



414 Nicollet Mall
Minneapolis, MN 55401

November 2, 2017

—Via Electronic Filing—

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

RE: COMPLIANCE FILING
STANDBY SERVICE TARIFFS
DOCKET NO. E999/CI-15-115

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Compliance filing in response to the Minnesota Public Utilities Commission's Order – specifically Order Points 18, 19 and 20 – dated October 3, 2017.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or 612-337-2268, or me at amy.a.liberkowski@xcelenergy.com or 612-330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY A. LIBERKOWSKI
DIRECTOR, REGULATORY PRICING & ANALYSIS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF
A COMMISSION INQUIRY INTO STANDBY
SERVICE TARIFFS

DOCKET NO. E999/CI-15-115

COMPLIANCE

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Compliance filing in response to the Minnesota Public Utilities Commission's Order – specifically Order Points 18, 19 and 20 – dated October 3, 2017. These order points require the following:

18. *Xcel shall work with other interested stakeholders and parties in this docket on development of a Solar PV Capacity Credit Rider and, in so doing, seek to reach an agreement on what the value of the Solar PV Capacity Credit Rider will be in the interim, prior to establishment of a methodology.*
19. *Xcel shall work with the parties to reach agreement on a proposed process and timeframe for establishing a methodology to be used in developing the solar PV capacity rider.*
20. *Within 30 days of the Order, Xcel shall file a report with the Commission with any agreements or partial agreements reached by the parties on the PV Solar Capacity Credit, and explain or identify any areas of disagreement or impasse remaining and basis therefore.*

The Company, the Department of Commerce, Metropolitan Council, City of Minneapolis, Target Corporation, MNSEIA, and numerous solar developers met on September 27, 2017 for a two hour discussion of issues related to the PV Demand Credit Rider. Representatives from the Company, Department and MNSEIA met again on October 17th, October 25th and October 26th. On October 30th the Company, Department and MNSEIA reached the following agreement related to the

PV Demand Credit interim rate, customer eligibility and the process and timeline to develop a new rate:

I. PV Demand Credit Rider Agreement Terms

The Company, Department and MNSEIA have reached agreement on the following terms regarding the PV Demand Credit Rider:

1. Interim Rate Level

Approve Xcel's PV Demand Credit Rider ("PV Rider"), as filed on May 19, 2016, but Xcel will recalculate the level of the credit in the PV Rider assuming a starting value of \$4.52/kW¹ credit and 11 months as the average non-grace period months in the conversion formula for the kWh based solar credit. This recalculation results in a credit value of 7.139 cents per kWh.

2. Customer Eligibility

Current customers under the Standby Service Rider who qualify under the PV Rider at a given location will no longer be on the Standby Service Rider and will be enrolled in the PV Rider. New customers who qualify for the PV Rider at a given location may also enroll in the PV Rider under this rate provided that they do so before the date of an order issued by the Commission authorizing a change to this rate. This subsequently revised rate in an updated PV Demand Credit Rider is referred to as the Revised PV Rider Rate.

3. Availability Term

The PV Rider credit rate of 7.139 cents per kWh will be available to customers properly enrolled at the rate as described above for a given location for six years from the date of the Commission order approving the PV Rider. Any customer enrolling in the Revised PV Rider will receive the credit as set forth in the Revised PV Rider.

4. Proposed Process and Time Frame for Establishing Methodology to Develop Solar PV Capacity Rider

Require Xcel, following discussions with the Department of Commerce, MNSEIA and other interested parties, to file a proposed methodology for determining the appropriate solar capacity or demand credit. The methodology

¹ \$4.52/kW is based on the Company's updated calculations of the capacity value stack methodology in Response to MPUC IR 3. Parties are not advocating for this methodology in this agreement. This agreement is a negotiated accord agreed to by the parties with the intent to move this program forward in a constructive and efficient manner.

should consider reasonable ways to incorporate cost of service principles in demand charges for behind-the-meter solar customer accounts as well as also address the additional issues surrounding the solar capacity or demand credit rider as raised by parties in this docket. Xcel should file its proposal and discussion of the additional issues by September 19, 2018 as well as rationales for why this study is or is not a better indicator of capacity or demand value than previously derived values. Parties will be allowed 60 days to respond.

As part of this process, Xcel, with input from the Department, MNSEIA and other interested parties, will evaluate to what extent the billing demand quantities of customers with solar generation is affected by their solar production. Xcel will review whether there is a mismatch between the net billing demand of individual customers with solar installations and their net demand on system peak demand days relative to non-solar generation customers and, if so, how to reflect that difference appropriately in demand billing or comparable rate component. Xcel will also be conducting a new ELCC load study in preparations for its resource planning process. In addition, Xcel will compare this credit to current peak controlled demand credits. All study results will be provided to parties by July 1, 2018.

A. Other Parties

The Company, Department and MNSEIA have recently reached out to other interested parties including the City of Minneapolis, Metropolitan Council, and Target but have not received confirmation of their support or opposition to this agreement. We are looking forward to their review.

CONCLUSION

We appreciate the engagement and time parties have spent discussing these issues and working towards resolution. We believe the agreement reached between the Company, Department and MNSEIA establishes a reasonable PV Demand Credit interim rate, provides additional certainty to customers, and establishes a workable process and timeline for establishing a new PV Demand Credit rate proposal. We respectfully request the Commission approve the proposed agreement.

Dated: November 2, 2017

Northern States Power Company

CERTIFICATE OF SERVICE

I, Carl Cronin, 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. E999/CI-15-115

Dated this 2nd day of November 2017

/s/

Carl Cronin
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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