

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Nancy Lange Chair
Daniel Lipschultz Commissioner
Matt Schuerger Commissioner
Katie Sieben Commissioner
John Tuma Commissioner
In the Matter of Solar* Rewards
Program and Community Solar
Garden Tariff Updates

September 26, 2018

ENERGY CONCEPTS, INC.
REPLY COMMENTS ON
SOLAR REWARDS

Docket No. E002/M-18-381

REPLY COMMENTS OF ENERGY CONCEPTS, INC (ECI)

ECI submits these reply comments in response to the Notice of Supplemental Comment Period issued by the Minnesota Public Utilities Commission (“Commission”) on August 27, 2018 in the above-referenced docket. For the reasons stated in its comments submitted on September 17 and in the reply comments below, ECI requests that the Commission consider the following embellishment of Xcel Energy’s (“Xcel”) proposed tariff revisions and order Xcel to submit modified tariff revisions consistent with the actual and intended requirements of Minn. Stat. § 116C.7792, as revised.

First, it is ECI’s position that Xcel Energy’s proposed interpretation of Minn. Stat. § 116C.7792 is incorrect and inconsistent with both the legislative record and our experience with working with the bill sponsors, our members, and Xcel Energy during the development of Minn. Stat. § 116C.7792. ECI agrees with iDEAL Energies’ interpretation of the statutory language filed in their 9/17/18 comments. I have also reviewed MSEIA’s draft language to be filed on behalf of the matter and we agree with their narrative as well.

ECI additionally adds the following to the discussion for consideration:

There are pre-existing Xcel customers that were advised by Xcel's previous Solar Rewards management team, to install parallel systems; one with a solar rewards contract and one – with a separate and dedicated point of connection - that could be enrolled under the PV Demand Credit Rider *once it was approved in it's final form*. These systems pre-date the June 1, 2018 deadline referenced in the Xcel narrative. These Xcel clients have expended significant capital and met the advised requirements at that time. Under the current proposed Xcel plan, they would have to choose to either enroll the larger second systems under the PV Demand Credit Rider and lose Solar rewards on that separate system or keep Solar Rewards and not garner the payback that was projected for the implementation of the much larger system using the PV Demand Credit Rider.

We respectfully request Xcel Energy to honor pre-existing parallel systems (Assuming the 120% rule is satisfied of course for the combined systems) installed prior to the June 1, 2018 to be allowed both the parallel Solar Rewards and PV Demand Credit Rider - as was advised by Xcel during the Docket stage of the Rider.

Craig A Tarr, PE
President
Energy Concepts, Inc.
ctarr@energyconcepts.us