

## NOTICE OF ANSWER AND COMMENT PERIOD

Issued: February 18, 2022

**In the Matter of the Formal Complaint and Request for Expedited Relief by SunShare, LLC  
Against Northern States Power Company d/b/a Xcel Energy regarding OsterSun Project;**

**In the Matter of the Formal Complaint and Request for Expedited Relief by SunShare, LLC  
Against Northern States Power Company d/b/a Xcel Energy regarding several SunShare Projects**

**PUC Docket Number(s):** E002/C-21-125;  
E002/C-21-126

**Answer Period:** Answer period closes March 10, 2022 at 4:30pm

**Comment Period:** Initial Comment period closes on March 21, 2022 at 4:30pm  
Reply Comment period closes on March 31, 2022 at 4:30pm

*Comments received after the close of the comment period may or may not be considered by the Commission.*

**Issue:** What action should the Commission take regarding SunShare's request for a variance from Xcel Tariff Sheet 9-64.1a regarding the applicable VOS (Value of Solar) rate for all five of the SunShare Projects?<sup>1</sup>

What action should the Commission take regarding SunShare's request that Xcel charge SunShare for the retrofitting of the existing recloser and regulator on the Cleodsun site rather than its respective replacement?

### **Topic(s) Open for Comment:**

- Should the Commission grant SunShare's variance request to achieve a 2020 VOS Vintage rate rather than a 2019 VOS Vintage rate for all of the SunShare Projects?
- Should the Commission determine that Xcel is imposing unreasonable interconnection costs by requiring a replacement, rather than a retrofitting, of a recloser and regulator for the CleodSun site?
- Are there other issues or concerns related to this matter?

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<sup>1</sup> The five projects include OsterSun, CleodSun, GraniteSun, QuarrySun, and SinclairSun, collectively known as "SunShare Projects".

## Background

On June 1, 2021, SunShare filed Public and Non-Public versions of an amended Formal Complaint Against Xcel Energy requesting Expedited Relief regarding the OsterSun (21-125) and CleodSun (21-126) Community Solar Garden Projects.

On December 21, 2021, Xcel filed public and non-public versions of a Partial Settlement Agreement with SunShare that covered issues in the OsterSun and CleodSun Formal Complaints.

On January 31, 2022, SunShare filed a Request for Variance from Xcel Tariff Sheet 9-64.1a in the 21-125 docket regarding the applicable VOS rate for the OsterSun, CleodSun, GraniteSun, QuarrySun, and SinclairSun projects.

On January 31, 2022, SunShare filed a Second Amended Complaint in the 21-126 docket that requests Commission approval of what Xcel Energy considers to be the non-standard technical alternative proposed by SunShare.

Minn. Rules 7829.1700 - .1900 address Formal Complaints. Minn. Rules Ch. 7829 is available at <https://www.revisor.mn.gov/rules/7829/>

**Filing Requirements:** Utilities, telecommunications carriers, official parties, and state agencies are **required** to efile documents using the Commission's electronic filing system (eFiling). All parties, participants, and interested persons are encouraged to use eFiling at:

<https://www.edockets.state.mn.us/EFiling>

## Submit Public Comments:

**Online:** [mn.gov/puc/consumers/public-comments](https://mn.gov/puc/consumers/public-comments), and follow the instructions.

**Email:** [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us)

**U.S. Mail:** Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul MN 55101

**Full Case Record:** See all documents filed in this matter on the Commission's website at: [mn.gov/puc/edockets](https://mn.gov/puc/edockets), select *Go to eDockets Project Database*, enter the year (21) and the docket numbers (125) and (126), and select *Search*.

**Subscribe:** To receive email notification when new documents are filed in this matter visit: <https://www.edockets.state.mn.us/EFiling> and select *Subscribe to Dockets*.

**Questions about this docket or Commission process and procedure?** Contact Commission staff, Derek Duran, at [Derek.Duran@state.mn.us](mailto:Derek.Duran@state.mn.us) or 651-201-2206.

**Change your mailing preferences:** Email [docketing.puc@state.mn.us](mailto:docketing.puc@state.mn.us) or call Leesa Norton at 651-201-2246.

PUC Docket Number E002/C-21-125 and E002/C-21-126

To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

**CERTIFICATE OF SERVICE**

I, Chrishna Beard, 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  
NOTICE OF ANSWER AND COMMENT PERIOD**

Docket Number **E002/C-21-125, E002/C-21-126**

Dated this 18th day of February, 2022

/s/ Chrishna Beard

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jacob	Bobrow	jbobrow@mysunshare.com	SunShare	1724 Gilpin St  Denver, CO 80218	Electronic Service	No	OFF_SL_21-125_Official Service List 21-125
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-125_Official Service List 21-125
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-125_Official Service List 21-125
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_21-125_Official Service List 21-125
Elizabeth	Reddington	lreddington@pivotenergy.net	Pivot Energy	1750 15th St Ste 400  Denver, CO 80202	Electronic Service	No	OFF_SL_21-125_Official Service List 21-125
Generic Notice	Residential Utilities Division	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_21-125_Official Service List 21-125
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-125_Official Service List 21-125
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-125_Official Service List 21-125
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street  Little Canada, MN 55126	Electronic Service	No	OFF_SL_21-125_Official Service List 21-125

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jacob	Bobrow	jbobrow@mysunshare.com	SunShare	1724 Gilpin St  Denver, CO 80218	Electronic Service	No	OFF_SL_21-126_Official Service List 21-126
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-126_Official Service List 21-126
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-126_Official Service List 21-126
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_21-126_Official Service List 21-126
Generic Notice	Residential Utilities Division	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_21-126_Official Service List 21-126
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-126_Official Service List 21-126
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-126_Official Service List 21-126
Curtis P	Zaun	curtis@cpzlaw.com	Attorney At Law	3254 Rice Street  Little Canada, MN 55126	Electronic Service	No	OFF_SL_21-126_Official Service List 21-126