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February 19, 2019

Daniel P. Wolf  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101  
via E-File

RE: STANDBY SERVICE  
DOCKET NO. E999/CI-15-115

Dear Mr. Wolf,

We appreciate the opportunity to comment on this docket. Sundial has been developing and installing commercial/industrial solar PV systems using the capacity credit since the original credit of \$5.15/kW was created and we have been involved in the ongoing stakeholder discussion since its inception. Since the approval of the current PV Rider, we have added several new clients to it. The PV Rider is vital to our business and to many of our clients.

We feel strongly that Xcel's October 19, 2018 proposed update to the methodology and value of the PV Rider is not appropriately or accurately calculated. We support the comments of MnSEIA, which thoroughly outline the gross inaccuracies of this proposal. Additionally, several of our clients have co-signed with other parties to similar comments as part of the Commercial Customer Cohort.

While we did not agree with Xcel's devaluation of the capacity credit which became the current April 19, 2018 PV Rider, we were content to support it in exchange for the added value of six years of certainty. As other parties mention, certainty is crucial for clients and is one of the most frequent concerns we hear about.

That said we find one of the greatest side effects of this inadequate proposal is it further delays establishing a long-term, reliable rate which we can show our clients. We are now nearly a year from the establishment of the current interim rate and seeing Xcel's latest proposal, it is now clear we are nowhere near a proper long-term solution. This "proposal" only muddies the waters and eats into the clock – devaluing its usefulness for prospective clients.

To account for this, we request the Commission extend the current period of the PV Rider by at least one year to account for the delay, in addition to requiring Xcel to perform a restudy using valid inputs that properly account for the cost of capacity on their grid.

Thank you for your continuing service.

Respectfully,

Jon Kramer  
CEO