



414 Nicollet Mall
Minneapolis, MN 55401

February 14, 2019

—Via Electronic Filing—

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

RE: IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF UPDATES TO SOLAR*REWARDS AND COMMUNITY SOLAR GARDENS PROGRAM TARIFFS & TARIFF MODIFICATIONS IMPLEMENTING RULES ON COGENERATION AND SMALL POWER PRODUCTION DOCKET NOS. E002/M-13-1015 & E002/M-16-222

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the Comments filed by the Department of Commerce regarding our December 14, 2018 Petition in the above referenced docket.

Pursuant to Minn. Stat. § 216.17, subd. 3, 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 Jessie Peterson at jessika.k.peterson@xcelenergy.com or (612) 330-6850 if you have any questions concerning this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER, DSM REGULATORY STRATEGY & PLANNING

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz
Matthew Schuerger
Katie J. Sieben
John A. Tuma

Vice Chair
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE PETITION OF
THE PETITION OF NORTHERN STATES
POWER COMPANY FOR
APPROVAL OF UPDATES TO
SOLAR*REWARDS AND COMMUNITY
SOLAR GARDENS PROGRAM TARIFFS

DOCKET NO. E002/M-13-1015

TARIFF MODIFICATIONS IMPLEMENTING
RULES ON COGENERATION AND SMALL
POWER PRODUCTION

DOCKET NO. E002/M-16-222

Reply Comments

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the Comments filed by the Department of Commerce (Department) regarding our December 14, 2018 Petition in the above referenced docket.

On February 4, 2019 the Department provided its Comments in this docket recommending approval of the Company's proposed tariff revisions for the Solar*Rewards program and:

- approval of a 30-day check-off for future contractual modifications; and
- a request to Xcel Energy to "make every effort to alert customers as to the generation requirements of each rate code prior to DG customers making any changes to their system(s)."

We appreciate the Department's thorough review of our tariff provisions. We further offer clarifications on our 30-day check-off request. The Commission's September 25, 2015 Order in Docket No. E002/M-15-650 currently permits the Company to proceed with an amended *first or second generation* Solar*Rewards Contract 32 days after it is filed with the Commission if all three of the following conditions are

met: (1) the filing amends a first or second generation Solar*Rewards Contract; (2) the filing includes a red-lined version showing the changes to the standard contract; and (3) no objection or intent to object is filed within 30 days of the filing. The Company requests that as part of our Petition the Commission allow for the same negative check-off process to apply to our *third-generation* Solar*Rewards tariff and for the *Solar*Rewards Contract for Those Receiving Solar*Rewards Incentive*.

The Company will continue to alert customers as to the PV system generation requirements applicable to each rate code prior to the DG customer making changes to existing systems.

Xcel Energy appreciates the opportunity to submit these Reply Comments and respectfully requests that the Commission approve our tariff modifications as approved by the Department.

Dated: February 14, 2019

Northern States Power Company

CERTIFICATE OF SERVICE

I, Paget Pengelly, 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-13-1015 & E002/M-16-222

Dated this 14th day of February.

/s/

Paget Pengelly
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
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Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South Minneapolis, MN 55406	Paper Service	No	OFF_SL_16-222_Official Service List 16-222
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Joshua	Smith	joshua.smith@sierraclub.or g		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
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Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
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Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_16-222_Official Service List 16-222
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-222_Official Service List 16-222
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