



414 Nicollet Mall
Minneapolis, MN 55401

October 30, 2015

—Via Electronic Filing—

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

RE: DENIAL OF REQUEST FOR EXTENSION
SUNSHARE COMPLAINT
DOCKET NO. E002/C-15-786

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this letter in order to inform the Commission about a possible project cancellation.

As the Commission is aware, the Company's Interconnection Process is governed by our Section 10 tariff. That tariff outlines a process that requires the developer to pay one-third of the indicative cost estimate set forth in the Interconnection Agreement before it can advance to detailed design. The process sets forth a deadline for developer payment, and in this instance, that deadline is upon us.

We have a developer, SunShare, who has expressed concern about being required to pay one-third of the indicative cost estimate before advancing to detailed design. SunShare has also expressed concern over the indicative cost estimate itself, although they have indicated that obtaining financing is not a problem.

Based on our communications, it is our understanding that SunShare does not intend to pay the amounts due for any of their projects. It is our understanding that SunShare has determined that the business risk of moving forward without having gone through detailed design is too great. SunShare has indicated that their preferred process would be to advance to detailed design before signing the Interconnection Agreement and making payment. SunShare has requested the Company provide it with a variance from the tariffed process.

This presents a real problem for the Company because it is our belief that we must administer the tariff in a transparent and non-discriminatory manner. Other

community solar garden developers have followed the tariffed process in order to advance their projects to detailed design and beyond. Also complicating the issue is that, at certain of the substations where SunShare has projects, there are developers behind it in the queue.

We appreciate SunShare's desire for flexibility, but we do not believe we are in a position to vary from our Section 10 process. As such, we intend to administer the tariff as written in order to facilitate a transparent and non-discriminatory process. As a result, if SunShare does not remit payment by the established deadlines, we intend to enforce the tariff.

We file this letter with the Commission to keep them informed on this issue—particularly given that we are before the Commission next week on related matters. Our actions may generate questions from the Commissioners, and we are prepared to respond to questions at any time, including at next week's meeting.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Amanda Rome at Amanda.Rome@xcelenergy.com or 612-215-5331 if you have any questions regarding this filing.

Sincerely,

/s/

AMANDA ROME
LEAD, ASSISTANT GENERAL COUNSEL

c: Service List

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.

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/C-15-786

Dated this 30th day of October 2015

/s/

SaGonna Thompson
Regulatory Administrator

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|--------------|----------------------------------|--|--|--------------------|-------------------|----------------------------------|
| Ross | Abbey | ross@mysunshare.com | SunShare, LLC | 609 S. 10th Street Suite 210 Minneapolis, MN 55404 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Michael | Allen | michael.allen@allenergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, Minnesota 55405 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Sara | Baldwin Auck | sarab@irecusa.org | Interstate Renewable Energy Council, Inc. | 774 E 3rd Ave Salt Lake City, UT 84103 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Kenneth | Bradley | kbradley1965@gmail.com | | 2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Michael J. | Bull | mbull@mncee.org | Center for Energy and Environment | 212 Third Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jessica | Burdette | jessica.burdette@state.mn.us | Department of Commerce | 85 7th Place East Suite 500 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Joel | Cannon | jcannon@tenksolar.com | Tenk Solar, Inc. | 9549 Penn Avenue S Bloomington, MN 55431 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| John J. | Carroll | jcarroll@newportpartners.com | Newport Partners, LLC | 9 Cushing, Suite 200 Irvine, California 92618 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Arthur | Crowell | Crowell.arthur@yahoo.com | A Work of Art Landscapes | 234 Jackson Ave N Hopkins, MN 55343 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-------------------------------------|------------------------------------|---|--------------------|-------------------|----------------------------------|
| Dustin | Denison | dustin@appliedenergyinnovations.org | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| James | Denniston | james.r.denniston@xcelenergy.com | Xcel Energy Services, Inc. | 414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| 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 | OFF_SL_15-786_PUC Official SL |
| Betsy | Engelking | betsy@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| John | Farrell | jfarrell@ilsr.org | Institute for Local Self-Reliance | 1313 5th St SE #303 Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Emma | Fazio | emma.fazio@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Nathan | Franzen | nathan@geronimoenergy.com | Geronimo Energy | 7650 Edinborough Way Suite 725 Edina, MN 55435 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|--------------------------------|---|--|--------------------|-------------------|----------------------------------|
| Allen | Gleckner | gleckner@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Timothy | Gulden | info@winonarenewableenergy.com | Winona Renewable Energy, LLC | 1449 Ridgewood Dr Winona, MN 55987 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Michael | Harvey | mike@weknowsolar.com | We Know Solar | 265 Mounds View Rd Suite #1 River Falls, WI 54022 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Duane | Hebert | duane.hebert@novelenergy.biz | Novel Energy Solutions | 1628 2nd Ave SE Rochester, MN 55904 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Lynn | Hinkle | lhinkle@mnseia.org | Minnesota Solar Energy Industries Association | 2512 33rd Ave South #2 Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jim | Horan | Jim@MREA.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| John S. | Jaffray | jjaffray@jrpowers.com | JJR Power | 350 Highway 7 Suite 236 Excelsior, MN 55331 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Linda | Jensen | linda.s.jensen@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Eric | Jensen | ejensen@iwla.org | Izaak Walton League of America | 213 East 4th Street Suite 412 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |

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|------------|-----------|--------------------------------------|-----------------------------------|---|--------------------|-------------------|----------------------------------|
| Michael | Kampmeyer | mkampmeyer@a-e-group.com | AEG Group, LLC | 260 Salem Church Road Sunfish Lake, Minnesota 55118 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Brad | Klein | bklein@elpc.org | Environmental Law & Policy Center | 35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Madeleine | Klein | mklein@socoreenergy.com | SoCore Energy | 225 W Hubbard Street Suite 200 Chicago, IL 60654 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| John | Kluempke | jwkluempke@winlectric.com | Elk River Winlectric | 12777 Meadowvale Rd Elk River, MN 55330 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jon | Kramer | jk2surf@aol.com | Sundial Solar | 4708 york ave. S Minneapolis, MN 55410 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Michael | Krause | michaelkrause61@yahoo.com | Kandiyo Consulting, LLC | 433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Holly | Lahd | lahd@fresh-energy.org | Fresh Energy | 408 St. Peter Street Ste 220 St. Paul, MN 55102 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Dean | Leischow | dean@sunriseenergyventures.com | Sunrise Energy Ventures | 601 Carlson Parkway, Suite 1050 Minneapolis, MN 55305 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Rebecca | Lundberg | rebecca.lundberg@powerfullygreen.com | Powerfully Green | 11451 Oregon Ave N Champlin, MN 55316 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| | | | | | | | |

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|------------|---------------|------------------------------------|--------------------------------|--|--------------------|-------------------|----------------------------------|
| Casey | MacCallum | casey@appliedenergyinnovations.org | Applied Energy Innovations | 4000 Minnehaha Ave S Minneapolis, MN 55406 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Erica | McConnell | mconnell@smwlaw.com | Shute, Mihaly & Weinberger LLP | 396 Hayes St San Francisco, California 94102-4421 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Thomas | Melone | Thomas.Melone@AllcoUS.com | Minnesota Go Solar LLC | 222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jenny | Monson Miller | jmonson-miller@mysunshare.com | SunShare | 609 S. 10th St., Ste 210 Minneapolis, MN 55404 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Andrew | Moratzka | apmoratzka@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Martin | Morud | mmorud@trunorthsolar.com | Tru North Solar | 5115 45th Ave S Minneapolis, MN 55417 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jeff | O'Neill | jeff.oneill@ci.monticello.mn.us | City of Monticello | 505 Walnut Street Suite 1 Monticello, Minnesota 55362 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Dan | Patry | dpatry@sunedison.com | SunEdison | 600 Clipper Drive Belmont, CA 94002 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jeffrey C | Paulson | jeff.jcplaw@comcast.net | Paulson Law Office, Ltd. | 7301 Ohms Ln Ste 325 Edina, MN 55439 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |

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|------------|----------------|-----------------------------------|---|---|--------------------|-------------------|----------------------------------|
| Donna | Pickard | dpickard@aladdinsolar.com | Aladdin Solar | 1215 Lilac Lane Excelsior, MN 55331 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Gayle | Prest | gayle.prest@minneapolis.gov | City of Mpls Sustainability | 350 South 5th St, #315 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Matthew J. | Schuerger P.E. | mjsreg@earthlink.net | Energy Systems Consulting Services, LLC | PO Box 16129 St. Paul, MN 55116 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| David | Shaffer | shaff081@gmail.com | MnSEIA | 2952 Beechwood AVE Beechwood Ave, Wayzata 55391 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Doug | Shoemaker | dougs@mnRenewables.org | MRES | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Eric | Swanson | eswanson@winthrop.com | Winthrop Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Thomas P. | Sweeney III | tom.sweeney@easycleanenergy.com | Clean Energy Collective | P O Box 1828 Boulder, CO 80306-1828 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| SaGonna | Thompson | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Pat | Treseler | pat.jcplaw@comcast.net | Paulson Law Office LTD | Suite 325 7301 Ohms Lane Edina, MN 55439 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |
| Jason | Willett | jason.willett@metc.state.mn.us | Metropolitan Council | 390 Robert St N Saint Paul, MN 55101-1805 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |

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|------------|-----------|--------------------------|------------------|---|--------------------|-------------------|----------------------------------|
| Daniel | Williams | DanWilliams.mg@gmail.com | Powerfully Green | 11451 Oregon Avenue N Champlin, MN 55316 | Electronic Service | No | OFF_SL_15-786_PUC Official SL |