

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

September 8, 2015

**In the Matter of the Petition of Northern States  
Power Company, dba Xcel Energy, for Approval of  
its Proposed Community Solar Garden Program**

**Docket No. E002/M-13-867**

**ANSWER TO THE REQUEST FOR CLARIFICATION OF THE MINNESOTA DEPARTMENT OF COMMERCE,  
DIVISION OF ENERGY RESOURCES**

Fresh Energy submits this Answer in response to the Minnesota Department of Commerce, Division of Energy Resources' ("Department") August 26, 2015 Request for Clarification regarding certain aspects of the Public Utility Commission's ("Commission") August 6, 2015 *Order Adopting Partial Settlement as Modified* ("Order").<sup>1</sup>

The Department's Request seeks to clarify four issues: 1) interconnection restrictions; 2) independent engineering review; 3) Department application timeliness review; and 4) project ownership transfer. Fresh Energy supports the Department's recommendations on all four issues, but limits discussion in our Answer to the first issue. We recommend that the Commission adopt the Department's suggestion to remove "an ambiguous one-million dollar cap on costs of interconnection with Xcel's distribution system that permits Xcel to refuse interconnection with the CSGs, even where the CSG complies with otherwise applicable law and offers to pay the reasonable costs that are directly related to installing and maintaining the physical facilities necessary for interconnected operations"<sup>2</sup> and to adopt the Department's suggested Order language<sup>3</sup>.

In addition to the reasoning in the Department's Request, the Commission should adopt the Department's recommendation to remove interconnection restrictions from the Order because: 1) the \$1 million "material upgrade" limit is not necessary to achieve the Commission's policy objective to moderate CSG capacity; 2) because the public interest is better served by having the S\*RC program conform to Minnesota and Federal interconnection rules; and 3) because the Order's interconnection restrictions create additional implementation issues for the S\*RC program.

**1) Interconnection Restrictions are Not Necessary to Achieve the Commission's Policy Objectives.**

In its August 6<sup>th</sup> Order, the Commission decided to limit the co-location of S\*RC projects until at least 2017.<sup>4</sup> This decision was in part to balance the amount of S\*RC capacity installed with the costs (and benefits) of those projects.<sup>5</sup> The only effect of additional interconnection limitations through a cost cap appears to be to further limit installed capacity, since interconnection costs are borne by the S\*RC project operators. Because the Commission was able to enact its policy objective regarding program size through its decision regarding co-location, further action restricting interconnection is unnecessary. This is particularly true considering that

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<sup>1</sup> Pursuant to Minn. Admin. Rule 7829.3000, subp. 4.

<sup>2</sup> Department Request at 1.

<sup>3</sup> *Id.* at 7-8.

<sup>4</sup> Order at 28.

<sup>5</sup> *Id.* at 13-14.

these interconnection restrictions also run counter to well-established interconnection policy and will create new implementation issues, as described below.

**2) The Public Interest is Best Served if S\*RC Interconnection Rules are not Contrary to Minnesota and Federal Rules.**

The Department's Request details the ways in which the Order's interconnection restrictions are contrary to existing Minnesota rules and PURPA.<sup>6</sup> In broad strokes, the Order's interconnection restrictions are counter to a central principle behind Minnesota and Federal standards: that utilities must interconnect non-utility renewable generators where the non-utility generator bears the reasonable costs associated with the interconnection. This principle serves the public interest because it prevents utilities from blocking access for customer-generators and other independent clean energy providers, while ensuring additional interconnection costs are not borne by the utility or its customers. The public benefit is that utilities seeking to limit competition cannot prevent the outcome of a more diverse energy supply. The public interest is best served by keeping existing interconnection policy intact for the S\*RC program. It is not worth creating exceptions that undercut the principles behind existing interconnection rules in this program when the Commission was able to achieve its policy outcome through other means and when these exceptions will likely create more delay.

**3) The Order's Interconnection Restrictions Create Additional Implementation Issues.**

Adding a new program limitation through the Order's interconnection restrictions will lead to implementation issues. The Order's limit on "material upgrades" through a \$1 million cap adds new complexity to the S\*RC program. The Department outlined a number of the ambiguities created by the limitation that will likely cause confusion and/or lead to disagreements among parties.<sup>7</sup> Other practical issues may arise as well, for example, what happens if final interconnection costs exceed \$1 million, when the initial estimate was below or at \$1 million? Or, if poles need to be upgraded, how is the salvage value of the existing poles to the utility factored into the \$1 million cap?

Each of these new practical implementation issues is an opportunity for additional dispute between parties, additional process at the Commission, and ultimately more time before interconnection agreements are finalized and construction can begin. Therefore, the interconnection restrictions will likely result in increased delay rather than to "result in a faster-moving interconnection queue" as the Commission intended.<sup>8</sup>

Indeed, the interconnection restrictions have already caused implementation issues. Xcel Energy (Xcel) has informed S\*RC applicants that it interprets the Order to include both a \$1 million cap on what it deems to be "non-material upgrades" and allows Xcel to reject any interconnection application that includes "material upgrades." Further, Xcel has interpreted "material upgrades" to include any of the interconnection work listed in the Order, but to also include anything the Company deems to be "material."<sup>9</sup> Xcel's interpretation will likely be disputed, as it creates additional limits to S\*RC development. Until then, S\*RC applicants will have uncertainty regarding the ultimate treatment of their applications.

In sum, the Commission should avoid creating new practical and implementation issues and the delay they entail, as well as departing from well-established Minnesota and Federal interconnection policy, especially when the Commission is able to achieve its policy objective through its co-location decision. Therefore, We recommend that the Commission adopt the Department's suggestion to remove "an ambiguous one-million dollar cap on costs of interconnection with Xcel's distribution system that permits Xcel to refuse

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<sup>6</sup> DOC Request at 6-8. We note that the Order's interconnection restrictions could be interpreted as contrary to Minn. Stat. §216B.1641's requirement that "There shall be no limitation on the number or cumulative generating capacity of community solar garden facilities other than the limitations imposed under section 216B.164, subdivision 4c, or other limitations provided in law or regulations."

<sup>7</sup> DOC Request at 5-6.

<sup>8</sup> Order at 14.

<sup>9</sup> See Xcel September 3, 2015 Compliance Filing, S\*RC Implementation Workgroup August 19, 2015 Meeting Minutes, Attachment A at 2-3 and 6 (included herein as Attachment 1). Xcel's interpretation was described in more detail orally at the Implementation Workgroup.

interconnection with the CSGs, even where the CSG complies with otherwise applicable law and offers to pay the reasonable costs that are directly related to installing and maintaining the physical facilities necessary for interconnected operations”<sup>10</sup> and to adopt the suggested Order language<sup>11</sup>.

/s/ Holly Lahd

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<sup>10</sup> DOC Request at 1.

<sup>11</sup> *Id.* at 7-8.

ATTACHMENT 1 – 8-19-15 S\*RC IMPLEMENTATION WORKGROUP MINUTES



414 Nicollet Mall  
Minneapolis, MN 55401

September 3, 2015

—Via Electronic Filing—

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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 and meeting minutes for August 19, 2015.

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](mailto: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

Enclosures  
c: Service List

## S\*RC Implementation Workgroup

Meeting Minutes

August 19, 2015

### OPENING

The S\*RC Implementation Workgroup was called to order at 9:06 am on August 19, 2015 at Xcel Energy by Jessie Peterson, Xcel Energy.

### PRESENT

15 Companies Present		
<ul style="list-style-type: none"><li>• Julie Jorgensen, GreenMark Solar</li><li>• Virginia Rutter, Eutectics</li><li>• Alan Gleckner, Fresh Energy</li><li>• Nathan Franzen, Geronimo Energy</li><li>• Patrick Dalton, Xcel Energy</li><li>• Kerry Klemm, Xcel Energy</li><li>• Lee Gabler, Xcel Energy</li></ul>	<ul style="list-style-type: none"><li>• Michael Krause, Sundial</li><li>• Michelle Matthews, US Solar</li><li>• Peter Teigland, MN Community Solar</li><li>• Duane Hebert, Novel Energy Solutions</li><li>• Jessie Peterson, Xcel Energy</li><li>• Mary Santori, Xcel Energy</li></ul>	<ul style="list-style-type: none"><li>• Brian Swanson, PUC</li><li>• Thomas Hand, SunEdison</li><li>• Joe Devito, Solarstone Partners</li><li>• Dean Leischow, Sunrise Energy</li><li>• Ross Abbey, Sunshare</li><li>• Marty Morud, TruNorth Solar</li></ul>

### APPROVAL OF MINUTES

- Minutes from July 29 & August 12, 2015, were approved by the Workgroup attendees with no changes.

### DISCUSSION/RESULTS

#### Topic 1: Updates

- **Escrow:** A question was raised as to whom to discuss escrow questions with at Xcel Energy. There were developers who had contacted the company without a response. Xcel Energy noted that there were requests to adjust the language within the escrow agreement; Xcel Energy's legal team is reviewing these. Xcel Energy noted they would get back to the questions received yet this week.

There is further concern that every developer will have a different take on the language itself and that the escrow should be between the bank and the developer. Xcel Energy will need to review this further. Xcel Energy will get to the emails sent for reviewed yet this week.

- **Co-Located Progress Letters:** Letters were sent via email regarding documentation of progress and co-located status on 8/18. Xcel Energy asked if there were any questions regarding that communication. Developers needed more time to review.

Co-located sites were identified by developer within the email communications. Disputes that were administrative in nature should be discussed with the Company in one-to-one phone calls or through the [SRCMN@xcelenergy.com](mailto:SRCMN@xcelenergy.com) email address—there are some missing pieces within the application system so there may be a few projects in this category. All other disputes will need to be sent to the Department of Commerce.

September 1 is the deadline for documentation of progress. Date on co-location will depend on when the Workgroup decides to implement other actions such as 50-day timeframe. These conversations are ongoing.

### **Topic 2: Rules of Engagement**

Xcel Energy provided the Workgroup with updated “Rules of Engagement” for discussion. See Attachment A for the rules presented to the Workgroup. Additionally, Xcel Energy mocked up what the voting parties may look like.

The group discussed attachment A and made the following recommendations:

- Substantial Agreement should include a super majority of 2/3 vote.
- Only applicants that have paid fees should be applicable to vote. One vote per developer – affiliated organizations do not each receive a vote.
- Phone lines will be added to the meeting (as available) in order to provide addition ability to vote on particular items – only voting parties may be present on the phone and one party per developer may attend.
- Votes will be recorded by Xcel Energy and voting parties will be noted.

Alternative methodologies for vote, including email, were discussed. Xcel Energy noted that this is an option, but attempted to add a phone line rather than take a vote electronically. Provided that there was a quorum at the meeting (in person or phone) the Workgroup was in agreement.

***Next Steps/Resolution:*** Xcel Energy agreed to adjust attachment A and send via email to the team. An official vote on the rules of engagement will be taken on Aug. 26

### **Topic 2: FAQ #15 - Hold**

### **Topic 3: Process**

Xcel Energy brought several items to the Workgroup for discussion. Xcel Energy’s proposals for discussion can be found on Attachment B.

- **Distribution System Upgrades:**

Position of Xcel Energy: The Company is not required to do material upgrades per the Order within the substation; the \$1M dollar upgrade is specific to materials to the feeder.

Xcel Energy noted materiality includes substation transformers and new feederbays, but does not include fans and telemetry.

There are situations where there are transformers under a million dollars – Xcel Energy will not allow.

There is no agreement on this particular item within the Workgroup. Parties interpret the language differently.

Developers asked Xcel Energy to provide a more detailed list noting “including but not limited to” in order to more fully understand what was included in this provision. Xcel Energy agreed to provide a more detailed list.

Developers asked when do these costs come in to play given that indicative bids have a plus/minus on them. If the SOW is under the \$1M and then goes above it will be honored per Xcel Energy.

Developers asked whether or not the \$1M cap included the tax implications. CIAC gross-up? Xcel Energy will follow-up.

Developers asked whether this included co-located projects only. Xcel Energy believed that to be true according to the Order.

**Next Steps/Resolution:** Xcel Energy will provide further language regarding “material” upgrades so that the group can discuss further at the August 26<sup>th</sup> meeting.

- **Determination of co-location:** Developers feel that the Commission language in the August 6<sup>th</sup> Order provides co-location language for now but not into the future.
  - *Issue:* what happens when a garden is built next to the original, what if it changes ownership, etc.
  - *Disputes* –Some developers feel that projects deemed complete don’t have a way to comply with the language without selling it. (Yet, cure language is in Section 9).
  - *Moving forward:* Developers asked whether once projects are deemed not co-located can Xcel Energy go back and change them. Xcel Energy noted that once the indicative cost estimate is complete Xcel Energy will not adjust these decisions.
  - Developers asked if a document could be pulled together noting this approval. A piece of paper would be helpful for financial purposes – as part of the IA – banks are skittish.

- **50-day timeline**

Developers noted that projects can change ownership in language today and that this should be allowed moving forward. Xcel Energy noted that this change, by Tariff is allowed once the project is approved.

There is concern by some developers that everyone should have the same opportunity to comply; especially those that may already have been deemed complete.

The Workgroup expressed several concerns regarding the dispute resolution with the Department. There was no Department representation at the Workgroup. One question included:

- Is the Department willing to make co-location determination outside the Tariff approval and not within the IA process?
- Can they determine how many disputes there are and what the nature of these disputes are?

MNSEIA is looking at pulling together things that would be brought to the attention of the Department. Developers discussed whether these issues should be added.

Additionally, how will Xcel Energy deal with those projects in dispute?

- If the Developer wins and we contest – how does the queue work?

The following proposal was brought to the table to be discussed at more length in order to come to an agreement among the parties for the 50-day timeframe.

- **Proposal:** Developers are allowed two weeks from notification by Xcel Energy to dispute co-location. The Department has 30-days in which to review disputes; during this time, projects behind others in the queue will be held.

If the Department favors Xcel Energy's position – the disputing parties will be studied at 5 MW. Other projects will move forward.

If the Department favors the Developer's position – the full co-located site will be studied in order to move other projects forward.

- **SOW Process Update**

Xcel Energy updated the group on the 30 days for approval of the SOW. The proposal can be found on Attachment B. The Workgroup was given time to review for discussion during our next meeting.

**Topic 5: Distribution Data Disclosure** – This item was not discussed

#### **NEXT MEETING**

The next meetings of the Implementation Workgroup will be August 26, 2015, 1:30 – 4:30; agenda to include items discussed above. Phyllis is on vacation through August, so Xcel Energy will continue to moderate.

Minutes submitted by: Jessie Peterson, Xcel Energy

Approved by: By Working Group Members during the August 26, 2015 meeting.

## Attachment A to 9.19.15 Meeting Minutes

### Alternative Decision-Making Methodology adjustment for S\*RC Implementation Workgroup:

The moderator of the Working Group will be responsible for deciding which of the following designations apply.

- **Full Consensus** – when no one in the group speaks or votes against the recommendation.
- **Substantial Agreement** – a position in which Xcel Energy is in agreement and over 50% of the other votes agree with the position. (Additionally, the positions of parties who vote against the position will be noted within meeting minutes.)
- **Divergence** – a position in which Xcel Energy is in agreement, but for which 50% or less of the other votes agree with the position, and where Xcel Energy has determined that an adjustment will need to be made within the S\*RC program.<sup>1</sup>
- **Minority View** – refers to a proposal in which one or more Garden Operators support or vote in favor of the recommendation which does not fall under one of the above categories.

Voting workgroup members will be required to be designated as such. Voting parties consist of Xcel Energy and Garden Operators who have applied for at least one solar garden. Garden Operators are considered to the same entity if they are affiliated with one another. No more than one vote per Garden Operator allowed. Only those parties present will be allowed to vote. A quorum is required for any such vote. A quorum consists of Xcel Energy plus at least 5 Garden Operators being in attendance. Not all parties consisting of the quorum need to vote for the vote to be effective.

#### ***Process for Disputes***

For disputes regarding FAQ's and program administration, the Workgroup will petition the Commission for clarification. All positions will be represented and signatories will be the voting parties.

<sup>1</sup> For FAQ documents it may be necessary to implement an administrative adjustment during a dispute. If such cases arise they will be acknowledged as such.

## Attachment B to 9.19.15 Meeting Minutes

# Draft Proposals for Workgroup Discussion Aug. 19

### Distribution System Upgrades

The Parties agree that for purposes of interconnecting Co-Located Community Solar Gardens to Xcel Energy's distribution system, Section 10 of the company's Minnesota Electric Rate Tariffs do not require the Company to undertake any material upgrades in its distribution system to accommodate interconnection of Community Solar Garden applications.

For planning purposes, we consider material upgrades to include:

- Alterations within the substation – including but not limited to the addition of substation transformers, the upgrading of existing substation transformers, the installation of new feeder bays, new overhead feeders or new underground feeders.
- Reconductor and pole line work where the cost of such upgrades exceeds one million dollars.

If a project site exceeds either of these Material Upgrade limits, but could be accommodated at a lower capacity, the applicant can choose to reduce the size of the site without affecting queue position. If material upgrades are not needed, Company will provide indicative cost estimates for the construction needed by the Company to accommodate the project.

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### Determination of Co-location

Xcel Energy notice excerpt:

The Minnesota Public Utilities Commission (MPUC) Order dated August 6, 2015, stated that for applications submitted prior to September 25, 2015, no more than 5 MW<sub>AC</sub> of Co-located Community Solar Gardens in the aggregate will be allowed at any given project site. After September 25, 2015, no more than 1 MW<sub>AC</sub> of co-location community solar gardens are allowed.

Community solar gardens are co-located if they exhibit characteristics of a single development including, but not limited to, common ownership structure, an umbrella sale arrangement, shared interconnection, revenue-sharing arrangements, and common debt and equity financing. These criteria are the same criteria used in Minn. Stat. §216E.021 and Minn. Stat. §272.0295 for determining the total size of separate yet related distributed solar generating systems. Some examples of gardens Xcel Energy considers co-located include those initially submitted on a common site plan, or having similar or adjacent addresses with the same garden name, company or developer.

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### Dispute resolution

#### *Co-location*

Applicants may appeal Company co-location determinations to the DOC. During the appeal process, the Company will not process those applications. However, if an applicant chooses to fulfill the requirements above and identify a compliant portion of a larger co-located site, the Company will process the compliant applications. Should the appeal result in favor of the applicant, the appealed

portions of the applications will enter the queue at that time, behind all other “expedited ready” applications.

### *Engineering*

Applicants may appeal Material Upgrade determinations to an independent engineer. Should the appeal result in favor of the applicant, it will re-enter the queue and be re-studied based on the then-current engineering information, including the extent of capacity taken by other applicants on the same feeder or substation.

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### **Signing of Interconnection Agreement**

Contingent upon receipt of payments and Letter of Credit for construction and proof of fulfilling insurance requirements as provided for in interconnection agreement. These payments and Letter of Credit must be provided within 30 days of receiving indicative cost estimate or the application will be removed from the interconnection queue and applicant will need to start a new application if it later decides to proceed. Also project must have timely complied with at least 3 of the 7 factors for showing progress before an interconnection agreement will be signed.

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### **SOW Process Update**

SOW for interconnection study for co-located gardens in excess program limits and gardens that have not yet received an interconnection study SOW:

- If you already have an SOW and study in progress, we will deliver resulting indicative cost estimates for compliant gardens. For best results, please remove excess gardens from the Solar\*Rewards Community system and send updated line diagrams and site plans showing your planned design.
- If you have not yet paid for and begun your study, we will not proceed until these steps are taken.
- If your study timeline is 90-days, we will honor the shorter of your 90 days or the 50-day timeline once it is activated.

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### **Implementation timeline for 50-day process**

Community Solar Gardens that have been deemed complete need to complete the following on or before ~~Sept. 8 (or filing date of our revised tariff — the compliance filing date)~~ **date to be discussed by workgroup** in order to be considered “expedited-ready.”

1. Submit new site plan and one-line diagram that complies with the 5MW limit (if above 5MW)
2. Submit complete Appendix C
3. Pay the study fee (if 2<sup>nd</sup> or higher in queue and have not received an SOW, we will provide one)

50-day expedited process begins on the compliance filing date for all applications that have complied with the above requirements on or before that date. Failure to comply with the above requirements on or before that date will result in the loss of queue position. Queue position is re-established behind all other “expedited ready” applications upon completion of the requirements.

Applications already in the study process that comply with the requirements above will be provided an interconnection agreement within the shorter of the existing Section 10 study timeline, or 50 days. Applications deemed complete after the compliance filing date will begin the 50-day expedited process when compliant with the requirements above.

**Required prior to implementation:** workgroup resolution on queue impacts if developers contest co-location or \$1M material upgrade determination. How does this impact the 50-day timelines?

DRAFT

## CERTIFICATE OF SERVICE

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

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

electronic filing

**Docket No.**        **E002/M-13-867**

Dated this 3rd day of September 2015

/s/

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SaGonna Thompson  
Regulatory Administrator

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