

March 16, 2026

VIA ELECTRONIC FILING

Sasha Bergman, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of a Formal Complaint by Larry Rauenhorst against Renville Sibley Cooperative Power Association

Dear Ms. Bergman,

Clean Energy Economy Minnesota (CEEM) respectfully submits these supplemental comments for PUC Docket Number: E136/C-26-113. In the Matter of a Formal Complaint by Larry Rauenhorst against Renville Sibley Cooperative Power Association.

Our mission at CEEM is to provide educational leadership, collaboration, and policy analysis that accelerates clean energy market growth and smart energy policies. We work to support and expand clean energy jobs and the economic opportunities provided by clean, reliable, and affordable energy on behalf of all Minnesotans.

Please feel free to contact us with any questions that you may have. We hope that these initial comments below provide you with useful insights.

Regards,



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State of Minnesota
Before the
Public Utilities Commission

Katie Sieben
Joseph K. Sullivan
Hwikwon Ham
Audrey Partridge
John Tuma

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

In the Matter of a Formal Complaint by
Larry Rauenhorst against Renville Sibley
Cooperative Power Association

CLEAN ENERGY ECONOMY
MINNESOTA'S
INITIAL COMMENTS

PUC Docket Number: E136/C-26-113

INTRODUCTION

Clean Energy Economy Minnesota

Clean Energy Economy Minnesota (“CEEM”) is an industry-led, nonpartisan, nonprofit organization representing the business voice of energy efficiency and clean energy in Minnesota. Our work is focused on educating Minnesotans about the economic benefits of transitioning to a clean energy economy. Our business membership comprises over 70 clean energy companies ranging from start-up businesses to Fortune 100 and 500 corporations that employ tens of thousands of Minnesotans across the state. CEEM and our members are committed to delivering a reliable, affordable, and clean energy future where all Minnesota businesses and citizens will thrive.

CEEM respectfully submits these Initial Comments in response to the Minnesota Public Utilities Commission’s (the “Commission”) February 13, 2026, Notice of Comment Period in the above referenced docket.

Issues and Action Required by the Evidence

The alleged actions of Renville Sibley Cooperative Power Association (the “Co-op”) raise serious concerns that reach to the public interest in the deployment of small solar,

under 40 kW systems in Minnesota. On a micro level, this complaint seeks an investigation into the alleged blatant disregard of the black letter net metering law by Co-op and obtaining tangible relief for Larry Rauenhorst (the “Complainant”). On a macro level, this matter is about whether the net metering law will be upheld and enforced in Minnesota so that all Minnesotans can be assured they will continue to have the right to be small electricity producers consistent with the net metering law.

CEEM respectfully requests the Commission commence an investigation into the allegations, provide the sought after relief for Complainant and uphold the net metering law to encourage, rather than discourage, the use of small electric power producers using solar as a tool by which to help fulfill the requirements of the Carbon-Free Standard.¹

Beyond the specific facts of this complaint, the Commission's response will signal to Minnesota's clean energy market whether statutory rights associated with distributed generation will be reliably enforced. Small-scale solar installations represent a growing segment of Minnesota's clean energy economy, supporting local installers, electrical contractors, equipment suppliers, and financing providers. When statutory rights such as net metering and interconnection are applied inconsistently, it creates market uncertainty that can discourage investment and participation in distributed energy resources. Ensuring consistent application of Minnesota's net metering law therefore protects not only individual customers but also the broader clean energy economy operating within the state.

CEEM responds to the five open topics in an abbreviated format followed by some detailed rationale for its position on each topic.

SHORT ANSWERS TO TOPICS OPEN FOR COMMENT

- Given the significant public policy matters at issue in this case, i.e., the rights of individual power producers using solar energy consistent with Minnesota law, and the jurisdictional authority of the Commission generally, the Commission does have jurisdiction over the subject matter of the complaint.
- Based on the totality of the circumstances involved in this action, there are reasonable grounds for the Commission to investigate the allegations set forth in the complaint.

¹ Minn. Stat. § 216B.1691 (2025).

- The allegations set forth in the complaint have implications for the right of every Minnesotan to be an electric power producer, so it is in the public interest for the Commission to investigate the allegations.
- Given the nature of the allegations set forth in the complaint, the Commission should use an informal or expedited proceeding to investigate the complaint.
- The allegations in the complaint raise serious questions about institutional respect for Minnesota’s net metering law as well as the state laws and public policies aimed at rapidly reducing Greenhouse Gas (GHG) emissions in the electricity sector. The Commission should investigate the allegations in the complaint as a means by which to uphold the integrity of the net metering law and GHG emission reduction policies, and to signal to other electric utilities, including electric cooperatives, that no one is above the law.

DETAILED RATIONALE FOR ANSWERS TO TOPICS OPEN FOR COMMENT

- The Commission has jurisdiction to hear the subject matter of the complaint given the authority granted to it by Minn. Stat. § 216A.05, Minn. Stat. § 216B.17, and Minn. R. 7835.4500. At minimum, two serious legal matters are raised by the allegations. One involves a service standard or practice. The other matter involves interconnection issues and the broader question of whether a cooperative can flout the black letter net metering law.

In an analogous case, the Commission found “The Community’s complaint involves the reasonableness of the Cooperative’s standards and practices regarding customer-sited solar generation and whether the Cooperative’s threat of disconnection is unjustly discriminatory. These issues clearly implicate the Cooperative’s “standards and practices,” and the Commission therefore concludes that it has jurisdiction over the issues raised in Community’s complaint under Minn. Stat. § 216B.17, subd. 6a.”²

Based on the allegations, the Co-op’s actions appear to be unreasonable, vexatious, and unjustly discriminatory. Furthermore, Co-op’s standards and practices are clearly blocking the interconnection of a qualified facility in contravention of the net metering black letter law. The implications of Co-op’s

² Minn. Pub. Util. Comm., *In the Matter of a Formal Complaint by the Upper Sioux Community Against Minnesota Valley Cooperative Light & Power Association*, Dkt. 25-219, Order Requesting Specialized Services, Referring Matter to Office of the Attorney General, and Notice of and Order for Hearing, p. 2 (Aug. 13, 2025).

actions is far reaching as it undermines other related and critically important state laws and policies crafted to bolster the use of solar energy to explicitly cut GHG emissions in the electricity sector. Given the totality of the circumstances, the Commission can hear this matter, make findings of fact, and order all appropriate relief.

- Given the evidence set forth in the complaint, there are reasonable grounds for the Commission to investigate the allegations in the complaint. The threshold is whether the complaint presents sufficient cause to examine the matter further, not whether the complaint has already been proven. Complainant cites a detailed timeline of retaliatory actions by Co-op, and supports its allegations with particularity as evidenced by at least six exhibits including communications between the Complainant and Co-op. The allegations are specific and credible enough to warrant an investigation.
- A Commission investigation into the allegations is in the public interest. The concept of public interest is a flexible standard that requires the Commission to make reasoned judgements that ultimately prioritize the long-term well-being of Minnesotans. In this matter, the Commission is aided by the black letter laws enacted by the Minnesota Legislature.

Minnesota's net metering law clearly allows for all Minnesotans to act as electric power producers using solar systems under 40 kW.³ Here, the actions taken by Co-op directly negate Complainant's right to be an electric power producer. By extension, Co-op's actions also threaten the integrity of Minnesota's net metering law as it can have a chilling effect on other similarly situated Minnesotans. Lastly, an attack on the net metering law and efforts to maximize the use of solar energy will have an adverse effect on Minnesota's overall efforts to rapidly cut GHG emissions to meet the requirements of the Carbon-Free Standard and other state policies⁴ aimed at cutting GHG emissions. Given the issues at play in this matter, it is in the public interest for the Commission to investigate this matter.

- The Commission should ideally use an expedited proceeding in this matter. Based on the record, there are no material facts in dispute and a quick resolution is necessary because Complainant has invested in a 36 kWac solar system which

³ Minn. Stat. § 216B.164 (2025).

⁴ Minnesota Pollution Control Agency, *2026 Climate Action Framework*, <https://climate.state.mn.us/sites/climate-action/files/cc-mn4-04a.pdf> (last visited March 16, 2026), at 26 (e.g., calling for actions steps to facilitate the use of small-scale energy generation).

was expected to be interconnected more than two years ago. On equitable grounds and in keeping with the clear meaning of the net metering black letter law, Complainant should be granted immediate relief.

- The complaint raises serious questions about the status of the rule of law with respect to Minnesotan's right to be small electricity producers. Exhibit A shows Co-op clearly encourages "Member-owned renewable generation" and states it will help its members interconnect to the Co-op system.

Exhibits B, C, and D address the interconnection agreement, interconnection rules and a Co-op determination letter respectively. On the one hand, Co-op purports to support members who elect to use Distributed Energy Resources consistent with the relevant laws including net metering. On the other hand, when the opportunity presented itself for Co-op to support Complainant's small solar project, it elected to undermine the project. Co-op clearly understood the net metering law because in Exhibit F, Co-op makes an argument, in writing, to the Minnesota Legislature to neuter the net metering law.

The net metering law supports small electric producers which in turn helps to cut GHG emissions in the electricity sector. This action benefits all Minnesotans because it serves to diversify generating sources, increases system reliability with DERs, and helps to avoid the costs associated with large capital intensive generating systems, all while driving down climate damaging and expensive GHG emissions. If a utility/co-op is allowed to use unreasonable, vexatious, and unjustly discriminatory actions to undermine its members electing to use DERs, then Minnesota's GHG emissions reduction laws are at risk of being neutered. Such a result would be injurious to Minnesotans due to the nature of GHG emissions.⁵ To avoid this result, the Commission must uphold the net metering law by applying it in this matter.

CONCLUSION

Beyond resolving the individual dispute at issue in this docket, the Commission's

⁵ Fifth National Climate Assessment, Chapter 2, *Climate Trends*, Overview 1-5, at <https://repository.library.noaa.gov/view/noaa/61592> (November 2023), (visited March 16, 2026) (offering a key message: "The more the planet warms, the greater the impacts – and the greater the risk of unforeseen consequences (very high confidence). The impacts of climate change increase with warming, and warming is virtually certain to continue if emissions of carbon dioxide do not reach net zero (very high confidence). **Rapidly reducing emissions would very likely limit future warming (very high confidence) and the associated increases in many risks (high confidence** [emphasis added]. While there are still uncertainties about how the planet will react to rapid warming and catastrophic future scenarios that cannot be ruled out, the future is largely in human hands.").

action will also provide important clarity to Minnesota's clean energy market. Clear and consistent enforcement of Minnesota's net metering law ensures that businesses, customers, and utilities alike can rely on predictable rules when investing in distributed energy resources.