



Sundial Solar

A Brighter Idea

To: Minnesota Public Utilities Commission
Dockets : E002/M-13-315 / E-999/R-13-729

RE: Standby Service
Date: April 14, 2015

Hello Commissioners,

We appreciate the ability to comment on this important matter. Sundial Solar is Minnesota's premier commercial-industrial solar developer. We therefore have a keen interest in this matter and hereby submit these comments in addition to those we sent in February:

QF of 100kw+

Sundial recommends that this docket and its eventual regulations be applicable to Qualifying Facilities (QFs) of 100kw or more of on-site generation. This is consistent with present Xcel rate classifications in considering a Standby Service customer.

Unique Benefits of Solar

We would also like to underscore the point that solar stands uniquely alone in its ability to assist the grid in curbing peak load during highest demand periods. This and a host of other environmental and societal benefits makes solar standby customers deserving of unique consideration. Since solar arrays offer completely clean energy and carry more societal and environmental benefits as a result, they should be exempted from Standby Charges. A diesel generating facility on standby service does not compare to a solar array in this regard. These benefits are considered and outlined in MISO's *Business Practice Manual*. See this link:

(<https://www.misoenergy.org/Library/BusinessPracticesManuals/Pages/BusinessPracticesManuals.aspx>).

We have particular concerns with the definitions around "firm power". The proposed language states that if the QF does not provide "firm power" to the utility, no capacity component compensation will be paid to the QF. Such an approach unfairly punishes the solar standby customer using a draconian definition of "firm power" and does not consider the dynamics of solar generation nor the unique contributions of a solar QF. Therefore, in the following sections we request the removal of *the text in RED*:

Subp. 2. Qualifying facilities over 100 kilowatt capacity. *A qualifying facility with more than 100 kilowatt capacity has the option to negotiate a contract with a utility or to be compensated under standard rates ~~if it commits to provide firm power.~~*

7835.0100 DEFINITIONS Subp. 9 Firm Power. *"Firm Power" means energy delivered by the qualifying facility to the utility ~~with at least a 65% on-peak capacity factor in the month. The capacity factor is based on the qualifying facility's maximum on-peak metered capacity delivered to the utility during the month.~~*

Contract Period

Long term contracts of at least 10 years, with fixed standby rates, capacity credits, grace period, etc should be provided to solar standby service customers. This is of critical importance in financing solar installations for commercial-industrial clients.

Sincerely,

Jon Kramer
CEO