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April 30, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2198

Re: MN Community Solar, LLC
PUC Docket No. E002/M-13-867

Dear Mr. Wolf:

We represent MN Community Solar, LLC and are eFiling and eServing the attached Additional Comments of MN Community Solar LLC and Certificate of Service on their behalf in the above-captioned matter.

Please feel free to contact me with any questions you may have.

Yours truly,



Jeffrey C. Paulson

JCP/pat
Enclosure

cc: Parties; MN Community Solar, LLC

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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

In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for approval of its proposed Community Solar Gardens Program

Docket No. E-002/M-13-867

ADDITIONAL COMMENTS OF MN COMMUNITY SOLAR, LLC

INTRODUCTION

Several rounds of comments have been submitted in this proceeding over the last several months on a number of issues. MN Community Solar, LLC (“MNCS”) commented on several issues, including comments filed April 2, 2015. On April 28, 2015, Northern States Power Company (“NSP”) submitted comments with respect to its continuing concern about co-location of 1 MW CSG projects; it also disclosed that it will unilaterally commence action disqualifying such proposed CSG projects from the application process. Certain parties calling themselves the “Solar Garden Community” filed a Petition for Expedited Relief seeking accelerated Commission action on the co-location issue.

DISCUSSION

MNCS reaffirms its earlier comments on selected issues. In addition, MNCS supports the positions taken by the Department of Commerce in Sections B, D and E with respect to RECs for Unsubscribed Energy, the application process, and the interconnection process.

With respect to the co-location of 1 MW projects, MNCS agrees with the parties who point out that no person is entitled to decide unilaterally that the law does not apply to them. NSP is no different; as the Department notes, the current Commission orders and NSP tariffs clearly permit co-location; NSP is not entitled to disregard these clear obligations. These actions call into question whether the Commission or any party can continue to rely on NSP to implement the CSG program in good faith. The Commission

needs to immediately make clear to NSP that NSP cannot take action in violation of the existing law, and the Commission should not feel pressured to change such laws solely due to NSP's defiance.

Respectfully Submitted,

PAULSON LAW OFFICE, LTD.

By 

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Dated: April 30, 2015

CERTIFICATE OF SERVICE

I, Patricia A. Treseler, hereby certify that I have this 30th day of April, 2015, served a true and correct copy of the attached Additional Comments of MN Community Solar, LLC in Docket No. E002/M-13-867, on all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same in an envelope with postage paid in the United States mail at Edina, Minnesota.



Patricia A. Treseler
Patricia A. Treseler

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|--------------|----------------------------------|---|--|--------------------|-------------------|---|
| Ross | Abbey | abbey@fresh-energy.org | Fresh Energy | 408 Saint Peter St Ste 220 St. Paul, MN 55102-1125 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
| Ross | Abbey | ross@mysunshare.com | SunShare, LLC | 609 S. 10th Street Suite 210 Minneapolis, MN 55404 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
| Michael | Allen | michael.allen@alienergysolar.com | All Energy Solar | 721 W 26th st Suite 211 Minneapolis, Minnesota 55405 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
| Sara | Baldwin Auck | N/A | Interstate Renewable Energy Council, Inc. | PO Box 1156 Latham, NY 12110-1156 | Paper Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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| Joel | Cannon | jcannon@tenksolar.com | Tenk Solar, Inc. | 9549 Penn Avenue S Bloomington, MN 55431 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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| Arthur | Crowell | Crowell.arthur@yahoo.com | A Work of Art Landscapes | 234 Jackson Ave N Hopkins, MN 55343 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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| John | Farrell | jfarrell@ilsr.org | Institute for Local Self-Reliance | 1313 5th St SE #303 Minneapolis, MN 55414 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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| Hal | Galvin | halgalvin@comcast.net | Provectus Energy Development llc | 1936 Kenwood Parkway Minneapolis, MN 55405 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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