (and vice versa). In our view this underscores the need for flexibility with respect to S-RECs under subdivision 2f.

Since there seems to be some question on this issue we believe it appropriate for the Commission to clarify that there is no shelf-life under Subd. 2f. Otter Tail believes this should be the case whether the device generating the S-RECs is installed in or outside of Minnesota. As noted by the question, Subd. 2f is silent on the issue of shelf-life on devices installed outside of Minnesota. In view of that silence, we believe that it is appropriate to treat S-RECs generated outside of Minnesota the same as S-RECs generated in Minnesota with respect to shelf-life. This approach promotes clarity in the administration and tracking of S-RECs, and is consistent with the requirement under Subd. 4 that the program established by the Commission “must treat all eligible energy technology equally and shall not give more or less credit to energy based on the state where the energy was generated or the technology with which the energy was generated.”

Attachment 1, Question 2:

Minn. Stat. §216B.1691, subd. 7 states that if the Commission finds noncompliance, it “may order the electric utility to construct facilities, purchase energy generated by eligible energy technology, purchase renewable energy credits, or engage in other activities to achieve compliance. 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.” The Commission has received informal inquiries asking whether this provision also applies to the SES or just the RES.

- a) Should the Commission issue a clarification?
- b) If so, does the provision apply to the SES given that the first sentence of subdivision 7 states that the Commission shall regularly investigate whether a utility is in compliance with subdivisions 2 and 2a, not 2f? Does the 2013 addition of subd. 2f(b) “The solar energy standard established in this subdivision is subject to all provisions of this section governing a utility’s standard obligation under subdivision 2a” relevant to this question?

Otter Tail’s Response: Otter Tail believes it would be appropriate for the Commission to clarify that its authority and obligations under Minn. Stat. §216B.1691, subd. 7 apply to the solar energy standards of subdivision 2f. Although there is a reasonable argument that the lack of any reference to the solar energy standard in Subd.7 limits the application of Subd.7, we think a better reading of the statute is to apply Subd.7 to the solar energy standard in Subd. 2f. This approach appears consistent with Subd. 2f(b), which provides that the “the solar energy standard established in this subdivision is subject to all provisions of this section governing a utility’s standard obligation under subdivision 2a.” On a more basic level it seems odd and awkward to carve the solar standard out of the Commission compliance obligations under Subd. 7.

Attachment 1, Question 3:

Minn. Stat. §216B.1691, subd. 2f(g) states that beginning on July 1, 2014 and each July 1 through 2020, each public utility shall file a report with the Commission reporting its progress in meeting the SES.

- a) The Commission has already established a biennial process whereby the Department and others investigate compliance with the RES, and then the Commission issues a finding on current RES compliance as well as likelihood of future compliance with the RES. The next biennial process will start with the filing of information by June 1, 2014. Should the SES be included in or excluded from this biennial process at this time? (Reference Dockets 12-958 and 10-989 for the Commission's past biennial dockets.)
- b) What information should be included in the utilities' annual reports on the SES? In its August 29, 2013 comments in this docket at page 5, the Department recommended the following: "Reporting could be included in the utilities annual RES reporting (June 1st for the previous calendar year), and should include the annual Minnesota retail sales, annual excluded customer sales, and annual solar generation." Please comment on this recommendation.
- c) Should utilities also be required to list efforts to meet the standard, obstacles anticipated, and potential solutions to the obstacles, as required for biennial reports under Minn. Stat. §216B.1691? Should utilities be required to comment on the anticipated mix of utility scale versus smaller solar projects that will be used to meet the standard?

Otter Tail's Response: Otter Tail agrees with the Department that SES compliance progress should be included in the existing RES biennial compliance reporting, and that the SES report should reference annual Minnesota retail sales, annual excluded customer sales, and annual solar generation. Otter Tail believes that it is more efficient to use the current reporting system and infrastructure than to develop a separate system. Otter Tail believes the content of the report with respect to obstacles and solutions should generally follow the current content required for biennial reporting. The Commission may want to consider an additional sub-category on the annual solar generation that would indicate the generation from small solar (20 kw or less) to meet the 10% of the 1.5% indicated in Subd. 2f.

Attachment 1, Question 4:

Minn. Stat. §216B.1691, subd. 4(d) states that “The commission shall require all electric utilities to participate in a commission-approved credit-tracking system or systems.”

Minnesota’s RES applies to 16 utilities. In contrast, Minnesota’s SES applies to only 4 utilities. Should the Commission consider an additional tracking system specifically for the SES? In addition, the Commission has received comments in the past that some small units that would be eligible for the RES are not registered in MRETS. Should the Commission consider an additional tracking system for small units that are eligible for the RES?

Otter Tail’s Response: Otter Tail does not believe that it is necessary or beneficial to develop an additional tracking system specifically for SES. In our view M-RETS should be used for tracking RECs for compliance with the REO, the RES, and the SES. Instead of exploring additional tracking systems we suggest the Commission explore the import capability into M-RETS from other tracking systems. This would allow utilities to utilize S-RECs tracked in other systems for Minnesota SES compliance.

Attachment 1, Question 5:

Are there other topics related to how the SES provision of the statute, subdivision 2f, should be read in light of its inclusion in Minn. Stat. §216B.1691?

Otter Tail’s Response: Otter Tail is not aware of other topics that should be considered in this filing, but we reserve the right to make further comment in reply comments.

Dated: January 31, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

**Re: In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section 216B.1691
MPUC Docket No. E999/CI-13-542**

I, Jana Emery, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Comments**

Dated this **31st** day of **January 2014**.

/s/ JANA EMERY

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