

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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IN THE MATTER OF IMPLEMENTATION OF 2023
LEGISLATION CHANGES TO XCEL ENERGY'S
COMMUNITY SOLAR GARDEN PROGRAM

DOCKET NO. E-002/CL-23-335

REPLY COMMENTS OF INTERESTED STAKEHOLDERS

Nokomis Energy, United States Solar Corporation, Coalition for Community Solar Access and Cooperative Energy Futures (“Interested Stakeholders”) jointly submit these Reply Comments to the Minnesota Public Utilities Commission (“Commission”) for consideration in the above-styled docket.

As noted in our prior comments, Interested Stakeholders have met with Northern States Power Company, d/b/a Xcel Energy (“Xcel”) and the Department of Commerce (“Department”) to resolve some of the outstanding items prior to consideration by the Commission. We believe we have resolved several of these issues. The parties have also shared their positions with each other in advance of these Reply Comments, hoping to expedite the Commission’s resolution of the issues that remain outstanding. We would like to thank Xcel and the Department for their productive engagement.

I. Battery Energy Storage System

The Commission filed a notice of comment period on October 11, 2024, seeking comment on several outstanding issues in the “standard contract” for the new LMI-Accessible CSG Program that is administered by the Department. Among those issues, the Commission sought comment on the following:

- How should the Commission address the addition of a definition of “Battery Energy Storage System” as proposed by stakeholders?

Interested Stakeholders, Xcel and the Department appear to have agreed on the following definition of “Battery Energy Storage System” (“BESS”), to be included in the standard contract and the associated tariff, and references to “BESS” where appropriate:

“Battery Energy Storage System” or “BESS” shall mean a commercially available technology that uses chemical processes to store energy generated solely from the

Community Solar Garden, and deliver the stored energy for sale or use at a later time. The parties agree the stored energy in the BESS may not include utility system energy.

Relatedly, the parties agreed to modify the definition of “Community Solar Garden Allocation,” to account for the proportional allocation of any CSG system incorporating BESS:

“Community Solar Garden Allocation” or “CSG Allocation” shall mean the monthly allocation, stated in Watts direct current (DC) as a portion of the total DC nameplate capacity of the PV generating portion of the Community Solar Garden, applicable to each Subscriber’s Subscription reflecting each Subscriber’s allocable portion of photovoltaic electricity produced by the Community Solar Garden in a particular Production Month.

This section contains the sole remaining use of “nameplate” within the standard contract and associated tariff, *see infra*, because Xcel manages subscriber allocation as a portion of system DC size. This non-material clarification would permit Xcel to continue to manage the allocation in a consistent manner, regardless of the addition of BESS to a CSG.

II. “Nameplate” Capacity

The Commission’s notice also sought comment in the use of “nameplate capacity”:

- How should the Commission address the non-consensus item regarding the use of the term “nameplate capacity” which appears across the LMI Standard Contract?

Interested Stakeholders and Xcel met and discussed this issue at length. The parties appear to agree that the word “nameplate” is no longer appropriate, in the standard contract or the associated tariff. Interested Stakeholders disagree with Xcel that any definition of “Capacity” is needed in the standard contract.

This is because the statute governing the LMI-Accessible CSG Program already defines capacity, using the definition in MINN. STAT. § 216B.164 Subd. 2a(c).¹ There is thus no need to reiterate the statutory definition in the new CSG standard contract. The previous CSG standard contract did not include a definition of “nameplate capacity,”² and the new CSG standard contract does not need to include a definition of “capacity.”

¹ MINN. STAT. § 216B.1641 Subd. 6(a)(2) (eligible projects must “have a **capacity**, as defined under section 216B.164, subdivision 2a, paragraph (c), of no more than five megawatts”) (emphasis added).

² The statute governing the Legacy CSG standard contract used the phrase “nameplate capacity.” See MINN. STAT. § 216B.1641 Subd. 1(b).

The Commission recently directed a separate rulemaking on this statutory definition of “capacity” *explicitly* as applied in the context of net metering eligibility.³ There is no final agreed-upon definition in that context, and there is no broadly applicable regulatory interpretation as applied in other contexts. Adding a new definition of capacity in the standard contract would likely be unlawful without a new rulemaking to interpret the statutory definition of “capacity” in the context of the LMI-Accessible CSG Program.⁴ Such a rulemaking would in turn needlessly delay the implementation of the standard contract for months.

Moreover, there is no legal or practical need to add a definition of “capacity” in the standard contract, given that the definition of “capacity” for purposes of project sizing and eligibility is already set forth in the recently amended statute. If the Commission later clarifies the statutory definition, as applicable to the LMI-Accessible CSG Program, then each instance of project “capacity” within the standard contract would have to conform to that interpretation as a matter of law.

III. Relationship of the Contract and the Tariff

Finally, the Commission’s notice sought comment on the relationship between Xcel’s tariff and the standard contract:

- How should the Commission address the non-consensus items regarding the relationship between the Tariff and the Contract?

As Interested Stakeholders previously noted, the new LMI-Accessible CSG Program is governed by statute and overseen by the Department, not Xcel. The standard contract for that program, like contracts used by Xcel in many other power purchase contexts, does not need to be in Xcel’s tariff.

The Department contends that the standard contract must be part of Xcel’s tariff “as a matter of law,” and cites to MINN. STAT. 216B.05.⁵ That statutory provision, however, does not say that a contract like the standard contract must be included in Xcel’s tariff. Instead, it says that such a contract “must be filed for approval by the commission.”⁶ That is what the parties are doing, pursuant to the Commission’s May 30, 2024 Order and the statute creating the LMI-Accessible CSG Program. No authority cited by the Department requires the standard contract to be included in, and made part of, Xcel’s tariff.

³ See *In the Matter of Impacts of the “Capacity” Definition in Minn. Stat. § 216B.164 and Associated Rules on **Net-metering Eligibility** for Rate-Regulated Utilities*, Doc. No. 24-200 (emphasis added).

⁴ In that separate docket, 24-200, the Commission opted for a rulemaking proceeding on the application of “capacity” within the context of net-metering eligibility, because without a formal rulemaking, any interpretation that differed from the statute would likely be unlawful.

⁵ See Minnesota Department of Commerce, *Initial Comments of The Minnesota Department of Commerce*, Doc. No. 23-335 at 6-8 (Nov. 12, 2024).

⁶ See MINN. STAT. 216B.05 Subd. 2a.

By including the contract in its tariff, Xcel wishes to be able to alter previously-executed contracts by updating its tariff. This is incompatible with contract law and the expectations of the parties to not only the standard contract, but subscription contracts and financing contracts that are dependent on the standard contract. The entire LMI-Accessible CSG Program would be weakened by inserting this override switch.

Relatedly, Interested Stakeholders also continue to recommend that the end of the definition of “Bill Credit Rate” in the standard contract should contain the following sentence:

“Upon execution of the Contract, the methodology used to calculate the Average Retail Rate shall not change for the term of the Contract.”

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Pursuant to MINN. R. 7829.0400 Subp. 3, I have electronically filed the foregoing with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

/s/ Matthew Melewski

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