

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of Northern States  
Power Company, dba Xcel Energy, for  
Approval of Its Proposed Community Solar  
Garden Program

ISSUE DATE: June 27, 2023

DOCKET NO. E-002/M-13-867

ORDER ADOPTING 2023 ARR AND  
REQUIRING ADDITIONAL FILING

**PROCEDURAL HISTORY**

On February 1, 2023, Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company) filed its annual update to the applicable retail rate (ARR) that is used to calculate bill credits for the energy production from community solar gardens (CSGs) that are not compensated at the value-of-solar rate (VOS).

On February 23, 2023, the Commission issued a Notice of Comment Period seeking input on Xcel’s filing, including its proposal to consider changes to the ARR methodology.

On February 28, 2023, Xcel filed initial comments.

By March 30, 2023, the following parties filed comments:

- Department of Commerce, Division of Energy Resources (the Department);
- The Minnesota Solar Energy Industries Association (MnSEIA) and the Coalition for Community Solar Access (the Joint Solar Associations or JSA);
- Cooperative Energy Futures, Institute for Local Self-Reliance, Vote Solar, and Novel Energy Solutions (CIVN);
- United States Solar Corporation (US Solar); and
- Fresh Energy.

By April 11, 2023, the following parties filed reply comments:

- The Department;
- The Joint Solar Associations;
- CIVN; and
- Xcel.

On May 11, 2023, the Commission met to consider this matter.

## FINDINGS AND CONCLUSIONS

### I. Introduction

#### A. Legal Background

The solar-garden statute, Minn. Stat. § 216B.1641, establishes the framework for a program under which utility customers subscribe to a solar generating facility (a CSG) and receive a bill credit from the utility for a portion of the energy generated by the facility.

The statute authorizes the Commission to approve, disapprove, or modify Xcel's CSG program.<sup>1</sup> Any program approved by the Commission must, among other requirements, reasonably allow for the creation, financing, and accessibility of CSGs and be consistent with the public interest.<sup>2</sup>

A public utility must purchase all energy generated by a CSG at the rate calculated under the VOS statute, or, until a VOS has been approved by the Commission, the ARR.<sup>3</sup>

While the solar-garden statute does not define ARR, in 2014, the Commission defined ARR to mean the CSG subscriber's full retail rate.<sup>4</sup> Subsequently, the Commission approved Xcel's request to recover CSG costs through the fuel clause rider<sup>5</sup> and ordered Xcel to include additional tariff provisions applicable to CSGs when they are receiving compensation at the ARR.<sup>6</sup>

In 2016, the Commission approved the VOS for use as the CSG bill-credit rate for all CSG applications filed after December 31, 2016.<sup>7</sup> The Commission elected not to make any adjustments to the ARR methodology at that time.<sup>8</sup>

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<sup>1</sup> Minn. Stat. § 216B.1641(e).

<sup>2</sup> Minn. Stat. § 216B.1641(e)(1), (4).

<sup>3</sup> See Minn. Stat. § 216B.1641(d) (providing that the compensation for garden energy "shall be at the rate calculated under section 216B.164, subdivision 10 [(the VOS)], or, until that rate for the public utility has been approved by the commission, the applicable retail rate").

<sup>4</sup> See April 7, 2014 order at 27, ordering para. 9 (providing "Xcel shall credit each subscriber's portion of the solar-garden production at the applicable retail rate, which shall be the full retail rate, including the energy charge, demand charge, customer charge and applicable riders, for the customer class applicable to the subscriber receiving the credit.).

<sup>5</sup> See September 17, 2014 order at 21, ordering para. 19.

<sup>6</sup> See *Id.* at 19, ordering para. 3.

<sup>7</sup> September 6, 2016 order at 23, ordering para. 1.

<sup>8</sup> *Id.* at 14.

## **B. Xcel's February 1, 2023 Filing**

On February 1, 2023, Xcel filed its annual ARR calculation for 2023 and noted that CSG compensation increased significantly compared to 2022 rates. Xcel stated that the increases were 10.5% for participating residential customers, 14.4% for participating small commercial customers, and 13.3% for demand-billed customers. Xcel identified three primary factors causing the rate increases: (1) costs attributed to the calculation from the Company's riders, including the Renewable Energy Standard (RES) Rider, (2) higher fuel costs including natural gas costs and transmission congestion costs, and (3) the impact of interim rates going into effect.

Xcel attributed some of the fuel cost increases to a compounding effect created by the ARR compensation formula where above locational marginal pricing (LMP) market fuel costs for CSGs, which are recovered through the fuel clause adjustment, increase fuel expenses for all customers and also increase the ARR for the following year. Xcel proposed removing the compounding effect by excluding above LMP market fuel costs from the ARR compensation formula for 2023 and in subsequent years. Xcel contended that removing the compounding effect from the 2023 ARR calculation would produce an approximate \$4.6 million annual cost savings for all customers.

## **II. Positions of the Parties**

### **A. Supporters of Proposed Change to ARR Calculation**

#### **1. Xcel**

Xcel recommended modifying the 2023 ARR by adjusting the calculation to remove (1) the compounding effect and (2) customer charge revenue. Xcel reasoned that the compounding effect is not in the public interest because it increases rates for all customers and compounds these increases when those rates are used to calculate the ARR in subsequent years. Xcel agreed with Fresh Energy that the ARR calculation should not include customer charge revenue because CSG subscribers do not avoid any costs associated with providing retail service by virtue of their CSG subscriptions. Xcel also agreed with Fresh Energy's proposal to remove a portion of the demand charge revenues from the ARR formula.

Xcel provided additional detail on the methodology utilized in its proposal to remove the compounding effect by referencing filings from its 2022 fuel true-up:

to comply with the fuel clause treatment approved in Docket No. E002/M-13-867, the [CSG] bill credits and unsubscribed energy are recorded as fuel purchases in FERC Account 555. To allocate the costs to jurisdiction, the Company first divides the costs into market and above [LMP] market categories. To determine market costs, the Company reviews the solar garden production by hour and the corresponding LMP price at that hour. These costs are allocated to jurisdiction based on sales. Costs above [LMP] market are directly assigned to the Minnesota fuel clause.

Xcel explained that calculation to remove CSG above LMP market costs from the ARR calculation involved the following steps:

1. Allocate CSG costs to market and above LMP market categories, as described above and in our 2022 Fuel True-up filing.
2. Calculate monthly CSG above LMP market cost per kWh by dividing Minnesota CSG above LMP market costs by Minnesota retail sales.
3. Multiply the CSG above LMP market cost per kWh by each classes' Fuel Adjustment Factor to produce monthly CSG above LMP market rates for each of the three CSG classes.
4. Multiply these rates by the CSG program sales for each of the three classes to determine the monthly CSG above LMP market costs by class.
5. The monthly above market LMP costs by class were then removed from the fuel costs used to calculate the ARR rates.

**a. Commission Authority to Modify**

According to Xcel, both the CSG enabling statute and Xcel's tariff provide express authority to modify all aspects of the CSG program, including its rate, rate design, business rules, and tariffed terms. In modifying the CSG program, the Commission must consider the standards in Minn. Stat. § 216B.1641(e)1–8.

Xcel explained that its tariffed Standard Contract is a uniform standard contract that applies the same tariff provisions to all CSGs.<sup>9</sup> The contract states that changes may be made to the tariffed contract from time to time and the language specifically includes changes to rates for sales and purchases of subscribed energy. Xcel referenced the tariffed Standard Contract as stating:

The rates for sales and purchases of Subscribed Energy shall be changed annually or otherwise as provided by order of the MPUC. The Community Solar Garden Operator shall comply with all of the rules stated in the Company's applicable electric tariff related to the Solar\*Rewards Community Program and the tariffed version of this Contract, as the same may be revised from time to time, or as otherwise allowed by an amendment to this Contract approved, or deemed approved, by the Minnesota Public Utilities Commission. In the event of any conflict between the terms of this Contract and Company's electric tariff, the provisions of the tariff shall control.<sup>10</sup>

According to Xcel, this framework (1) allows it to effectively administer the CSG program by providing uniformity of contracts across 860+ CSGs and (2) prevents any single CSG operator from vetoing a Commission-approved tariff revision that modifies the CSG program. Xcel noted

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<sup>9</sup> Xcel noted that amendments to the Standard Contract addressing discrete issues may also be authorized on a case-by-case basis upon agreement of the contracting parties.

<sup>10</sup> Standard Contract for Solar\*Rewards Community at tariff sheet 9-73, par. 1.B. Xcel emphasized that the language makes clear the Commission's authority to amend or modify the tariffed contract and that the tariffed version controls.

that the Commission has previously exercised its right to modify the program after the initial tariffs were in place when the Commission imposed CSG co-location caps.

Xcel contested US Solar's assertions that Xcel was attempting to unilaterally modify relevant contracts without the signatures of both parties. Xcel argued that US Solar was conflating contract amendments that require the parties' signatures with revisions to the tariffed Standard Contract, which become effective upon filing after the issuance of a Commission order authorizing the revised or new tariff sheet.

Xcel asserted that its proposal does not implicate retroactive ratemaking because it would only apply the value of the ARR at the time the service (production of energy purchased by Xcel) is rendered.

Xcel also noted that it filed comments in 2016 that recommended modifying the ARR formula to remove the compounding effect, customer charges, and demand charges from the ARR calculation. Xcel contended that even though the Commission did not adopt its recommended changes, the language used in several orders indicate that the Commission recognized that it may modify the ARR formula and that changes may be appropriate in the future once more is known about the CSG program.

#### **b. Subscriber Notice**

In response to the concerns expressed by US Solar about CSG subscribers not receiving notice of the proposed modifications to the ARR calculation, Xcel stated that it did not believe notice beyond what it provided is required. Xcel noted that many issues impacting subscribers have previously been addressed in this docket without the issuance of special notice to subscribers. If the Commission requires Xcel to provide additional subscriber notice, Xcel would not object; however, it would seek to recover the costs incurred in providing such notices from CSGs as part of their annual participation fee. As CSG operators are in the best position to determine the degree of potential subscriber impact, Xcel suggested that individual CSG operators should have the option to provide notice to their subscribers.

### **2. Fresh Energy**

Fresh Energy supported Xcel's proposed adjustment to the ARR methodology to remove the compounding effect. Fresh Energy noted that as of 2022, the ARR had increased 14–20% since the Commission approved it in 2014. Without any changes in 2023, Fresh Energy stated that the ARR will increase 10–13% from 2022 which is 25–36% over 2014 levels. Fresh Energy stated that the modest change proposed by Xcel resolves a fundamental unfairness that was unintentionally included in the ARR methodology.

Noting that CSG programs have existed now for nearly a decade, Fresh Energy argued that the Commission should revisit the ARR formula to explore whether it remains reasonable and in the public interest under the current market conditions and policy environment. Fresh Energy recommended that the Commission make two other changes that would reduce CSG costs for general ratepayers. First, it supported removing customer charges from the ARR formula. Fresh Energy contended that the need for the infrastructure funded by customer charges is not eliminated when a customer subscribes to a CSG. Second, Fresh Energy recommended reducing

the amount of demand-charge compensation paid by the general service class used in the ARR formula. While Fresh Energy conceded that on average solar production reduces demand during peak periods, it expressed skepticism that 100% was the appropriate compensation level for general service customers' demand charges. Fresh Energy proposed reducing demand charges used in the ARR formula by 50%.

Given the escalating costs of ARR bill credits, Fresh Energy recommended that the Commission modify the ARR methodology starting in 2023 to remove the compounding effect as proposed by Xcel, remove customer charges, and reduce demand charges by 50%. Fresh Energy asserted that these changes are reasonable and justified and would better align ARR impacts with the public interest.

### **3. The Department**

The Department stated that Xcel's proposed calculation to remove the compounding effect was reasonable and recommended that the Commission approve the modification as applied to the ARR calculation in 2023 and subsequent years. The Department did not support proposals to modify the 2023 ARR to eliminate customer charges or reduce demand charges.

#### **B. Opponents of Proposed Change to ARR Calculation**

US Solar, the Joint Solar Associations, CIVN, and the City of St. Cloud opposed any Commission action that would decrease the 2023 ARR.

##### **1. US Solar**

US Solar contended that any modification of the ARR calculation at this point may be prohibited by applicable legal principles. Specifically, US Solar asserted that Xcel's proposal to modify the ARR methodology to remove the compounding effect undermines the plain terms of the ARR Standard Contract and generally contravenes the sanctity of contract by relieving a contracting party of its agreed-to contractual duties.<sup>11</sup> To the extent Xcel's proposal alters the ARR and Standard Contract approved by the Commission in 2014, US Solar argued that the filed-rate doctrine prevents the Commission from retroactively revising the previously established rate. Additionally, US Solar noted that the application of the *Mobile-Sierra* doctrine invalidates rate filings that are inconsistent with contractual obligations.

US Solar contended that Xcel's proposal adversely impacts CSG subscribers by likely delaying the effective date of the 2023 ARR, which has historically become effective by April 1. US Solar also faulted Xcel for failing to notify CSG subscribers of the potential impact of Xcel's proposal.

In addition to arguing that Xcel failed to demonstrate sufficient legal and factual justification for the Commission to adopt its proposed change, US Solar emphasized that uncertainties of rate stability and contract sanctity may adversely affect investments resulting in long-term harm to Minnesota customers.

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<sup>11</sup> US Solar also noted that the plain terms of the ARR Standard Contract state that it "can only be amended or modified by a writing signed by both parties."

## 2. Joint Solar Associations

JSA supported the positions expressed by US Solar and asserted that Xcel's proposal to modify the ARR calculation lacks a legal basis. JSA also contended that Xcel failed to comply with various ratemaking requirements outlined in Minn. Stat. § 216B.16, which should bar the Commission from taking the action Xcel requested.

To the extent that the proposed changes to the ARR can be supported by legal authority, JSA argued that the factual record was insufficient to justify Xcel's proposed change. JSA noted that Xcel should provide additional information relating to the basis of its calculations and an explanation as to why it did not raise the issue of the compounding effect during discussions of the potential ARR calculations and methodologies that occurred in 2014. Because Xcel did not adequately identify or address the potential of an ARR-related compounding effect in 2014, JSA argued that Xcel should pay for the financial impacts of any changes ordered by the Commission so that CSG subscribers or other innocent parties do not suffer harm. JSA contended that current ARR levels fall within a range predicted in 2014.

If the Commission finds that it has the authority to modify the ARR calculation, JSA suggested that preservation of the status quo is also justified for policy reasons. Echoing the sentiment expressed by US Solar, JSA contended that a departure from past practices at this point may create a perception of an uncertain regulatory environment and reduce the number of renewable energy developers willing to invest in CSGs.

## 3. CIVN

To the extent past CSG bill credits create net costs to ratepayers, CIVN agreed that those net costs should not contribute to elevating future CSG bill credits; however, CIVN argued that Xcel's methodology lacks transparency and its approach to characterizing and quantifying the net costs of past CSGs is flawed and overestimates the net costs of the program. According to CIVN, the use of LMPs as the definition of when ratepayers are cost neutral is misleading because it captures the price of bulk energy on the market but not the infrastructure, capacity, or operating costs of energy generation and distribution. Unlike costs related to other sources of power, CSGs pass 100% of their cost to ratepayers via the fuel clause, including non-fuel expenses like distribution and grid upgrades.

CIVN noted that the VOS relies on a detailed methodology that provides a reasonable estimation of the overall costs avoided through the use of solar energy. While Xcel's proposal fails to account for many costs CSGs allow ratepayers to avoid, CIVN recommended using VOS when calculating net costs to ratepayers.<sup>12</sup>

Given the complexity of accurately calculating the overall costs of community solar programs, CIVN recommended that the Commission not make any changes to the ARR until 2024, at the earliest, to allow for additional stakeholder dialogue. CIVN contended that additional exploration of these issues would yield important insights into the public-interest impact of CSG under the

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<sup>12</sup> CIVN proposed the following formula: Net Community Solar Costs to Ratepayers = (Bill Credits Delivered to Subscribers + Payments to CSG Developers for Unsubscribed Energy) – (Levelized VOS x kWh of energy Delivered via Community Solar).

ARR and may lead to more accurate and less contentious modification proposals. CIVN recommended that the Commission approve the 2023 ARR with none of the proposed methodological modifications and with an effective date of April 1, 2023.

#### **4. City of St. Cloud**

The City of St. Cloud stated that it is a subscriber to multiple CSGs through multiple developers and expressed concern that Xcel’s proposal would reduce the financial benefits it expected to receive from its CSG subscriptions.

### **III. Commission Action**

#### **A. Authority to Modify CSG Program**

The legislature granted the Commission broad authority to ensure the CSG program aligns with the intent of the CSG statute, which includes authority to define, calculate, and set the appropriate ARR.<sup>13</sup> Minnesota Statutes § 216B.1641 grants the Commission authority to “approve, disapprove, or modify a community solar garden program.” Among other considerations, the statute requires that a Commission-approved CSG program must reasonably allow for the creation, financing, and accessibility of community solar gardens and be consistent with the public interest. Since Xcel first filed the proposal for its CSG program, the Commission has solicited, received, and considered diverse opinions from stakeholders addressing various parameters of the CSG program. Throughout the development and implementation process, the Commission has incorporated new information and applied its expertise and judgment to balance competing interests and ensure that the resulting CSG program is consistent with statutory requirements. During the CSG’s program’s inception and roll out, the Commission refined certain aspects of the program due to unanticipated outcomes—the Commission has an obligation to continue to monitor the program and address issues as they arise.

#### **B. Removal of Compounding Effect**

The compounding effect Xcel identified in the ARR methodology has created an additional, unintentional cross-subsidy to CSG subscribers from non-subscribers. Continuing to perpetuate the compounding effect is inconsistent with the public interest as it unnecessarily increases costs to all ratepayers. The above-market CSG expenses remain part of the full retail rate by class that all ratepayers pay—the proposed change to the calculation simply removes these costs from the ARR formula to end the compounding cycle. Calculating the 2023 ARR by excluding the compounding effect remains consistent with the Commission’s definition of the ARR as the subscriber’s full retail rate as approved in 2014. To better align the ARR methodology with the public interest, the Commission will adopt Xcel’s proposed methodology to remove the compounding effect from the ARR calculation and approve the 2023 ARR as calculated under the modified methodology.

The compounding effect was not fully considered and intentionally included when calculating the ARR. At the time the Commission initially defined the ARR, it was clear that the ARR would to

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<sup>13</sup> The Standard Contract also recognizes this authority in its terms by acknowledging that rates for subscribed energy shall be changed annually or otherwise as provided by order of the Commission.



be reviewed annually and adjusted in the future.<sup>14</sup> Furthermore, the compounding effect had yet to manifest because it is a function of Xcel's recovery of CSG-related costs through the fuel clause, which the Commission did not authorize until its September 17, 2014 order. Given the iterative process of developing and making adjustments to the CSG program, the non-existence of the compounding effect at the time the Commission defined ARR, and the expectation at the time that the ARR would only apply until the approval of the VOS, the Commission concludes that the compounding effect is not an essential component of the ARR calculation.

Contrary to the contention of several commenters, the modified ARR calculation approved for 2023 does not constitute retroactive ratemaking because the changes only apply prospectively to bill credits for energy that will be produced and purchased after Xcel files updated tariffs that incorporate the modifications approved by this order. Similarly, the plain language of the tariffed Standard Contract specifically notes that the rates for subscribed energy shall be changed annually or as provided by order of the Commission.

In approving this modified ARR calculation, the Commission must also consider whether the program still reasonably allows for the creation, financing, and accessibility of CSGs. The ARR only applies to CSGs that submitted completed applications prior to 2017, all of which are now constructed and operational. Xcel purchases energy produced from CSGs that submitted completed applications after 2016 at the VOS. Even when the compounding effect is removed from the 2023 ARR and combined with the REC credit, the ARR is still well above the corresponding VOS. Therefore, the CSG program as modified by this order still reasonably allows for the creation, financing, and accessibility of CSGs.

### **C. Effective Date for 2023 ARR**

The ARR is reviewed annually and adjusted accordingly. In past practice, the timing of the annual review and adjustment occurred with the updated ARR becoming effective each year on April 1. This has resulted in an ARR that is effective from April 1 through March 31 of the following year; however, the operative occurrence is the effective date of the updated tariffs rather than the specific date of April 1. Although there may be benefits to maintaining the past schedule, the Commission is not persuaded, based on this record, that doing so is reasonable at this time.

Therefore, the Commission will require Xcel to make a compliance filing with the approved tariff modifications within 10 days of the issuance of this order. The effective date of the updated tariffs will be the first calendar date of the month following the date of the compliance filing. Until the effective date of the compliance tariff filing, the Commission will require Xcel to apply the 2022 ARR to ARR-era CSG production.

### **D. Additional Action**

Multiple parties commented that additional changes to the 2023 ARR may implicate complex issues of fact and law that are inadequately addressed in the current record. The Commission finds that the record does not support modifying the ARR to remove customer charges and reduce demand charges for the 2023 ARR at this time. However, the Commission finds that the current record raises questions about whether calculating CSG bill credits based on the ARR, as

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<sup>14</sup> See April 7, 2014 order at 28, ordering para. 11.

currently defined, remains consistent with the public interest and other statutory requirements of Minn. Stat. § 216B.1641. To further augment the record and explore the relevant legal and factual issues more fully, the Commission will require Xcel to develop and file a detailed proposal for transitioning ARR-era CSGs to the appropriate VOS rate.

## ORDER

1. The Commission modifies the ARR formula by removing the compounding effect via Xcel's proposed methodology as explained in its April 10, 2023 reply comments and approves the 2023 ARR as calculated under the modified methodology.
2. Xcel must file a compliance filing with the required tariff modifications within 10 days of the issuance of this order, with an effective date being the first calendar date of the month following the date of the compliance filing.
3. Xcel must apply the 2022 ARR to ARR-era CSG production from April 1, 2023 until the effective date of the compliance tariff filing following the order adopting the 2023 ARR.
4. Within 90 days from the issuance date of this order, Xcel must develop and file a detailed proposal for Commission consideration for switching ARR-era gardens to the appropriate VOS rate. The Commission delegates authority to the Executive Secretary to approve, via notice, requests to extend the deadline for making this compliance filing.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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## **CERTIFICATE OF SERVICE**

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission**

**ORDER ADOPTING 2023 ARR AND REQUIRING ADDITIONAL FILING**

Docket Number **E-002/M-13-867**

Dated this 27th day of June, 2023

/s/ MAI CHOUA XIONG

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