

July 1st, 2020

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th place East, Suite 350
Saint Paul, MN 55101

Re: Docket Nos. CI-02-2034/M-12-383

Thank you for the opportunity to provide comments regarding Xcel Energy's request to omit the 129 complaints.

Background/Experience

With nearly 2000 solar installations sold and constructed within Xcel Energy's service territory, we have a significant amount of experience navigating the rebate submission and interconnection process. We also utilize the same software that Xcel Energy uses to manage our timelines and deadlines to ensure our customers are moving through whatever interconnection process we are following. Having built projects in over 170 different utility territories, we are familiar with these steps and timelines, and appreciate that they differ from utility to utility.

Filing complaints

Filing complaints with the CAO or any organization should always be taken seriously and in many cases as a last resort. This is not something that we take lightly and always look to steps for resolution prior to filing officially. We have documented several hundreds, if not thousands, of emails notifying Xcel of the missed deadlines that we were experiencing. The complaints that were submitted is just a small sample of the great amount of issues we have come across. Xcel Energy started missing the MN DIP deadlines as early as July 2019 and it was not until September 2019 that we were notified as to the proper CAO submission process by the MN DOC. Even then we waited to submit complaints for 3 more months. Dozens of times a day, we would have to remind Xcel Energy that they were missing their steps and or not following the process, and then would be required to continuously follow up to get a resolution. The tracking

of all of this became a task so large that we had to dedicate two of our team members to monitor Xcel Energy's Solar Rewards portal and double enter data into our software so we can keep track of the MN DIP deadlines that Xcel was missing.

Delays and Penalties

At first glance one might not think that missing one deadline would have major effects. When in reality, the ripples actually turn into waves that grow larger and larger as more process steps are delayed and impacted. Our company processes thousands of projects a year, each of those projects may have 20-40 individual processes and or deadlines that need to be met. In order to keep those processes moving smoothly, the counter parties (utilities) must also be holding up to their end of the deal. In some cases a 1 day delay would result in a 10-30 day net impact to the timeline of a customer's project.

From the consumers perspective, delays or problems are usually construed as "contractor issues". When something gets delayed or there is a holdup in the process, we do not blame the utility or try to hide behind the utility caused delays, we typically apologize on behalf of the utility, but of course the customer doesn't want to hear excuses, they just want noticeable action.

We see this relationship as more of a partnership, where we are both working on behalf of our customer. If there is a problem with Xcel, then there is a problem with the process, which is a problem that we need to help fix for both of our customers.

Not only do customers experience delays in their projects, but also increased costs or reduced incentives. The Federal Tax Credit reduced from 30% in 2019 to 26% in 2020. Xcel failed to meet many deadlines in 2019 causing projects to get pushed to 2020, thereby causing customers to lose out on 4% of their tax credit incentive. Had the deadlines been met on many of those projects, they would have qualified for the larger tax credit. Instead our company alone experienced over \$150,000 in penalties from our customers and the commitments that we made to them. Not all of the delays we experienced were due to Xcel delays but a significant percentage were. We made commitments to our customers based on rules that Xcel Energy agreed to follow in MN DIP. Ultimately, Xcel customers were delayed in their projects and we were penalized financially because of it.

Resolution

We strongly encourage the PUC to accept the CAO complaints as provided. All 128 were valid and necessary to show the depth and extent of the issues. If these complaints were thrown out, this would essentially limit the complaint process to emails and or calls to an extremely understaffed Solar Rewards team, and ultimately leads to unhappy and unsatisfied customers, overall frustration in the market, and undermine our efforts to facilitate this process seamlessly for both of our customers.

We look forward to working with all parties to make this a better overall process and experience. We also believe that if these complaints are not taken seriously, they will fall on deaf ears and no changes will be made. All Energy Solar looks forward to providing the commission any specific detail they would like to verify all data.

Michael R. Allen
President
All Energy Solar