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March 28, 2025

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55105

**RE: In the Matter of a Formal Complaint and Petition for Relief by SunShare LLC  
Against Northern States Power Co. d/b/a Xcel Energy Regarding Settlement  
Agreement**

**Docket No. E002/C-25-76**

Executive Secretary Seuffert,

The Coalition for Community Solar Access ("CCSA") provides these brief comments in support of SunShare LLC's request for relief under consideration in the above-referenced docket.

CCSA is a 501(c)(6) nonprofit trade organization focused on supporting the community solar industry through legislative and regulatory efforts. CCSA's mission is to empower every American energy consumer with the option to choose local, clean, and affordable community solar. CCSA works with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win for all, starting with the customer. CCSA has over 120 member companies and is active in virtually all state-level community solar markets, as well as at the federal level.

Although the dispute at issue in this docket is limited to a subset of community solar garden projects in the interconnection queue, the complaint demonstrates the actual impact of Xcel Energy's unilateral changes to the interconnection study process. Despite the Commission's order staying the implementation of the Midwest Independent System Operator ("MISO") Affected System Study Agreement,<sup>1</sup> Xcel Energy has determined that it has the ability to incorporate new transmission impact study processes into the Minnesota Distributed Energy Resources Interconnection Process ("MN DIP") without prior approval. The fact remains, however, that Minnesota Statute § 216B.1611 prohibits Xcel Energy from modifying the approved MN DIP without the consent of the Commission.

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<sup>1</sup> *In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. §216B.1611*, MPUC Docket No. E999/CI-16-521, Order Modifying Practices and Setting Reporting Requirements at 12 (March 31, 2022).

Xcel Energy's introduction of unauthorized modifications to MN DIP, including the introduction of MISO's Distributed Energy Resources Affected Systems Study process coupled with new internal transmission studies based on screening criteria in excess of criteria used by MISO, are causing unnecessary and excessive delays in the interconnection of community solar gardens. These delays have a material impact on Minnesota's ability to achieve state policy goals, such as the delivery of 100% clean energy by 2050. More importantly, interconnection-related delays prevent additional Minnesotans from having the option to enroll in a community solar garden and benefit from immediate bill savings that provide relief from the high electricity costs facing customers today.

CCSA, along with the Minnesota Solar Energy Industries Association and Clean Energy Economy Minnesota, submitted comments<sup>2</sup> to Commission Docket No. 16-521 in December 2024 detailing a number of concerns related to the adverse impacts of Xcel Energy's recent interconnection-related study practices. We continue to request that the Commission open an investigation into Xcel Energy's unsanctioned transmission study practices and direct the utility to cease any application of these practices until it receives Commission approval to incorporate them into MN DIP.

Respectfully submitted,

/s/ Nick Bowman

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<sup>2</sup> *In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. §216B.1611*, MPUC Docket No. E999/CI-16-521, Comments of Clean Energy Economy Minnesota, Minnesota Solar Energy Industries Association, and the Coalition for Community Solar Access (December 13, 2024).