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February 20, 2014

VIA E-FILING

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

Re: In the Matter of Establishing a Distributed
Solar Value Methodology Under
Minn. Stat. §216B.164, subd. 10 (e) and (f)
Docket No. E-999/M-14-65

Dear Dr. Haar:

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Expedited Comment Period on Distributed Solar Value Methodology Proposal (“Notice”) on January 31, 2014, in the above referenced docket. Minnesota Power respectfully submits its Reply Comments in response to the Notice.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

Marcia A. Podratz

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Establishing a Distributed
Solar Value Methodology under
Minn. Stat. §216B.164, subd. 10 (e) and (f)

Docket No. E-999/M-14-65
**MINNESOTA POWER'S
REPLY COMMENTS**

On February 13, 2014 Minnesota Power (“Company”) and other parties submitted Comments to the Minnesota Public Utilities Commission (“Commission”) in response to its January 31, 2014 Notice of Expedited Comment Period on Distributed Solar Value Methodology Proposal. These Reply Comments address areas of concern that Minnesota Power identified in the other parties’ Comments regarding the Minnesota Department of Commerce’s (“Department”) proposed Value of Solar (“VOS”) Methodology. Minnesota Power continues to urge the Commission and Department to be conservative in considering the VOS methodology and to use known and measurable costs that are truly avoidable as a result of solar photovoltaic (“PV”) resources being added to utility systems. As previously discussed in Minnesota Power’s February 13, 2014 Comments, such avoided costs can potentially include reductions in fixed costs (e.g., generation, transmission, and distribution capacity) that the utility may avoid or defer because of the presence of a solar generator in a specific location on its system. They also can include reductions in variable costs (e.g., fuel, variable O&M, and variable environmental costs).

The Joint Initial Comments of Environmental Law and Policy Center (ELPC), Fresh Energy (FE), Interstate Renewable Energy Council, Inc. (IREC), Institute for Local Self-Reliance (ILSR), Izaak Walton League of America (IWLA), SunEdison, LLC (SE), and the Vote Solar Initiative (VSI) (“Joint Initial Comments”) support inclusion of the Department’s proposed use of the federal social cost of carbon and existing Minnesota externalities to represent avoided

environmental costs.¹ The Joint Initial Comments also support the Department’s proposed methodological approach for avoided transmission capacity costs, avoided distribution system capacity costs, and avoided fuel costs (i.e., avoided costs of price volatility risk).² Minnesota Power disagrees. Any methodology used to value distributed solar PV should incorporate actual avoidable costs rather than theoretical, future, or potential costs and benefits. Because avoided energy/fuel costs will likely be the largest cost savings component associated with solar PV, it is very important to use realistic assumptions for fuel sources and prices. For this and all other components in the methodology, only known and measurable cost savings should be included. The methodology should also avoid double-counting of societal benefits that accrue to the general public but have already been compensated for by tax subsidies or rebates for solar power. Minnesota Power agrees with Xcel Energy that additional incentives may be needed to support solar market development, but all incentives should be separate from the base VOS rate.³

Minnesota Power also agrees with Xcel Energy regarding the importance of distributed solar PV customers contributing to the cost of operating and maintaining the power delivery system.

From a distribution system perspective, the addition of distributed solar to the distribution grid changes how the grid has historically operated from a one-way system to a two-way system. Increased penetration of solar on the distribution system will result in increased capital expenditures, as well as operating costs. These costs should be considered in future VOS rate calculations, particularly as solar penetration increases.⁴

Regarding application of the VOS tariff, The Alliance for Solar Choice (“TASC”) opposes the Department statement that “if a VOS tariff is approved, solar customers will be billed for all usage under the existing applicable tariff, and will receive a VOS credit for their

¹ Environmental Law & Policy Center, et al, February 13, 2014 Joint Initial Comments, page 2.

² Environmental Law & Policy Center, et al, February 13, 2014 Joint Initial Comments, page 2.

³ Xcel Energy February 13, 2014 Comments, page 6.

⁴ Xcel Energy February 13, 2014 Comments, page 7.

gross solar energy production.”⁵ Minnesota Power disagrees with TASC’s opinion. Minn. Stat. §216B.164, subd. 10(c)(3) and subd. 10(c)(4) clearly state that for an alternative tariff (i.e., VOS tariff) to be approved, the utility must demonstrate that the alternative tariff charges the customer for all electricity consumed at the retail rate and credits the customer for all electricity generated at the VOS tariff rate.

Finally, in a related matter, the Edison Electric Institute (“EEI”), an association of all U.S. investor-owned electric companies whose members provide electricity for 220 million Americans and operate in all 50 states and the District of Columbia, recently submitted Comments on Value and Cost of Distributed Generation to the Arizona Corporation Commission (“Arizona Comments”).⁶ EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums for its members and interested stakeholders. In its Arizona Comments, EEI stated:

DG customers should be compensated for their electricity sales at rates commensurate with what it costs electric utilities to serve their customers by producing electricity or purchasing it in the wholesale market. DG customers should receive a credit for reducing electric utility costs only if there are identifiable, verifiable costs that utilities save as a result of DG systems being added at specific locations. Including intangible or difficult to measure components in the process will ultimately lead to lack of confidence in the end product.... The Commission should instead require a methodology that includes only costs that are measurable and verifiable. This will serve to protect non-DG customers, the vast majority of all customers, from paying for benefits that are speculative, sensitive to unverifiable assumptions, lack standard calculation approaches, or otherwise may not actually materialize as expected.⁷

Minnesota Power is an active member of EEI and participates in its educational and policy activities related to distributed generation (“DG”) resources. Minnesota Power believes that the EEI Arizona Comments quoted above provide excellent guidance for the current VOS proceeding in Minnesota.

⁵ TASC February 13, 2014 Initial Comments, page 4.

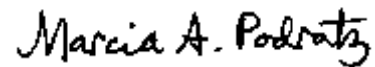
⁶ Arizona Corporation Commission, Docket E-00000J-14-0023, EEI Comments on Value and Cost of Distributed Generation (Including Net Metering), February 14, 2014 (“EEI Arizona Comments”).

⁷ EEI Arizona Comments, page 6.

Minnesota Power appreciates the opportunity to provide additional feedback to the Commission on the Department's proposed VOS methodology. The Company reaffirms its belief that the VOS tariff methodology should focus on measurable and verifiable avoided costs, which will result in proper price signals to solar developers. Minnesota Power looks forward to helping shape a VOS tariff that is equitable and in the best interest of all stakeholders.

Dated: February 20, 2014

Respectfully submitted,

A handwritten signature in black ink that reads "Marcia A. Podratz". The signature is written in a cursive, slightly slanted style.

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Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Deborah Fohr	Levchak	dlevchak@bepec.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 585030564	Paper Service	No	SPL_SL_14-65_Interested Parties
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_14-65_Interested Parties
Mark	Lindquist	N/A	The Minnesota Project	57107 422nd St New Ulm, MN 56073-4321	Paper Service	No	SPL_SL_14-65_Interested Parties
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Paper Service	No	SPL_SL_14-65_Interested Parties
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_14-65_Interested Parties
Casey	Maccullum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_14-65_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Paper Service	No	SPL_SL_14-65_Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 St. Paul, MN 55104-1850	Paper Service	No	SPL_SL_14-65_Interested Parties
Dave	McNary	N/A	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_14-65_Interested Parties
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_14-65_Interested Parties
Valerie	Means	valerie.means@lawmoss.com	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_14-65_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ben	Nelson		CMPMA	459 South Grove Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_14-65_Interested Parties
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_14-65_Interested Parties
Nick	Paluck	nick.paluck@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
James	Pearson	james.g.pearson@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_14-65_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_14-65_Interested Parties
Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Paper Service	No	SPL_SL_14-65_Interested Parties
Gayle	Prest	gayle.prest@minneapolis.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_14-65_Interested Parties
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_14-65_Interested Parties
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_14-65_Interested Parties
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_14-65_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Paper Service	No	SPL_SL_14-65_Interested Parties
Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	SPL_SL_14-65_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue St. Paul, MN 55102	Paper Service	No	SPL_SL_14-65_Interested Parties
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Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_14-65_Interested Parties
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_14-65_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-65_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_14-65_Interested Parties
Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_14-65_Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	SPL_SL_14-65_Interested Parties
Gary	Shaver	N/A	Silicon Energy	3506 124th St NE Marysville, WA 98271	Paper Service	No	SPL_SL_14-65_Interested Parties

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Erin	Shea	eshea@silicon-energy.com	Silicon Energy	11168 Sumter Circle Bloomington, MN 55438	Electronic Service	No	SPL_SL_14-65_Interested Parties
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Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_14-65_Interested Parties
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	SPL_SL_14-65_Interested Parties
Chanti	Sourignavong	chantipal.sourignavong@honeywell.com	Honeywell	1985 Douglas Drive North MN10-111A Golden Valley, MN 55422-3992	Paper Service	No	SPL_SL_14-65_Interested Parties
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-65_Interested Parties
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-65_Interested Parties
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Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_14-65_Interested Parties
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Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_14-65_Interested Parties
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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_14-65_Interested Parties
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-65_Interested Parties

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Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_14-65_Interested Parties
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	SPL_SL_14-65_Interested Parties
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_14-65_Interested Parties
Steven	Wishart	steven.w.wishart@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_14-65_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_14-65_Interested Parties
Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_14-65_Interested Parties