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September 19, 2018

—Via Electronic Filing—

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

RE: ERRATA FILING
SUPPLEMENTAL COMMENTS
SOLAR*REWARDS PROGRAM AND COMMUNITY SOLAR GARDEN PROGRAM
TARIFF UPDATES
DOCKET NO. E002/M-18-381

Dear Mr. Wolf,

On September 17, 2018 Northern States Power Company doing business as Xcel Energy, submitted Supplemental Comments in response to the Commission's Notice of Supplemental Comment Period issued on August 27, 2018. We have identified an error in our September 17 filing and we submit this errata filing to correct Table 1. The corrected values appear at the top of page 6 impacting the estimated Solar*Rewards dollars as a percent of cost and total percent of cost. For convenience, we provided the corrected Supplemental Comments in entirety.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at jessica.k.peterson@xcelenergy.com or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER
DSM REGULATORY STRATEGY & PLANNING

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF PROGRAM TARIFF
UPDATES FOR SOLAR*REWARDS

DOCKET No. E002/M-18-381

**ERRATA
SUPPLEMENTAL COMMENTS**

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits these Supplemental Comments in response to the Commission's Notice of Supplemental Comment Period issued on August 27, 2018.

Minn. Statute §116C.7792, which address the Company's Solar*Rewards incentive program, was modified in the 2018 legislative session. The plain language of the modified statute limits eligibility for receiving a production incentive to no more than a total aggregate system nameplate capacity per premise of 40 kW. The Company's proposed tariff revisions dated August 14 give effect to the statute and address systems installed both before and after June 1, 2018. We believe the Company's tariffs properly implement the plain language of the statute. We do appreciate, however, the benefit that further clarity from the Commission can bring to matters of interpretation and implementation.

To that end, we believe the Commission's Notice appropriately focuses on the key questions: 1) adherence to statute, and 2) the implications of bifurcation and colocation of PV systems attempting to access benefits expressly reserved for small systems under the Company's tariffed programs.

As we describe further in our these Supplemental Comments, we urge caution in determining broad policy decisions regarding program eligibility as not all customers are similarly impacted. Indeed, the state's recent experience with co-location in the context of community solar gardens indicates the need for clarity and precaution.

COMMENTS

In its Notice issued on August 27, 2018 the Commission requested comments about the interpretation of the Solar*Rewards statute and the implications for implementation. We address the Commission's questions here.

A. Do the proposed tariff revisions in Xcel Energy's August 14, 2018 Reply comments comply with the revised Minn. Stat. §116C.7792?

Yes, our proposed tariff revisions comply with the plain language of the statute. In our June filing we proposed tariff language that directly tracked the modified statutory language that, "the total aggregate nameplate capacity per premise of all solar energy shall be no more than 40 kilowatts DC". Just prior to our August 14 filing, however, we heard customer concern regarding systems installed prior to June 2018.

We re-examined the statute and proposed a revised tariff on August 14 that addresses customer impact in varying situations. The August 14 proposal addresses the circumstances of customers with a project receiving the Solar*Rewards incentive installed prior to June 2018 and separately addresses those systems installed after June 2018. Under the terms of the proposed tariff, those with systems installed prior to the date identified in statute remain eligible to receive incentive payments even if other non-incentive systems on the premises are later installed causing the aggregate system capacity at the premise to exceed 40 kW.

What is apparently at issue is the treatment of Solar*Rewards projects for PV installations after June 1, 2018. As set forth in the proposed tariff, the Company has defined eligibility for Solar*Rewards incentive payments for systems installed after June 2018 to be subject to a total aggregate capacity limit by premise. This bright line definition sets expectations prior to the installation of any photovoltaic system so customers understand the rules and requirements for their ten year commitment under the Solar*Rewards program. Where the limit is exceeded by the installation of additional systems on the same premise, the customer is ineligible for continued Solar*Rewards payments for the systems installed after June 2018.

iDEAL Energies, however, proposes that any prohibition on aggregate size per premise should only apply to systems receiving Solar*Rewards incentives (not all systems at the premises) regardless of when the Solar*Rewards systems are installed. They argue that the statute should be interpreted as if it had additional wording. The language iDEAL prefers to read into the statute is shown below in redline in the square brackets:

116C.7792 SOLAR ENERGY INCENTIVE PROGRAM. The utility subject to section 116C.779 shall operate a program to provide solar energy production incentives for solar energy systems of no more than a total aggregate nameplate capacity of 40 kilowatts direct current per premise. The owner of a solar energy system installed before June 1, 2018, is eligible to receive a production incentive under this section for any additional solar energy systems constructed at the same customer location, provided that the aggregate capacity of all systems **[receiving the Solar*Rewards incentive]** at the customer location does not exceed 40 kilowatts. ... The solar system must be sized to less than 120 percent of the customer's onsite annual energy consumption when combined with other distributed generation resources and subscriptions provided under section 216B.1641 associated with the premise. ...

Adding these words to the statute in order to interpret the statute would fundamentally change the meaning of the statute. This approach conflicts with established law that in interpreting a statute one cannot add words to a statute and cannot supply what the legislature either purposefully omitted or inadvertently overlooked. *River Valley Truck Center v. Interstate Companies*, 680 N.W.2d 99, 105 (Minn. App. 2004).

B. Did the 2018 legislative change to Minn. Stat. §116C.7792 establish an aggregate capacity limit of 40 kW for all solar systems or all solar systems receiving the Solar*Rewards at a customer's premise?

The statute is express with respect to customers with systems installed prior to June 1, 2018; it is silent, however, with respect to customers who did not install a system prior to June 1, 2018.

The Company believes it is a reasonable application of the statute that a customer installing a system after June 1, 2018 is eligible for a Solar*Rewards incentive only if the aggregate nameplate capacity of systems (whether incentivized or not) at the premise do not exceed 40 kW. Another requirement in the revised wording of the statute is that the solar energy system subject to the Solar*Rewards incentive must be sized to less than 120 percent of the customer's on-site annual energy consumption when combined with other distributed generation resources and community solar garden subscriptions associated with the premise.

Similarly, if a customer has a Solar*Rewards system installed prior to June 2018 which was originally sized under 20 kW, the customer may apply again to the Solar*Rewards

program and receive a second contract for incentives for the additional capacity up to a premise maximum aggregate capacity of 40 kW.

The Company does not believe a customer is barred from installing solar that would cause the aggregate capacity at the premise to exceed 40 kW, only that the customer who chose to proceed in excess of the limit would cease to receive production incentives under the Solar*Rewards statute for systems installed after June 1, 2018.

C. Is a customer allowed to bifurcate a portion of a solar system larger than 40 kW to qualify for Solar*Rewards incentives?

We understand the question to be referring to new projects installed after June 1, 2018. The revisions in the statute are silent on this. As such this is a policy issue for the Commission to address.

We note that the revisions to allow incentives for solar energy systems up to 40 kW_{DC} on a premise aligns with the revised 40 kW threshold under the Solar Energy Standard (SES) carve-out for small solar that was also revised this year. The same bill that revised §116C.7792 to make the solar incentive available to systems up to 40 kW (up from the prior 20 kW) also revised §216B.1691, subd 2f to have the SES carve out for small solar to now be based on systems up to 40 kW (up from the prior 20 kW). The revisions to §116C.7792 allow a customer with a Solar*Rewards system installed prior to June 2018 to add a solar energy system after June 2018, and still receive a Solar*Rewards incentive, as long as the aggregate capacity of all systems receiving an incentive does not exceed 40 kW.

To state that this aggregate capacity rule should apply *only* where there was a Solar*Rewards system on the premises prior to June 2018 would disfavor those who previously installed a solar energy system on their premise. There is no public policy that would disfavor those who put on solar energy system prior to June 2018 compared to those who first put on solar after June 1, 2018. Such a policy would result in unbalanced results, such that,

- If a customer had an existing incentivized solar system installed prior to June 2018, it could receive an incentive for additional capacity added after June 1, 2018 up to a premise total of 40 kW only if the total aggregate capacity of all systems at the premises does not exceed 40 kW. For example, a customer could have installed a 5 kW system and still be eligible to receive another production incentive up to 35 kW after June 1. If the customer added more solar capacity beyond the 40 kW at the

premise, then the customer from that point forward would no longer be able to receive the incentive for the 35 kW portion.

The imbalance is illustrated by contrasting the above to the following example.

- Under iDEAL Energy's interpretation, a customer who has no solar energy systems installed prior to June 2018 could add 40 kW and receive a Solar*Rewards production incentive, and further add up to 960 kW as a non-incentive system (as long as they did not surpass the 120% limit), and retain the incentive for the 40 kW system.

We do not believe that these divergent results align with legislative intent, nor with good public policy. Given that the first example is based on the wording of the statute, public policy should not favor those who first installed a solar incentive system after June 1, 2018.

The clear intent of the Solar*Rewards statute is to encourage the development of solar systems at the small-scale end of the market. iDEAL Energy's interpretation represents the installation of a small system and later growing these systems from 40kW to 50kW, 100kW or perhaps even larger over time. Working with an existing customer who has benefited from the Solar*Rewards incentive is an effective sales technique, but limits the market for developers selling additional 40 kW_{DC} systems under the Solar*Rewards program to new customers. Policy that encourages this creates a future program barrier to grow small solar installations. We do not believe that the goal of small-scale solar development is achieved when a customer continues to add solar facilities and moves beyond hosting on-site solar at the size and scale identified in statute.

Looking at the on-site solar opportunities for different types of customers, there are several financial opportunities that vary by customer type and financial situation. These factors, together, have the potential to drive the market in ways that may not align with the intent of small-solar incentive program, as shown in the following table.

Table 1: Examples of Financial Factors in Solar Rooftop Installations

| System Type | ITC | Est Solar*Rewards \$ as % of Cost (Pre ITC) | Depreciation Tax Benefits | Total % of cost |
|--|-----|--|------------------------------|--------------------|
| Residential System (8 kW @ \$3.59/W installed cost) | 30% | 28% | 0% | 58% |
| Commercial - Solar*Rewards (40 kW @ \$3/W) | 30% | 34% | 37% | 101% |
| Commercial - PV Demand Credit Rider (100 kW @ \$2.50/W) | 30% | 0% | 37% | 67% |

While reported installed costs and other variables will differ among developers and customers, the end result is that financial opportunities already favor commercial Solar*Rewards installations even without favorable program treatment. Using rough, conservative estimates, the return on investment and simple payback calculations for commercial systems that also take into account net metering savings and the PV Demand Credit payment already are very favorable compared to customers who are unable to take advantage of all of these financial levers. The PV Demand Credit Rider offers a reasonable alternative for those seeking larger installations while preserving Solar*Rewards funding for truly small systems needing that additional boost to become viable projects.

Further, it is instructive to examine the Solar*Rewards small solar incentive format in view of the small solar carve-out in the Solar Energy Standard. The statutory revisions to the Solar*Rewards incentive align directly with the statutory revisions to the carve-out under the SES statute. Indeed, the Commission previously denied the request of the Company to apply community solar garden subscriptions of less than 20 kW towards its small-scale solar obligation because, in part, the purpose of the statute is to promote small-scale distributed solar generation.¹ If bifurcation is permitted for purposes of determining eligibility for Solar*Rewards, however, it should also be permitted for purposes of determining compliance with the SES small solar carve-out.

¹ *In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard*, Docket No. E999/M-17-283, Order Accepting Reports, Denying Request, and Setting Additional Reporting Requirements (October 20, 2017)

D. Are there other issues or concerns related to this matter?

As noted previously, the state’s experience with co-location and bifurcation in the context of community solar gardens reminds us about the importance of clear requirements, and about determining eligibility for benefits based on the underlying policy giving rise to the benefits. In this case, the underlying policy is entirely focused on the scale of the solar. The benefit is reserved exclusively for the small-scale sector of the market.

We are aware of a growing number of solar installers who would like to potentially aggregate or co-locate on-site systems so that a commercial customer could essentially install, for example, a 120 kW system at one premise while applying for 40 kW as part of the Solar*Rewards program and 80 kW for net metering with the PV Demand Credit. Like the co-located projects in our community solar garden program, these projects would be one system from a distribution engineering perspective, even though each would require its own production meter. Under our community solar gardens program, systems that are on the same premise, but have separate production meters, are impermissibly co-located if over 1 MW. Similarly, a customer seeking to arbitrage different programs should not be allowed to bifurcate or co-locate systems on a premise so as to artificially avoid program rules and/or obtain a benefit intended for a different market sector.

The Company also provides a point of clarification to the number of applications we described at the Hearing on August 23, 2018. Table 2 provides the quantity of applications received by the Company in 2018 by program type.

Table 2: Application Status as of September 5, 2018

| Year-Program | PV Size (DC) | Applications Received | Total MW |
|---|---------------------|------------------------------|-----------------|
| 2018 - Solar*Rewards Applications | <20 kW | 826 | 7.88 |
| 2018 Solar*Rewards Applications | >20 kW - ≤40 kW | 106 | 3.9 |
| 2018 Non-Solar Rewards Solar Installation | <20 kW | 14 | 0.10 |
| 2018 Non-Solar Rewards Solar Installation | >20 kW - ≤40 kW | 3 | 0.09 |
| 2018 Non-Solar Rewards Installation | >40 kW - ≤ 1000 kW | 39 | 9.45 |
| Total | | 949 | 11.97 |

CONCLUSION

We appreciate the opportunity to provide these Supplemental Comments. The Company's tariffs are a reasonable application of the statute and are consistent with the policy objectives of the program. Accordingly, we respectfully request the Commission approve our tariffs as revised.

Dated: September 19, 2018

Northern States Power Company

CERTIFICATE OF SERVICE

I, Jim Erickson, 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; or

xx by electronic filing.

Docket Nos.: E002/M-18-381

Dated this 19th day of September.

/s/

Jim Erickson
Regulatory Administrator

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