



Sundial Solar

A Brighter Idea

Burl W. Haar
Public Utilities Commission
PUC Docket Number: E-002/M-13-315

March 17, 2014

In the Matter of a Rate for Large Solar Photovoltaic Installations

Dear Dr. Haar-

We appreciate the ability to comment on this matter. Sundial Solar has met with DER, SRRG, Xcel Energy and other stakeholders in productive discussions to move this matter forward.

We support the latest DER filing earlier today with the following additional comments:

- 1) This docket should be kept separate from all others. We strongly urge the Commission to rule for a final Capacity Credit of not less than \$5.15 per kw per month as soon as possible.
- 2) The method for determining the applicable kw rating in a PV system eligible for capacity credits should be based on the total combined maximum inverter AC rating. This is the most logical and practical formula.
- 3) The ruling in this matter should apply to all solar PV systems which are greater than 100kw and thus on Standby Service.
- 4) The Capacity Credit rate should track along with Xcel's Demand charges and change proportionally whenever Demand charges fluctuate.
- 5) As is presently the case, the SRECs in these systems should remain with the owner who may, at their option, sell them to Xcel or another entity.

Thank you for your consideration in this matter.

Sincerely,

Jon Kramer, CEO