



414 Nicollet Mall
Minneapolis, MN 55401

April 7, 2015

—Via Electronic Filing—

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

RE: STAKEHOLDER COMPLIANCE
COMMUNITY SOLAR GARDENS PROGRAM
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Compliance Report in response to the Commission's April 7, 2014 Order (Order Point 25) submitted in the above-noted docket.

The Solar*Rewards Community Implementation Workgroup has continued to address implementation and process details since the launch of the program in December 2014. Our Compliance Report reviews discussion topics, resolved issues and challenges.

Our comments are a result of meetings held through March 4, 2015. In accordance with our March 13, 2015 letter to the Commission, the Company is holding three specific Implementation Workgroups to address policy issues in the March/April timeframe. The results of these efforts will be filed with the Commission mid-April.

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 jessica.k.peterson@xcelenergy.com or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER, DSM & RENEWABLE REGULATORY PLANNING & STRATEGY

Enclosures
c: Service List

Solar*Rewards Community Issue Tracker [Implementation Workgroup]

Last Updated: 3/15/15

CONSENSUS

Issue Number	Resolved	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
009	No	RECs for Unsubscribed Energy	12/17/14	Should Garden Operators receive the REC payment in addition to the unsubscribed energy rate for unsubscribed energy?	A. Garden Operator chooses at project outset to sell or retain RECs – If retained a MRETS account must be set up B. If Garden Operator chooses at project outset to sell RECS, they should be paid the REC price for unsubscribed Energy	A. Full Consensus B. Consensus	A. None B. Xcel Energy – Not supported by the Order or Tariff Suggested that parties include in 3/2 Comments	A. If operator retains the RECs and later wants to sell the RECs, there is no existing tariff governing the later purchase of these RECs. A contract amendment will not work, and XE would need to file a new rate for PUC approval. Or, operator could sell these on the market at a market-based rates. B. No REC payment will be paid until Commission determines REC price.	April 7, 2014 and Sept. 17, 2014 Orders; Docket 13-720 Order of July 22, 2014; Section 9 Sheet 85
007-B	Yes	Location: Address Validation	12/17/14; 2/18/15; 3/4/15	If host site change is required for any reason, should the application start completely over and be subject to new terms, conditions and rates should the utility program change during this time?	Applicants will strive to provide a valid address for each garden. If, upon a change in CSG address, applicant can provide documentation from the permitting authority that the change was not due to a change in the PV system connectivity, service meter location, or physical location, but rather due to something outside of the Operator's control, the applicant will be permitted to continue through the process	Full Consensus	None		September 17, 2014 Order Section 9, Sheet 64.1 Section 9, Sheet 67

Issue Number	Resolved	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
005	Yes	Subscription Transfers (for Subscribers)	12/7/14	Process: 1. If a subscriber moves from a program perspective the original subscription is no longer valid. 2. The Garden Operator will need to add a new subscription to the online subscriber management system and the 120% rule will be applied as with any new subscription. 3. If the original subscription size does not comply with the 120% rule, the subscription size will have to be reduced so that it does comply.		Consensus reached on process	Some parties remain concerned with how XE calculates premise assumptions.	TBD	
004	Yes	Subscription Disclosure	12/3/14	Must Operators still use disclosure documents/process from the April 7 th Order?	Yes, this still remains true except that it is part of the tariffed contract. A disclosure form has been circulated for Operator use.	Full Consensus		Disclosure Form distributed to Stakeholder Group; CERTS documentation added to Xcel Energy website	April 7 th Order & Section 9 Tariff
002	Yes	Annual Reporting	10/1/2014	Tariff currently requires audited financial statements including balance sheet, income statement and uses of funds statement	Don't require this of Solar Operators nor make public.	Consensus		This will need to be addressed within contract negotiations. Once one contract has been adjusted it will be offered to all Operators, and will be filed for Commission approval.	Section 9

Issue Number	Resolved	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
010	No	Queue Transparency	2/4/15	<p>Transparency in the DG queue would help increase efficiency for solar developers in the interconnection process.</p> <p>More transparency is needed in order to move these projects forward or withdraw applications</p>	<p>A. Pre-registration process B. Online Map C. Additional Information</p> <p>At minimum Garden Operators need:</p> <ol style="list-style-type: none"> 1. Capacity of projects ahead of us in the queue 2. Substation capacity/Transformer size 3. Minimum daytime load <p><i>*Prior to paying studies the above would be requested; discussed within scoping meeting*</i></p> <ol style="list-style-type: none"> 1. Timelines, Stages of projects ahead of you (estimated time of when the other projects will be complete) 2. Planned system upgrades 	Consensus	Xcel Energy notes mapping isn't currently possible due to physical security and not required under a uniform state interpretation of Section 10.	Xcel Energy to review further for discussion on 4/1/15	
011	Yes	Bill Credit Rate – Process	3/4/15	How should the billing rate be adjusted in the future?	<p>2015: March ARR filing, April 1 Effective Date Future: February ARR filing, April 1 Effective Date Proposed by Xcel Energy in 3/2/15 Filing</p>	General Support on direction		Expect Comment Period on Rate by the MPUC	
012	Yes	When can Xcel Energy provide information on particular Garden Operators?	3/4/15	Questions are being raised by subscribers as to who to contact for subscriptions. Garden Operators retain that it is still too early in the process	Garden Operators will be added by county and including email address once an interconnection agreement has been signed	Consensus		Xcel Energy to add upon signing of interconnection agreements	

NON- CONSENSUS

Issue Number	Resolved	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
008	Yes	Existing Section 10 Applications and Process	Various	Current rule states that existing applications will continue within the Sec. 10 process regardless of when they enter the SRC program	Section 10 projects should have to redo interconnection as a SRC project	Strong Support but significant opposition		Resolved	Commission Order: By Tariff by date of Application Completeness
006	No	RECs in years 11-25 for S*RC + Made in MN	12/17/14	What will happen to the RECs for MiM projects participating in S*RC		None		This is an issue for both S*R and MiM outside the S*RC program. Suggested that parties include in 3/2 comments.	
001	Yes	Subscriber Definition	10/1/2014	Is the current definition appropriate?	Adjust the definition.	None		Resolved	Commission Order: XE to add further information to website

FURTHER DISCUSSION NEEDED

Issue Number	Resolved	Issue	Stakeholder Meeting	Details	Proposal	Stakeholder Consensus	Dissent	Next Steps	Corresponding Rule
007-A	No	Definition of Incomplete	12/17/14	Tariff defines when an application is complete, but it does not define when changes in an application make the application "incomplete". Complete/incomplete application status matters for interconnection process and applicability					
003		Marketing Guidelines	12/3/14	Who shall provide Marketing Guidelines? Xcel Energy or Developers.					
013		Cost sharing between Garden Operators for system upgrades	3/4/15	Garden Operators want further information in order to potentially cost share in system upgrades	See Issue #014				

Please note this is an ongoing document and changes per Implementation Workgroup Meeting. It is not intended to be final unless noted.

CERTIFICATE OF SERVICE

I, Tiffany Hughes, 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

xx electronic filing

Docket No. E002/M-13-867

Dated this 7th day of April 2015

/s/

Tiffany Hughes
Records Analyst

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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