



414 Nicollet Mall  
Minneapolis, Minnesota 55401

July 11, 2014

—VIA ELECTRONIC FILING—

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REPLY COMMENTS  
SOLAR ENERGY STANDARD ANNUAL REPORTS  
DOCKET NO. E999/M-14-321

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this brief Reply to the June 30, 2014 Comments of the Minnesota Department of Commerce – Division of Energy Resources regarding utilities' 2013 Solar Energy Standard (SES) Annual Reports.

We appreciate the Department's thorough review of utilities' first SES Annual Reports and its recommendation that the Commission approve Xcel Energy's and the other utilities' reports. We agree with the Department's suggestion for clarification of the annual solar generation on the utilities' systems reporting requirement so that all utilities are reporting comparable information in future reports.

We also have no objection to the Department's recommendation to provide in the next and future reports: a) Excluded sales only from customers that have requested and have been approved for exclusion from the SES requirements; b) More information supporting the utilities' assumed solar capacity factor; and c) More detailed information regarding utilities' ongoing efforts to obtain solar energy on their systems.

In our originally-filed report, we provided the exclusion information as defined by the Department in its June 30 Comments, and the Department indicated satisfaction with the level of detail we provided regarding our ongoing efforts to obtain solar energy at

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this time. We did not, however, originally provide detail supporting our assumed solar capacity factor in our original report. We provide this information below.

The Company used a 17 percent capacity factor assumption to estimate the solar resources necessary to meet the SES. As the Department requested in its Comments, we will update our assumptions in our next SES Annual Report as we gain more experience with solar and thus are better able to forecast the mix of solar resources on our system.

We appreciate the opportunity to provide this Reply to the Department's Comments. We have electronically filed this document, and copies have been served on the parties on the attached service list.

Please contact me at [paul.lehman@xcelenergy.com](mailto:paul.lehman@xcelenergy.com) or 612-330-7529 if you have any questions regarding this filing.

SINCERELY,

/s/

PAUL J LEHMAN  
MANAGER, COMPLIANCE AND FILINGS

c: Service List

## CERTIFICATE OF SERVICE

I, Jada Calhoun, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**Docket No. E999/M-14-321**

Dated this 11<sup>th</sup> day of July 2014

/s/

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Jada Calhoun

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