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Subject: Comment from MNIPL for docket 20-607
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To Whom it may Concern,

Minnesota Interfaith Power and Light (MNIPL) submits this comment in relation to Docket 20-607, which proposes changes and extension of Minnesota Power's (the Company) SolarSense program portfolio. MNIPL has been a formal party to docket comments on this program, as well as the preceding program (16-485), since 2016. MNIPL has a full-time staff member and many volunteers within the service region of the Company. In addition, as one of the "stakeholders" referred to by the Company in their reply comments within 20-607, we feel further compelled to add to the current public record. We do understand that the due date for public comment passed on 8/6/24, and regret that due to capacity issues, MNIPL was not able to submit comments within this docket prior to that date. Nevertheless, MNIPL offers these comments in the hope of furthering the public record and discussion of the issues discussed therein.

20-607 Questions and Comments

1) Should the Commission extend the SolarSense and IQ Solar Grants programs for an additional three years (2025-2027)?

Yes, MNIPL believes the Commission should extend the SolarSense and IQ Solar Grant programs for the additional three years as requested by the Company. MNIPL recognizes that the Company has met their SES requirements, and appreciates that this is a voluntary offering by the Company. Small scale, distributed solar provides environmental, economic, and energy services wherever they are deployed, and efforts to accelerate that deployment helps to accelerate those local services. MNIPL thanks the Company for their continued interest in offering these incentive programs and thereby advancing these services in the communities where they are deployed.

2) Should the Commission adopt the following program modifications: (a) the 150% Area Median Income SolarSense Rebate cap, (b) the prioritization of Disadvantaged Communities and Tribal Lands, and (c) the establishment of an Education and Outreach budget?

2a&b) Yes, MNIPL believes that is in the public interest to move the SolarSense program to a 150% cap based on Area Median Income, and to prioritize Disadvantaged Communities (DACs) and Tribal Lands within the programs. MNIPL concurs with the excellent reply comments on these questions filed by the Minnesota Department of Commerce (the

Department). The move to a 150% AMI cap is in line with coming home electrification rebates under the IRA, and recognizes the primary barrier of available personal capital for small scale distributed solar deployment. And the prioritization of DAC's and tribal lands is indeed in line with the federal Justice40 initiative, and should further the goal of assisting those most in need in realizing the benefits of solar.

2c) No, the Commission should not approve the Company's requested establishment of outreach and education budget. MNIPL has read the reply comments of the Company on this matter, and does appreciate their desire to communicate the benefits of small scale solar to income groups and communities. MNIPL also appreciates the desire of the Company to work with community and nonprofit actors in their service areas to further this end. As one of the stakeholders the Company refers to within their reply comments, MNIPL concurs that this was a topic of conversation within the discussions we were party to.

However, MNIPL does not think the proposed outreach and education budget is in the public interest for the following reasons:

-Minnesota Power currently has a marketing budget that could be applied to this end. In this point, we largely concur with the reasoning that the Department filed in their reply comments, namely that the advertising budget that the company recovers through base rates can be applied to the SolarSense programs.

-Basic communication could yield large rewards. Currently, the SolarSense rebates have been consistently oversubscribed and the IQ Solar Grant is often challenged in finding applicants. MNIPL feels that simply by making all SolarSense applicants, newly capped with AMI income limits, aware of the existence of the IQ solar grant program (and their potential ability to qualify), the additional communication and attention will be extremely helpful in forwarding both programs. *MNIPL does request clarity from the Company as to if income qualified customers may apply for, and receive concurrent awards from, both the SolarSense rebate and the IQ Solar Grant program.*

-Administrative costs should not be added to the program when the amount of total direct benefit budget remains so low. MNIPL has been consistent in past comments within 20-607 with our concern regarding the current total budget of the direct annual benefits of SolarSense programs being so low (a proposed combined \$207,675), while the *relative* annual administrative costs (\$140,650) of the program are high. While MNIPL concedes the proposed outreach and education could potentially provide *indirect* benefits, it's also without a doubt a *direct* added cost of \$15,000 annually. Given the currently proposed, very low benefit to cost ratio of the SolarSense program portfolio, MNIPL does not feel it appropriate to add to costs at this time, especially for uncertain benefits that could potentially come from a pre-recovered advertising budget.

In fact, MNIPL thinks the best use of the proposed \$15,000 annual budget for outreach and education would be to simply add it into the IQ Solar Grant program annual benefit budget. This would slightly increase the annual benefit to cost ratio of the full SolarSense program portfolio. But even more importantly, it could fund small solar arrays on 2-3 homes within the IQ Solar Grant program over the 3-year period. While this is a small increase in the budget, it could represent a life-changing benefit to those households receiving the award.

Recommendations

- MNIPL requests that the Commission **approve an extension of the Company SolarSense and IQ Solar Grant programs for 3 additional years.**
- MNIPL requests that the Commission **approve the proposed 150% Area Median Income SolarSense Rebate cap modification.**
- MNIPL requests that the Commission **approve the proposal to prioritize Disadvantaged Communities and Tribal Lands within the programs.**
- MNIPL requests that the Commission **reject the proposed establishment of an Outreach and Education budget.**
- MNIPL asks the Company and the Commission **to consider moving the proposed annual Outreach and Education budget into the IQ Solar Grant program annual budget.**

Most Sincerely,

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