

August 25, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 300
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-14-648

Dear Dr. Haar:

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

Northern States Power Company d/b/a Xcel Energy's request for Approval of changes to its Section 10 Interconnection Tariffs.

The request was filed on July 31, 2014 by:

Amy Liberkowski
Manager, Regulatory Analysis
Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401

The Department recommends **Xcel provide additional information in reply** and is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst

SLP/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E002/M-14-648

I. BACKGROUND INFORMATION

In its 2011 rate case, Northern States Power d/b/a Xcel Energy (Xcel or the Company) entered into a partial settlement with the Minnesota Chamber of Commerce (MCC) to modify its interconnection tariff language to provide firm cost estimates for interconnection studies. The Commission's rate case Order directed Xcel to comply with the settlement.

On July 31, 2014, Xcel submitted revisions to its interconnection tariff reflecting its discussions with the MCC.

II. SUMMARY OF TARIFF CHANGES.

Under the terms of Xcel's current interconnection tariff, the Company charges an application fee as well as engineering study costs. MCC expressed concerns that the current tariff requires the interconnecting generator to pay the actual costs of the engineering study without providing any guidance as to what those costs might be for facilities greater than 250 kW. Under the terms of the settlement with MCC, Xcel agreed "to work with the Chamber to modify its DG tariff language to provide for firm estimates to perform interconnection studies."

Xcel proposes to combine its application fee and engineering cost study into a single charge. Attachment 1 provides a summary of the current and proposed charges. For the largest, most complex distribution generation facility interconnections, the Company will continue to assess separate engineering study costs, but will provide a firm cost estimate "at the time of preliminary review based on scope provided in the application." In addition, Xcel proposes language allowing it to update the firm cost estimate if the scope is changed after the estimate is provided.

III. DEPARTMENT ANALYSIS

The Commission established generic interconnection standards in its September 28, 2004 Order in Docket No. E999/CI-01-1023.¹ The Department has reviewed Xcel's proposed interconnection tariff, and has one concern with the Company's proposal.

Xcel proposes to consolidate its application and engineering study fees into a single charge. Under its current tariff, all facilities over 250 kW are charged actual engineering study costs plus an application fee ranging from \$0 to 1,500. Under the proposed tariff, the total application and energy cost study charge would be set between \$0 and \$3,000 depending on the type of interconnection. For the most complex interconnections, the Company would continue to assess actual engineering study costs, but has committed to provide a firm cost estimate at the time of its preliminary review based on the scope provided in the application. Xcel reserves the ability to update its firm cost estimate in the event the scope of the interconnection changes following its preliminary review.

The Department understands the MCC was concerned with obtaining more surety regarding the engineering study costs for the larger more complex interconnections. Xcel's proposed tariff revision appears to provide that surety with adequate protections to remaining ratepayers in the event the interconnection scope is revised.

The Department has concerns with the revisions made to fees applied to small, less than 20 kW facilities. In its current tariff, Xcel's application fee for small generators less than 20 kW is \$0 - \$100 depending on the type of interconnection, and the engineering study cost is \$0. Under the Company's proposal, the Company proposes to charge a combined application and engineering cost study fee of \$250. According to Xcel's Solar*Rewards tariff, which is available to systems of no more than 20 kW direct current, the engineering cost study for its Solar*Rewards incentive customers is \$250. Nonetheless, the Department is concerned that the Company seeks to charge \$250 for interconnecting facilities less than 20 kW when it previously was able to do so for \$0. The Department requests that Xcel provide an explanation of the increase in the application and engineering cost study charges for small generation facilities. The Department also requests the Company provide information on any efforts underway to streamline the process, improve the efficiency, and reduce the costs of its interconnection process for small generation facilities.

The Department also recommends one tariff revision to clarify the changes proposed by Xcel. The table providing the consolidated fee structure reads "Generation Interconnection Application Fees". The Department recommends revising fee structure title to read

¹ In the Matter of Establishing Generic Standards for utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 202, ORDER ESTABLISHING STANDARDS, Docket No. E999/CI-01-1023, September 28, 2004.

“Generation Interconnection Application and Engineering Cost Study Fees” to clarify that the proposed fees cover both application and engineering costs.

IV. DEPARTMENT RECOMMENDATION

The Department recommends Xcel provide reply comments explaining the increase in the application and engineering cost study charges for generation facilities less than 20 kW, along with information on its efforts to streamline the process, improve the efficiency and reduce the costs of interconnecting small generation facilities.

The Department recommends the Commission direct Xcel to revise the title of its fee structure table to reflect that the stated fees cover both application and engineering costs.

/ja

Xcel Energy DG Interconnection Application and Study Fees Comparison

Docket No. E002/M-14-648
8/21/2014

Proposed Application and Study Fees	<20kW	20kW - 250 kW	250 kW - 500 kW	500 kW - 1000 kW	1 MW - 10 MW
Open Transfer	0	0	0	0	250
Quick Closed Transfer	250	250	250	250	250
Soft Closed Transfer	250	250	500	500	1000
Extended Parallel Non-exporting Pre-certified	250	250	250	1000	1500 + study costs
Extended Parallel Non-exporting Pre-certified	250	250	1000	1000	2000 + study costs
Extended Parallel Pre-certified	250	250	2000	2000	1500 + study costs
Extended Parallel Non-Pre-certified	250	1000	3000	2000 + study costs	2000 + study costs

Current Application Fees	<20kW	20kW - 250 kW	250 kW - 500 kW	500 kW - 1000 kW	1 MW - 10 MW
Open Transfer	0	0	0	100	100
Quick Closed Transfer	0	100	100	250	500
Soft Closed Transfer	100	250	500	500	1000
Extended Parallel Non-exporting Pre-certified	0	250	1000	1000	1500
Extended Parallel Non-exporting	100	500	1500	1500	1500
Extended Parallel Pre-certified	0	250	1000	1000	1500
Extended Parallel Non-Pre-certified	100	500	1500	1500	1500

Current Study Fees	<20kW	20kW - 250 kW*	250 kW - 500 kW	500 kW - 1000 kW	1 MW - 10 MW
Open Transfer	0	500 or 1000	actual costs	actual costs	actual costs
Quick Closed Transfer	0	500 or 1000	actual costs	actual costs	actual costs
Soft Closed Transfer	0	500 or 1000	actual costs	actual costs	actual costs
Extended Parallel Non-exporting Pre-certified	0	500 or 1000	actual costs	actual costs	actual costs
Extended Parallel Non-exporting	0	500 or 1000	actual costs	actual costs	actual costs
Extended Parallel Pre-certified	0	500 or 1000	actual costs	actual costs	actual costs
Extended Parallel Non-Pre-certified	0	500 or 1000	actual costs	actual costs	actual costs

* Current Study Fees are \$500 for 20kW-100kW and \$1000 for 100kW-250kW

Current Application and Study Fees Total	<20kW	20kW - 250 kW	250 kW - 500 kW	500 kW - 1000 kW	1 MW - 10 MW
Open Transfer	0	500 or 1000	0 + study costs	100 + study costs	100 + study costs
Quick Closed Transfer	0	600 or 1100	100 + study costs	250 + study costs	500 + study costs
Soft Closed Transfer	100	750 or 1250	500 + study costs	500 + study costs	1000 + study costs
Extended Parallel Non-exporting Pre-certified	0	750 or 1250	1000 + study costs	1000 + study costs	1500 + study costs
Extended Parallel Non-exporting	100	1000 or 1500	1500 + study costs	1500 + study costs	1500 + study costs
Extended Parallel Pre-certified	0	750 or 1250	1000 + study costs	1000 + study costs	1500 + study costs
Extended Parallel Non-Pre-certified	100	1000 or 1500	1500 + study costs	1500 + study costs	1500 + study costs

Differences in Application + Study Fees	<20kW	20kW - 250 kW	250 kW - 500 kW	500 kW - 1000 kW	1 MW - 10 MW
Open Transfer	0	-500 to -1000	≤ 0	≤ -100	≤ 150
Quick Closed Transfer	250	-350 to -850	≤ 150	≤ 0	≤ -250
Soft Closed Transfer	150	-500 to -1000	≤ 0	≤ 0	≤ 0
Extended Parallel Non-exporting Pre-certified	250	-500 to -1000	≤ -750	≤ 0	0**
Extended Parallel Non-exporting	150	-750 to -1250	≤ -500	≤ -500	0**
Extended Parallel Pre-certified	250	-500 to -1000	≤ 1000	≤ 1000	0**
Extended Parallel Non-Pre-certified	150	0 to -500	≤ 1500	0**	0**

**applicant will pay actual costs under current and proposed fee structures.

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-14-648

Dated this 26th day of August 2014

/s/Sharon Ferguson

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