



414 Nicollet Mall
Minneapolis, MN 55401

May 12, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: STAKEHOLDER MINUTES
COMMUNITY SOLAR GARDENS
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Compliance information in response to the Commission's February 13, 2015 Order (Order Point 3) submitted in the above-noted docket.

Per Commission Order, all agendas, approved minutes and attachments from the Solar*Rewards Community Implementation Workgroup will be filed in eDockets. Attachment A includes the agenda, meeting minutes, and issues tracker for the Workgroup meetings held on the following dates: March 24, April 1, April 9 and April 15, 2015. Additional meeting minutes will be filed upon their approval by the Implementation Workgroup.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at Jessica.K.Peterson@xcelenergy.com or 612-330-6850 if you have any questions regarding this filing.

Sincerely,
/s/

SHAWN WHITE
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING
Enclosure
c: Service List, Attachment

Meeting Agenda: S*RC Implementation Working Group

Date: March 24, 2015	
Start Time: 1:30 pm Central	Location: Mpls Central Library; BC Gamble room
End Time: 3:00 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome and Approve Previous Minutes	Thor B.	Approval
- MISO review process		
Goals for next three meetings	Marty M.	Discussion
Distribution system and DG queue transparency	Patrick D.	Discussion
- Continue discussion		
Future agenda items	All	Discussion
- Discuss which items we can make progress on in the next two meetings		
Other items		Discussion

Meeting Agenda: S*RC Implementation Working Group

Date: April 1, 2015	
Start Time: 1:30 pm Central	Location: 414 Nicollet Mall, Lower Level Bay 3
End Time: 3:00 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome and approve 3/4 minutes	Thor B.	
Distribution system and DG queue transparency	Patrick D.	Discussion
- Wrap up discussion		
Secure cancellation and return of deposit	Thor B.	Discussion
- Discuss application system changes to the cancellation and return of the deposit process		
RECs for unsubscribed energy	Thor B.	Discussion
- Discuss possible solutions to unsubscribed energy RECs.		
RECs for MiM and S*R	Thor B.	Discussion
- Discuss possible solutions to RECs in years 11-25 for small solar incentive projects participating in SRC.		
Other items		Discussion

Meeting Agenda: S*RC Implementation Working Group

Date: April 9, 2015	
Start Time: 1:30 pm Central	Location: 414 Nicollet Mall, 1B
End Time: 3:00 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome and Facilitator introduction	Thor B.	
- Phyllis Reha		
RECs for unsubscribed energy		Discussion
- Continue discussion		
RECs for MiM and S*R		Discussion
- Discuss possible solutions to RECs in years 11-25 for small solar incentive projects participating in SRC.		
MISO process		Update
- Additional detail added to process		
1MW garden size limit		Discussion
- Is there a workable definition to determine a 1MW size limit?		
Other items		Discussion

Meeting Agenda: S*RC Implementation Working Group

Date: April 15, 2015	
Start Time: 1:00 pm Central	Location: 414 Nicollet Mall, 1B
End Time: 3:00 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome	Phyllis R.	
1MW garden size limit	Phyllis R.	Discussion
- Is there a workable definition to determine a 1MW size limit?		
Pre-Screen	Phyllis R.	Discussion
- Follow up on prescreen options		
Other items		Discussion

S*RC Implementation Workgroup

Meeting Minutes

March 24, April 1, April 9 & April 15

OPENING

A special session of the S*RC Implementation Workgroup was requested by Xcel Energy for the following dates: March 24, April 1, April 9 & April 15. The first two sessions were led by Thor Bjork, Xcel Energy. The final two were led by a third-party moderator, Phyllis Reha, ParEnergy Solutions. The purpose of these four meetings was to address specific issues as a result of the Solar Garden Docket. The intent was to come to some agreement where possible to limit outstanding issues with the Commission for a hearing date set on June 25, 2015.

PRESENT

March 24 14 Companies	April 1 13 Companies	April 9 9 Companies	April 15 14 Companies
<ul style="list-style-type: none"> • Alan Gleckner, Fresh Energy • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Ian Schonwald, Eutectics • Steve Coleman, MN Community Solar • Lynn Hinkle, MnSEIA • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Laura Hannah, Sunshare • Ross Abbey, Sunshare • Mike Michaud, Sunshare • Marty Morud, TruNorth Solar • Shawn Bagley, Xcel Energy • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • David Shaffer, MnSEIA • Patrick Dalton, Xcel Energy • Joe Tierney, Sunrise Energy • Sue Peirce, DOC 	<ul style="list-style-type: none"> • Holly Lahd, DOC • Virginia Rutter, Eutectics • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Steve Coleman, MN Community Solar • Lynn Hinkle, MnSEIA • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Dean Leischow, Sunrise Energy • Ross Abbey, Sunshare • Marty Morud, TruNorth Solar • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • Kevin Cray, Xcel Energy • Joe Tierney, Sunrise Energy 	<ul style="list-style-type: none"> • Holly Lahd, DOC • Nathan Franzen, Geronimo Energy • Ian Schonwald, Eutectics • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Steve Coleman, MN Community Solar • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Joe DeVito, SolarStone Partners • Ross Abbey, Sunshare • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • Kevin Cray, Xcel Energy • Patrick Dalton, Xcel Energy 	<ul style="list-style-type: none"> • Virginia Rutter, Eutectics • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Steve Coleman, MN Community Solar • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Sue Peirce, DOC • Joe Tierney, Sunrise Energy • Joe DeVito, Solarstone Partners • Ross Abbey, Sunshare • Marty Morud, TruNorth Solar • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • Shawn Bagley, Xcel Energy • Patrick Dalton, Xcel Energy • David Shaffer, MnSEIA

APPROVAL OF MINUTES

No minutes were approved (compiling all four extra meetings from March 24-April 15 together for review on May 6th.)

DISCUSSION/RESULTS

Topic 1: MISO Review Process

Applications are reviewed by distribution engineering to assess their potential to affect the transmission system, and may need to go through a review process by MISO given potential transmission impact. Xcel Energy presented an overview of the process on March 24.

Developers showed concern with where in the process this would take place and requested milestones and specific timing of when this review process will take place. Xcel Energy noted that this is a new process for the Company as well. MISO review can technically occur during any part of the interconnection process. MISO also has their own processes in which the Company doesn't have control over. For example, MISO is under no obligation to provide milestones or provide a time limit for review.

Developers asked whether or not there was a potential for cost sharing between the developer and utility if transmission upgrade studies were needed. Xcel Energy confirmed that there are no dollars earmarked for transmission studies within our engineering study process – which addresses distribution upgrades and not transmission upgrades.

Continued discussion ensued during these set of meetings as well as outside these discussions since March 24. Geronimo, SunShare, and Xcel Energy began working together to define the process in more detail. The Companies noted above began with original language and have been adding further detail to the process. Language was being adjusted to match MISO terms and definitions. It was further noted that a flow-chart format was also being discussed to make the clearly articulate the process. The Companies requested a sub-group meeting with their engineers to finalize the documentation. The group was supportive of this direction.

An additional topic addressing when and whether a project can reduce in size in order to avoid transmission impacts. Xcel Energy will review further as part of the subgroup effort.

Next Steps/Resolution: Subgroup to make edits to process and discuss at a future meeting.

Topic 2: Distribution System and DG Queue Transparency

In response to the Implementation Workgroup, Xcel Energy offered a solution to providing specific details regarding the capacity of projects ahead of them in the queue, substation capacity and transformer size, and minimum daytime load. The Company presented this information on March 24th to be provided to developers once an application was deemed complete per Section 9, and prior to issuing a Statement of Work for engineering studies.

There was concern with providing particular pieces of information (specifically capacity ahead of them in the queue). Some developers believe that if we are going to provide information it should be made public. Xcel Energy noted that public information is currently outside the scope of solar alone and would prefer to address public data (such as maps) in other forums, but could provide details by project.

Meeting Minutes

There was consensus by the Workgroup that this could be provided and that the developers would appreciate the information Xcel Energy could provide. One Garden Operator dissented from this consensus requesting also that developers know who is behind them in the queue as well and that this information should be made public. If Xcel Energy takes one step, why can they not go a step further – a majority of developers agreed.

Xcel Energy noted their preference to not provide any further detail outside of a yes/no to applications ahead of others in the queue until a full consensus was reached. The Company agreed that ideally we would like to have a full DG view on our website, however, this isn't possible today given the systems we have available. No resolution was obtained during the March 24th meeting.

Xcel Energy offered another solution on April 1, 2015, including a public document including: SRC ID, Substation, County, Date Application Reviewed for Completeness, and Size (kW). The Company acknowledged this is a short term solution, but recommended accepting this significant step towards full queue transparency.

Developers had additional requirements and/or changes to add to the proposed solution including an addition of a time stamp rather than date and clarification regarding “deemed complete” titles. Xcel Energy agreed to add these two items. The group further determined additional columns may be beneficial as projects move to construction and are complete. For the time being, the Company will include a column for status including rejected projects. Others may be added in the future. It was also discussed as to how frequently this would be updated – the Company agreed to update monthly.

Developers also requested that the document be provided as an excel file rather than pdf. Xcel Energy will check to verify this is viable via our website.

A vote was conducted and the group reached full consensus on the proposed solution as a first step towards queue transparency.

Next Steps/Resolution: Xcel Energy will begin to offer information on their website once a few issues are resolved based on our system of record and pulling requested data.

Topic 3: Prescreen

In response to developer requests, the Company proposed to make a pre-screen option available to applicants and potential applicants. Following consensus on making the SRC queue public, the group discussed whether or not there was still a need for a prescreen process. The group determined that a prescreen would still be beneficial. Xcel Energy offered specific details including , feeder voltage, distance from substation, substation capacity and loading, substation transformer capacity and loading, and whether other DG projects had already applied for interconnection at that substation, in a prescreen report for a fee of \$500.

The group suggested that the price may not be appropriate and discussed other pre-screen options including a similar mechanism required by the Federal Energy Regulatory Commission and in use by transmission operators, and the option available in Colorado. The group determined that additional information was needed prior to moving forward with a full prescreening decision.

Meeting Minutes

Next Steps/Resolution: No final resolution. The Workgroup is looking towards further discussion on May 6th.

Topic 4: Secure Cancellation and Return of Deposit

Xcel Energy cannot agree to assign repayment to a third-party, however, we have taken steps to look into updating the Salesforce process to allow Garden Operators to withdraw their applications and designate the account information for return of the deposit from within the application system.

The group also discussed the purpose of the deposit, evaluating the deposit for effectiveness, future adjustments, and the uncertainty lenders have with the process. Requiring a title company to hold the deposit was also suggested as a means of solving a number of concerns. The Company is open to this solution, but asked that the developers bring back more information on how it would work.

Developers also discussed further changes to Salesforce allowing more than one log in so different people could be assigned to different areas (such as assignment of deposit versus adding subscribers).

Next Steps/Resolution: No final resolution.

- Xcel Energy to review updating deposit letter, provided that we receive actionable edits (Dean Leischow)
- Xcel Energy to provide, in writing, how we intend to do cancellations/withdrawals – to account specified by the project manager during cancellation/withdrawal
- Various parties were to review other options for a third-party holding the deposits
- Marty Morud reviewed needs for additional log in accounts and how that may look in practice; he will continue to work with Xcel Energy and provide updates at further Workgroup meetings

Topic 5: RECs for Unsubscribed Energy

The Workgroup discussed RECs for Unsubscribed Energy in the April 1, 9, and 15th meeting.

On April 1, the group began the discussion point around RECs and current rules. Xcel Energy noted that a REC price isn't supported by Tariff or the Commission, however, agrees that it would be more straightforward to pay something for these RECS. The Company suggested that 2-3 cents per REC was excessive.

The group discussed what a price may look like and specific concerns regarding projects less than 40 kW on an A50 retail rate. Many group members agreed that encouraging unsubscribed gardens was not in the best interest of the program. Additionally it was suggested that there be a time limit on unsubscribed energy or an overall percentage of garden that could receive the REC price for unsubscribed energy.

A price per REC for unsubscribed energy was also discussed. National voluntary REC prices were stated to be around \$0.003 per kWh. The group was to have gone back to their Companies to discuss appropriate costs.

The plan language of Section 9 Tariff states Xcel Energy will receive the RECS in the absence of the developer choosing to claim them within a 6 month period. The tariff today doesn't require Xcel Energy to pay a REC price for unsubscribed energy. No conclusions were drawn as to what the

Meeting Minutes

REC price should be set at during the April 1, meeting however it was unanimous by developers that a REC price should be paid for unsubscribed energy.

Discussions began on April 9, with discussion on how a new rate would be addressed given it doesn't exist within the current Section 9 Tariff. Xcel Energy clarified that it would have to be brought to the Commission through a tariff filing. With full consensus on a rate, Xcel Energy could possibly include within their 4/30 comments to the Commission. Without consensus it would have to go into the Commission process through a misc. tariff adjustment and go through the normal process; likely taking 3+ months to adjust. The next agenda meeting for the Commission on Solar Gardens will be June 25.

Xcel Energy recommended the group adopt one rate for unsubscribed energy at \$0.01 per kWh. There was some agreement among the group that this would be a beneficial change and higher than current national REC prices. Other members felt that the REC price should remain consistent with those that are paid for subscribed energy given the following:

- The current rate paid for unsubscribed energy is already being discounted to the utility's avoided cost
- It could be administratively burdensome to Xcel Energy to not keep it consistent

Xcel Energy reminded the group that the REC price would be on top of the \$0.03 to \$0.11 cent co-generation costs paid for unsubscribed energy. Additionally, there is a choice to sell the RECs or keep them.

It was further noted that smaller projects would be impacted the most by the REC rate of \$0.01 per kWh – these groups are not represented well within the current make-up of the Workgroup.

The Department noted that Commission Order can be interpreted such that a REC price should be provided at the same REC price as subscribed energy. Additionally, the REC price has already been vetted through the Regulatory process. It was also discussed that it can be interpreted to be read differently – as noted by the approval of the Xcel Energy's Section 9 Tariff.

The majority of the group agreed that RECs should be paid for if Xcel Energy is to acquire them. The group also discussed the impact on subscriber contracts. Cancellation details will be built around the decision of REC price for unsubscribed energy.

The group was polled for consensus on Xcel Energy's proposal. No consensus was reached. However, the Workgroup did agree that Xcel Energy should offer up a price for unsubscribed energy and clarify the issue within their Section 9 Tariff. The group requested to discuss Xcel Energy's proposal further within their individual companies.

The topic was addressed again on April 15. Xcel Energy noted that consensus on this item was important and that without one the company would not be sending a recommendation to the Commission. The group discussed Xcel Energy's proposal of \$0.01/kWh for unsubscribed energy. Several developers agreed to this proposal.

The Department continued to question whether the amount of REC payment was appropriate and suggested a formula of sorts could be reached to discourage unsubscribed energy. Xcel Energy discouraged complicated formulas given the difficulty to track and implement within our billing system.

Meeting Minutes

Other developers continued to question whether an unsubscribed amount should be different than the subscribed REC payment. No consensus was reached.

Next Steps/Resolution: No final resolution. No action items given no consensus status.

Topic 6: RECs for Made in Minnesota and Solar*Rewards

Made in Minnesota and Solar*Rewards incentive recipients that operate as gardens receive incentives for 10 years versus the 25 years allotted for S*RC.

Since this issue did not concern everyone in the group given the size of these projects, Xcel Energy suggested that this topic be addressed within a sub-group.

It was also noted that other rules are in process through an official rule making process for MiM, although it was determined that the REC price for these projects doesn't belong within this rule making process.

The Workgroup came to consensus to take this up with a small sub-group. MnSEIA volunteered to lead the subgroup. The Department was to also provide contacts for MiM and parties involved in the rule making process.

Xcel Energy noted that this issue could be resolved through a contract modification through the Commission process. Some parties felt strongly that this was an issue that should be addressed with the Tariff.

Next Steps/Resolution: Small Group discussions current being explored.

Topic 7: 1 MW limitation

The goal of the discussion as noted by the facilitator was to get the "lay of the land" so to speak. Developers believe that the 1MW definition is based on the point of common coupling. Xcel Energy continues to note that nameplate capacity is the definition in the Minnesota State Statute. The utility company feels that many of the current gardens within the queue are utility scale projects disguised as "solar gardens".

The group discussed what Xcel Energy felt would be a reasonable limit. The Company reiterated their concerns and noted statutory requirements. Co-location rules are not being contested, as long as they don't exceed 1 MW as defined by statute.

Parties agreed that it would be beneficial to work something out prior to the June Commission hearing, however, the majority of parties felt any enforcement of the 1MW limit should be a prospective adjustment. Prospective adjustments don't address the impacts of current applications.

Benefits of large gardens were discussed including cost-efficiencies. Additionally the group discussed the strategy of applying for several MW's during the application process and having them naturally drop off depending on grid capacity.

Some developers voiced concern that certain parties exploited the rules and therefore limited the addition of smaller gardens – given that time is running out to build these projects it may not be in

Meeting Minutes

the best interest of solar gardens to continue this as a prospective rule making process for future program adjustments.

Further questions were asked of Xcel Energy regarding their intent for solar (the Company continues to be committed to solar growth) and limits that exist today on distributed generation (Section 10 Tariffs do have a 10 MW limitation).

Parties discussed a functional approach to the issue such as determining functionality or technical ability, price, income tax, etc. However, the Workgroup did not come to a consensus of how to move forward without the involvement of the Commission given the differing viewpoints. Additionally there is significant concern that projects were developed based on the September 2014 Order and significant investments have already been made regardless of what the intention of the statute was.

Further, the Workgroup's ability to interpret rules was called into question. Many developers felt that it was not the intent of the group to interpret rules, however, Xcel Energy noted that several of the program rules and processes have been interpreted by the group and continues to help move the program forward.

Next Steps/Resolution: No resolution reached.

MISC. TOPICS

Updates

Xcel Energy provided a reminder regarding new interconnection fees ordered by the PUC and updates on www.xcelenergy.com with engineering requirements for interconnection.

FOLLOW-UP BY PARTIES/ SUB-GROUP DISCUSSIONS

- MISO subgroup discussion to be scheduled by Xcel Energy
- Xcel Energy to review updating deposit letter provided that we receive actionable edits (Dean Leischow)
- Small Group discussion to be scheduled by MnSEIA regarding REC prices for MiM and S*R

NEXT MEETING

Our next meeting will be held on May 6th. Topics will include how to work with the engineering contacts and further details regarding prescreen options.

Additionally, the following topics have been suggested for upcoming meetings:

- Definition of transformer minimum daytime load

Meeting Minutes

Minutes submitted by: Jessie Peterson

Approved by: Implementation Workgroup members on 5/6/2105.

CERTIFICATE OF SERVICE

I, Tiffany Hughes, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-13-867

Dated this 12th day of May 2015

/s/

SaGonna Thompson
Regulatory Administrator

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