



# Sundial Solar

*A Brighter Idea*

## STATE OF MINNESOTA PUBLIC UTILITIES COMMISSION

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

Docket Number **E-002/M-13-867**

### **In the Matter of Xcel Energy's Plan for a Community Solar Garden Program**

Dear Commissioners,

Sundial Solar, like much of the solar community, has a vested interest in these proceedings. Sundial has many community solar projects in its plans.

However, contrary to many comments you have received, **Sundial supports Xcel Energy** and its announcement of April 28 in which it plans to disallow applications for community solar gardens of more than 1MW per site. The original legislation's intent was clearly to support a community – oriented approach to the development of solar gardens by imposing a 1MW limit to the size of any one array. Giant multi-megawatt arrays as proposed by Sun Edison, SoCore, Sunshare, TruNorth, and others is clearly NOT within the intent of the original legislation.

The problem is “common coupling”. While the PUC ruled that common coupling should be allowed, the original language of a 1MW cap on solar gardens remained a keystone of the program. If it was the Commission's intention of allowing giant multi-megawatt arrays to qualify for the community solar program via common coupling, then why limit any garden size to 1MW?

**If the Commission allows stacking of multiple 1MW arrays on a single site then it is clearly violating the intention of the 1MW size limit in the original legislation.**

The use of common coupling should be allowed, but only up to a maximum of 1MW per site. In our opinion the stacking of multiple 1MW arrays on the same site using common-coupling is an attempt to game the system, plain and simple. Such multiple megawatt solar arrays are not “community solar” at all – rather, they are **utility scale solar**.

Simply ask how many subscribers each of these giant arrays has lined up and you'll discover just how little “community” there is in these plans. The vast majority of them are designed only for very large organizations, to the exclusion of homeowners and small businesses.

To be clear, Sundial feels there is a need for large multi-megawatt solar farms and there should be a mechanism to provide for them. But to allow these huge arrays into the present community solar program is not within the original legislative intent nor in the public interest.

Respectfully–

Jon Kramer, CEO