

January 4, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
Saint Paul, MN 55101

Re: Docket E002/M-13-867 regarding Xcel Energy proposal to move ARR-era CSG to value of solar rates

Will Seuffert:

The City of Burnsville submits the following comments on the Xcel proposal regarding the change of applicable retail rate (ARR) era community solar garden (CSG) subscriptions to value of solar (VOS) rates.

- Burnsville was an early adopter for the use of CSGs and played a pivotal role in developing and using CSGs to offset energy cost increases.
- Xcel Energy is changing the rules mid-stream to communities who embarked on the CSG contracts and who are tied to these contracts for up to 25 years.
- Burnsville's modest cost recovery modeling for CSG participation will drop from an anticipated \$4.5-million-dollar savings over 25 years to a mere \$550,000 if the proposed changes take effect.
- Deviating from the existing agreements will have a disparate impact on communities of color and low-income residents living in Burnsville. 89% of our community is identified as living in an area of environmental justice concern by the Minnesota Pollution Control Agency.

The City of Burnsville has used and plans to continue to use savings from the existing ARR contracts to budget for our community needs in mindfulness of fiscal impacts for our community members. After 25-year contracts were initiated, it is unfair for Xcel Energy to change contract rates. The

remainder of the contract years would be rendered as annual losses or minimal savings not worth the time, energy and investment to keep the programs viable.

The City of Burnsville asserts that it is unwarranted to modify these credits which were agreed upon by all parties when contracts were signed initially. There has been minimal engagement by Xcel to communicate these changes and their failure to communicate and act forthright on this important fiscal issue makes future program participation an exceedingly wary venture.

The City of Burnsville respectfully requests that the Minnesota Public Utilities Commission reject Xcel's proposed rate change and partner with program participants to find a better solution to this issue.

On behalf of the City of Burnsville, I thank you for your service and appreciate the Public Utilities Commission's thoughtful consideration of our community's concern.

Best,

A handwritten signature in blue ink, appearing to read "Gregg Lindberg". The signature is stylized and written in a cursive-like font.

Gregg Lindberg
City Manager