

PUC Comments for Larry Rauenhorst Complaint

docket number (26-113)

3/10/26

To whom it may concern,

My name is Aaron Busse; President of Minnesota Renewable Energies, Inc. a wind and solar equipment supplier and engineering design company since 2009.

It is important to note that MN's net metering law has been around since 1981 and is the foundation for many renewable energy projects since then; giving MN consumers an option for where their power comes from.

Before getting into this business, I did lots of research on the laws and policies for renewable energy interconnection with MN utilities. The law is very simple and has been the foundation for our industry and MN consumers since its inception.

Since 2009; I have personally processed over 500 renewable energy interconnections with over 25 utilities across MN. Back in 2009, this process was very new to everyone involved with typically cumbersome paperwork in person, mail or via fax. Then around 2017 interconnection became an automated online process that most utilities in MN are part of today. In all the systems I helped get interconnected over the years; there were never any legal conversations with any utility as the net metering law was well known and utilities respected the member's or customer's right.

Larry Rauenhorst contacted me in 2023 looking for assistance with the interconnection process. He explained he and his brother Rolly were working on a plan that would prove you can install solar panels high enough on racking in a farm field and still farm underneath it without losing much production. This struck a chord with me as lots of farmers expressed concern about solar panels taking up good farmland. I quickly learned the Rauenhorst's simply wanted to help solve this problem. To get the project going, they would be building an office/ utility building at the study site that would also serve as an electric charging station for electric farm equipment and electric vehicles.

They mentioned they already met with Renville-Sibley Coop to discuss the project details early in the design phase, hoping to make sure they followed all the steps correctly. Instead of a meeting with a single individual at the Coop as planned; they were ambushed by board members, electrical inspectors and other officials that claimed at this meeting they could not build the project. To me this sounded like some simple misunderstandings between the member and the Coop, and I agreed to consult and help Larry through the process.

I initially shared with the Rauenhorst's that it is perfectly fine to consider solar interconnection when you are planning a new electrical service. As the service is built, there are engineering considerations that both the member and utility would want to plan together, which I had learned from experience working with other utilities. Further conversations with Renville-Sibley Coop seemed to create a roadblock for their project, so the Rauenhorst's were also considering an off-grid installation to help move their project forward. They kept me informed on their project details and I consulted on system design and the interconnection process if the system would be grid-tied.

After considering all the options with them, it was clear that they should establish an electrical service first for their office/charging station and then apply for the solar interconnection. I then became Larry's "application agent" for the solar interconnection application. The application agent is typically an industry professional, installer or developer that helps consumers navigate the interconnection process.

Everything went completely normal as Renville-Sibley utilizes an online platform called Nova Portal which is supported by an engineering firm in Alexandria, MN called Star Energy. This company provides consulting and engineering services to utilities for the interconnection review and approval process. Larry Rauenhorst's solar project got to the final stages of this process, which is signing an interconnection agreement, and he completed this step with his signature.

The interconnection agreement is a simple contract reflecting MN's net metering law. The standard process for Nova Portal is to send an online agreement for the customer to review and sign – this agreement is almost identical for all utilities that use the Nova Portal platform and is a simple reflection of the MN net metering law. After the member signs the agreement, it is standard practice for the utility to sign the agreement.

Larry signed the agreement, but the Coop cancelled the agreement. In all my years since 2009 being part of this process for over 500 interconnection applications I have never seen the utility cancel the members signature and say the "average retail rate" credit wasn't available to them. In addition, the Coop went out of their way to delete Mr. Rauenhorst's signed agreement from the online portal and told him to start over and not select "average retail rate" even though it is an option in the interconnection agreement presented to him.

After witnessing this interaction between Larry and the Coop, I was deeply concerned and contacted Mr. Bruns at the Coop to let him know his actions didn't seem normal. Then he told me he wasn't in control of the matter even though it was his name on all the email correspondence and the agreement. He said we would need to discuss it with the board.

Since they cancelled the agreement, we submitted a new application through the Nova Portal. Then Larry received the same standard agreement, and he signed the interconnection agreement again. This time I helped him save a copy on a computer for reference. Then after a few days, the Coop canceled the agreement again.

So here we are over a year later and the solar system has been installed, inspected and a Certificate of Completion submitted to the Coop, yet they have denied Larry commissioning the system since they cancelled the interconnection agreement.

Renville-Sibley Coop has broken the MN net metering law twice by deleting and or canceling Larry's interconnection agreement and has tried to coerce him to agree to another credit rate option. This seems like an effort by the board and the CEO to ultimately make the whole process a hassle and discourage other members from installing solar. With this information being shared amongst members already there is no longer trust in the interconnection process with Renville-Sibley Coop, creating further damage to its members.

It's time that someone holds Renville Sibley Coop Board members and their CEO accountable for breaking the MN net metering law and for breaking MN contract law when they purposefully deleted executed contract documents.

***SEE EXHIBIT A ATTACHED – screen shots of the interconnection app on Nova Portal**

Cordially,

Aaron Busse

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President

Minnesota Renewable Energies, Inc.

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