414 Nicollet Mall
Minneapolis, MN 55401

July 25, 2025

—Via Electronic Filing—

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: ANSWER TO PETITION FOR AMENDMENT AND RECONSIDERATION
PROPOSED REVISIONS TO NET METERING TARIFFS
DOCKET NO. E002/M-24-389

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Answer to the Hennepin County Petition for Amendment and Reconsideration.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on all parties on the attached service list. Please contact Nathan Kostiuk at Nathan.c.kostiuk@xcelenergy.com or me at Brian.t.monson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIAN MONSON
MANAGER, REGULATORY AFFAIRS

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, D/B/A XCEL ENERGY TO REVISE ITS NET METERING TARIFFS TO APPLY TO QUALIFYING FACILITIES UP TO 5 MW	DOCKET NO. E002/M-24-389 **ANSWER TO PETITION FOR AMENDMENT AND RECONSIDERATION**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Answer to the Hennepin County Petition for Amendment and Reconsideration (Petition) of the Commission's June 25, 2025 Order (June 2025 Order).

The Petition should be denied for several reasons. First, the Petition seeks to amend the Commission's June 2025 Order because it allegedly needs clarification, but there are no ambiguities in the June 2025 Order. Second, the Petition does not meet the legal standard for rehearing. Minn. Stat. § 216B.27, Subd. 3 provides that: "If in the Commission's judgment . . . it shall appear that the original decision, order, or determination is in any respect unlawful or unreasonable, the Commission may reverse, change, modify, or suspend the original action accordingly." The Commission has stated that it will reconsider an Order when (1) new issues it has not yet considered are raised; (2) new facts not yet in evidence are presented for consideration; (3) there are errors or ambiguities in the Commission's Order; or (4) the Commission is otherwise persuaded to reconsider an Order.[1] The Petition has not raised any new relevant issues or presented any new relevant facts that should be considered. Third, there are no sufficient grounds for Hennepin County to obtain the variance from the June 2025 Order that it has requested in its Petition.

[1] *In the Matter of Detailing Criteria and Standards for Measuring an Electric Utility's Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. § 216B.1691*, ORDER AFTER RECONSIDERATION at 9, Docket No. E999/CI-03-869 (Aug. 13, 2004).

ANSWER

The Petition contains an extensive listing of challenges to the June 2025 Order. The Petition first argues that the June 2025 Order was not clear on its application of the one-mile rule for determining the size of a Qualifying Facility (QF) for purposes of determining eligibility for the state's statutory net metering programs. The Petition requests that the Commission amend its June 2025 Order to clarify whether it adopted the one-mile rule, and if the Commission did in fact adopt the one-mile rule, the Petition asks for reconsideration of that decision, or alternatively granting a variance so that the one-mile rule is not applied to Hennepin County DER facilities that already have a signed Uniform Statewide Contract. The Commission should deny all of these requests.

I. THE JUNE 2025 ORDER IS CLEAR ON THE APPLICATION OF THE ONE-MILE RULE

The June 2025 Order is clear on the application of the one-mile rule. The Order, at page 3, specifically noted that United Health Group argued that DER facilities owned by the same customer that are within one mile of each other should not have their capacity aggregated for determining the QF size for purposes of determining eligibility for Minnesota statutory net metering[2]. At page 4, the Order noted that Xcel Energy had argued that United Health Group's suggested approach would unfairly reduce monthly electricity payments from larger net metering customers, thereby shifting costs onto other ratepayers and also argued that aggregation of net metered facilities within one mile of each other to determine the size of the QF for purposes of eligibility for Minnesota statutory net metering is in the public interest and consistent with Federal Energy Regulatory Commission guidance on determining the size of a QF.

The Order clearly rejected the suggested approach from United Health Group and stated: "Xcel [Energy] argued that United Health Group's recommended net metering tariff changes would unfairly reduce monthly electricity payments from larger net metering customers, thereby shifting costs onto other ratepayers. Xcel [Energy] also

[2] Succinctly stated, the Minnesota statutory net metering is generally reflected in the Xcel Energy net metering rate codes A50 to A56. Rate Code A50 is at tariff sheet 9-2, and consistent with Minn. Stat. § 216B.164, Subd. 3, pars. b and d. This Rate Code A50 is available to QFs less than 40 kW and provides payment for excess production on a monthly basis at the "Average Retail Energy Rate". Rate Codes A51-A56 are available for QFs less than 1,000 kW consistent with Minn. Stat. § 216B.164, Subd. 3, par. b and Subd. 3a. Rate Codes A51-A56 provide payment for excess production at an avoided cost rate based on either 15-minute net metering (Rate Codes A51/A52 at tariff sheet 9-3), monthly net metering (Rate Codes A53/A54 at tariff sheet 9-4), or annual net metering (Rate Codes A55/A56 at tariff sheet 9-4.2).

argued that aggregation of net metered facilities within one mile of each other is in the public interest and consistent with Federal Energy Regulatory Commission guidance." (June 2025 Order, page 4).

There is no need to amend the Order to create greater clarity on the Commission applying the one-mile rule to determine the size of a QF for purposes of implementing the state's net metering programs. The Commission has properly applied the one-mile rule and the Order did not change this. Here, Hennepin County has admitted that the Public Safety Services (PSS) facility has a capacity of 720 kW, and that the Adult Correctional Facility (ACF) has a capacity of 620 kW, and that they are 0.17 miles from each other. The Uniform Statewide Contract and the signed Interconnection Agreements for these systems reflect these same capacity sizes. Accordingly, by these contracts both parties have agreed on the size of these systems. But, while each system is under 1 MW, cumulatively under the one-mile rule they form a single QF which exceeds 1 MW, and this QF size is applicable once both systems have achieved operation. As noted in the Hennepin County Petition, the ACF facility is still under construction.

II. OTHER LEGAL CHALLENGES SEEKING TO CHANGE THE JUNE 2025 ORDER

Hennepin County made a number of legal challenges in conjunction with asking for reconsideration of the June 2025 Order, including the following arguments:

1. The Commission first needs to establish the one-mile rule through a formal rulemaking before the one-mile rule can be applied to determine the size of a QF. (Petition, page 10).
2. Net metering is outside of PURPA, and PURPA does not apply to state net metering facilities. (Petition, pages 4-5). Under statute, net metered facilities can have a capacity of 40 kW or greater, but need to be less than 1,000 kW, and can participate in annual net metering. (Petition, pages 5-6).[3]
3. FERC only has jurisdiction where a behind-the-meter generation is a net supplier of energy to the grid during the applicable billing period, and FERC defers to state jurisdiction on applying net metering credits. (Petition, pages 7-8).
4. Applying the one-mile rule does not align with Minn. Stat. § 216B.164, Subd 1, which provides that this section shall at all times be construed to give the maximum possible encouragement to cogeneration and small power

[3] Citing to non-existent Minn. Stat. §264.16, Subds. 2(j) and 3a. We understand that the intended reference should be to Minn. Stat. § 216B.164, Subd. 2a(j) and Minn. Stat. §216B.164, Subd. 3a.

production consistent with protection of ratepayers and the public. (Petition, page 11).

5. The FERC one-mile rule, as applied in the SunE case, is distinguishable because the sales in SunE were under PPAs. (Petition, page 8).
6. The one-mile rule was enacted by FERC under PURPA to prevent developers seeking to sell energy to utilities from a QF exceeding the 80 MW size threshold, and the one-mile rule has never been adopted. (Petition, pages 4 and 11-12).

These arguments are without merit and we respond to them briefly below. No further rulemaking is necessary to implement the one-mile rule. Under the Commission's existing rules at Minn. R. 7835.0100, Subp. 19, the Commission has already established the following definition of a QF:

> ***Qualifying facility.*** *"Qualifying facility" means a cogeneration or small power production facility which satisfies the conditions established in Code of Federal Regulations, title 18, part 292. The initial operation date or initial installation date of a cogeneration or small power production facility must not prevent the facility from being considered a qualifying facility for the purposes of this chapter if it otherwise satisfies all stated conditions.*

This is consistent with the enabling statute, Minn. Stat. § 216B.164, Subd. 2, which states that this statute "… *as well as any rules promulgated by the commission to implement this section or [PURPA], as amended, and the [FERC] regulations thereunder, Code of Federal Regulations, title 18, part 292, as amended, shall, unless otherwise provided in this section, apply to all Minnesota electric utilities* …" and "*Nothing in this section shall be construed to alter the rights and duties of any person pursuant to [PURPA] and the [FERC] regulations thereunder* …."

The repeated language in Minn. Stat. §216B.164, when it uses the term capacity, associates it with the capacity of a "qualifying facility." (See, for example, Minn. Stat. §216B.164 Subds. 3, 3a, 4, and 6). Consistent with this, the Uniform Statewide Contract under Minn. R. 7835.9910 references the utility purchase of production from the "QF." The term "qualifying facility" is well known as a FERC term as part of its implementation of PURPA. The provisions of Minn. Stat. §216B.164 do not indicate any different definition of this term other than as defined by FERC in implementing PURPA.

Accordingly, pursuant to the Commission rules and state statute, the term QF is defined consistent with the CFR and the FERC interpretation of those regulations. Our February 28, 2025 Reply Comments explained at length how FERC in the SunE

decision applied the one-mile rule to determine whether a QF is larger than 1 MW capacity and that this analysis applies also here. We will not repeat the points here.

Minnesota statutes do not require net metering for QFs above 1 MW. This is not disputed. The issue here is how to determine the size of a QF, and the law is clear that the one-mile rule is to be applied. While Hennepin County cites general statutory policy provisions about encouraging cogeneration and small power production under Minn. Stat. § 216B.164, subd 1, it fails to discuss the critical phrase from this statute that this must be "consistent with protection of the ratepayers and the public." The Company explains below why the Hennepin County position is not consistent with these requirements. Further, the statutory net metering that Hennepin County seeks is limited to QFs having less than 1,000 kW capacity, yet the Hennepin County QF will exceed this threshold once both systems are in operation.

Hennepin County's attempts to distinguish SunE are not on point. The focus of that decision was how to measure the size of a QF by applying the one-mile rule for purposes of determining whether the QF was larger than 1 MW. The FERC SunE order at page 6 mentioned that "… the one-mile rule of section 292.204(a)(2) [(part of Code of Federal Regulations, title 18, part 292)] is a size determination which the Commission has consistently applied generally to the regulations pursuant to PURPA." The distinctions that Hennepin County assert, that in SunE there was a sale of the energy to the utility under a PPA, did not weigh in the FERC's decision on applying the one-mile rule to determine the size of the QF.

Hennepin County also argues that the one-mile rule is only used to determine if a facility exceeds the 80 MW QF limit. This is not correct. The FERC SunE decision applied the one-mile rule to determine the size of the QF and whether the QF exceeded 1 MW.

Hennepin County additionally argues that the state's net metering statute does not use the FERC one-mile rule. This is not correct. The state statute on net metering uses the term "qualifying facility" many times in the context of eligibility for net metering, and has proxied the FERC regulations. The Commission's rules that implemented this state statute, as quoted above, also proxied the FERC definition of QF. FERC is clear under its long-standing rule that the one-mile rule is to be applied for determining the size of a QF, and whether the QF is over 1 MW.

In the present docket, the record shows that UnitedHealth Group raised similar arguments as Hennepin County. They also asked the Commission to use "each interconnection point" instead of the one-mile rule to determine the size of the DER systems for purposes of determining whether together they constituted one QF in

excess of 1 MW. UnitedHealth noted on the record that they have four interconnection points within one-mile of each other. During the May 8, 2025 Agenda Meeting in this docket, there was substantial discussion of the one-mile rule and the Commission vote aligned with applying the one-mile rule for determining the size of a QF for purposes of applying the size limitations of the net metering tariffs.

III. OTHER CHALLENGES SEEKING A VARIANCE TO APPLYING THE ONE-MILE RULE TO THE HENNEPIN COUNTY DG FACILITIES WITH SIGNED UNIFORM STATEWIDE CONTRACTS

Hennepin County alternatively requested a variance and provided the following reasons to support its argument that the one-mile rule should not be applied to determine the size of its QF in Plymouth:

1. Under Minnesota Statutes, and the Xcel Energy tariff sheet 9-1, the total capacity of a DG system is based on the same set of aggregated meters. However, the meters for the PSS and ACF systems are not aggregated with each other. (Petition, pages 3 and 6-7).
2. Hennepin County is not seeking QF status and therefore, the one-mile rule does not apply. Hennepin County is only seeking status as a net metering facility. (Petition, pages 3 and 8-9).
3. Hennepin County did not see a need to participate in this docket previously because it already had signed Uniform Statewide Contracts. Because it did not participate previously in the docket, Hennepin County claims that the June 2025 Order does not apply to it. (Petition, page 4).
4. Hennepin County paid approximately $8.6 million for electric services in 2024. (Petition, page 2).
5. The 720 kw PSS DER system has been completed and is approximately 0.17 miles from the 620 kW ACF in Plymouth which is still under construction. The PSS and ACF are interconnected to different feeders. (Petition, page 3).
6. Applying the one-mile rule would cause Xcel Energy to "abrogate" its existing Uniform Statewide Contracts (signed on September 5, 2024 and October 9, 2024) and instead offer 15-minute net metering to the County's detriment, and Hennepin County is spending approximately $4.1 million on the PSS and ACF facilities. Rescission of the Uniform Statewide Contracts would amount to a breach of contract. It would be unjust to allow Xcel Energy to provide a notice of cancellation of the Uniform Statewide Contract as allowed by Section 17 of the Uniform Statewide Contract. (Petition, pages 5-6, and 10-11).

The Hennepin County argument on aggregation of meters conflates two different issues. Meter aggregation (under Minn. Stat. § 216B.164, Subd. 4a and tariff sheet 9-8.1) is available to QF DER systems under 1 MW that qualify for the tariffed net metering that are on contiguous property to load, the total of all aggregated meters must be subject in the aggregate to less than 1,000 kW, and this meter aggregation allows the DER production on one property to offset load on the adjacent property owned or leased by the same customer. Hennepin County does not qualify for aggregation of meters because the two DER systems in the aggregate exceed 1 MW. Further, the description of aggregated meters has no application outside of this meter aggregation program, and is not used to determine the size of the QF.

The Hennepin County argument that it is not seeking QF status is illogical. In order to obtain the tariffed net metering service that Hennepin County seeks here under the A55/A56 net metering rate codes, any DER system would need to be a QF. The requirement to be a QF to participate in net metering is specified throughout the Company's net metering tariff, the Uniform Statewide Contract, and the underlying Commission rules at Minn. R. 7835.4012 (Compensation for QFs having less than 1,000 kW capacity), Minn. R. 7835.4014 (QF Simultaneous Purchase and Sale Billing Rate), Minn. R. 7835.4015 (QF Time-of-Day Purchase Rates), Minn. R. 7835.4017 (Net Metered Facility, which is a subset of a QF) and Minn. R. 7835.9910 (Uniform Statewide Contract, where the customer is referred to as a QF). So, if the two facilities at issue here are not a QF, then the tariffed net metering provisions under the A55/A56 rate codes that Hennepin County seek to obtain under the Uniform Statewide Contract would not be available to Hennepin County. Further, if these two facilities together are a QF with a capacity in excess of 1,000 kW because they are within one-mile of each other, then under Minn. R. 7835.4019 they must negotiate a contract with the utility to receive compensation from the utility for excess production.

The Commission's determination in the June 2025 Order that the one-mile rule applies when determining the size of a QF for purposes of determining eligibility for the Minnesota statutory net metering remains applicable to all QFs. The fact that Hennepin County chose not to participate earlier in this docket does not change this. Otherwise, the Commission might subsequently be faced with challenges from every developer that would otherwise be subject to the one-mile rule, arguing that they did not file comments in this docket and therefore the Commission ruling on the application of the one-mile rule does not apply. This approach would be burdensome and unnecessary given that the Commission was merely applying established law in its June 2025 Order.

Similarly, the quantity of electrical service that Hennepin County received last year does not change the legal analysis here. Further, the fact that the two PV facilities are interconnected to different distribution feeder circuits does not impact the analysis under the one-mile rule as it is a definitive rule that is only based on distance and any facilities inside the one-mile periphery automatically constitute a single QF at a single site. Being interconnected to different feeders does not change the result.

The Hennepin County claim about Xcel Energy breaching the Uniform Statewide Contract is misplaced. Xcel Energy has noted to Hennepin County that when both Hennepin County systems at issue here are operational, the size of the QF would exceed the allowed size under the Uniform Statewide Contract. Prior to this point in time, which has not yet occurred since the AFC facility is still under construction, the Uniform Statewide Contract may be in place since the QF in operation is under 1 MW. The Uniform Statewide Contract is not a perpetual contract. The Uniform Statewide Contract at par. 17 states that it may be cancelled by either party upon 30 days notice. The Xcel Energy letter of March 12, 2025 to Hennepin County (attached as Attachment 4 to the Petition) explained why it was proper to sign each Uniform Statewide Contract, and why it would be appropriate to cancel both contracts once the two systems at issue here are in operation. The letter explained that at the same time of notice of cancellation, Xcel Energy would offer a PPA with 15-minute net metering at an avoided cost rate for a QF that is under 5 MW. This would now include offering the tariffed PPA that was approved in the June 2025 Order. There would be no breach of the Uniform Statewide Contract by giving notice of cancellation of the Uniform Statewide Contract as allowed by par. 17 of this contract. The lawful cancellation of this contract, as allowed by the provisions of this contract, does not constitute an unlawful "abrogation" or breach of this contract.

Xcel Energy believes that we have offered Hennepin County a reasonable path forward, consistent with applicable law. Xcel Energy cannot provide Hennepin County more favorable terms than what it offers to its other similarly situated customers.

Expanding net metering to systems beyond the Minnesota statutory requirement, which mandates monthly or annual net metering only for QF systems up to 1 MW, would not be in the public interest as it would effectively push more costs on other ratepayers. This monthly or annual net metering would result in monthly or annual "banking" of energy that would reduce the amount of utility sales to the monthly or annual net metered customer. This is because the monthly net metered customer would, on a monthly or annual basis, use periods of excess production from the PV system to help cover periods of time when their energy usage exceeds the production from the PV system. This would reduce the customer's monthly payments for energy

received from the utility even though the customer's demand could significantly exceed the production of their PV system during some periods of time within the month. Therefore, this would reduce the recovery of the fixed costs of the utility in providing utility service, including the costs to provide system capacity to serve the customer during low-production, high-usage time periods. Increasing the maximum limit for monthly or annual net metering for QF systems over 1 MW would exacerbate this effect because larger systems comprise a larger portion of the capacity, and therefore the costs of the distribution system. Every dollar that the monthly net metered customer would save would need to be made up from other customers. This would amount to a cross-subsidy from other ratepayers (including low-income customers) to a large customer, which would not be in the public interest. Furthermore, this would violate the Commission rules in Minn. R. 7835, which implement net metering to QF systems (including net metered facilities which are a subset of QFs) under 1 MW. (See, for example, Minn. R. 7835.4011, .4012 (Subp. 2), .4017, and .9910).

Hennepin County has not met the requirements for granting a variance to Commission rules or shown that any variance to these rules is appropriate.
The Commission standard for granting a variance to its rules is set forth in Minn. R. 7829.3200, which states as follows:

> *7829.3200 OTHER VARIANCES.*
> *I. Subpart 1. When granted. The commission shall grant a variance to its rules when it determines that the following requirements are met:*
> *A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;*
> *B. granting the variance would not adversely affect the public interest; and*
> *C. granting the variance would not conflict with standards imposed by law.*
> *II. Subp. 2. Conditions. A variance may be granted contingent upon compliance with conditions imposed by the commission.*
> *III. Subp. 3. Duration. Unless the commission orders otherwise, variances automatically expire in one year. They may be revoked sooner due to changes in circumstances or due to failure to comply with requirements imposed as a condition of receiving a variance.*

As explained above, granting Hennepin County a variance would impose an excessive burden on other ratepayers, would adversely affect the public interest, and would conflict with standards imposed by law.

CONCLUSION

The Company requests that the Commission deny the Petition because no clarification of the June 2025 Order is needed, the Petition does not meet the legal standard for rehearing, and there are no grounds to grant a variance to the application of the one-mile rule.

Dated: July 25, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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. E002/M-24-389

Dated this 25th day of July 2025

/s/

Christine Schwartz
Regulatory Administrator

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24	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-24-389
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