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October 29, 2013

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**VIA E-FILING**

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

Re: Solar Rate Reform Group Comments on Possible Amendment to Rules Governing  
Cogeneration and Small Power Production, Minnesota Rules, Chapter 7835;  
Reviser's ID No. R-04214; PUC Docket No. E-999/R-13-729  
and  
Rate for Large Solar Photovoltaic Installations  
PUC Docket No. E002-CI-13-315  
Our File No. 2177-01

Dear Dr. Haar:

The Solar Rate Reform Group ("SRRG") appreciates Xcel's cooperation in this proceeding and proposal to move forward. We recognize that Xcel's proposal to continue with a temporary or "interim" rate was based in part on discussions with and agreement with SRRG, but events subsequent to Xcel's proposal have caused SRRG to urge a "final" rate be set as soon as possible. SRRG has maintained that large solar is substantially different than small solar and the value of solar ("VOS") methodology process; the rates or methodologies do not have to be related, nor should they be related.

The intervening factors are; first, the Department of Commerce, on October 14, 2013, now articulated that the VOS proceedings will not apply to facilities above 1000 kW, and secondly, some SRRG members need to make investment decisions in a shorter timeframe than the VOS process will allow.

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While we recognize rates can change over time, a “final” rate now will be helpful and is appropriate as we do not believe additional time will change the underlying inputs or issues related to valuation in this case.

Very truly yours

/s/ Richard J. Savelkoul  
Richard J. Savelkoul

RJS:wsl