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July 14, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities
121 7th Please East, Suite 350
St. Paul, MN 55101-2147

RE: Docket # E999/M-17-283

Minnesota Electric Utilities Efforts to Achieve Solar Energy Standards

Dear Mr. Wolf and Commissioners:

Thank you for the opportunity and please accept these comments from All Energy Solar Inc. (AES) in regards to the above referenced docket.

Overview

All Energy Solar sells, designs, builds, and maintains solar electric systems all throughout MN, WI, IA, and MA. With over 1,700 solar electric systems installed (AES) works regularly with all the Minnesota Investor Owned Utilities with regards to rebate programs and interconnection rules/standards.

Comments

1. AES believes that efforts have not been fully exhausted and should be further explored to finding ways to encourage all MN IOU's to meet their existing SES and small-scale solar carve out. Using subscriptions from community solar projects does not meet the intent of having a small scale solar carve out and simply defeats the point of intending to build upon a market segment that encourages local, meaningful job growth.
2. Without a clear understanding of a financial penalty for not meeting these SES goals, it is very difficult to comprehend why an IOU would not wait until the last possible moment to purchase the cheapest possible SREC's, which most likely will be from out of state.
3. Minnesota has taken a national leadership role in Community Solar projects and should be proud of what we have accomplished thus far. At the same time we have the opportunity to energize another market segment within Minnesota that requires local companies to sell, design, install and maintain projects that benefit both urban and rural communities statewide. Allowing utilities to pick and choose the market segments they want to develop ultimately benefits the utilities while hurting their residential and small commercial customers with a lack of clean energy options.
4. Xcel needs to be more transparent with the allocation of the Solar Rewards funds. According to Graph 1 in Xcel's June 19th response, in 2015 Xcel only installed 2735kW out of the 4600kW they had funding for, but yet in November 2015 Xcel announced that almost all the funds had been allocated. This shows that many projects that had funding allocated to them did not actually get built (approx. 60%). Where did the remaining funding go and why not added to the subsequent year. According to Graph 2 of Xcel's response even if Xcel only installed half of the funding they would be very close to meeting their small scale carve out each year after 2018. Adding the unused funds to the subsequent year would extend out the timeframe and help Xcel to remain in compliance. This may need to be a legislative issue but shows that there are options available to Xcel besides using community solar subscriptions.
5. Start marketing the solar rewards program to your residential and commercial customer base. More and more advertising has surfaced encouraging renewable programs other than Solar Rewards for your home and or business. Providing your customer base with knowledge of these solar rebates will help allocate and build the entire fund.



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All Energy Solar appreciates this opportunity to provide comments in this docket and looks forward to the follow-up conversations.

Michael R. Allen

President
All Energy Solar