



414 Nicollet Mall
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December 3, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: SUPPLEMENTAL REPLY COMMENTS
INTERCONNECTION TARIFF CHANGES
DOCKET NO. E002/M-14-648

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits this Supplemental Reply to the October 14, 2014 Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket regarding proposed changes to our Interconnection Tariffs.

The Department's October 14, 2014 Comments raised concerns about the Company's \$250 fee for Distributed Generation (DG) applications less than 20 kW. Specifically, the Department has concerns on the following points:

- whether \$250 is a reasonable application fee for facilities less than 20 kW
- whether there are differences in the costs associated with processing an application for an incentive program such as Solar*Rewards and those of a net metered or DG customer
- Xcel appears to be charging net metering customers a non-tariffed application fee.

We appreciate the Department's review of our Petition and Reply Comments. In this brief Supplemental Reply we offer our response to the items with which they raised concern.

SUPPLEMENTAL REPLY

A. Is the \$250 application fee reasonable?

We acknowledge the Department's concern as to whether the proposed \$250 application fee for interconnecting facilities less than 20 kW is reasonable. Evaluating applications for systems under 20 kW involves checking the application information for completeness and following-up on any missing information, reviewing the interconnection agreement, confirming proof of insurance, and assessing the site diagram and site plan to verify the proposed facility is suitable for interconnection. An investigation of the transformer capacity and voltage considerations for any existing DG at the premise or routed through the same transformer must also be completed. In non-certified cases the test procedure used to verify the protection and operation of the system must be approved, and field checks and witness testing may be conducted. Both area engineering and an electrical engineer from the meter shop review each application. The review generally takes between two and a half and five hours of time. Rates for this work can be as low as \$40 per hour for a recently graduated contract engineer up to the fully loaded labor rate of an internal engineer at \$80 per hour. Therefore, we estimate the range of cost for these evaluations to be \$100 to \$400 (\$40 per hour for 2.5 hours up to \$80 per hour for 5 hours).

As a resolution to the concern raised by the Department, the Company proposes a \$100 generation interconnection application and engineering study fee in our Section 10 tariff for interconnecting facilities less than 20 kW. The fee for a 20 kW or less system with an open transfer would remain \$0.

B. Are there differences in the costs associated with processing an application for an incentive program such as Solar*Rewards with those of a net metered or distributed generation customer?

The engineering review process is the same in each case. However, some additional time is spent establishing program compliance for Solar*Rewards customers. In addition, for Solar*Rewards, the Company must purchase and annually renew a \$300 Salesforce site license to establish a user ID for each developer or individual customer requesting interconnection. The Company has not proposed any changes to the fee for Solar*Rewards participants in this docket. The Solar*Rewards application fee in our Section 9 tariff is currently \$250.

C. Is Xcel Energy charging a non-tariffed rate to its net metered customers?

In Docket No. E002/M-01-937, Xcel Energy established a study fee of \$250 for DG interconnections less than or equal to 100 kW. See tariff sheet 10-72 in Attachment A. This tariff page was in effect until September 1, 2012, when it was cancelled as part of Xcel Energy's electric rate case Docket No. E002/GR-10-971. See Attachment B. We have determined that in some cases the Company continued to charge the \$250 fee until recently. Xcel Energy proposes to refund the customers who paid \$250 fees after September 1, 2012 for DG systems less than or equal to 20 kW. We estimate there are approximately 20 customers that would receive a refund under this proposal.

In summary, we appreciate the Department's review of our Petition and Reply Comments, offer proposals for resolving the Department's concern about the level of fees, and propose a refund to those customers who have been charged non-tariffed fees. We respectfully request the Commission to approve our request, as amended by this Supplemental Reply.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6613 or amy.a.liberkowski@xcelenergy.com if you have any questions.

SINCERELY,

/s/

AMY LIBERKOWSKI
MANAGER, REGULATORY ANALYSIS

Enclosures
c: Service List



Northern States Power Company
 Minneapolis, Minnesota 55401
 MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

**DISTRIBUTED GENERATION STANDARD
 INTERCONNECTION AND POWER PURCHASE TARIFF
 (Continued)**

Section No. 10
 Original Sheet No. 72

**XCEL ENERGY DISTRIBUTED GENERATION INTERCONNECTION
 STUDY FEE SCHEDULE**

Installation Proposed on Normal Secondary Retail Service

Generator Size	Study Cost
0 ≤ 100kW	\$250.00
100 < 1000kW	\$875.00
1,000 ≤ 2,000kW	\$1,875.00

Installation Proposed on Secondary Network Retail Service

Generator Size	Study Cost
0 ≤ 2,000kW	Actual cost, see note # 6

Notes:

1. The above costs do not include the cost of certifying the interconnection equipment used in the installation acceptable for use on the Xcel Energy System. Certification of the equipment will cost an additional \$375 per unit and will be incorporated in fee for first customer requesting an Interconnection study for a particular unit.
2. Cost for study of multiple generators on same feeder segment, increase study costs by \$125/hour - not to exceed \$1,000 additional.
3. Xcel Energy will provide customer a Distributed Generation/Parallel Operations Master Agreement detailing all interconnection costs within 65 days after receipt of completed Application and Service Agreement.
4. If aggregate of existing and proposed Unit would exceed standard feeder segment loading or short circuit contribution on normal secondary retail service, further study may be required, if applicable. Required study will cost an additional \$625.
5. Add up to 65 days of response time to determine a Distribution facility credit. Add an additional \$125/hour for study cost - not to exceed \$7,000.
6. For customer proposing generation on secondary network retail service locations, study cost will be dependant on scope of request, the variables involved and based actual costs. Xcel Energy cannot provide an exact cost estimate at this time

Date Filed: 06-12-01

By: Kent T. Larson
 State Vice President - Minnesota & Dakotas

Effective Date: 07-29-02

Docket No. E-002/M-01-937

Order Date: 07-29-02

Docket No. E002/M-14-648
Supplemental Reply Comments
Attachment B

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

**DISTRIBUTED GENERATION STANDARD
INTERCONNECTION AND POWER PURCHASE TARIFF
(Continued)**

Section No. 10
1st Revised Sheet No. 72

CANCELED

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Date Filed:	11-03-10	By: Judy M. Pofel	Effective Date:	09-01-12
		President and CEO of Northern States Power Company, a Minnesota corporation		
Docket No.	E002/GR-10-971		Order Date:	05-14-12

CERTIFICATE OF SERVICE

I, Tiffany Hughes, hereby certify that I have this day served copies or summaries 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-14-648

Dated this 3rd day of December 2014

/s/

Tiffany Hughes
Records Analyst

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