

August 8, 2019

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-19-453

Dear Mr. Wolf:

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

Northern States Power Company, doing business as Xcel Energy's Petition for Solar\*Rewards Program and Community Solar Garden Program Tariff Updates.

The filing was submitted on July 17, 2019 by:

Shawn White  
Manager, DSM Regulatory Strategy & Planning  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Xcel's proposed tariff updates**. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ MICHAEL N. ZAJICEK  
Rate Analyst

MNZ/ar  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-19-453

#### I. INTRODUCTION

On July 17, 2019 Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed a petition (Petition) for *Solar\*Rewards Program and Community Solar Garden Program Tariff Updates* with the Minnesota Public Utilities Commission (Commission). The Petition requested approval of tariff updates to account for recent changes to Minn. Stat. § 116C.7792.

#### II. XCEL'S PETITION

On May 30, 2019, Governor Walz signed 2019, 1<sup>st</sup> *Special Session, Chapter 7, H.F. No. 2* into law, that in part revised Minn. Stat. § 116C.7792 so as to allow participation in the Solar\*Rewards program of no more than 40 kW alternating current (AC). Prior to this revision Minn. Stat. § 116C.7792 restricted participation in the Solar\*Rewards program to systems no more than 40 kW direct current (DC). Specifically the Minn. Stat. § 116C.7792 now reads:

##### *116C.7792 Solar Energy Incentive Program*

The utility subject to section 116C.779 shall operate a program to provide solar energy production incentives for solar energy systems of no more than a total aggregate nameplate capacity of 40 kilowatts direct *alternating* current per premise. The owner of a solar energy system installed before June 1, 2018, is eligible to receive a production incentive under this section for any additional solar energy systems constructed at the same customer location, provided that the aggregate capacity of all systems at the customer location does not exceed 40 kilowatts.

As stated above the Company's Petition requests approval of tariff revisions to account for this change.

### **III. DEPARTMENT ANALYSIS**

The Department reviewed the Company's proposed tariff revisions and the revision to Minn. Stat. § 116C.7792. The Department concludes that the Company has made the necessary changes to its tariff to account for the changes to Minn. Stat. § 116C.7792 and thus recommends that the Commission approve Xcel's updated tariff.

### **IV. RECOMMENDATIONS**

The Department recommends that the Commission approve Xcel's petition.

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