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January 30, 2014

VIA E-FILING

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Implementation of
Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1619
Docket No. E999/CI-13-542

Dear Dr. Haar:

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES (“Notice”) on December 30, 2013 in the above referenced docket. Minnesota Power respectfully submits its Comments in response to the Notice.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

Lori Hoyum

Attachment
cc: Service List

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

In the Matter of the Implementation of Solar
Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes,
Section 216B.1691

Docket No. E999/CI-13-542

**MINNESOTA POWER'S
COMMENTS**

I. Introduction

Minnesota Power appreciates the opportunity to submit Comments to the Minnesota Public Utilities Commission (“Commission”) in response to the December 30, 2013 Notice of Comment Period on Annual Report Contents, S-REC Tracking and Shelf-Life, and Other Clarifications on Implementation of the SES (“Notice”). The Company is actively engaged in seeking the best results for implementation of a solar renewable energy credit (“S-REC”) tracking system and associated compliance procedures.

II. Minnesota Power’s Response to the Notice

General Comments:

- *Should the Commission issue any clarifications on S-REC shelf life?*

Yes, clarification on S-REC shelf life would be helpful. It would also be helpful for the Commission to clarify that all S-RECs are equal and should be accounted for as such. i.e., an out-of-state S-REC should count the same as in-state S-RECs. This clarification would ease the burden of administration and also serve to create a more robust S-REC market.

- *What information should be provided in the utilities' annual reports on the SES?*

Minnesota Power suggests utilizing the annual REO/RES¹ Reports as a template for reporting and tracking S-REC compliance. The utilities can augment their current REO/RES Reports and include a specific section for reporting of S-RECs.

- *Should the Commission authorize an additional tracking system to track compliance with the SES?*

Minnesota Power does not believe a separate tracking system is necessary for the purpose of the S-RECs. The current tool used for tracking RECs in Minnesota, the Midwest Renewable Energy Tracking System (“M-RETS”), is a proven tracking system. The creation and administration of a separate tracking system would create an unnecessary cost to Minnesota’s electric utility customers. The company believes there are adequate existing mechanisms to track S-REC compliance.

Reponses to Attachment 1 of the Notice:

1. The Commission determined that the shelf life of a REC is the first year of generation plus an additional four years. However, a 2013 addition to Minn. Stat. §216B.1691, subd. 2f(f) states: “Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after August 1, 2013, but before 2020 may be used to meet the solar energy standard established under this subdivision.”

a) Should the Commission clarify that an S-REC that meets the requirements under subd. 2(f) has no shelf life for purposes of meeting the SES?

b) Subd. 2(f) is silent on the shelf life of a S-REC that is installed and generating after August 1, 2013 but before 2020 located outside of Minnesota. Should the

¹ Docket No. E-999/PR-13-186 and E-999/PR-02-1240

Commission consider clarifying that S-RECs that meet the timeframe in Subd. 2(f) but are located outside of Minnesota also have no shelf life? Why or why not?

Yes, the Company believes clarification on the issues listed in 1 (a) and (b) of the Notice would be helpful.

2. *Minn. Stat. §216B.1691, subd. 7 states that if the Commission finds noncompliance, it “may order the electric utility to construct facilities, purchase energy generated by eligible energy technology, purchase renewable energy credits, or engage in other activities to achieve compliance. If an electric utility fails to comply with an order under this subdivision, the commission may impose a financial penalty on the electric utility in an amount not to exceed the estimated cost of the electric utility to achieve compliance.” The Commission has received informal inquiries asking whether this provision also applies to the SES or just the RES.*

a) Should the Commission issue a clarification?

Yes, Minnesota Power believes it would be helpful for Commission to issue a clarification on this matter.

b) If so, does the provision apply to the SES given that the first sentence of subdivision 7 states that the Commission shall regularly investigate whether a utility is in compliance with subdivisions 2 and 2a, not 2f? Does the 2013 addition of subd. 2f (b) “The solar energy standard established in this subdivision is subject to all the provisions of this section governing a utility’s standard obligation under subdivision 2a” relevant to this question?

Minnesota Power believes the Commission has ample authority to review each public utility’s ongoing compliance with the SES under both subdivisions 2 and 2a as well as the annual reports required under subdivision 2f(g).

3. *Minn. Stat. §216B.1691, subd. 2f(g) states that beginning on July 1, 2014 and each July 1 through 2020, each public utility shall file a report with the Commission reporting its progress in meeting the SES.*

a) The Commission has already established a biennial process whereby the Department and others investigate compliance with the RES, and then the Commission issues a finding on current RES compliance as well as likelihood of future compliance with the RES. The next biennial process will start with the filing of information by June 1, 2014. Should the SES be included in or excluded from this biennial process at this time? (Reference Dockets 12-958 and 10-989 for the Commission's past biennial dockets.)

As stated in the Comments above, Minnesota Power believes that the S-REC compliance should be reported within the currently established REO/RES Reporting process.

b) What information should be included in utilities' annual reports on the SES? In its August 29, 2013 comments in this docket at page 5, the Department recommended the following: "Reporting could be included with the utilities annual RES reporting (June 1st for the previous calendar year), and should include the annual Minnesota retail sales, annual excluded customer sales, and annual solar generation." Please comment on this recommendation.

For consistency and to ease the burden of reporting processes, the information included and timing of the annual SES reports should be consistent with the requirements of the annual reports for the RES. For initial reports, Minnesota Power believes the Department's recommendation is reasonable. The Commission will have the opportunity for clarification after review of these initial reports.

c) *Should utilities also be required to list efforts to meet the standard, obstacles anticipated, and potential solutions to the obstacles, as required for biennial reports under Minn. Stat. §216B.1691? Should utilities be required to comment on the anticipated mix of utility scale versus smaller solar projects that will be used to meet the standard?*

Minnesota Power believes it is reasonable for the utilities to report all of the information listed. It will provide clarity for regulators and customers alike and will provide a holistic view of the Company's efforts to reach the obligations set forth under Minn. Stat. §216B.169. The second question does not need a requirement, the SES identifies that the utility will have ten percent of its solar portfolio come from smaller solar projects. A utility cannot reliably predict which customers will be purchasing solar projects for their own use.

4. *Minn. Stat. §216B.1691, subd. 4(d) states that "The commission shall require all electric utilities to participate in a commission-approved credit-tracking system or systems." Minnesota's RES applies to 16 utilities. In contrast, Minnesota's SES applies to only 4 utilities. Should the Commission consider an additional tracking system specifically for the SES? In addition, the Commission has received comments in the past that some small units that would be eligible for the RES are not registered in MRETS. Should the Commission consider an additional tracking system for small units that are eligible for the RES?*

Minnesota Power does not believe that a separate tracking system is necessary for the purpose of the S-RECs for the reasons stated earlier in these Comments.

5. *Are there other topics related to how the SES provision of the statute, subdivision 2f, should be read in light of its inclusion in Minn. Stat. §216B.1691?*

While not Minnesota Power's intent, the inclusion of the SES in Minn. Stat. §216B.1691 does allow public utilities all the rights and procedures allowed under subdivision 2b - "Modification or delay of standard."

III. Conclusion

Minnesota Power appreciates the opportunity to provide Comments on the evolving issues surrounding tracking of S-RECs and compliance with Minnesota's solar energy standard. Minnesota Power believes it is important to create a transparent and accurate tracking mechanism without burdening either the utility or customers with unnecessary administrative tasks and costs. The Company supports the Commission's thoughtful and thorough approach to the design of these compliance mechanisms.

Dated: January 31, 2014

Respectfully submitted,

A handwritten signature in black ink that reads "Lori Hoyum". The signature is written in a cursive, flowing style.

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STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Kristie Lindstrom of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 31st day of January, 2014, she served Minnesota Power’s Comments in Docket No. E999/CI-13-542 to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.

/s/ Kristie Lindstrom

Subscribed and sworn to before
me this 31st day of January, 2014.

/s/ Jodi Nash

Notary Public - Minnesota
My Commission Expires January 31, 2015

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