

October 14, 2014

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

RE: Reply Comments of the Minnesota Department of Commerce, Division of Energy
Resources
Docket No. E002/M-14-648

Dear Dr. Haar,

On August 26, 2014, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted comments on Xcel Energy's (Xcel or the Company) request for approval of changes to its Interconnection Tariff. In its comments, the Department noted that the application/engineering fee for facilities less than 20 kW is currently \$0 or \$100, depending on the type of interconnection, and is proposed to increase to \$250. The Department requested Xcel to provide an explanation of the increase in the application and engineering cost study charges for generation facilities less than 20 kW.

On September 17, 2014, Xcel submitted reply comments stating that its proposed modification is intended to "align the cost responsibility associated with processing the interconnection application and the engineering study to the appropriate customers," and to be consistent with fees charged for similar sized facilities under the Company's Solar*Rewards Program.

The Department remains concerned with the increase in the application/engineering fee for facilities less than 20 kW. In discussions with Xcel personnel, the Department understands that it has been the Company's practice to charge customers with facilities less than 20 kW under its net metering tariff, as well as its Solar*Rewards Program, a \$250 application fee. In contrast, the Interconnection Tariff at issue in this docket states that the application fee is \$0 for facilities that are pre-certified, and \$100 for other facilities. The Department notes that Xcel's net metering tariff does not currently include an application fee; however, the Company's net metering information packet sent to interested customers states there is a \$250 application fee in its cover letter. In addition, Xcel stated that most customers with facilities less than 20 kW use either the Solar*Rewards Program or its net metering tariff, not the interconnection tariff.

The Department generally supports assigning costs to the appropriate cost causer. In this instance, the Department remains unclear as to whether \$250 is a reasonable application fee for facilities less than 20 kW, and whether there are differences in the costs associated with processing an application for an incentive program such as Solar*Rewards with those of a net metered or distributed generation customer. In addition, the Department is concerned that Xcel appears to be charging net metering customers an untariffed application fee. As part of its SunShot Initiative, the Department of Energy has referenced the Interstate Renewable Energy Council (IREC) Model Interconnection Standards as best practices. According to IREC's Model Interconnection Standards the application fee for facilities less than 20 kW is \$100.¹

The Department notes that the purpose of Xcel's initial filing was to address concerns raised by the Minnesota Chamber of Commerce regarding the application and engineering fees associated with larger installations. The Department does not have any objections to approving Xcel's proposed fee changes for facilities over 20 kW. Further, the Commission could determine that \$250 is a reasonable application fee for all facilities less than 20 kW. Alternatively, if the Commission determines that \$250 is not appropriate for smaller interconnection applications or needs additional information on the cost of these smaller facilities, the Department recommends the Commission approve the remainder of the tariff changes, and address the application fee for facilities less than 20 kW separately.

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

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst

SLP/ja

¹ <http://www.irecusa.org/publications/Model> Interconnection Procedures

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
Reply Comments**

Docket No. E002/M-14-648

Dated this 14th day of October 2014

/s/Sharon Ferguson

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