



414 Nicollet Mall
Minneapolis, MN 55401

April 7, 2015

—Via Electronic Filing—

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

RE: STAKEHOLDER MINUTES
COMMUNITY SOLAR GARDENS
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Compliance information in response to the Commission's February 13, 2015 Order (Order Point 3) submitted in the above-noted docket.

Per Commission Order, all agendas, approved minutes and attachments from the Solar*Rewards Community Implementation Workgroup will be filed in eDockets. Attachment A includes the agenda, meeting minutes, and issues tracker for the Workgroup meeting held on February 18, 2015. Additional meeting minutes will be filed upon their approval by the Implementation Workgroup.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at Jessica.K.Peterson@xcelenergy.com or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING
Enclosure
c: Service List, Attachment

Meeting Agenda: S*RC Implementation Working Group

Date: February 18, 2015	
Start Time: 1:30 pm Central	Location: 1B; 414 Nicollet Mall, Mpls, MN
End Time: 3:00 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome and Approve Previous Minutes	Thor B.	Discussion
Location identifier subgroup readout	Thor B.	Discussion
Proposed resolution for full Working Group Discussion (Feb. 4) Applicants will strive to provide a valid address for each garden. If, upon a change in CSG address, applicant can provide documentation from the permitting authority that the change was not due to a change in the PV system configuration or location, but rather due to something outside of the Operator’s control, the applicant will be permitted to continue through the process. <ul style="list-style-type: none"> ○ All paperwork and drawings need to be re-submitted with the new address. ○ Garden Operator must also contact the Builder’s Call Line to change the address in our billing systems. 		
Review issue tracker	Jessie P.	Discussion
Continue going through the issue tracker to refine areas of consensus and areas where further discussion is required.		
Metering configuration	Shawn B.	Discussion
Standards to implement metering for production and house power.		
Regulatory Update	Susan M.	Discussion
<ul style="list-style-type: none"> • PUC written orders <ul style="list-style-type: none"> ○ Clarification on the definition of a subscriber ○ SoCore petition ○ Working group • 3/2 rate comments • Request for comments – XE 2/10 filing <ul style="list-style-type: none"> ○ Due 2/24 ○ Reply comments due 3/4 		
Other items		Discussion

S*RC Implementation Workgroup

Meeting Minutes
 February 18, 2015

Opening

The regular meeting of the S*RC Implementation Workgroup was called to order at 1:30 pm on February 18, 2015 at Xcel Energy General Offices by Thor Bjork.

Present

	Name	Company		Name	Company
	Mike Harvey	Able Energy		Lindsey Ransom	SoCore
	Tom Hunt	Clean Energy Collective	x	Tom Green	SoCore
	Holly Lahd	DOC		Joe DeVito	Solarstone Partners
x	Virginia Rutter	Eutectics		Sara Bergan	Stoel Rives
	Alan Gleckner	Fresh Energy		Dan Patry	SunEdison
	Matt Bertolatus	Geronimo	x	Dan Rogers	SunEdison
	Betsy Engelking	Geronimo Energy	x	Dean Leischow	Sunrise Energy
	Tena Rytel	Geronimo Energy		JW Postal	SunShare
x	Nathan Franzen	Geronimo Energy	x	Laura Hannah	SunShare
	Ralph Jacobsen	Innovative Power Systems	x	Mike Michaud	Sunshare
x	Michael Krause	Kandiyohi (Sundial)	x	Ross Abbey	SunShare
x	Steve Coleman	MN Community Solar	x	Marty Morud	TruNorth Solar
	Michelle Matthews	MN Community Solar	x	Shawn Bagley	Xcel Energy
	Steve Coleman	MN Community Solar	x	Thor Bjork	Xcel Energy
x	Lynn Hinkle	MnSEIA	x	Jessie Peterson	Xcel Energy
x	David Shaffer	MnSEIA	x	Kevin Cray	Xcel Energy
x	Duane Hebert	Novel Energy Solutions		John Wold	Xcel Energy
	Ian Dobson	OAG	x	Patrick Dalton	Xcel Energy
x	Brian Swanson	PUC			
x	Susan Mackenzie	PUC			

Approval of Minutes

The meeting minutes for 2/18/15 were approved by those attending the meeting.

Open Issues

Location identifier subgroup recommendation:

Applicants will strive to provide a valid address for each garden. If, upon a change in CSG address, applicant can provide documentation from the permitting authority that the change was not due to a change in the PV system configuration or location, but rather due to something outside of the Operator's control, the applicant will be permitted to continue through the process.

- All paperwork and drawings need to be re-submitted with the new address.
- Garden Operator must also contact the Builder's Call Line to change the address in our billing systems.

Discussion by Group:

- 911 citing is different than permitting
- Xcel Energy:
 - Utility perspective: Changes in address could be material to our review and distribution service – Xcel Energy needs to take a look at what the impacts are for each individual project
 - Is clerical change in address allowable – yes, through adoption of above recommendation
 - Fee may be added in future depending upon various factors (labor involved, how many received, etc.)
 - Can the array change versus the point of common coupling? What constitutes a configuration change? As long as it doesn't change the address does it trigger something? –site plan would change, address is only an issue if the METER changes. Connectivity changes are a significant change.
 - What if Xcel Energy moves the meter? Would the applicant be subject to a fee? Specific rules for applying a potential future fee will be worked out later.
- **Next Step:** Update above language to identify final. Xcel Energy to send update within meeting minutes for approval. *[Please note the update will be in 3/4/15 meeting minutes]*

Final proposed redlined language for review:

Applicants will strive to provide a valid address for each garden. If, upon a change in CSG address, applicant can provide documentation from the permitting authority that the change was not due to a change in the PV system ~~configuration~~ connectivity, service meter location, or physical location, but rather due to something outside of the Operator's control, the applicant will be permitted to continue through the process.

Review of Issue Tracker [Attachment] – Jessie Peterson, Xcel Energy

To be added to filed meeting minutes.

Additionally discussed:

- Queue Position Transparency and mapping substation capacity - some utilities in other states provide this, while Xcel Energy has maintained a position of privacy as noted in other dockets with the Commission.
- MRETS Secondary Process – the process exists to transfer RECs to another account holder, but is a bit unclear to the group how it fits within the solar garden program or whether it is feasible
- Subscriber Disclosure – General consensus that the program requires Garden Operators to follow the April 7 PUC order to disclose certain information to subscribers

Metering Configuration – Shawn Bagley, Xcel Energy

Discussion

- Section 9 Tariff (Sheet 75) requires two meters - main service meter and production meter
- House Power is everything in between the two meters
- Question: Why do we have to have two meters – required by the tariff for each garden to have two meters, a production meter and a house power meter
- Must provide Xcel Energy standard voltages. If inverter output is not standard, the voltage must be transformed by customer.

Next Steps: Thor to update attachment and send to full group for comment [*sent to attendees on 2/23/2015, and now found on www.xcelenergy.com*]

Regulatory Update – Susan Mackenzie, MPUC

- Written Orders – No additional comments
- 3/2 Financeable Rate Comments
- Requested Comments – Xcel Energy 2/10 filing – Due 2/24 and 3/4

New Business

Addressing Utility Scale Projects – the group expressed views along the following general lines

Differing viewpoints (Discussion)

- **No Issue**
 - The biggest project for interconnection is 1 MW as required by Legislation
 - Xcel Energy can reject any project that proposes an issue on the distribution
 - Did anyone request to have the full project site (co-located projects) reviewed? Yes.
 - Developers are applying for several co-located MWs and will choose not to go forward for those that don't make sense or are too costly

- There is one interconnection agreement per garden required
 - Reliability rules are well understood and being determined by garden application
 - Look at the CREST program in California – developers will find ways to make projects work within rules set by the Legislation and Commission
 - If the project causes adverse impacts on the distribution system Xcel Energy can reject them
- **There is an issue**
 - 10 1MW plant versus 10 MW plant looks like the same thing from a technical perspective
- **Reaction to 2/10 written comments by Xcel Energy on the intent of the law**
 - Anchors are used to help move cost-effective subscriptions forward – how is this wrong?
 - Economic development impacts of solar arrays? There is probably a lot of legislators, etc. who find it helpful
 - What about communities? Communities object because they don't understand—they will eventually accept
 - Xcel Energy needs to show their math – where is the 2% rate impact coming from
 - Developers will work with the rules provided to them
 - Co-location – Xcel Energy didn't bring up these concerns back when this decision was made nor did they request an adjustment (ask for reconsideration)
 - We had this discussion around 40% - it wouldn't be cost effective without the anchors behind these projects (2013)
 - Xcel Energy was in the room when this language was drafted
 - It was disingenuous of Xcel Energy to note this in a filing
- **Not what was intended by Legislation**
 - Representatives have recently stated publicly that what has occurred is not what the legislature anticipated – this is common when legislation is actually put in practice; there were changes to the rules that facilitated this new environment.
- **Program should be left as is**
 - As long as there is benefit for the smaller subscriber, this should be left alone for the time being
 - There is a waterfall effect. We don't know, today, whether or not the intent is being met or not met – rules need to stay in place until we understand this further
 - Important to use market data from ACTUAL projects – we've barely gotten out of the gates
- **What if the Commission makes an adjustment?**

- Section 10/MISO issues address this – Xcel Energy has the ability to make this work
 - Net Metering Petition? Once solar reaches 4% on grid it requires a grid review (corrective action) – Long ways from this level of penetration and not sure this would apply to gardens
 - Commission needs to address the way utilities are organized (business model) – there is a tension between solar and the utility at a generation level – e21 initiatives
- **Next Steps:** Parties to file comments on February 24 (next week)

Key Questions

Location identifiers subgroup readout

- **Order Language:** N/A
- **Discussion:** Via small group and noted above
- **Consensus/Non-Consensus:** Not reached
- **Next Steps:** Review language as noted above and send out in Minutes for final review

Proposed Agenda for Next Meeting

- Meeting to be held on March 4
- Xcel Energy requests that comments be sent regarding metering prior to this time

Adjournment

Meeting was adjourned at 3:00 by Thor Bjork. The next general meeting will be at 1:30 on March 4, 2015, at Xcel Energy General Offices.

Minutes submitted by: Jessie Peterson

Approved by: Implementation Working Group Attendees on 3/24/15

Note: These meeting minutes were approved on 3/24/15, with notice that there may be additional adjustments and resubmission in the future.

Solar*Rewards Community Issue Tracker [Implementation Workgroup]

Last Updated: 2/27/2015

CONSENSUS

Issue Number	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
009	RECs for Unsubscribed Energy	12/17/14	Should Garden Operators receive the REC payment in addition to the unsubscribed energy rate for unsubscribed energy?	A. Garden Operator chooses at project outset to sell or retain RECs – If retained a MRETS account must be set up B. If Garden Operator chooses at project outset to sell RECS, they should be paid the REC price for unsubscribed Energy	A. Full Consensus B. Consensus	A. None B. Xcel Energy – Not supported by the Order or Tariff Suggested that parties include in 3/2 Comments	A. If operator retains the RECs and later wants to sell the RECs, there is no existing tariff governing the later purchase of these RECs. A contract amendment will not work, and XE would need to file a new rate for PUC approval. Or, operator could sell these on the market at a market-based rates. No REC payment will be paid until Commission determines REC price.	April 7, 2014 Order REC Docket Section 9 Sheet 85
007-B	Location/Site Adjustments	12/17/14; 2/18/15	If host site change is required for any reason, should the application start completely over and be subject to new terms, conditions and rates should the utility program change during this time?	Applicants will strive to provide a valid address for each garden. If, upon a change in CSG address, applicant can provide documentation from the permitting authority that the change was not due to a change in the PV system connectivity or location, but rather due to something outside of the Operator's control, the applicant will be permitted to continue through the process	TBD	None	Xcel Energy to reword language per 2/18/15 discussion in order to reach full consensus	September 17, 2014 Order Section 9, Sheet 64.1 Section 9, Sheet 67

Issue Number	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
005	Subscription Transfers (for Subscribers)	12/7/14	Process: 1. If a subscriber moves from a program perspective the original subscription is no longer valid. 2. The Garden Operator will need to add a new subscription to the online subscriber management system and the 120% rule will be applied as with any new subscription. 3. If the original subscription size does not comply with the 120% rule, the subscription size will have to be reduced so that it does comply.		Consensus reached on process	Some parties remain concerned with how XE calculates premise assumptions.	TBD	
004	Subscription Disclosure	12/3/14	Must Operators still use disclosure documents/process from the April 7 th Order?	Yes, this still remains true except that it is part of the tariffed contract. A disclosure form has been circulated for Operator use.	Full Consensus		Disclosure Form distributed to Stakeholder Group; CERTS documentation added to Xcel Energy website	April 7 th Order & Section 9 Tariff
002	Annual Reporting	10/1/2014	Tariff currently requires audited financial statements including balance sheet, income statement and uses of funds statement	Don't require this of Solar Operators nor make public.	Consensus		This will need to be addressed within contract negotiations. Once one contract has been adjusted it will be offered to all Operators, and will be filed for Commission approval.	Section 9
010	Queue Transparency	2/4/15	Transparency in the DG queue would help increase efficiency for solar developers in the interconnection process.	A. Pre-registration process B. Online Map	Consensus	Xcel Energy notes mapping isn't currently possible due to physical security and full DG Tariff (Section 10)	May require broader discussion since this affects all statewide DG, not just gardens.	

NON- CONSENSUS

Issue Number	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
008	Existing Section 10 Applications and Process	Various	Current rule states that existing applications will continue within the Sec. 10 process regardless of when they enter the SRC program	Section 10 projects should have to redo interconnection as a SRC project	Strong Support but significant opposition		Resolved	Commission Order: By Tariff by date of Application Completeness
006	RECs in years 11-25 for S*RC + Made in MN	12/17/14	What will happen to the RECs for MiM projects participating in S*RC		None		This is an issue for both S*R and MiM outside the S*RC program. Suggested that parties include in 3/2 comments.	
001	Subscriber Definition	10/1/2014	Is the current definition appropriate?	Adjust the definition.	None		Resolved	Commission Order: XE to add further information to website

FURTHER DISCUSSION NEEDED

Issue Number	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Remedy	Corresponding Rule
007-A	Definition of Incomplete	12/17/14	Tariff defines when an application is complete, but it does not define when changes in an application make the application “incomplete”. Complete/incomplete application status matters for interconnection process and applicability					
003	Marketing Guidelines	12/3/14	Who shall provide Marketing Guidelines? Xcel Energy or Developers.					

Please note this is an ongoing document and changes per Implementation Workgroup Meeting. It is not intended to be final unless noted.

CERTIFICATE OF SERVICE

I, Tiffany Hughes, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-13-867

Dated this 7th day of April 2015

/s/

Tiffany Hughes
Records Analyst

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_13-867_Community Solar Garden - Xcel
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