

Rice, Robin (PUC)

From: Rebecca Lundberg <rebecca.lundberg@powerfullygreen.com>
Sent: Thursday, January 23, 2014 11:50 PM
To: #PUC_Public Comments
Subject: Docket No. E999/CI-13-720
Attachments: PUC_REC_E99 CI-13-720.pdf

To Whom it May Concern,

Please find comments attached regarding docket #E999/CI-13-720 regarding the renewable energy credits. Please let me know if you have any questions.

Sincerely,

Rebecca Lundberg
NABCEP Certified Solar PV Installer ®
Owner/President
Powerfully Green®
763.438.1976 | Rebecca.Lundberg@PowerfullyGreen.com

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January 23, 2014



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

RE: Comments on Ownership of Renewable Energy Credits, Docket No. E999/CI-13-720

Dear Dr. Haar:

Thank you for including our local solar industry in your inquiry about ownership of renewable energy credits in Minnesota. As you probably know, many feel that RECs may have a significant role in the future of energy policy.

We have had a solar photovoltaic system installed at our home since 2007. It was not until the Solar*Rewards program began in 2010 that Renewable Energy Credits started to be given to the utility in exchange for the customer's rebate. We have had customers intentionally decline thousands of dollars from an available Xcel Energy rebate so that they could retain ownership of their RECs!

RECs from net-metered customers belong to the customer. When a customer connects a small PV system to the utility grid they are, by state law, reimbursed at retail rate for the kilowatt-hours generated. This retail rate does not provide an additional payment for the RECs, and therefore does not include the RECs. It does not matter whether the QF is being paid the average retail rate or avoided cost rate; if a specific purchase price for the RECs has not been included, then ownership of the RECs remains with the customer.

If a third party owns the PV equipment and leases to the homeowner/business, in this case RECs also belong to the owner of the PV equipment, in this case a third party.

In the case of something like a community solar project where parts of the system are owned by different parties, I feel that the RECs belong to those owning the solar project, with RECs allocated in the same way that energy generation is allocated.

Because a utility is by nature a for-profit business, they will understandably be charged with looking out for their own financial viability. For this reason I feel that the Public Utilities Commission should make decisions on REC ownership. These decisions should be part of state policy, and added to the Minnesota Statutes on cogeneration and small power production so that they apply statewide to all utilities and all Minnesota customers.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Lundberg".

Rebecca Lundberg
Owner/CEO, Powerfully Green