



June 20, 2025

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Implementation of 2023 Legislative Changes to Xcel Energy's
Community Solar Garden Program. Docket No. E002/CI-23-335**

Executive Secretary Seuffert,

The Coalition for Community Solar Access ("CCSA") hereby submits its Initial Comments to the above-referenced docket. CCSA has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is enclosed.

Respectfully submitted,

/s/ Nick Bowman

Nick Bowman
Senior Manager, Markets & Research
Coalition for Community Solar Access
(E) nick@communitysolaraccess.org
(T) 843-345-8150

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie J Sieben	Chair
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In the Matter of Implementation of 2023 :
Legislative Changes to Xcel Energy's :
Community Solar Garden Program : **Docket No. E002/CI-13-867**
:

INITIAL COMMENTS OF THE COALITION FOR COMMUNITY SOLAR ACCESS

The Coalition for Community Solar Access (CCSA) respectfully submits the following Initial Comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period, issued April 4, 2025, and Notice of Extended Comment Period, issued May 29, 2025 in the above-captioned docket, regarding Xcel Energy's proposal to increase the annual participation fee for Community Solar Garden (CSG) subscriber organizations beginning in February 2026.

Introduction

CCSA supports a fair and transparent approach to fee increases that accurately reflect the costs directly caused by CSG program participants. We echo MnSEIA's concerns regarding Xcel Energy's revised proposal to more than double the annual participation fee to \$1,200/MW — a 140% increase over the existing \$500/MW rate — and urge the Commission to require detailed justification before considering any such increase.

Lack of Cost Justification and Transparency

Xcel Energy has not provided sufficient transparency or a robust cost breakdown to justify its proposed increase in the participation fee. While Xcel Energy claims that ongoing assessments and technology upgrades warrant the increase, the utility has not clearly demonstrated which

costs are directly caused by Legacy or Low-to-Moderate Income (LMI) CSGs — a critical standard for cost recovery.

Specifically:

- The \$961,000 per year Minnesota Department of Commerce assessment on Xcel Energy for program administration is not new. These costs were anticipated under the 2023 legislation and appear to be double-counted without sufficient documentation to distinguish incremental burdens.
- Xcel’s portal upgrade cost escalated from \$800,000 to \$1.6 million, yet the explanation provided is vague. If Xcel is modifying the broader Minnesota Distributed Energy Resource Interconnection Process portal — which serves a variety of distributed generation technologies — those costs should not be borne exclusively by CSG subscriber organizations.
- Xcel Energy’s description regarding consolidated billing implementation lacks specificity and the utility offers no breakdown of what new staffing or operational demands drove unanticipated cost growth.

Until Xcel Energy provides documentation clearly attributing each component of the increased costs to specific CSG functions, the proposed increase fails to meet the “just and reasonable” standard of Minn. Stat. § 216B.03.

Disproportionate Burden on Subscriber Organizations

The participation fee is intended to recover administrative costs caused by subscriber organizations — not to subsidize broader utility operations or cover general administrative overhead. The Commission must ensure that any increase aligns with this “cost-causer pays” principle. As Minnesota Solar Energy Industries Association (MnSEIA) aptly notes in its June 20, 2025 initial comments, it is inappropriate to allocate costs to subscriber organizations if those costs also serve other utility functions or ratepayer classes.¹

The proposed 120% increase is especially troubling given that:

- CSG developers in the LMI CSG program already bear an application fee of \$4,125/MW.
- New statutory and regulatory requirements were known as of mid-2023, allowing time for planning and integration into Xcel Energy’s cost recovery mechanisms.

¹ Docket No. E002/CI-23-335, Initial Comments of the Minnesota Solar Energy Industries Association at 3 (June 20, 2025).

Biennial Review and Application Fee Support

CCSA concurs with both Xcel Energy and MnSEIA in supporting a biennial review of participation fees through a regular Commission process. This review mechanism will help ensure transparency, accountability, and alignment with actual program costs. Additionally, we agree with maintaining the current \$4,125/MW application fee for LMI CSGs as appropriate for the time being. There is no clear evidence that this fee is over- or under-recovering costs, and further review may be warranted in the future.

Conclusion

CCSA supports MnSEIA's recommendation that any increase to the annual participation fee must be based on clear, transparent evidence demonstrating that the proposed fee is both:

- Directly attributable to costs incurred by CSG subscriber organizations, and
- Just and reasonable under Minnesota law.

Absent such evidence, the Commission should reject Xcel Energy's proposed \$1,200/MW participation fee. We respectfully urge the Commission to require a detailed cost breakdown before authorizing any increase.

Respectfully submitted,

/s/ Nick Bowman

Nick Bowman
Senior Manager, Markets & Research
Coalition for Community Solar Access
(E) nick@communitysolaraccess.org
(T) 843-345-8150

Dated: June 20, 2025

CERTIFICATE OF SERVICE

I, Nick Bowman, hereby certify that I have this day served a true and correct copy of the ***Initial Comments of the Coalition for Community Solar Access*** to all persons on the attached service list by electronic filing or electronic mail.

Dated: June 20, 2025

/s/ Nick Bowman

Nick Bowman
Senior Manager, Markets & Research
Coalition for Community Solar Access