

October 29, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-13-315

Dear Dr. Haar:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (the Department) in the following matter:

In the Matter of a Rate for Large Solar Photovoltaic Installations.

On October 14, 2013, the Minnesota Public Utilities Commission (Commission) issued its NOTICE OF COMMENT PERIOD ON XCEL'S PROPOSAL TO CONTINUE THE INTERIM SOLAR STANDBY SERVICE CAPACITY CREDIT. Specifically, the Commission's Notice requested comments on whether the Commission should adopt Xcel's proposal to continue the existing interim solar Standby Service capacity credit of \$5.15 per kW/month until the Commission has made a determination on the Value of Solar methodology or until some other point in time. The Department's brief comments are attached.

The Department recommends that the Commission **approve Xcel's proposal to continue the existing interim solar Standby Service capacity credit of \$5.15 per kW/month until the Commission has made a determination on the Value of Solar methodology** and is available to answer any questions the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS

Rates Analyst

CTD/sm

Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E002/M-13-215

I. INTRODUCTION

On May 13, 2013, the Commission issued its ORDER SETTING INTERIM RATE AND ESTABLISHING NEW SOLAR RATE DOCKET, in the above-cited docket. In this Order, the Commission established an interim photovoltaic (PV) capacity credit of \$5.15 per kW/month and ordered Northern States Power Company d/b/a Xcel Energy (Xcel) to file a large customer PV rate proposal by October 1, 2013. On October 1, 2013, Xcel filed a letter explaining that the Commission's May 13 Order was issued prior to the passage of legislation establishing the timeline to develop a value of solar (VOS) methodology. Since the capacity value of solar will be addressed in the Minnesota Department of Commerce's (Department) VOS methodology, and is related to the calculation of a large customer PV rate, Xcel believes filing a final rate proposal at this time would be premature.

II. DEPARTMENT ANALYSIS

The Department conducted a series of workshops on the Value of Solar Tariff both to educate stakeholders and to seek input on a method for valuing electricity provided by PV installations by utility customers. As noted above, the capacity value of solar will be addressed in the Department's VOS methodology. Thus, the Department agrees with Xcel Energy that it is reasonable to delay a final PV capacity credit filing until after the Value of Solar process is finalized. The legislation (MN Laws 2013, Chapter 85 HF 729, Article 9, Section 10) requires that the Department develop the methodology and submit it to the Public Utilities Commission no later than January 31, 2014. The Department is on schedule to do so.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve Xcel's proposal to continue the existing interim solar Standby Service capacity credit of \$5.15 per kW/month until the Commission has made a determination on the Value of Solar methodology.

/sm

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. E002/M-13-315

Dated this 29th day of **October, 2013**

/s/Sharon Ferguson

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SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 315_Interested Parties
Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13- 315_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13- 315_Interested Parties
Daniel	Williams	N/A	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Paper Service	No	SPL_SL_13- 315_Interested Parties