MINNESOTA DEPARTMENT OF COMMERCE

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February 7, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/CI-13-720

Dear Dr. Haar:

On December 30, 2013, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period in the Matter of a Commission Inquiry into Ownership of Renewable Energy Credits used to Meet Minnesota Requirements. Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst

SLP/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/CI-13-720

I. BACKGROUND INFORMATION

Minn. Stat. §216B.1691 established the Renewable Energy Standard (RES), and permitted the use of Renewable Energy Certificates (RECs) for compliance. In its October 9, 2007 Order in Docket No. E999/CI-04-1616[1], the Commission approved the use of the Midwest Renewable Energy Tracking System (M-RETS) to track RECs, and directed utilities to register generation facilities with M-RETS to be used for compliance with the RES.

In the 2013 Legislative Session, a number of legislative changes were made, including passing a Solar Energy Standard (SES, Minn. Stat. §216B.1691, Subd. 2(f)), establishing a Made in Minnesota production incentive (Minn. Stat. §216C.414), requiring Xcel to file a "solar garden" plan (Minn. Stat. §216B.1641), and allowing utilities to apply for a tariff as an alternative to net metered tariffs to compensate customers for the value of distributed solar generation "operated by customers primarily for meeting their own energy needs" (also known as the "Value of Solar Tariff") (Minn. Stat. §216B.164, Subd. 10).

The Commission's December 30, 2013 *Notice of Comment Period* seeks comment on the following topics:

[1] *In the Matter of a Commission Investigation into a Multi-state Tracking and Trading System for Renewable Energy Credits,* Order Approving Midwest Renewable Energy Tracking System (M-RETS) Under Minn. Stat. §216B.1691, Subd. 4(d) and Requiring Utilities to Participate in M-RETS.

- What categories of Renewable Energy Credits (RECs) need clarity on ownership?
- Who owns the RECs from net metered customers? Does it matter whether the qualifying facility (QF) is being paid the average retail rate or avoided cost rate?
- Who owns the RECs if a third party owns the PV equipment and leases to the homeowner/business?
- Are there special considerations on REC ownership related to REC aggregators/marketers?
- What factors should the Commission take into account when determining REC ownership?
- Should the Commission make decisions on REC ownership?
- If the Commission should issue decisions on REC ownership, for which utilities or parties to a transaction should the Commission's decision apply?

II. DEPARTMENT ANALYSIS

The Department provides the following comments on the questions listed above.

A. WHAT CATEGORIES OF RENEWABLE ENERGY CREDITS (RECS) NEED CLARITY ON OWNERSHIP?

Statutory requirements dictate REC ownership in many instances. For example, both the Value of Solar and Made in Minnesota statutes award RECs from renewable facilities subject to those statutes to the utility.

The Value of Solar statute, as an alternative to net metering, specifically awards RECs from solar generation receiving the value of solar rate to the utility providing the credit (Minn. Stat. §216B.164, Subd. 10 (i)). Likewise, the Solar Garden statute awards RECs to the utility on behalf of ratepayers via reference to the Value of Solar statute (Minn. Stat. §216B.1641, subp. d).

The Made in Minnesota Solar Energy production inventive also requires that "RECs associated with energy provided to a public utility for which an incentive payment is made belong to the utility."

Consequently, once a Value of Solar Tariff is in place, or if incentives under the Made in Minnesota program are being paid to renewable generation providers, then the RECs will accrue to the utility for the benefit of ratepayers.

The one area that appears to require clarity is for net metered facilities. Net metering is available to small generation facilities less than 40 kW. The standard net metering contract set forth in Minn. Rules pt. 7835.9910 is silent on the treatment of RECs since those rules were established

long before renewable energy credits were contemplated. In addition, the small size of these facilities, their relatively small contribution to total electricity need, and the cost of registering them in M-RETS have not necessitated resolving REC ownership issues in the past.

B. WHO OWNS THE RECS FROM NET METERED CUSTOMERS?

As noted above, Minnesota statutes dictate REC ownership under a number of circumstances and may apply to some net metered facilities. Therefore, if a customer is receiving the Value of Solar rate through the Solar Garden Tariff, or an incentive through the Made in Minnesota Program then clearly the RECs would accrue to the utility for the benefit of ratepayers.

If none of these statutory provisions apply and the contract is silent on the treatment of the RECs, the Department is unable to conclude that the utility should be awarded the RECs. In the Commission's September 9, 2010 Order in Docket E002/M-08-440, *In the Matter of Xcel Energy's Petition for a Determination of Entitlement to Renewable Attributes of Energy Purchases Pursuant to Renewable Energy Requirements* (08-400 Order), the Commission found that for "power purchase agreements entered into pursuant to [Public Utility Regulatory Policy Act] PURPA (Minn. Stat. § 216B.164), the generators own the renewable energy credits."

As indicated by Minn. Stat. §216B.164, subd. 2, net metering was established in Minnesota as a result of PURPA:

> This section as well as any rules promulgated by the commission to implement this section or the Public Utility Regulatory Policies Act of 1978, Public Law 95-617, Statutes at Large, volume 92, page 3117, and the Federal Energy Regulatory Commission regulations thereunder, Code of Federal Regulations, title 18, part 292, shall, unless otherwise provided in this section, apply to all Minnesota electric utilities, including cooperative electric associations and municipal electric utilities.

For non-solar facilities less than 40 kW, both Minn. Stat. §216B.164 and the rules governing small power production (Minn. Rules 7835.9910) are silent regarding the treatment of RECs. Further, Minn. Stat. §216B.164 was not revised to indicate that the RECs transferred to the utility under net metering, even though other changes were made to the statute regarding ownership of RECs. Consequently, the Department is unable to conclude that the RECs should be awarded to the utility. Instead, it appears that the RECs remain with the generators for facilities under 40 kW.

In its September 28, 2004 Order Establishing Standards in Docket No. E999/CI-01-1023, the Commission specifically found that for distributed generation facilities greater than 40 kW,

> A DG customer who installs a renewable DG facility should be paid the avoided cost of "green power" to the extent that installation of the DG facility allows the utility to avoid the need to purchase "green power" elsewhere. Otherwise a renewable DG facility should be paid the utility's regular avoided costs.[2]

Thus, for non-solar facilities over 40 kW, the Commission's earlier decision indicates that, if the price paid for the energy is the avoided cost of renewable energy (rather than fossil fuel energy), the RECs could be awarded to the utility.

For solar facilities, Minn. Stat. §216B.164 clarifies under subdivision 10 that RECs are awarded to the utility if the utility has a Value of Solar tariff in place. Since the statute does not award the RECs to the utility under any subdivision other than 10, the Department concludes that the RECs remain with the generator, not the utility, unless a Value of Solar tariff is in place or the generator is otherwise participating in the Made in Minnesota incentive program.

C. THIRD-PARTY OWNERSHIP OF PV EQUIPMENT AND OTHER SPECIAL ARRANGEMENTS.

The Department limits its answer to what is known at this time, namely the Solar Garden statute. If other circumstances arise, as noted above, the Solar Garden statute references the Value of Solar statute. Specifically, Minn. Stat. §216B.1641, subd (d) states:

> The public utility must purchase from the community solar garden all energy generated by the solar garden. *The purchase shall be at the rate calculated under section 216B.164, subdivision 10, or, until that rate for the public utility has been approved by the commission, the applicable retail rate.* A solar garden is eligible for any incentive programs offered under either section 116C.7792 or section 216C.415. A subscriber's portion of the purchase shall be provided by a credit on the subscriber's bill. (Emphasis added)

In referencing this subdivision of Minn. Stat. §216B.164, the Solar Garden statute is tied to the provisions of the Value of Solar Tariff. Thus, consistent with Department's related recommendations, the Department recommends that the Commission determine that RECs

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[2] In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 212, Order Establishing Standards, Docket No. E999/CI-01-1023, September 28, 2004.

should not be awarded to the utility until a Value of Solar tariff is in place, at which time the RECs would be awarded to the utility.

In general, if one of the statutory requirements applies, then the utility receives the RECs, and the facility should be registered in M-RETS by the utility.

If the utility is not receiving the RECs, then the Department concludes that REC ownership between the customer and the third party is determined by the contract between the customer and third-party and is generally not subject to the Commission's jurisdiction. However, if there is an attempt in the future to sell such RECs to a utility under the Commission's jurisdiction, then it would be necessary at that time to ensure that any such RECs comply with Minnesota Statute 216B.1691, subd. 4, such as ensuring that credits are used "only once."

Based on what is known at this time, this "only once" factor is one of the primary issues that the Commission would need to consider regarding aggregators/marketers or other sources of RECs. However, such decisions should be based on facts available in the future under any such proposals.

D. SHOULD THE COMMISSION MAKE DECISIONS ON REC OWNERSHIP?

The statutes dictate the treatment of REC ownership in many circumstances. Going forward, the Department believes the development and use of a Value of Solar Tariff as well as the availability of various incentive programs for solar energy will resolve ownership issues for future projects. For existing net metered facilities, the Commission can determine that RECs are owned by the customer in instances where no other statutory requirement exists and contract language does not specify ownership. Utilities would be free to propose a Value of Solar tariff or otherwise pursue acquisition of those RECs consistent with their RES compliance plans, should they choose to do so. Likewise, customers with RECs could pursue registration of their facilities in M-RETS and could make those RECs available for purchase.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E999/CI-13-720

Dated this **7th** day of **February 2014**

/s/Sharon Ferguson

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