

STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

In the Matter of Xcel Energy Energy's Plan for a Community Solar Garden Program
Pursuant to Minn. Stat. §216B.1641

From Juliet Branca and Mark Thoson, unaffiliated ratepayers

Commissioners,

We appreciate the opportunity to share our point of view on the matter before you. Since learning of the statute nearly two years ago, we have been anxious to participate. Originally our interest was solely as subscribers but we have developed what we believe is a powerful new way to utilize Community Solar Gardens as well.

We are engaged in a project called SHINE, (Solar Harvesting Is Now for Everyone). Its purpose depends on the availability of subscriptions to Community Solar Gardens. In short, we are volunteering our time to connect environmental philanthropists with charitable nonprofits to maximize their gifts while supporting clean energy. We both serve on the board of Humanists of Minnesota and on May 16th, Humanists of MN presented a dedicated gift to Tubman for the purchase of subscriptions in a Community Solar Garden. This method of philanthropy becomes doubly potent, supporting the charity while turning its energy use green. It is our intent

to replicate this idea through SHINE with other philanthropists and nonprofits as many times as possible. Our website is shinecommunity.org. We accept no compensation for our work.

Tubman is very excited about this gift. Besides the excellent work they do in family crisis and support services, this gift opens up a new funding avenue, reaching out to environmental philanthropists who want to leverage their gifts into other areas at the same time. Additionally, our informational presentation to Tubman about this gift inspired it to consider solar installations of their own where possible.

Early in 2014 we became concerned by ways in which Xcel was attempting to limit the program. We prepared a statement of our concerns and Mark read it to you at your February 18, 2014 hearing. (Text reprinted below) We were impressed and encouraged by the PUC's response, protecting the public's growing desire for clean energy and not accepting limits to the number of megawatts included in the program.

Recently our concerns have intensified once again because of Xcel's unilateral action to limit participation by co-located gardens. We believe that Xcel's notification to the PUC on 4/28/2015 indicating its intent to restrict all co-located Solar Gardens to a single megawatt is another attempt to control the energy market for its own profit. The evidence for this is clear in its promotion of its own intent to increase production of solar energy for 40,000 households by the end of 2016 in emails to subscribers enrolled in the program. This action, is of great concern to us as consumers as well as advocates for solar expansion. By limiting the program to only 1 MW stand alone gardens, the available subscriptions for large non-profits could be severely decimated making our initiative untenable.

It is more than ironic that Xcel puts itself in the position of interpreting the intent of the legislation in this way. It appears to us that one intent of the legislation is to force energy providers to move more quickly to sustainable and less polluting sources. That is something Xcel has not sufficiently or quickly enough done on its own. It also seems to us that it is the PUC's authority which is the interpreter of the legislation at this point, not Xcel's.

We need all the clean energy we can generate in order to be able to reduce the release of CO₂ which is the primary cause of climate change and ocean acidification. This needs to be done world-wide and Xcel, through Minnesota's legislature, has been given a chance to lead by example in this regard. It would be in the interest of all Xcel's customers, residents and businesses alike, to facilitate as much solar power as the clamoring public is obviously ready for. The demand for solar is rising because people are waking up to the real danger we are facing. Xcel should not be standing in the way of Community Solar Gardens that serve nonprofits, larger businesses, schools, hospitals, or any other entities that are interested. It should be joining with the enthusiastic developers of solar power in MN to, as rapidly as possible, shift to any non-polluting energy source.

We as ratepayers, have no financial interest in the success or failure of the Community Solar Garden Program. We have however, seen great potential in this program to enhance quality of life, reduce pollution, create jobs, lessen the reliance on fossil fuels, and motivate the public to take personal initiative in all these benefits. The unexpectedly large rush and interest by solar developers to take advantage of this opportunity is not only financially viable at this time, it is also an indication that the reason that they are involved with solar in the first place has been accommodated by the statute in exactly the right way.

We are not blind to the complexities of this new initiative in Minnesota. The intent to give the general public a less expensive way to participate in clean solar energy while stimulating growth and jobs in the industry is worth the effort though. And while it is easy to see that a giant energy company like Xcel will be wary of competition, we urge the commission to hold them accountable to their word. Co-location of gardens for the benefits of scaled construction was agreed to by Xcel and should move forward as quickly as possible. Not to do so may set back the solar industry in Minnesota for years.

The window of incentives from Federal and State programs is finite and under attack. Delay or severe limits to construction of solar power imposed on developers by Xcel becomes a frightening benefit for the utility in the form of potentially crushing the

alternative, larger producers of energy whom it must see as competition. That delay may also be an unconscionable use of comment periods, contentious panels, and perhaps even litigation to wait out the government incentives in hopes that they expire.

While we empathize with the need for corporations to enhance and protect profit, the global hazards that CO2 presents must come first. Each hour that passes, tons of hazardous materials are being dumped into the atmosphere. Meanwhile, we all live in a political environment which favors mega-corporate interests and limits their liabilities for the harm that they do. Those of us who don't have lobbyists or lawyers or big bank accounts have little hope of making lasting change to the environment without the assistance of forward thinking legislators and regulators like yourselves, our representatives on the PUC. We are counting on you to press this initiative forward.

The statute states that the commission has the power to approve, disapprove or modify the Community Solar Garden Program. We urge you to use this power to bring as much solar power online through this program as is feasible and as quickly as possible. We need you to keep the "power-full" in check and give us a more effective voice. The individual subscribers, advocates for clean energy, developers of solar energy, and even larger more responsible businesses are all poised to get busy with the necessary work. We must get on with the monumental task of righting the mistakes of the past and cleaning our air. Please act with all haste to help us make a difference. There is no time to waste. Thank you.

Juliet Branca and Mark Thoson

Board members of the Humanists of Minnesota,

Neighbors in Saint Paul

Homeowners and Xcel ratepayers

Advocates for sustainable energy at shinecommunity.org

PUC Statement 2-18-2014 (reprint)

My name is Mark Thoson and I am a homeowner and Xcel ratepayer from Saint Paul. I believe I represent many Minnesotans who want to utilize solar energy and support renewable energy solutions but have not found a way to do so for a variety of reasons. My home and garage do not have south facing roofs and there are trees that would make solar installations ineffective. I also have limited financial means with which to purchase my own solar panels. I would however, dearly appreciate the opportunity to join in a subscription to a solar garden for at least some of the energy I use.

I also believe I have found a different path for making a positive environmental change through solar gardens. As a board member of the Humanists of Minnesota, a small non-profit corporation with about 200 members, I am certain that a substantial number of our membership would also take advantage of a solar garden as a collaborative membership activity. As a person with administrative, writing and speaking skills, I have identified a way in which our organization could become involved in a solar installation that is likely to be up-scalable to other non-profits, schools, businesses and civic groups. It may well be that the number of interested persons like myself with limits to physical structure and finances could join together to drive an increase in the use of solar technology that could lead Minnesota into the very forefront of the industry nationwide.

However, I am concerned that some of Xcel's solar garden policies will once again delay and/or make my participation unlikely. If Xcel excessively limits the rate of compensation per watt, the length of subscriber leases or the allowable annual power generation attributed to Solar Gardens, those restrictions would have a severely dampening effect on the participation of individuals like myself. Fair compensation, the ability to recoup small investments and the development of solar gardens determined by an unrestricted, competitive and free market are essential components to a successful

strategy of moving the population into this exceptional opportunity as mandated by the Minnesota State Legislature.

In short, if Xcel is concerned about handling the changes to the electrical grid which solar gardens might cause, the solution does not lie in slowing down the public participation. The solution lies in improvements to the grid's infrastructure and technical prowess. The dividends of that investment are immense and essential to our response to changing climate. Please keep the route to participation in renewable energy as open and viable as possible for individuals as well as organizations and industry .Thank you.

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