

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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In the Matter of the Petition of Northern
States Power Company, d/b/a Xcel Energy,
for approval of its proposed Community
Solar Gardens Program

Docket No. E-002/M-13-867

COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC.

The Interstate Renewable Energy Council, Inc. (IREC) submits these comments in response to a Notice issued on May 1, 2015 by the Minnesota Public Commission (Commission) in the instant docket.

As noted in earlier comments, the Interstate Renewable Energy Council, Inc. (IREC) is an independent, 501(c)(3) non-profit organization with a mission to increase consumer access to renewable energy. We accomplish this, in part, by providing technical expertise on a number of regulatory topics, including both shared solar and interconnection. IREC has been particularly instrumental in guiding the interconnection reform process in numerous states, most recently in California, Ohio, North Carolina and Illinois. Through this work, we have used our national perspective and experience to improve efficiency and decrease costs, while ensuring the safety, reliability and power quality of the grid. IREC is very familiar with the renewable energy growth issues that Minnesota faces and we have been extensively involved in this docket, most recently by providing comments on February 24, 2015. In the following comments we focus on key short-term and longer-term interconnection recommendations that IREC believes are critical to ensure safe and sustainable growth in Minnesota's renewable energy market.

In reviewing parties' recent comments, in addition to conversations with parties outside of the docket, it seems apparent that Minnesota's current interconnection process is hindering the success of the State's recent, nationally recognized community solar gardens (CSG) program. Commenters seem to highlight challenges associated with process clarity and lack of information from the utility. The Solar Garden Community (SGC) remarked, that its members have experienced obstacles resulting from unclear expectations regarding one-line diagrams and site plans, an ambiguous queuing process and an inability to target optimal siting locations on the grid.¹ SunShare further expressed its frustration due to the apparent lack of consistency regarding Xcel meeting required timelines.² The Division of Energy Resources (DER) noted that it has heard concerns from developers that a project may be subject to delay if a project ahead of them in the queue experiences delays.³ In light of these early challenges, the DER hypothesized that, "[g]iven the very slow pace of Xcel's interconnection process, it is possible that no community solar gardens will be operating by the end of the year."⁴

As noted in IREC's February 24, 2015 comments, as well our December 1, 2014 comments submitted with the Environmental Law and Policy Center and Vote Solar (collectively, the "National Groups"), we again emphasize that robust, efficient interconnection procedures are essential to a successful CSG program. In IREC's February comments, we provided specific recommendations for both near-term and longer-term reform measures that the Commission could adopt to improve Xcel's interconnection process. Based on the challenges

¹ SGC Reply Comments from April 30, 2015, at 3 and 5.

² SunShare Reply Comments from April 30, 2015, at 2.

³ DER Reply Comments from May 1, 2015, at 9.

⁴ *Id.* at 10.

that developers have noted in just the initial phases of the interconnection process, we thought it would be helpful to summarize these recommendations again.

IREC continues to believe our near-term recommendations will make a positive impact in the efficiency and overall interconnection process for both utility and developer. These included requiring Xcel to:

- 1) Report information sooner or more frequently for CSG projects, which would provide developers with more locational information and greatly improve the clarity of the interconnection queue;
- 2) Develop an electronic, web-based platform for interconnection application processing and data tracking, which would improve the speed and transparency of the application process and help both utilities and developers meet timelines; and
- 3) Provide adequate information to direct solar development to optimal locations on the grid, potentially via electronic maps. This would likely allay the concerns of the SGC regarding developers' inability to locate optimal siting.

IREC also strongly agrees that the availability of a pre-application report in the near-term could greatly enhance the efficiency and transparency of the process, as suggested by several parties and agreed to by Xcel.⁵ In fact, this is a best practice now in place in several other states' procedures, as well as the Federal Energy Regulatory Commission (FERC) Small Generator Interconnection Procedures (SGIP). Based on Xcel's April 28 Supplemental Comments, it

⁵ See, e.g., SGC Reply Comments from April 30, 2015 at 5; Xcel April 16, 2015 Compliance Filing, at Attachment A, p. 10.

appears that at least some of these issues are being carefully considered in the Solar*Rewards Community Implementation Workgroup and that consensus solutions may be possible.⁶

Additionally, IREC recommended in our February comments that Xcel should coordinate with Midcontinent Independent System Operator (MISO) if a CSG project warrants additional review to determine potential transmission impacts.⁷ It appears from Xcel's April 28, 2015 comments that this issue has been discussed at length and has been referred to a subgroup for further discussion and refinement.⁸

IREC commends the Implementation Workgroup and appreciates these efforts to find solutions. Despite this constructive dialogue, however, IREC believes that resolving these challenges in a timely manner may require some additional direction from Commission requiring Xcel to incorporate the suggested reforms into its process. With so many CSG projects and their participating customers eagerly waiting in the queue, it is especially important to make some near-term improvements to help move these projects forward.

Regarding longer-term reform efforts, IREC continues to underscore the importance of more comprehensive interconnection reform. Recent best practice measures adopted by California, Massachusetts, Ohio and FERC are having a transformative and positive impact on utilities' ability to process applications in an efficient manner. Published queue data suggests that California's Pacific Gas & Electric utility, for example, was able to interconnect 44% more projects on a "Fast Track" basis—projects that would have previously required a lengthy and

⁶ Xcel Supplemental Comments from April 28, 2015, at 5-6.

⁷ IREC Initial Comments from Feb. 24, 2015, at 4-10.

⁸ Xcel Supplemental Comments from April 28, 2015, at 5.

costly additional study under the State's previous interconnection procedures.⁹ Well-vetted interconnection procedure models, such as the FERC SGIP or IREC's *Model Interconnection Procedures*, are based on practical input from experienced utility engineers who work in high-penetration solar states such as California.¹⁰ Adopting a best-practice model could avert additional interconnection challenges now and down the road, as penetrations of renewable energy increase, while still ensuring the safety and reliability of the system. In the end, interconnection is a foundational policy that not only supports CSG development but Minnesota's broader renewable energy economy, as well.¹¹

As IREC also noted, further longer-term efforts that would be particularly useful to Minnesota include the recent innovations of distribution group studies and Integrated Distribution Planning (IDP).¹² Group studies and IDP can proactively address issues of cost allocation, identification of optimal grid locations and the integration of distributed energy resources into distribution system planning, and, in doing so, provide for a much more efficient interconnection process. As solar penetrations increase, these solutions may become increasingly necessary.

In conclusion, we commend Minnesota for its progressive and proactive CSG program.

IREC believes that interconnection reform will be critical to the ultimate success of the program

⁹ See, e.g., Passera, Laurel, *The Proof of the Interconnection Reform is in the...Data*, IREC (Aug. 14, 2014) available at <http://www.irecusa.org/2014/08/the-proof-of-the-interconnection-reform-is-in-the-data/>.

¹⁰ FERC, Small Generator Interconnection Agreements & Procedures, 78 Fed. Reg. 73,240 (Dec. 5, 2013), available at <http://www.gpo.gov/fdsys/pkg/FR-2013-12-05/pdf/2013-28515.pdf>; IREC Model Interconnection Procedures (2013), available at www.irecusa.org/wp-content/uploads/2013-IRECInterconnection-Model-Procedures.pdf.

¹¹ See D. Steward and E. Doris, *The Effect of State Policy Suites on the Development of Solar Markets*, National Renewable Energy Laboratory (Nov. 2014), available at <http://www.nrel.gov/docs/fy15osti/62506.pdf> (finding that good interconnection policies are "foundational" and that states without good procedures struggle to create robust markets).

¹² IREC Initial Comments from Feb. 24, 2015, at 12-13.

and we appreciate the efforts of Xcel and others for engaging in this constructive dialogue. We would be happy to address any additional questions the Commission may have on these issues.

Respectfully submitted this 18th day of May, 2015,

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CERTIFICATE OF SERVICE

I, Kimberly Kooles, hereby certify that I have this day served copies of the foregoing document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at Cary, North Carolina.

DOCKET NO. E-002/M-13-867

Dated this 18th day of May 2015.

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