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May 6, 2016

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/CI-15-755

Dear Mr. Wolf:

On December 23, 2015, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period in the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities*.

Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rates Analyst

SLP/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E999/CI-15-755

I. BACKGROUND INFORMATION

This docket is an outgrowth of a complaint filed by a distributed generation customer of People's Energy Cooperative regarding the imposition of a \$5 per month 'facility fee' on the customer's distributed generation facility. (Docket No. E132/CG-15-255). In that proceeding, other electric utilities were identified as charging similar fees on distributed generation customers.

On October 13, 2015, the Minnesota Public Utilities Commission (Commission) opened a docket to collect information about charges imposed on distributed generation customers and issued a notice to all investor-owned, cooperative and municipal utilities seeking information on fees charged to net metered customers prior to July 1, 2015.¹ The table below lists the utilities that indicated they impose a monthly fee on qualifying facilities (QF):

¹ Minn. Stat. §216.164, subd. 3(a) was amended by the Minnesota Legislature effective July 1, 2015 to state "a cooperative electric association or municipal utility may charge an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement...."

Table 1
Summary of QF Charges

Company	Monthly Fee
Connexus	\$2.65
Mille Lacs Coop.	\$4.50
Goodhue	\$3.00
Minnesota Power	<40 kW: \$2.55 ≥40 kW to ≤ 100 kW: \$3.57
OTP	\$3.70
Xcel Energy	Net Energy Bill, single-phase: \$3.15 Net Energy Bill, 3-phase: \$6.40 Purchase & Sale, single-phase: \$5.50 Purchase & Sale, 3-phase: \$8.00 TOD Purchase, single-phase: \$5.50 TOD Purchase, 3-phase: \$8.00

II. SUMMARY OF THE INVESTIGATION

As noted above, on October 13, 2015, the Commission opened a docket to collect information about charges imposed on customers with distributed generation that are not imposed on other customers.

On December 23, 2015, the Commission issued a Notice of Comment Period seeking comment on whether imposing a charge on customers with distributed generation systems interconnected to a cooperative or to a municipal utility prior to July 1, 2015, or to a public utility, was permissible under Minn. Stat 216B.164 and/or Minn. Rules 7835.3000. If permissible, the Commission sought comment on the reasonableness of the charges of Connexus Energy (Connexus), Goodhue Cooperative Electric Association (Goodhue), Mille Lacs Electric Cooperative (Mille Lacs Co-op), Minnesota Power, Otter Tail Power (OTP), and Xcel Energy.

III. DEPARTMENT ANALYSIS

A. *DO MINNESOTA STATUTES PERMIT THE IMPOSITION OF AN ADDITIONAL CHARGE ON DISTRIBUTED GENERATION CUSTOMERS INTERCONNECTED WITH A PUBLIC UTILITY OR, PRIOR TO JULY 1, 2015, WITH A COOPERATIVE OR MUNICIPAL UTILITY?*

Minn. Stat §216B.164 sets out the statutory requirements for utilities regarding cogeneration and small power production. Minn. Stat. §216B.164, subd. 3(a) addresses the rate treatment of small qualifying facilities (less than 40 kW) interconnecting with cooperatives and municipalities and states:

(a) this paragraph applies to cooperative electric associations and municipal utilities. For a qualifying facility having less than 40-kilowatt capacity, the customer shall be billed for the net energy supplied by the utility according to the applicable rate schedule for sales to that class of customer. A cooperative electric association or municipal utility may charge an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement. Any additional charge by the utility must be reasonable and appropriate for that class of customer based on the most recent cost of service study. The cost of service study must be made available for review by a customer of the utility upon request. In the case of net input into the utility system by a qualifying facility having less than 40-kilowatt capacity, compensation to the customer shall be at a per kilowatt-hour rate determined under paragraph (c), (d), or (f).

Minn. Stat. §216B.164, subd. 3(b) applies to public utilities, and states:

(b)... For a qualifying facility having less than 1,000-kilowatt capacity, the customers shall be billed for the net energy supplied by the utility according to the applicable rate schedule for sales to that class of customer. In the case of net input into the utility system by a qualifying facility having: (1) more than 40-kilowatt but less than 1,000-kilowatt capacity, compensation to the customer shall be at a per kilowatt-hour rate determined under paragraph (c); or (2) less than 40-kilowatt capacity, compensation to the customer shall be at a per-kilowatt rate determined under paragraph (c) or (d).

Minn. Rule 7835.9910 contains the Uniform Statewide Contract to be used in interconnections between a utility and Qualifying Facility (QF) of less than 1,000 kW.

The Uniform Statewide Contract (see Attachment A) establishes the rate schedule to be applied to the purchase and sale of electricity to be elected by the QF under 1) average retail utility energy rate; 2) simultaneous purchase and sale billing rate; or 3) Time-of-day purchase rates. Section 6 of the Uniform Contract states:

6. The rates for sales and purchases of electricity may change over the time this contract is in force, due to actions of the Utility or of the Commission, and the QF and the Utility agree that sales and purchases will be made under the rates in effect each month during the time this contract is in force.

The Department understands section 6 to permit utilities to change the rates for the sale and purchase of electricity under the contract to reflect changes to the retail rates. The

Department does not believe section 6 of the Uniform Statewide Contract permits the utilities to impose a separate facility charge in addition to the rates contained in the retail tariff.

Although the imposition of a separate facility charge, such as the charges imposed by the utilities listed in Table 1, does not appear permissible under the Uniform Statewide Contract, other statutes and rules contemplate the ability of the utility to recover reasonable interconnection costs from a QF. Minn. Stat. §216B.164, subd. 8(b) addresses recovery of interconnection costs, stating:

(b) Nothing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers or from any fixed charges normally assessed such nongenerating customers.

Section 12 of the Uniform Statewide Contract provides:

12. The QF is responsible for the actual, reasonable costs of interconnection which are estimated to be \$_____. The QF will pay the Utility in this way:
_____.

Minn. Rule 7835.0100 subd. 12 defines interconnection costs:

“Interconnection costs” means the reasonable costs of connection, switching, metering, transmission, distribution, safety provisions, and administrative costs incurred by the utility that are directly related to installing and maintain the physical facilities necessary to permit interconnected operations with a qualifying facility. Costs are considered interconnection costs only to the extent that they exceed the corresponding costs which the utility would have incurred if it had not engaged in interconnected operations, but instead generated from its own facilities or purchased from other sources an equivalent amount of electric energy or capacity. Costs are considered interconnection costs only to the extent that they exceed the costs the utility would incur in selling electricity to the qualifying facility as a nongenerating customer.

The Department understands Minn. Stat. §216B.164, subd. 8(b) and the Uniform Statewide Contract to permit the assessment of reasonable interconnection costs with the type of recovery (up-front, monthly or some combination of the two) to be determined by parties to the contract.

The Department notes that the fees in question were not assessed as part of the interconnection process, or reflected in the interconnection costs detailed in the Uniform Statewide Contract, but rather were imposed as an ongoing tariff charge. While the statute and rules permit recovery of the incremental costs associated with the interconnection of a distributed generation facility, such as additional metering and the ongoing maintenance costs associated with such metering, the utilities have not provided sufficient information establishing that the charges are incremental to those already recovered from the standard customer charge assessed against all customers including customers with DG facilities. The Department also notes that, had the utilities made such a showing, it appears that those costs should be included in the interconnection costs listed in Section 12 of the Uniform Statewide Contract.

B. REASONABLE CHARGES

As noted above, Minn. Rule 7835.0100, subd. 12 defines interconnection costs, and specifically states, “Costs are considered interconnection costs only to the extent that they exceed the costs the utility would incur in selling electricity to the qualifying facility as a non-generating customer.” Consequently, any interconnection costs recovered from DG customers should be net of the costs already recovered in that customer’s standard customer charge. For example, ongoing billing and maintenance costs should reflect only the incremental additional cost associated with serving the QF, and not the cost associated with and paid for in the standard customer charge. Likewise, to the extent an existing meter is replaced with a bi-directional meter, the Department expects recovery from the QF to be limited to the reasonable incremental cost, if any, between the existing standard meter, and the bi-directional meter.

Finally, the Uniform Statewide Contract appears to provide flexibility as to how the QF will pay for any interconnection costs. To the extent the fees in question are found to be interconnection costs, recovery of a one-time cost on a monthly basis in perpetuity is not reasonable.

The Department does not have sufficient information on which to determine that the fees reflect the incremental costs of serving the QF facility nor that recovery on a monthly basis is reasonable.

C. HAS THE COMMISSION APPROVED THESE CHARGES?

Of the six utilities with facility fees in place, only OTP’s charge was filed and received Commission approval before it was imposed on any customer; that approval was in OTP’s 2010 rate case (Docket No. E017/GR-10-239). The remaining utilities filed their tariff changes as part of their annual reporting under Minn. Rule 7835.0300, but to the Department’s knowledge, the remaining utilities never received formal Commission approval.

IV. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission:

- Find that Connexus Energy, Mille Lacs Cooperative Energy, Goodhue County Cooperative Electric, Xcel Energy and Minnesota Power have not demonstrated that their monthly QF charges are reasonable.
- Find that the QF fees charged by Connexus Energy, Mille Lacs Cooperative Energy, Goodhue County Cooperative Electric, Xcel Energy and Minnesota Power have not received Commission approval as required by Minn. Rules 7835.0300.
- Direct Connexus Energy, Mille Lacs Cooperative Energy, Goodhue County Cooperative Electric, Xcel Energy and Minnesota Power to each file, within 30 days of the Commission's Order, a compliance filing accounting for all QF fees charged to date, together with a proposed plan for refunding such charges, and a proposal for providing notice of the Order and proposed refund plan to affected QF customers.

/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E999/CI-15-755

Dated this 6th day of May 2016

/s/Sharon Ferguson

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Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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John	Pendray	john.pendray@cummins.com		N/A	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC

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