

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

Nancy Lange
Dan Lipschultz
Matthew Schuenger
Katie Sieben
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Petition of Northern States
Power Company, dba Xcel Energy, for Approval
of a Customer Access Joint Pilot Program

Docket No. E-002/M-17-527

**REPLY COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL,
INC. ON XCEL ENERGY'S PETITION FOR APPROVAL OF A CUSTOMER ACCESS
JOINT PILOT PROGRAM**

I. INTRODUCTION

In response to the Commission's July 10, 2017 notice soliciting comments on Xcel Energy's Petition for Approval of a Customer Access Joint Pilot Program (Petition), seven parties, including the Interstate Renewable Energy Council, Inc. (IREC), filed initial comments.¹

¹ In addition to IREC, these parties were: Minnesota Department of Commerce, Division of Energy Resources (DOC); Fresh Energy; Environmental Law and Policy Center (ELPC); Joint Commenters (comprised of Cooperative Energy Futures, Minnesota Solar Connection, and Novel Energy Solutions/Minnesota Community Solar); Clean Energy Access Coalition (comprised of Institute for Local Self-Reliance (ILSR) and allied signers Cooperative Energy Futures, Rural Renewable Energy Alliance, Clean Up our River Environment, Community Power, Minnesota Interfaith Power & Light, ISIAAH, and Minnesota Public Interest Research Group); and Ampion.

IREC has reviewed these initial comments and submits these reply comments pursuant to the Commission's notice.²

II. RESPONSES TO PARTY COMMENTS ON COMMISSION QUESTIONS

Parties generally support Commission approval of Xcel's low-income pilot proposal and praise the ways in which it promises to overcome barriers faced by low-income customers.³

However, parties also raise certain critical issues that warrant Commission attention prior to pilot approval.

A. Additional Detail Regarding Scaling the Pilot Program Is Required.

Along with IREC, Fresh Energy, ELPC, Joint Commenters, and Clean Energy Access Coalition all highlighted that Xcel's program, as proposed, would serve only a small segment of low-income customers and Xcel provides no details regarding how it would grow the program beyond the pilot stage.⁴ Fresh Energy and ELPC suggested that Xcel be required to file a detailed plan to scale its program within six months of an order approving the pilot.⁵ IREC supports Fresh Energy's and ELPC's recommendation. Fresh Energy also suggested a number of specific communities in which Xcel's program model may be expanded and IREC encourages the Commission to require Xcel to address these possible opportunities in its filing.⁶

² On August 16, 2017, the Commission issued a Notice of Extended Comment Period, extending the reply comment deadline to September 25, 2017.

³ IREC Comments at 4-7; DOC Comments at 4; Fresh Energy Comments at 2-6; ELPC Comments at 4-6; Joint Commenters Comments at 2-3; Clean Energy Access Coalition Comments at 1-3.

⁴ IREC Comments at 5-6; Fresh Energy Comments at 2-5; ELPC Comments at 5-6; Joint Commenters Comments at 2; Clean Energy Access Coalition Comments at 2-3.

⁵ Fresh Energy Comments at 7-8; ELPC Comments at 5; *see also* IREC Comments at 5-6 (making a similar recommendation that the Commission require a supplementary filing from Xcel).

⁶ Fresh Energy Comments at 3-5, Att. A.

B. Xcel's Bill Crediting Approach Raises Issues Related to Discriminatory Treatment and Requires Modification.

Parties identified discriminatory and anti-competitive concerns associated with Xcel's bill crediting approach, specifically related to its presentment of one net value on a participant's bill and its use of on-bill repayment.⁷ While IREC believes the Commission could still approve the initial pilot project despite these concerns, we agree that they are significant, and will only become more so as Xcel scales its program. At the least, IREC urges the Commission to require Xcel to address them in its scaling plan, and to allow parties to comment on that plan and Xcel's proposals to mitigate these issues. In its plan, Xcel should be required to respond to parties' suggestions, as expressed in their initial comments in this proceeding, on how to address these discriminatory concerns. Generally, IREC also continues to encourage the Commission to require Xcel to explain how its three non-discrimination principles will evolve as the program grows.⁸

On the topic of net bill credit presentment, IREC agrees that allowing Xcel to present a net value undermines transparency for customers, such that they cannot understand or compare the costs and value associated with their subscriptions, and thus also insulates Xcel from any market competition, especially since this net credit option is not available to non-utility providers.⁹ Therefore, IREC supports parties' suggestion that Xcel be required to separate the

⁷ Fresh Energy Comments at 9; ELPC Comments at 5, 7; Joint Commenters Comments at 3-5; Clean Energy Access Coalition Comments at 4; Ampion Comments at 2-3.

⁸ See IREC Comments at 9-14; *see also* Fresh Energy Comments at 8-9 (support non-discrimination principles but urge Commission to keep reviewing since these issues are likely to be more sensitive as program grows, especially as projects occur based on different types of proposals/arrangements).

⁹ See Fresh Energy Comments at 9; ELPC Comments at 5; Joint Commenters Comments at 4-5; Clean Energy Access Coalition Comments at 4; Ampion Comments at 2-3.

bill credit from the charge, although IREC recognizes that this may detract somewhat from simplicity in bill presentation.

Regarding on-bill repayment, parties point out that third-party providers do not have the same access to consolidated billing.¹⁰ Whereas Xcel can present both the charges and credits for a customer on a single bill, and thus effectively recover its costs on the customer's bill, third-party providers must charge customers separately. IREC agrees that this disparity is problematic and discriminatory for third-party providers, and that the Commission should address these concerns by allowing third-party providers access to the same streamlined billing treatment. IREC and other parties highlighted the value of on-bill repayment (and on-bill financing) in Docket No. E-002/M-13-867 in overcoming barriers to access for low-income customers, and we encourage the Commission to explore this concept further. While IREC appreciates that on-bill repayment in isolation may not fully enable non-utility providers to serve low-income customers more effectively,¹¹ IREC suggests it should be considered in tandem with other mechanisms, as discussed further in the section below.

C. There Are Additional Mechanisms That Could Be Put in Place to Facilitate Broader Low-Income Customer Access.

Many parties, including IREC, Fresh Energy, ELPC, Joint Commenters, and Clean Energy Access Coalition, emphasized that approval of Xcel's pilot proposal should not come at the expense of continuing to explore ways to expand access for low-income customers more broadly, including through non-utility providers.¹² In addition to comments filed previously in

¹⁰ ELPC Comments at 7; Joint Commenters Comments at 3-4; Clean Energy Access Coalition Comments at 4; Ampion Comments at 2-3.

¹¹ See DOC Comments at 3.

¹² IREC Comments at 4, 6-7, 15-17; Fresh Energy Comments at 2-6, 10-11; ELPC Comments at 4-6, 8-9; Joint Commenters Comments at 5-9; Clean Energy Access Coalition Comments at 1-5.

Docket No. E-002/M-13-867, the principles and comments filed by ILSR and its allied signers in this proceeding, and parties' comments in response, provide several promising avenues to pursue. IREC encourages the Commission to continue to consider these options within Docket No. E-002/M-13-867.

D. Additional Reporting Requirements Are Necessary.

Parties generally supported Xcel's proposed reporting elements and suggested several other components that the Commission should require Xcel to incorporate. In particular, IREC and other parties emphasized the importance of clear and detailed reporting on community solar gardens (CSG) costs.¹³ Such cost data may help the Commission and stakeholders to understand the value of Xcel's program generally and to low-income participants specifically, and inform any necessary modifications (e.g., if costs seem too high). Beyond these cost reporting measures and the other, additional requirements IREC suggested in our initial comments,¹⁴ we agree the Commission should require Xcel to report on:

- Actual program performance and participation within Petition Table 3.¹⁵
- Project implementation actions, sorted by project partner.¹⁶
- Customer interest and disinterest, as described by Fresh Energy, as well as participant turnover rates.¹⁷
- Number of housing units served, sorted by type of housing stock.¹⁸

¹³ IREC Comments at 18; Fresh Energy Comments at 12; ELPC Comments at 5, 8-9.

¹⁴ IREC Comments at 17-19.

¹⁵ Fresh Energy Comments at 11.

¹⁶ Fresh Energy Comments at 12.

¹⁷ Fresh Energy Comments at 12; ELPC Comments at 9.

¹⁸ Fresh Energy Comments at 12.

- Conservation Improvement Program (CIP) reporting requirements, as suggested by DOC.¹⁹

IREC also agrees with Joint Commenters that reporting on the number of low-income subscribers in Xcel's Solar*Rewards Community program would be valuable to understanding how well the program is serving those customers.²⁰ IREC would support such reporting so long as any necessary privacy protections are in place for participating customers. We also suggest that it may be appropriate for that data to be reported separately, within Xcel's general Solar*Rewards Community reporting, rather than within reporting for this pilot program.

E. There Are Other Issues Requiring Clarification and Modification.

IREC agrees with Fresh Energy that at least three additional issues require clarification or modification with respect to Xcel's Petition. First, Xcel should provide additional detail regarding the process for verifying eligibility for the Low-Income Home Energy Assistance Program (LIHEAP).²¹ Second, Xcel should clarify its assumptions regarding energy savings achieved through the energy-efficiency component of its proposed pilot program, which will affect how it sizes customers' CSG subscriptions.²² And third, Xcel should consider targeted outreach to multifamily residents, who, as a class, could benefit particularly from access to CSG offerings, both in this initial pilot phase of its program and going forward.²³

¹⁹ DOC Comments at 3-4.

²⁰ Joint Commenters Comments at 6-7, 10 (referring to ILSR Comments at 2 (March 1, 2017)).

²¹ Fresh Energy Comments at 15.

²² Fresh Energy Comments at 15.

²³ Fresh Energy Comments at 5.

III. CONCLUSION

In closing, IREC notes that several parties, including IREC, disagreed strongly with Xcel's mischaracterization of Minnesota's community solar gardens program.²⁴ IREC again urges the Commission to reject Xcel's statements in this regard. We commend the Commission's efforts to develop a robust CSG program in Minnesota and to continue to explore modifications to make this successful program accessible to all customers, including low-income customers.

IREC appreciates the opportunity to submit these reply comments and looks forward to continuing our participation in this proceeding and the ongoing community solar gardens docket (E-002/M-13-867).

DATED: September 25, 2017

SHUTE, MIHALY & WEINBERGER LLP

By: /s/ Erica S. McConnell
ERICA S. McCONNELL

Attorneys for Interstate Renewable Energy
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²⁴ IREC Comments at 19-22; Fresh Energy Comments at 13-15; ELPC Comments at 10; Clean Energy Access Coalition at 3-4.

CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 396 Hayes Street, San Francisco, CA 94102.

On September 25, 2017, I served a true and correct copy of

REPLY COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL, INC. ON XCEL ENERGY’S PETITION FOR APPROVAL OF A CUSTOMER ACCESS JOINT PILOT PROGRAM

on the parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC FILING: I caused a copy of the document(s) to be sent to the e-mail addresses of the persons designated as accepting electronic service on the Official Service List by using the eService feature of the eFiling application of the Minnesota Public Utilities Commission.

BY MAIL: I enclosed the document(s) in a sealed envelope addressed to the persons designated as requiring paper service on the Official Service List. I am readily familiar with Shute, Mihaly & Weinberger LLP’s practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on September 25, 2017.

/s/Amy Zehring
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