

PUBLIC COMMENTS

XCEL ENERGY PETITION FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDEN PROGRAM | M-13-867

Created: May 15, 2015 17:22

Last response: May 18, 2015 20:59

PARTICIPANTS

1

ANSWERS

1

REPLIES

0

**times above are in UTC*

Xcel Energy Petition for Approval of Its Proposed Community Solar Garden Program | M-13-867

Topic: Response to Xcel's April 28, 2015 comments filed in this docket, including potential ways to address concerns surrounding co-location as raised by Xcel and other parties in the docket

Topic: Response to the Petition for Expedited Relief filed by the Solar Garden Community on April 29, 2015

John Crampton at May 18, 2015 at 3:59pm CDT

Chair, Green Committee, Oak Grove Presbyterian, I am the chair of the Oak Grove Presbyterian Green Committee. We are a congregation of 560 members located in Bloomington, Minnesota..

Our church is committed to subscribing to a community solar garden (GSG) as soon as it becomes available. We hope to subscribe for 100 kw to provide our approximate 130,000 kwh of electricity annually for 25 years. Our primary goal is to cut our carbon emissions to net zero. We estimate that, over 25 years, we will avoid emitting 675 metric tons (1,500,000 lbs) of CO₂, with avoided social costs of carbon of approximately \$41,000.

Another primary goal is to offer the option of joining a CSG for all our members who live in Xcel territory. Of approximately 350 households in our church, we believe that, when available, 100 households will sign up with the solar developer to subscribe to the CSG. This will result in 800kw of clean, renewable solar energy being built. Over 25 years it will enable Oak Grove members to avoid emitting 5,400 tons (12,000,000 lbs) of CO₂ and to thereby avoid \$328,000 in social costs of carbon. Subscription to the CSG will enable Oak Grove and its members to undertake, by far, the greatest social justice, mission, and earth care project our church has ever done.

For our members who live outside Xcel territory or those members who cannot make a long term commitment, we will include them in a broad-based campaign using Windsorce and other programs to dramatically reduce their individual carbon footprints. Our goal is to have our church and 80% its members signed up to get 100% clean, renewable energy for their electricity by the end of 2016.

Why are we doing this? Because we are scared to death about climate change, and we know that we are very quickly running out of time in our efforts to limit global warming to 2 degrees Celsius, and thus to be able to pass on a "survivable" world to our children and grandchildren. We see community solar gardens as a fantastic, grassroots way to attract investment to make clean, renewable energy a real option for all people.

And that's why we find Xcel's actions in slowing the implementation and now trying to undo the 2013 Minnesota Community Solar Act to be reprehensible:

- When now Xcel complains that utility scale solar will be less costly for rate payers, we need to ask, "Why have you been holding out on us? Where is our utility solar?"
- When Xcel now complains that only the big corporations are signing up for CSGs, we need to ask, "What did you expect?" Compared with communities, corporations can make faster decisions on more solar MW and it's easier to find decisive, empowered decision makers.

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In the long run, we believe that faith communities and their members can be real leaders in a widespread, grassroots movement to 100% clean, renewable solar energy. We are depending on you commissioners at the Minnesota PUC to stand your ground and uphold to the law to prevent Xcel from strangling the community solar program before it is born. We feel that faith communities can spearhead this movement because:

- Most faith communities have ethical values supporting earth stewardship and climate change avoidance.
- They are natural communities where people know each other and it's safe to talk about difficult, even overwhelming issues, values, ethics and the issues such as the future livability of God's Creation.
- Community Solar Gardens are a perfect organizing project for a church green team. They save electricity costs with no or very little out-of-pocket investments and minimal financial risks.
- Solar Garden organizing projects start new conversations with people who have never heard about climate change, the importance of clean energy, or how they can influence clean energy policy. They help defeat the pessimism and despair that says, "It's too late... There's nothing we can do about climate change!"
- When a faith community launches its community solar garden, it celebrates: "We did it. We are living our values. Our faith community is powerful, and stronger than before. Bring on the next challenge!"

Accordingly, Oak Grove Presbyterian is also working in cooperation with 3 other Presbyterian and 4-5 Unitarian-Universalist congregations to help vet and refine solar developers' offerings and contracts. We are doing everything we can to spread the word about Community Solar Gardens and the importance of cutting our carbon emissions. And all this is in accordance with the spirit and the letter of the 2013 Community Solar Law. We strongly condemn all of Xcel's actions to try to defeat this law.

In conclusion, please direct Xcel to quit their stalling and to process the 400 MW + of applications they have already received for CSGs so they can get built in 2015 and so we can do even more in 2016. Overrule their complaints about co-location. If Xcel is so worried about co-location, why don't they build more utility scale solar to show us how inexpensive it can be? Finally, remind them that as a government-sponsored private monopoly they have a duty to something beyond their shareholders..... they have a duty to the "public good" and to the future generations who are depending on us all for a world that is "livable."

** Calculations of carbon emissions and SCC are from the EPA websites:

www.epa.gov/climatechange/EPAactivities/economics/scc.html www.epa.gov/cleanenergy/energy-resources/calculator.html

Topic: Identification of all issues that require Commission action, including but not limited to changes to Commission Orders or Commission-approved tariffs

Topic: Identification of all resolved issues

Topic: Replies to any comments filed to-date in the docket

Topic: Replies to comments filed on April 30, 2015

Rice, Robin (PUC)

From: Jessie Sorensen <Jessie.Sorensen@cctwincities.org>
Sent: Monday, May 18, 2015 1:46 PM
To: #PUC_Public Comments
Subject: Comments on Solar Garden Program - MPUC Docket No. E002 / M-13-768
Attachments: Solar Garden Comments to MPUC from Catholic Charities - May 2015.pdf

Mr. Wolf and Members of the Commission,

Please accept the attached comments from Catholic Charities regarding the Community Solar Gardens program. Thank you for the opportunity to comment, and please don't hesitate to be in touch if there are questions or additional information we can provide.

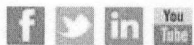
Sincerely,
Jessie

Jessie Sorensen
Senior Vice President of Advancement and Public Engagement
Catholic Charities of St. Paul and Minneapolis
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Minneapolis, MN 55403

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May is Mental Health Month. Because of your support, Catholic Charities can provide important counseling services to those most in need.



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CATHOLIC CHARITIES
of St. Paul and Minneapolis

1200 Second Avenue South
Minneapolis, MN 55403
612-204-8500
cctwincities.org

May 18, 2015

Via e-mail

Minnesota Public Utilities Commission
PublicComments.puc@state.mn.us
Attention: Daniel Wolf, Executive Secretary

**Re: MPUC Docket NO. E002/M-13-867
IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDENS PROGRAM**

Dear Mr. Wolf and Members of the Commission:

Catholic Charities of St. Paul and Minneapolis (Catholic Charities) respectfully submits the following comments in the above matter. We do not request permission to intervene as a party and, therefore, are not serving other parties with these comments.

Catholic Charities is the largest comprehensive social service agency in the Greater Minneapolis St. Paul region. Each year we serve as many 30,000 women, children and men who are experiencing poverty. We provide housing and shelter to the homeless (450,000 nights in 2014), feed the hungry (800,000 meals in 2014), assist vulnerable older adults to maintain housing and stability as they age, work with thousands of children and their families to provide early childhood education, address the needs of abused and troubled children, provide counseling in schools and other settings, and assist New Americans to achieve stability in a new nation.

Most of those we serve are in dire economic circumstances, the poorest of the poor in our region, and they come from the neighborhoods with the highest concentrations of poverty and distress. Our clients regularly make difficult trade-offs between paying for food, rent, medicine, utilities and transportation. An increased expense or an emergency situation can often put them in a downward spiral where they lose their job, home, and stability. The impact of the Great Recession is still being felt by most of our clients who are not experiencing the benefits of the recovery that others are experiencing.

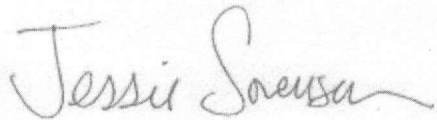
While Catholic Charities believes strongly in environmental stewardship and continued progress toward the use of renewable resources such as solar, it is critically important that progress not come at the expense of those most in need. They simply cannot afford to

subsidize or cross-subsidize with higher utility rates those who might otherwise benefit from investments in solar energy.

Consequently, as the Commission proceeds with its deliberations on this matter, Catholic Charities urges it to carefully consider the comments from the Minnesota Chamber, the Residential Utility Division of the Minnesota Attorney General, Xcel and other stakeholders expressing similar concerns.

Catholic Charities appreciates the opportunity to offer comments on this matter and would be happy to submit additional information at the request of the Commission.

Respectfully submitted,



By _____
Jessica Sorensen, Senior Vice President
Advancement and Public Engagement
Catholic Charities of St. Paul and Minneapolis
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Minneapolis MN, 55403
Phone: (612)204-8431
jessie.sorensen@cctwincities.org

Rice, Robin (PUC)

From: Linda Anderson <LAnderson@minneapolischamber.org>
Sent: Monday, May 18, 2015 2:39 PM
To: #PUC_Public Comments
Subject: Re: Docket MPUC E-002/M-13-867 - Minneapolis Regional Chamber of Commerce
Attachments: PUC letter.pdf

Please see attached letter from Todd Klingel, Minneapolis Regional Chamber of Commerce.

Linda Sue Anderson
Executive Assistant
612.370.9152

June 17 ★ *Meet the Chamber! Minneapolis*

11:30 am - 1:00 pm/United States Postal Service/ free to members and future members

Meet the Chamber is designed to give you an overview of the benefits/services that are available to members through the Regional Chamber, Bloomington Chamber and Northeast Minneapolis Chamber.



81 South Ninth Street, Suite 200
Minneapolis, MN 55402-3223
Phone: (612) 370-9100 Fax: (612) 370-9195
www.minneapolischamber.org

May 18, 2015

Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101-2147

Re: Docket MPUC E-002/M-13-867

Dear Mr. Wolf:

I am writing to you today to express concern with the Xcel Energy Community Solar Garden program. Our concern is that the program is unfolding in a way that is not consistent with the policy intent and, as a consequence, it will unnecessarily increase energy rates on our members who are not participating in a Solar Garden.

As one of the State's largest Chambers of Commerce, we work to insure that businesses in the Region are not unnecessarily burdened with unintended costs.

We understand that the Community Solar Garden program launched late last year by Xcel Energy is not fulfilling its original intent and has the potential to increase energy rates on our members who are not participating in a Solar Garden. We note with interest the statements of the Office of Attorney General which cite dramatic levels of customer impact that will result if this program is not fixed.

The Office of Attorney General points out the subsidy that flows between customers as a result of the program. They state, "the scale of the proposed CSG projects proposed thus far affords large companies the opportunity to offset their entire energy use and receive a bill credit that is currently designed to be greater than their full retail rate. The impact of this is that these subscribers may receive bill credits that are equal to, or possibly greater than their electric bills—and all of those costs would be paid for by Xcel's other ratepayers. The result is a direct subsidy from non-participants to pay for the program."

We urge the Commission to consider working with all parties involved to enforce the 1 MW limit on gardens to make sure the program is implemented correctly and does not unfairly raise rates on our members who do not choose to participate in these gardens.

Thank you for your time and consideration.

A handwritten signature in black ink that reads "Todd E. Klingel". The signature is fluid and cursive.

Sincerely,
Todd Klingel, President & CEO