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January 31, 2014

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

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/CI-13-542

Dear Dr. Haar,

On December 30, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES*. Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in this matter.

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

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst

/s/ HOLLY LAHD
Rate Analyst

SLP/HL/ja
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E999/CI-13-542

I. BACKGROUND INFORMATION

In the 2013 legislative session, Minn. Stat. §216B.1691 was amended to add a Solar Energy Standard (SES). In addition to the Renewable Energy Standard (RES), public utilities are required to generate or procure electricity from solar energy sufficient to serve 1.5 percent of the utility's Minnesota retail electric sales. Specifically, the statute states,

Subd. 2f. Solar energy standard. (a) In addition to the requirements of subdivisions 2a and 2b, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy. At least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kilowatts or less.

....

Subd 2f (e) A public utility may not use energy used to satisfy the solar energy standard under this subdivision to satisfy its standard obligation under subdivision 2a. A public utility may not use energy used to satisfy the standard obligation under subdivision 2a to satisfy the solar standard under this subdivision.

Subd 2 f (f) Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after the effective date of this act but before 2020 may be used to meet the solar energy standard established under this subdivision.

Subd. 2 f (g) Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision.

On December 20, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES* (Notice) seeking comment on the following issues:

- Should the Commission issue any clarification on Solar Renewable Energy Certificate (S-REC)¹ shelf life?
- What information should be provided in the utilities' annual reports on the SES?
- Should the Commission authorize an additional tracking system to track compliance with the SES?
- Are there other clarifications to be made about the SES as it should be read within the RES statute?

The Department offers the following comments.

II. DEPARTMENT ANALYSIS

A. S-REC SHELF LIFE

In its December 18, 2007 Order in Docket No. E999/CI-04-1616, the Commission established a four-year shelf life for RECs meaning that RECs could be retired for RES compliance in “the year of generation plus four years”.² The Commission adopted the four-year shelf life reasoning that, “it achieves a balance between the goals of encouraging new generation and allowing utilities to reap incentives and efficiencies from longer-range planning in the development of

¹ The Department's assumption when using the term S-REC is that S-RECs are RECs used to comply with the SES rather than the RES

² *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits*, ORDER ESTABLISHING INITIAL PROTOCOLS FOR TRADING RENEWABLE ENERGY CREDITS, Docket No. E999/CI-04-1616, December 18, 2007.

new renewable resources and compliance strategies, while avoiding the creation of a glut of renewable energy credits on the emerging market.”³

The SES requires that utilities obtain 1.5 percent of their retail electric sales in Minnesota from solar energy beginning in 2020, and further provides that energy from solar facilities installed between the effective date of the statute and 2020 be available for compliance with the SES. Consequently, the SES Statute would permit RECs from facilities placed on-line in 2014 to be retired to meet SES requirements beginning in 2020, a period of six years, at least for the period of enactment of the statute to 2020, as compared with the four years contemplated by the Commission’s Order establishing a shelf life for retirement of RECs to meet the RES. The issue remains open as to whether or not to continue that six-year shelf life after 2020

The SES statute provides several years’ lead time for utilities to develop solar projects or otherwise acquire the solar energy necessary to meet the SES requirement. One goal of this longer shelf life during this lead time is to ensure that utilities are not penalized for acquiring solar energy early and then having S-RECs become ineligible for SES retirement in 2020 because they have exceeded the established shelf life. Once the SES requirements are in place and ongoing, the Department believes a four-year shelf life is appropriate.

Thus, in order to accommodate the early development and acquisition of solar energy prior to 2020, the Department recommends that the four-year shelf life for all S-RECs coming on-line between the effective date of the statute and January 2020 commences in 2020. In other words, S-RECs with a vintage falling between the effective date of the statute and January 2020 would not have the time prior to January 2020 count against their four-year shelf life. Instead, their shelf lives would be established as if their generation had occurred in 2020, plus the four subsequent years.

B. SOLAR FACILITY LOCATION

In Attachment 1 to its Notice for Comment, the Commission requested comment on whether S-RECs from facilities located outside of Minnesota generated between August 1, 2013 and 2020 should be treated the same as S-RECs from facilities located within Minnesota.

Minn. Stat. §216B.1691, Subd. 2f (f) states:

Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity **in Minnesota** after the effective date of this act, but before 2020 may be used to meet the solar energy standard established under this subdivision. [**emphasis added**]

³ *Id.* at 7.

It appears that the intention of the statute is to give solar resources developed in Minnesota the benefit of the longer six-year shelf life during the initial start-up period. However, the Department recommends that all solar resources acquired after 2020 have the same shelf lives, whether located inside or outside of Minnesota.

C. TRACKING SYSTEMS

In its December 3, 2008 Order in Docket No. E999/CI-04-1616, the Commission required that “only RECs recorded and tracked through M-RETS [the Midwest Renewable Tracking System] may be used to meet the requirements of Minn. Stat. §216B.1691.”⁴ Since subd 2f (b) states that “The solar energy standard established in this subdivision is subject to all the provisions of this section governing a utility's standard obligation under subdivision 2a,” the Department recommends that the Commission require that S-REC s also be registered in M-RETS.⁵

Minn. Stat. §216B.1691, Subd. 4(d) states that “the Commission shall require all electric utilities to participate in a commission-approved credit-tracking system.” The Commission noted that the RES applies to 16 utilities whereas the SES applies to only 4 utilities, and questioned whether it was necessary to consider an additional tracking system specifically for the SES. M-RETS is currently being used to track compliance with Minnesota’s RES requirement and green pricing programs, as well as being used by other states to ensure compliance with their state renewable requirements and green pricing programs. Given the diversity of various states’ renewable requirements, the Department believes that the M-RETS system is sufficiently flexible to adequately track compliance with Minnesota’s SES requirement.

M-RETS currently identifies REC eligibility with 19 different state programs. Adding a column to the eligibility designation for Minnesota’s SES should be relatively easy to accomplish.⁶ Additionally, when retiring RECs for compliance purposes, the utilities subject to the SES would simply be required to establish a separate retirement account for SES, and retire the appropriate number of SES-eligible RECs into the account on an annual basis. The Department does not recommend establishing a separate tracking system solely for SES compliance, as it will be administratively inefficient and unnecessarily costly since all costs would need to be recovered from numerous small units, without the larger volume generators to cover some of the costs.

⁴ *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits*, THIRD ORDER DETAILING CRITERIA AND STANDARDS FOR DETERMINING COMPLIANCE UNDER MINN. STAT. §216B.1691 AND SETTING PROCEDURES FOR RETIRING RENEWABLE ENERGY CREDITS, Docket No. E999/CI-04-1616, December 3, 2008.

⁵ The Department notes that M-RETS is capable of tracking compliance with several states’ renewable requirements and green pricing programs; therefore, M-RETS is potentially capable of tracking Minnesota’s RES and SES compliance separately. See further discussion in section II.C. Tracking Systems.

⁶ If provision subd. 2f(f) is interpreted to treat Minnesota and non-Minnesota solar resources differently during the start-up period before 2020, it would be necessary to differentiate solar resources by the location of the facility. However, this structure should not be difficult to accommodate.

In the past, the cost of registering small facilities in M-RETS has been cost prohibitive. The Department understands that M-RETS has adjusted its pricing to better accommodate RECs from small facilities. In addition, the Department is aware of discussions within M-RETS to address and improve reporting for aggregated generating units. Project aggregation would be a means of tracking generation from smaller distributed generation facilities on an aggregated basis. Consequently, the Department recommends that all solar facilities used for SES compliance be required to register in M-RETS.

D. REPORTING REQUIREMENTS

Minn. Stat. §216B.1691, Subd. 2f(g) requires utilities to file a report with the Commission on their progress in achieving the SES beginning July 1, 2014 and on each subsequent July 1 through 2020. The Commission sought comment on the process and information that should be included in this annual reporting.

Currently, utilities are required to report the retirement of RECs for the previous compliance year to the Commission by June 1 each year. In addition, utilities are required to submit additional information in even-numbered years to facilitate the completion of a biennial report to the Legislature in January of odd-numbered years.

The Department recommends that the Commission require utilities subject to the SES to include their SES reporting requirements in their annual RES filing due June 1 of each year. The utilities already submit their annual Minnesota retail sales and total renewable generation for the previous calendar year as part of their annual RES compliance filing. Those utilities subject to the SES could include annual excluded customer sales and annual solar generation in this report. In addition, the utilities subject to the SES could provide a short summary of their ongoing efforts to obtain solar energy. Initially, the information necessary to estimate the amount of solar generation a utility would be required to obtain, along with a short summary of ongoing efforts to obtain that solar energy should be sufficient. As solar development gets further underway and the year of required compliance with the SES closer, the Commission may wish to supplement the information it obtains from utilities to include a more detailed accounting of the size of solar projects being acquired and the obstacles being encountered. However, for the 2014 reporting year, the Department concludes that reporting can be limited to an estimate of the potential SES requirement.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission order that:

- All eligible S-RECs from facilities coming on-line between the effective date of the SES statute and January 2020, and with a vintage prior to January 2020, will have a

four-year shelf life commencing January 2020. All S-RECs created after January 2020 will have a shelf life of four years.

- All S-RECs must be registered in M-RETS to be eligible for SES compliance.
- All utilities subject to the SES must file the following information with their RES compliance report on June 1st of each year:
 - a. a list of the customers requesting exclusion from the requirements of the SES, the primary North American Industrial Classification System (NAICS) code associated with their manufacturing activity, and their annual kWh usage;⁷
 - b. the total Minnesota retail sales for customers excluded from the SES requirement;
 - c. the annual solar electricity generated that will be used to comply with the SES; and
 - d. a short description of the utilities' ongoing efforts to meet the SES requirement.

/ja

⁷ The Department repeats this recommendation that was made in its December 17, 2013 comments in the instant docket to ensure consistency and continuity of the record.

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
Comments**

Docket No. E999/CI-13-542

Dated this 31st day of **January 2014**

/s/Sharon Ferguson

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