

May 7, 2019

Via Electronic Filing

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, MN 55101

Re: **Amended Request for Relief**

In the Matter of a Formal Complaint Against Xcel Energy By SunShare, LLC Pursuant to Minn. Stat. § 216B.17, Docket No. E002/C-19-203

Dear Mr. Wolf:

Enclosed for filing the above-captioned matter are revised requests for relief of SunShare, LCC ("SunShare"). SunShare is revising its requests in recognition of additional information received from Northern States Power Company regarding the interconnection queue for the applicable substation, and following settlement of the Linden dispute in Docket No. E002/M-19-29. The revised requests for relief are included in both clean and redline format.

Please contact me if you have any questions regarding this filing.

Sincerely,

Stinson LLP

/s/Andrew J. Gibbons

Andrew J. Gibbons

AJG:GA

Amended request for relief to reflect Xcel's April 26th response to a PUC Information Request containing new information and the recent Linden settlement.

1. Find that Xcel violated, *inter alia*, Sections 9 and 10 of its electric tariff book, S*RC program rules, existing settlement agreements, and/or Commission Orders;
2. Require Xcel to immediately restore the Schiller Project to the interconnection queue behind the last project in the queue for which there is a signed interconnection agreement and which is placed in service or currently under construction, and to complete required interconnection upgrades no later than October 30 2019;
3. Require Xcel to study the Schiller Project using least-cost industry standards, including Xcel's "simplified" IEEE 1453 methodology agreed to for projects with high interconnection costs in SunShare's January 2017 settlement with Xcel. Further require Xcel to begin implementing the full IEEE 1453 methodology as Xcel stated it would work towards developing in its April 26, 2017 compliance filing addressing 1453;
4. Allow SunShare's engineers to confirm Xcel study inputs prior to conducting the study, and confirm study results post study, to identify and correct errors;
5. Grant any other further relief in SunShare's favor that the Commission thinks appropriate.

Amended request for relief to reflect Xcel's April 26th response to a PUC Information Request containing new information and the recent Linden settlement.

1. Find that Xcel violated, *inter alia*, Sections 9 and 10 of its electric tariff book, S*RC program rules, existing settlement agreements, and/or Commission Orders;
2. Require Xcel to immediately restore the Schiller Project to ~~its prior position in the interconnection queue, without impact to the~~ behind the last project in the queue for which there is a signed interconnection agreement and which is placed in service or currently under construction—timeline, and to complete required interconnection upgrades ~~by September~~ no later than October 30 2019;
3. Require Xcel to study the Schiller Project using ~~appropriate and~~ least-cost industry standards, including Xcel's "simplified" IEEE 1453 methodology, ~~and if~~ agreed to for projects with high interconnection costs ~~are still prohibitively expensive, the current in SunShare's January 2017 settlement with Xcel. Further require Xcel to begin implementing the full~~ IEEE 1453 methodology ~~recognized by the IE as the appropriate standard~~ as Xcel stated it would work towards developing in its April 26, 2017 compliance filing addressing 1453;
4. Allow SunShare's engineers to ~~participate in developing and running the studies~~ confirm Xcel study inputs prior to conducting the study, and confirm study results post study, to identify and correct errors;
- ~~5. As part of the restudy, require Xcel to analyze whether the use of smart inverter functionalities and storage can address flicker and steady state voltage concerns and reduce interconnection costs, and if so, allow for the use of those functionalities;~~
- ~~6. Prohibit Xcel from charging its overhead, profit, bond costs, other markups, or labor to SunShare to complete the interconnection work, recognizing the significant delays caused by Xcel to date;~~
- ~~7. In recognition that Xcel wrongfully removed the Schiller Project from the queue, and likely allowed other projects to proceed, prohibit Xcel from charging any costs to SunShare to upgrade its grid that would not have been necessary had Xcel not wrongfully removed the project; and~~
- ~~5. 8.~~ Grant any other further relief in SunShare's favor that the Commission thinks appropriate.

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

<i>In the Matter of a Formal Complaint Against</i>)	
<i>Xcel Energy By SunShare, LLC Pursuant to</i>)	MPUC Docket No. E002/M-19-203
<i>Minn. Stat. § 216B.17</i>)	
)	
)	CERTIFICATE OF
)	SERVICE

The undersigned hereby certifies that true and correct copies of **SunShare, LLC's Amended Request for Relief** was served today upon parties of the attached services lists.

Dated this 7th day of May, 2019

/s/ Tammy J. Krause
Tammy J. Krause

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Amster Olzweski	david@mysunshare.com	SunShare, LLC	1151 Bannock St Denver, CO 80204-8020	Electronic Service	No	OFF_SL_19-203_C-19-203
Thomas	Burman	thomas.burman@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Paper Service	No	OFF_SL_19-203_C-19-203
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-203_C-19-203
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-203_C-19-203
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-203_C-19-203
Andrew	Gibbons	andrew.gibbons@stinson.com	Stinson Leonard Street	50 S 6th St Ste 2600 Minneapolis, MN 54002	Electronic Service	No	OFF_SL_19-203_C-19-203
Melanie	Kelly	marketing@mysunshare.com	SunShare	1151 Bannock Street Denver, Colorado 80204	Electronic Service	No	OFF_SL_19-203_C-19-203
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-203_C-19-203
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-203_C-19-203
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-203_C-19-203