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Minneapolis, MN 55401

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June 1, 2018

**—Via Electronic Filing—**

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

RE: ANNUAL REPORT  
SOLAR ENERGY STANDARD  
DOCKET NO. E999/M-18-205

Dear Mr. Wolf:

Enclosed for filing is the 2017 Annual Report on Progress in Achieving the Solar Energy Standard of Northern States Power Company, doing business as Xcel Energy, submitted in compliance with the Commission's April 25, 2014 Order in Docket No. E999/CI-13-542 and the Commission's October 20, 2017 Order in Docket No. E999/M-17-283.

Please note that we have marked as "Non-Public" certain information identifying the names or locations of customers who have been exempted from the costs associated with complying with the Solar Energy Standard. This is considered to be private data pursuant to Minn. Stat. §13.02, Subd. 9, and is non-public pursuant to Minn. Stat. § 13.37, Subd.2.

We have also marked as "Non-Public" capacity factor information relating to specific Purchase Power Agreements (PPAs). The terms of the Commission approved PPAs require that this information be non-public. Further, this is considered to be "nonpublic data" pursuant to Minn. Stat. §13.02, Subd.9, and is also "Trade Secret" information pursuant to Minn. Stat. §13.37, subd. 1(b) as it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Rebecca Eilers at [rebecca.d.eilers@xcelenergy.com](mailto:rebecca.d.eilers@xcelenergy.com) or (612) 337-5570 or me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or (612) 330-6064 if you have any questions regarding this filing

Sincerely,

/s/

BRIA E. SHEA  
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures  
c: Service List

# Solar Energy Standard Annual Report

**Due:** June 1, 2018

**Reporting period:** January 1, 2017 – December 31, 2017

**Statute/Rule reference:** [216B.1691 Subd. 2f\(g\)](#).  
 (g) Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision.  
 Order, issued April 25 in Docket No. E-999/CI-13-542  
 Order, issued October 23, 2014 in Docket No. E-999/M-14-321  
 Order, issued November 28, 2016 in Docket No. E-999/M-16-342  
 Order, issued October 20, 2017 in Docket No. E-999/M-17-283

**Comments:** Please answer questions below and eFile as a PDF

Report Year	2017	
Date Submitted	6/1/2018	
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State	MN	
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Comments/Notes		

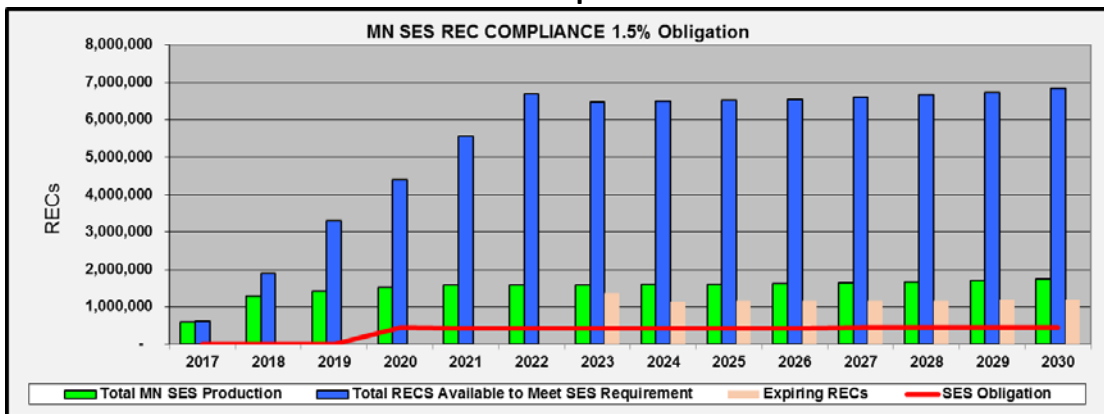
**1. Summary of ongoing efforts to obtain solar energy, including a brief summary of the anticipated mix of project sizes for SES compliance.**

*Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.H*

For purposes of this Section 1, Solar Energy Standard (SES) compliance means the requirement set forth in Minn. Stat. § 216B.1691, Subd. 2f, whereby Xcel Energy, by the end of 2020, needs to generate or procure sufficient electricity generated by solar energy so that at least 1.5 percent of the Company’s total retail electric sales to retail customers in Minnesota is generated by solar energy. The other requirement in Subd. 2f regarding systems of 20 kW (AC) or less is not addressed in the Company’s response to Section 1 of this report, but instead is addressed in its response to Section 2 below.

The Company has developed a large portfolio of programs to provide renewable options to residential and commercial customers. Since the passage of the SES under the 2013 Energy Omnibus Bill, we have also grown our utility portfolio of solar resources to expand access to solar benefits to all customers while achieving compliance in 2020. The expected cumulative impact of the programs and efforts detailed below are graphically displayed below in Graph 1, and in the attached Excel file (Tab 5 – Additional Graphs).

**Graph 1**



**Solar\*Rewards (Second Generation) – For PV installations of 20 kW<sub>DC</sub> or less**

Our Solar\*Rewards program offers customers installing solar photovoltaic (PV) systems sized 20 kW<sub>DC</sub> or less an incentive based on the system’s energy production. The program offers a production incentive of \$0.08/kWh for 10 years from the beginning of production under a Solar\*Rewards contract. The legislature under Minn. Stat. § 116C.77792 has authorized this program to be available for eight consecutive years at an annual budget of \$5 million for the first four years, \$15 million in the fifth year, \$10 million in the sixth and seventh years, and \$5 million in the eighth year from the renewable development account beginning in August 2014. More details about the results of the program are available in our Solar\*Rewards Annual Report.<sup>1</sup> The RECs generated under the Solar\*Rewards program RECS are assigned to the Company for the first 10 years of each installation.<sup>2</sup>

<sup>1</sup> Annual Reports are filed on or around June 1 of every year beginning in 2015 in Docket No. E002/M-13-1015.

<sup>2</sup> Docket No. E002/M-13-1015, Solar\*Rewards, Deputy Commissioner Decision, February 24, 2014.

### **Solar\*Rewards (First Generation) – For PV installations of < 40 kW<sub>DC</sub>**

Our SES compliance also includes RECs established under our first generation program (2010 – 2014). This program was part of the Company’s Conservation Improvement Plan portfolio and provided one-time incentives for projects sized less than 40 kW<sub>DC</sub>. The program was discontinued when the Solar\*Rewards program was redeveloped in 2013 because of the passage of Minn. Stat. § 116C.7792. The program was closed for incoming applications in August 2014, but contracts relating to these installations still remain in place for their contract term and previously awarded applications continued to be installed after August 2014. These contracts have assigned the RECs to the Company for the 20 year contract term.

### **Solar\*Rewards Community – For PV installations up to 1 MW**

The Company launched its community solar garden program, called Solar\*Rewards Community, in December 2014.<sup>3</sup> Solar gardens are shared PV arrays up to one MW that interconnect with the distribution grid under a 25 year contract term. Customers who subscribe to a solar garden receive a bill credit for their portion of the system’s production and the Company receives the RECs for the term of the contract.<sup>4</sup> There is no statutory budget or capacity limit for the Solar\*Rewards Community program.

### **Made in Minnesota – For PV installations of < 40 kW<sub>DC</sub>**

Established by legislation in 2013, the Made in Minnesota program provided incentives to systems manufactured in Minnesota that were up to 40 kW<sub>DC</sub>, with the majority being over 20 kW<sub>DC</sub>. The program was launched in 2014 and cancelled by the legislature in 2017 (Minn. Stat. § 216C.417). The program continues to be administered by the Department of Commerce.

Made in Minnesota had an annual budget of \$15 million per year for 10 years, funded primarily through the Renewable Development Fund, with a small portion funded through CIP. The program offered incentives to customers of the Company and other qualified utilities, ranging from \$0.10 to \$0.22/kWh for 10 years of production, depending on the customer type and equipment manufacturer. The RECs generated under this program by Company customers belong to the Company for 10 years from installation.

### **Universal Scale Solar**

Since the passage of the SES legislation, the Company has developed a portfolio of three universal scale solar projects. The Company has 162.25 MW of large-scale solar generation from two projects under Power Purchase Agreement (PPA) contracts, consisting of the North Star project (100 MW) and the Marshall Solar project (62.25 MW). These projects began operating in late 2016 and early 2017. We anticipate these will generate approximately 313,000 solar RECs annually. These resources were approved by the Commission as part of a Solar Portfolio from a Request for Proposals process.<sup>5</sup> However, the Company has allotted as much as 25% of the expected output of the North Star facility for the Renewable\*Connect program. The Company portfolio also includes the 100 MW Aurora Solar PPA which was approved through the

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<sup>3</sup> See Docket No. E002/M-13-867.

<sup>4</sup> Prior to 2017, Garden Operators had the choice as to whether or not to receive the RECs directly. Currently, all community solar gardens have chosen to provide them to the Company.

<sup>5</sup> See Dockets No. E002/M-14-162, In the Matter of Xcel Energy’s Petition for Approval of a Solar Portfolio to Meet Initial Solar Energy Standard.

Company's Competitive Acquisition Process proceeding<sup>6</sup>. This project is made up of multiple distributed generation solar sites, estimated to generate 201,000 solar RECs annually. All phases of this project were in commercial operation by summer 2017.

**Renewable Development Fund (RDF)**

1994 Legislature mandated the creation of the Renewable Development Fund (RDF) for the purpose of developing renewable sources of electricity, including solar. Recipients of RDF grant funds that install energy production assign and transfer all RECs from the facility's generation of energy using renewable fuel to the Company for the life of the facility. Since August 1, 2013, fifteen facilities have been commissioned with a total installed capacity of 5.368 MW<sub>DC</sub>. Of these installed facilities, four are 20 kW<sub>DC</sub> or smaller with an installed capacity of 0.025 MW<sub>DC</sub>, one is between 20 kW<sub>DC</sub> and 40 kW<sub>DC</sub> with an installed capacity of 0.039 MW<sub>DC</sub> and ten are larger than 40 kW<sub>DC</sub> with an installed capacity of 5.304 MW<sub>DC</sub>. An additional 11 facilities are planned or under construction and will add an additional 4.133 MW<sub>DC</sub> of capacity. All of the planned facilities are to be larger than 40kW<sub>DC</sub>. Legislation passed in 2017 made significant changes to the RDF statute (Minn. Stat. § 116C.779). These changes include the creation of the Renewable Development Account (RDA) as a special account within the Minnesota treasury. Additional changes include the purposes for how funds may be expended and how projects are selected. Therefore it is not known at this time if any new RDF facilities will be installed which affect the SES.

**Table 1: RDF Solar Facilities\***

<b>Facility Size</b>	<b>Number</b>	<b>Capacity (MW<sub>DC</sub>)</b>
<b>Commissioned Facilities</b>		
<20 kW <sub>DC</sub>	4	0.025
20 – 40 kW <sub>DC</sub>	1	0.039
>40 kW <sub>DC</sub>	15	5.304
<b>Total Commissioned Facilities</b>	<b>15</b>	<b>5.368</b>
<b>Planned Facilities</b>		
<20 kW <sub>DC</sub>	0	0.000
20 – 40 kW <sub>DC</sub>	0	0.000
>40 kW <sub>DC</sub>	11	4.133
<b>Total Planned Facilities</b>	<b>11</b>	<b>4.133</b>
<b>TOTAL RDF FACILITIES</b>	<b>26</b>	<b>9.501</b>

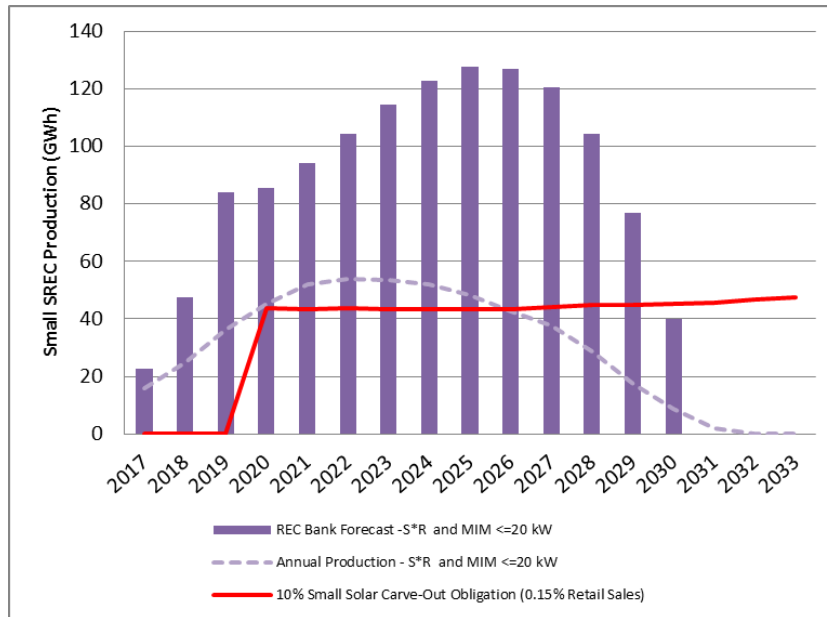
\*Resources that went into service on or after 8/1/2013.

<sup>6</sup> See Docket No. E002/CN-12/1240, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need.

**2. Progress towards the 10% carve-out for systems less than 20/40 kW, including the method by which the utility will meet the carve-out. Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.1**

Graph 2 below represents our current projection for REC compliance with the 10% small solar carve out. This chart shows the Company may be in compliance with the small solar carve out through 2029. However, this representation uses program assumptions and thus has embedded risk that the actual results could be significantly different than the forecast. The Company cannot predict what the market installation rate will be for small solar rooftop.

**Graph 2  
Small SREC Production with Solar\*Rewards  
Program Extension through 2021**



The chart above assume 100 percent of funds are awarded and that of these there will be an installation rate of 75% for the Solar\*Rewards program. The Solar\*Rewards program awarded 100% of the 2017 funding. If actual solar installations are lower than forecasted levels, the Company may not be able to meet the small solar carve-out requirements prior to 2030.

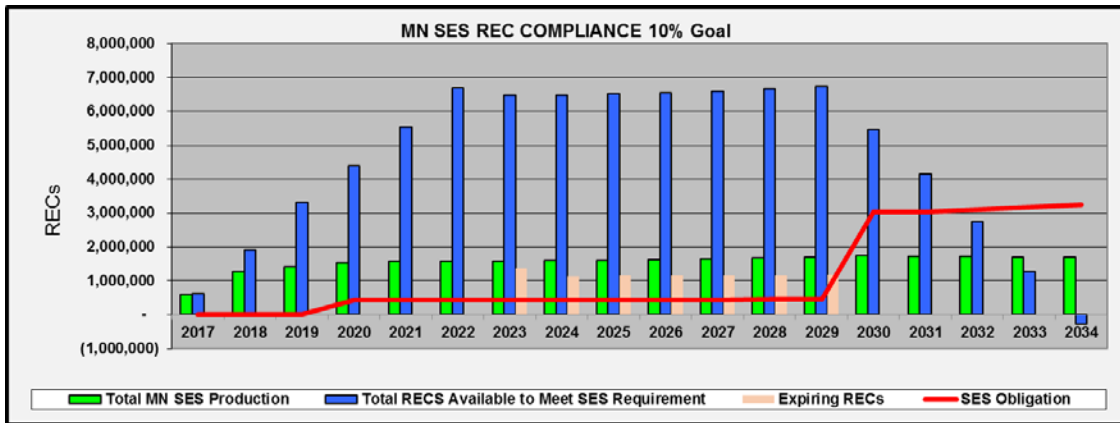
Also, the above analysis is based on the understanding that the nameplate capacity for purposes of this statute is measured in alternating current (AC). This is consistent with the definition of capacity in Minn. Stat. § 216B.164, Subd. 2a.(c)., as well as how capacity is used or interpreted under the following statutes: Minn. Stat. §§ 216B.1611, Subd.2(a), and Subd.3a(a)(1); 216B.1613; 216B.164, and Subd. 4c; 216B.1641 (b).

**3. Discussion on the utilities’ efforts to reach, by 2030, the energy goal that ten percent of the retail electric sales in Minnesota be generated by solar energy.**

*Docket Nos. E999/CI-13-542, E999/M-16-342, Commission Order (November 28, 2016)*

The 10% by 2030 goal is an energy goal of the state of Minnesota. We understand this question to be requesting our efforts to reach our proportional share of the state’s energy goal. As shown in Graph 3 below and in the attached Excel file (Tab 5 – Additional Graphs), the Company forecasts that we will meet the 2030 goal for years 2030 – 2033. This is largely due to the banking of solar RECs up to that point. Starting in 2034 we expect to fall short of the goal if no additional solar is in-service. We expect to review this further in a future resource plan.

**Graph 3**



**4. Any additional comments or materials the utility may wish to include.**

**SES Cost Exclusion**

No new SES exclusion applications were approved by the March 1, 2018, deadline for this report, and no applications are pending. We provide the production information and solar costs excluded for the two customers at six premises that became eligible for exclusion on June 1, 2017 in the attached Excel file (Tab 2 – Retail and Excluded). Per the exclusion process approved by the Commission in Docket No. E002/M-17-425, we issued bill credits in March 2018 to customers approved for exclusion for SES-eligible costs incurred between June 1 through December 31, 2017. See Tab 2 of the attached Excel file (Retail and Excluded) for the excluded customer sales and refund amount issued to each excluded premise.

**Cost Recovery of 2017 SES Exclusion Amount**

To recover the 2017 SES excluded costs from non-exempt customers, \$90,331 was included in the May 2018 monthly fuel clause rate (Docket No. E002/AA-18-308, see Attachment 1, page 4); \$6,867 was included in the CIP Rider tracker filed in Docket No. E,G002/CIP-16-115.06 on March 30, 2018 (see footnote 1 on the 2018 tracker, page 32); and \$77,123 will be added to the RDF tracker to be filed with the Commission by October 1, 2018.

**Future SES Cost Exclusion**

In its January 16, 2018 Order in Docket No. E002/M-17-425, the Commission found that only



those costs associated with SRECs that are retired for the purpose of meeting the requirements of Minn. Stat. § 216B.1691, subd. 2f, can be excluded from rates charged to exempt customers. We anticipate that all SRECs being generated at this time will be retired in order to meet the SES. At some point in the future, however, we may begin generating more SRECs than are needed for SES compliance. In a future annual report, we will discuss refinements to our SES cost exclusion methodology that will account for the fact that not all SRECs generated in a given year will be needed for SES compliance.

#### **MRETS**

M-RETS (Midwest Renewable Energy Tracking System) has contracted with developers to redesign and improve functionality to the official Midwest REC Tracking Registry. One particular change that was implemented was the addition of the Minnesota Small Solar carve-out eligibility flag. This flag, which is labeled "Minnesota: SES Small Solar," has the efficient ability to quickly inform users which RECs and solar generators fall under the Small Solar guidelines. To reiterate, the qualifying small solar RECs must come from solar generators that have a nameplate capacity of 20 kW or less and achieved commercial operation after August 2013. In 2017, the Company had 19 aggregated Solar\*Rewards units registered and 4 small RDF projects for a total of 13,894 RECs that are eligible to fulfill MN Small Solar requirements and will be held in our REC bank until retirements are required in 2020. In addition, the Company has established a separate sub-account within the M-RETS system that holds the annual accumulated small solar RECs aside from other RECs held in our REC bank.

## 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/M-18-205**

Dated this 1<sup>st</sup> day of June 2018

/s/

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Carl Cronin  
Regulatory Administrator

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