



Sundial Solar

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September 17, 2017

Daniel P. Wolf
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101
via E-File

RE: DOCKET NO. 18-381

Dear Mr. Wolf,

Sundial does not think the proposed tariff revisions comply with the revised Minn. Stat. §116C.7792. The 40 kW limit stated in the revised statute is clearly in reference to the incentive program, not the premise as a whole. It is our opinion based on reading the bill language and from our discussions with industry partners when the bill was being drafted that the intent of the bill was obviously to allow Xcel customers to utilize more of the incentive, and not to in any way limit their ability to install more solar to their premise.

In our experience as a developer of 10+ years there are many clients who wish to install solar on only part of their rooftop as a “trial system”. We have had several clients with large rooftops, e.g. 500 kW potential capacity, who have approached us years after installing a 20-40 kW incentive (Solar*Rewards or Made in Minnesota) system to install a second system that would utilize the rest of their roof space. It is our expectation to have many more of these incentive clients come to us in the future hoping to expand on their system using the non-incentive PV Rider. Large solar systems, e.g. 100 kW+, are large investments and many business owners feel more comfortable first installing a small, incentive sized system and seeing the pay-off on that before committing too a much larger one.

Respectfully,

Jon Kramer
CEO