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February 6, 2014



Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of a Commission Inquiry into Ownership of Renewable Energy Credits
used to Meet Minnesota Requirements
Minnesota Docket No. E999/CI-13-720
COMMENTS**

Dear Dr. Haar:

Otter Tail Power Company submits the enclosed Comments in response to the Minnesota Public Utilities Commission's ("Commission's") Notice for Comment Period on Commission Inquiry issued December 30, 2013.

We have electronically filed this document with the Commission, which also constitutes service on the Minnesota Department of Commerce, Division of Energy Resources and the Office of the Attorney General, Antitrust and Utilities Division. A copy of this filing has been served on all parties on the service list in this docket.

Please contact me at (218) 739-8417 or bhdraxten@otpc.com if you have any questions.

Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

wao
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Docket No. E999/CI-13-720

In the Matter of a Commission Inquiry into
Ownership of Renewable Energy Credits
used to Meet Minnesota Requirements

**OTTER TAIL POWER COMPANY'S
COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) respectfully submits the following Comments in the above-captioned matter. The Comments are made in response to the Commission's Notice of Comment Period on Commission Inquiry, issued in the above-captioned docket on December 30, 2013. In these Comments, Otter Tail addresses each of the issues identified in the Notice as Topics Open for Comment:

- What categories of Renewable Energy Credits (RECs) need clarity on ownership?
- Who owns the RECs from net metered customers? Does it matter whether the QF is being paid the average retail rate or avoided cost rate?
- Who owns the RECs if a third party owns the PV equipment and leases to the homeowner/business?
- Are there special considerations on REC ownership related to REC aggregators/marketers?
- What factors should the Commission take into account when determining REC ownership?
- Should the Commission make decisions on REC ownership?
- If the Commission should issue decisions on REC ownership, for which utilities or parties to a transaction should the Commission's decision apply?

As additional background, Otter Tail notes that the uniform state-wide contract (rule 7835.9910) is silent on REC ownership. Otter Tail would like to see the universal state-wide contract altered to allow the customer to choose the REC ownership. For historical projects subject to the universal state-wide contract, Otter Tail is indifferent to the handling of REC ownership.

II. COMMENTS ON OPEN TOPICS

A) *What categories of Renewable Energy Credits (RECs) need clarity of ownership?*

Otter Tail Response:

REC ownership clarification should be limited to the projects subject to the uniform state-wide contract referenced in statute 216B.164 subd 6 with the template listed in rule 7835.9910. The uniform state-wide contract is silent on REC ownership. Otter Tail would like to see the uniform state-wide contract adjusted to clarify REC ownership. The solar energy standard has a requirement that a portion of the solar energy come from 20 kw or smaller. These smaller solar installations would be subject to the uniform state-wide contract and clarifying the REC ownership in the uniform state-wide contract will be needed. Otter Tail's renewable energy Purchased Power Agreements (PPAs) not subject to the uniform state-wide contracts (per rule 7835.9910) have the ownership of the RECs clearly defined in the agreement.

B) *Who owns the RECs from net metered customers? Does it matter whether the QF is being paid the average retail rate or the avoided cost rate?*

Otter Tail Response:

Ownership of a REC depends on these two factors: the entity that generates the REC¹ or purchases the REC.

Otter Tail believes it does not matter how the qualifying facility is being paid for the QF generation, per the REC definition used by Otter Tail, and as long as REC payment occurs only once.

In order to comply with the solar energy standard, which requires a portion of the solar energy come from 20 kw or smaller installations, it is important that the utility own the RECs so they can be registered in the M-RETS system and retired for compliance with the solar energy standard. Otter Tail would advocate for dual pricing in the small power producer tariff rates. One price would have the utility owning the RECs. The alternate price would allow the customer (seller) to retain ownership of the RECs. At the onset of the project, the customer (seller) would select the alternative that best fits their situation.

C) *Who owns the RECs if a third party owns the PV equipment and leases the homeowner/business?*

Otter Tail Response:

The REC ownership should be decided in the business relationship between the homeowner/business (utility customer) and the third party.

¹ Otter Tail defines a renewable energy credit (REC) as the production measured output of 1 MWh from an eligible energy technology, as defined by 216b.1691, subd. 1.

As stated in B above, one possibility to consider is dual pricing in the small power producer tariff rates. One price would have the utility owning the RECs. The alternate price would allow the customer to retain ownership of the RECs. At the onset of the project, the customer would select the alternative that best fits their situation. If the customer chooses to retain the RECs, they would have the option to sell the RECs.

D) Are there special considerations on REC ownership related to REC aggregators/marketers?

Otter Tail Response:

If the universal state-wide contract is altered to clarify REC ownership and the customer chooses to own the RECs, the customer would have the option to sell the RECs to an aggregator/marketer.

E) What factors should the commission take into account when determining REC ownership?

Otter Tail Response:

At least these two factors: proof of the generation ownership and the purchasing ownership. The generation ownership is the result of the REC ownership as decided between the utility customer and the third party (e.g. leaser). The purchasing ownership is the result of the agreed purchase from the generation owner(s) and the purchaser(s) (e.g. utility/third party aggregator).

Otter Tail believes that emphasis and effort should be placed on clarifying REC ownership for future installations rather than clarifying past installations.

F) Should the Commission make decisions on REC ownership?

Otter Tail Response:

Based on Otter Tail's responses in this filing, no. Otter Tail believes ownership is between the generator, third party, or purchaser. However, the Commission should verify the REC ownership in its REO/RES requirements.

Otter Tail is indifferent on the handling of REC ownership for historical projects. For future projects subject to the universal state-wide contract, Otter Tail believes that the commission, through the rulemaking process, can and should change the state-wide contract to clarify REC ownership. As stated in B above, one possibility to consider is dual pricing in the small power producer tariff rates. One price would have the utility owning the RECs. The alternate price would allow the customer to retain ownership of the RECs. At the onset of the project, the customer would select the alternative that best fits their situation.

G) If the Commission should issue decisions on REC ownership, for which utilities or parties to a transaction should the Commission's decisions apply?

Otter Tail Response:

At this time, as stated in Response F, Otter Tail believes the Commission decisions should apply only for REC ownership verification when it impacts the REO/RES, whether it is from the utility customer, third party, or utility.

Assuming the REC ownership decision is limited to historical projects subject to the universal state-wide contract, Otter Tail believes the decision should apply to all historical projects subject to the state-wide contract. For future projects, Otter Tail would like to see the universal state-wide contract altered to allow the customer to choose the REC ownership alternative.

Dated: February 6, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ BRIAN DRAXTEN

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Manager, Resource Planning

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CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Inquiry into Ownership of Renewable Energy
Credits used to Meet Minnesota Requirements
Docket No. E999/CI-13-720**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company
Comments**

Dated this **6th** day of **February 2014**.

/s/ WENDIA. OLSON
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