



ENVIRONMENTAL LAW & POLICY CENTER
Protecting the Midwest's Environment and Natural Heritage

February 21, 2014

VIA E-FILING

Burl W. Haar
Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of a Commission Inquiry into Ownership of Renewable Energy Credits
used to Meet Minnesota Requirements, PUC Docket Number/s: E999/CI-13-720**

Dear Dr. Haar,

Enclosed herewith in connection with the above matter please find the *Joint Reply Comments of Environmental Law and Policy Center (ELPC), Fresh Energy, Izaak Walton League of America, SunEdison, and Vote Solar Initiative*. Please do not hesitate to contact me with any questions.

Sincerely,

s/ Allen Gleckner
Allen Gleckner
Staff Attorney

Enclosure

Cc: Attached Service List

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PUBLIC UTILITIES COMMISSION**

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**In the Matter of a Commission Inquiry into Ownership
of Renewable Energy Credits used to Meet Minnesota
Requirements**

Docket No. E999/CI-13-720

**JOINT REPLY COMMENTS OF
ENVIRONMENTAL LAW & POLICY CENTER (ELPC),
FRESH ENERGY (FE), IZAAK WALTON LEAGUE OF AMERICA (IWLA),
SUNEDISON (SE), AND THE VOTE SOLAR INITIATIVE (VSI).**

We appreciate the opportunity to further elaborate on our initial comments in these matters. After review of comments from other parties, we will focus on furthering the discussion around the Commission's second question from the December 30, 2013 *Notice of Comment Period*.

Who Owns the RECs from Net Metered Customers? Does it Matter Whether the QF is Being Paid the Average Retail Rate or Avoided Cost Rate?

In their February 7, 2014 filing, the Minnesota Department of Commerce, Division of Energy Resources (Department) stated three primary responses to this question:

- RECs would accrue to the utility when customers receive the benefits of programs, such as the Made in Minnesota incentive program, where statute directly dictates this transfer.
- The Department was unable to conclude in other instances that the utility should be awarded RECs in any situation where contracts are silent on the treatment of RECs, and therefore, the RECs remain with the generator.
- A 2004 order in Docket No. E999/CI-01-1023 appears to indicate that for non-solar facilities over 40 kW, if the price paid for the energy is the avoided cost of renewable energy, as opposed to the avoided cost of fossil fuel or other energy, then the utility should be awarded the RECs.

We agree with the Department's positions in this case. To their last point, it is acceptable to transfer RECs generated by PURPA qualifying facilities to the utility if the price paid utilizes a market-proxy avoided cost calculation, so long as this value comparison is between like generation types of similar size. This is independent of any net metering, generic avoided

cost, or other price floors established in statute. For example, a wind resource should be compared to the next deferrable, similar wind resource, especially in cases where regulator, programmatic, policy, or other requirements are guiding the addition of said resource.

Separately but importantly, to clarify, we also note that in net metered projects of any technology type up to 1MW, the generators should retain the REC.

In response to other parties, we wish to reiterate the points made in our initial comments in this docket.

Minnesota's practice of RECs vesting with the net metered generator aligns with nationwide best practices and the intent of the legislation "...to give the maximum possible encouragement to cogeneration and small power production..."¹

Xcel cites policy language added in 2013 Minn. Stat. § 216B.1691, Subd. 2f(f);

(f) Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after the effective date of this act but before 2020 may be used to meet the solar energy standard established under this subdivision.

Their conclusion that this language shows intent for the REC for solar facilities to be automatically owned by the utility is incorrect. Xcel and the Commission should note the word "may" in the referenced statutory language. This sentence simply clarifies that the RECs produced by solar photovoltaic installations installed between now and 2020 can be utilized for compliance by utilities, should the utility wish to enter into an agreement with the generator to procure those RECs.

We do agree with Xcel in their conclusion regarding current practices demonstrating how utilities can procure RECs. The existing Solar*Rewards program, as an example, provides the customer a payment, above and beyond the net metered rate they receive for energy and load carrying capability, in exchange for the REC. We feel it is reasonable and proper to expect the utility to bear the responsibility in this manner, to work with net metered and other REC generating customers to establish agreements with clear language indicating the terms of REC transfer when statute is not explicit.

Conclusion

We appreciate the opportunity to provide these reply comments.

¹ Minnesota Statutes 216B.164 COGENERATION AND SMALL POWER PRODUCTION. Subdivision 1. Scope and purpose.

Sincerely,

/s/ Eric Jensen
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*Submitted on behalf of Fresh Energy,
Environmental Law and Policy Center,
Izaak Walton League of America,
SunEdison, and Vote Solar Initiative.*

CERTIFICATE OF SERVICE

I, Allen Gleckner, hereby certify that I have this day served a true and correct copy of the foregoing document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, interoffice mail or by depositing said documents in the United States Mail, postage prepaid, in Chicago, Illinois.

**In the Matter of a Commission Inquiry into Ownership of Renewable Energy
Credits used to Meet Minnesota Requirements**

PUC Docket Number/s: E999/CI-13-720

Dated this 21st day of February, 2014.

s/ Allen Gleckner
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