



414 Nicollet Mall  
Minneapolis, MN 55401

February 27, 2015

—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: STAKEHOLDER MINUTES  
COMMUNITY SOLAR GARDENS  
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Compliance information in response to the Commission's February 13, 2015 Order (Order Point 3) submitted in the above-noted docket.

Per Commission Order, all agendas, approved minutes and attachments from the Solar\*Rewards Community Implementation Workgroup will be filed in eDockets. The attached set of approved meeting minutes includes all past meeting minutes. Additional meeting minutes will be filed upon their approval by the Implementation Workgroup.

Attachments include:

- Attachment A: September 4, 2014
- Attachment B: September 17, 2014
- Attachment C: October 1, 2014
- Attachment D: October 1, 2014 Subscriber Subgroup
- Attachment E: October 15, 2014
- Attachment F: October 29, 2014
- Attachment G: November 11, 2014
- Attachment H: December 3, 2014
- Attachment I: December 17, 2014
- Attachment J: January 7, 2015

- Attachment K: February 4, 2015

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 Jessica Peterson at [Jessica.K.Peterson@xcelenergy.com](mailto:Jessica.K.Peterson@xcelenergy.com) or 612-330-6850 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE  
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING

Enclosure  
c: Service List  
Attachments

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> September 4, 2014	
<b>Start Time:</b> 2:30 pm Central	<b>Location:</b> 1D; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 4:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Condon Jefferds	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Introductions</b>	Thor	Update
<b>Implementation Group Organizing Document</b>	Thor	Discussion
1. Section I <ul style="list-style-type: none"> <li>a. Leads</li> <li>b. Start/End date</li> </ul> 2. Section II <ul style="list-style-type: none"> <li>a. Scope</li> <li>b. Objectives</li> <li>c. Deliverables</li> </ul> 3. Section III <ul style="list-style-type: none"> <li>a. Membership</li> <li>b. Meeting plan</li> </ul> 4. Rules of Engagement <ul style="list-style-type: none"> <li>a. Decision-making</li> </ul>		
<b>Issue Discussion (as time permits)</b>	Marty	Discussion
Begin with an item from the Scope list		
<b>Other items</b>		
<b>New Action items</b>		
<b>Old Action items</b>		

**TO:**  
**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** SEPTEMBER 12, 2014  
**CC:**

---

## Meeting Minutes September 4, 2014

### Welcome and Introduction

**Objective of Team:** Introductions were made and Working Group leads Thor Bjork and Marty Morud explained that the deliverables for the group will relate to topics on the implementation and administration of the Solar\*Rewards Community program, but **would not** include policy items.

**Members:** Comments were made about expanding participation in the group to include representation from other parties with interest in participating. There seemed to be a consensus that the group size should remain manageable and focused on issues related to launching the program.

The group seemed open to making adjustments to membership if prospective community solar owners wishes to participate. It was hoped that sharing the minutes with a larger audience would help communicate the group's actions for parties interested in the policy side of S\*RC but will not be submitting applications.

The group leads also stated that these meetings are not meant to provide training for submitting a S\*RC application. Such training would be provided to any interested party at a later time.

Following a brief discussion, it was decided that **meetings will be held every two weeks** until the launch of the program, followed by monthly meetings through April 2015.

### Implementation Group Organizing Document

**Scope:** An initial list of items included:

1. Plan for a smooth implementation of S\*RC
2. Clarify the application process
3. Uniformity of forms/documents among S\*RC owners
4. Information required on a S\*RC owners websites related to marketing materials
5. Limitations on promotion materials
6. Uniform standards on production estimates
7. Best practices

### Discussion

#1: Plan for a smooth implementation of S\*RC

This was considered a general statement for the entire process. One suggestion was that there could be a general information brochure explaining the program independent of individual projects. This would have been helpful during the launch in Colorado.

# 2: Clarify the application process

#2 would include the items 3-6. This could be addressed by walking through the online application process step by step. It was agreed to set up a demo of the online application process to help address items 3-6.

#3: Uniformity of forms/documents among S\*RC owners

This item may be redundant to the items #4 and #5.

#4: Information required on a S\*RC owners websites related to marketing materials

#5: Limitations on promotion materials

Both items #4 and #5 are of specific concern to the Minnesota Attorney General's Office. Since the Minnesota Attorney General's Office was not in attendance, it was decided to address these two items at a later meeting with OAG representation.

#6: Uniform Standards for production estimates.

The online application system will use the standard PV Watts/D rate factor calculation combined with tracking and orientation to calculate the 120% rule. Once the rule is passed in the customer's application, Xcel Energy will only recheck the 120% rule if the subscription size changes or the customer relocates. The promotional side of the production estimate may need to be discussed further.

#7: Best practices

This was another all inclusive item to the process that should be developed as the working group proceeds. It was emphasized that the development and exchange these best practices are important to both sides for program – both Xcel Energy and the S\*RC developer community.

It was also suggested that two additional items should be included to the scope of the working group's duties.

1. Add the 120% rule requirements as a specific item.
2. The group anticipates receiving the PUC order which may lead to additional items to include.

Ultimately the goal of the working group is to plan for a smooth opening of the application system on first day.

Suggestion for the form of future meetings is to walk through the entire process from project conception through the application process and all the way through the 25 year contract.

The team decided to schedule several meetings every other week beginning Wednesday, September 17 from 1:30 to 3:00 p.m.

*Notes taken by John Wold.*

# SRC Implementation Working Group

Section I: Group Identification	
<b>Name:</b>	Solar*Rewards Community Implementation Working Group
<b>Working Group Leads :</b>	Thor Bjork; Xcel Energy Marty Morud; TruNorth Solar
<b>Start Date:</b>	August 7, 2014
<b>End Date:</b>	April 7, 2015; or continue as needed
<b>Important Document Links:</b>	<ul style="list-style-type: none"> <li>• Community Solar Gardens Docket <a href="#">13-867</a></li> </ul>
Section II: Scope, Objectives, and Deliverables	
<b>Scope:</b>	
<p>At the Commission’s request, Xcel Energy is encouraged to continue collaboration among solar-garden developers, the Department, the OAG, and other interested parties to address issues including:</p> <ol style="list-style-type: none"> <li>1. ensure the smooth implementation of Xcel’s solar-garden program;</li> <li>2. clarify and streamline the application process, interconnection, and bill crediting;</li> <li>3. discuss uniform subscriber disclosure forms;</li> <li>4. clarify what information a solar-garden developer must make available on its Web site;</li> <li>5. discuss limitations on promotional activities and materials;</li> <li>6. discuss uniform standards for solar-garden production estimates; and</li> <li>7. develop and implement best practices for solar gardens in Minnesota.</li> </ol>	
<b>Objectives &amp; Goals:</b>	
To develop a set of recommendations to ensure (1) the smooth implementation of Solar*Rewards Community and (2) a positive customer and garden operator experience.	
<b>Deliverables &amp; Timeframes:</b>	
Xcel Energy will make compliance filings on October 7, 2014 and April 7, 2015, reporting on the progress of the discussions between the parties and any resolutions for each issue.	
Section III: Organization	
<b>Membership Criteria:</b>	
The Working Group will be open to potential Garden Operators interested in participating. New members who join after work has been completed will need to review previous documents and meeting transcripts.	
<b>Meeting plan</b>	

<b>Date range</b>	<b>Frequency</b>	
9/4/2014 – launch date	Every two weeks	
Immediately preceding and following launch date	Four weekly meetings	
Post launch	Monthly	
Meetings will be held at 414 Nicollet Mall, Minneapolis, MN 55401.		
<b>Working Group Roles, Functions, &amp; Duties:</b>		
Working Group leads will set meeting dates and locations, create the agenda and distribute meeting minutes.		
<b>Team Member (Not finalized)</b>	<b>Organization</b>	<b>Email</b>
Thor Bjork	Xcel Energy	<a href="mailto:Thor.s.bjork@xcelenergy.com">Thor.s.bjork@xcelenergy.com</a>
John Wold	Xcel Energy	<a href="mailto:John.c.wold@xcelenergy.com">John.c.wold@xcelenergy.com</a>
Ian Dobson	OAG	
Holly Lahd	DOC	
Marty Morud	TruNorth Solar	
Ralph Jacobson	Innovative Power Solutions	
Michael Krause	Sundial Solar (Kandiyo Consulting)	
Steve Coleman	MN Community Solar	
Lynn Hinkle	MnSEIA	
Rick Condon	MN Interfaith Power and Light	
Dan Rogers	SunEdison	
Duane Hebert	Novel Energy Solutions	
Mike Harvey	Able Energy	
Madeleine Klein	SoCore Energy	
J.W. Postal	SunShare	
Tom Hunt	Clean Energy Collective	
<b>Section IV: Rules of Engagement</b>		
<b>Decision-Making Methodologies:</b>		
The Working Group leads will be responsible for designating each position as having one of the following designations:		
<ul style="list-style-type: none"> <li>• <b>Full consensus</b> - when no one in the group speaks against the recommendation in its last readings. This is also sometimes referred to as <b>Unanimous Consensus</b>.</li> </ul>		

- **Consensus** - a position where only a small minority disagrees, but most agree.
- **Strong support but significant opposition** - a position where, while most of the group supports a recommendation, there are a significant number of those who do not support it.
- **Divergence** (also referred to as **No Consensus**) - a position where there isn't strong support for any particular position, but many different points of view. Sometimes this is due to irreconcilable differences of opinion and sometimes it is due to the fact that no one has a particularly strong or convincing viewpoint, but the members of the group agree that it is worth listing the issue in the report nonetheless.
- **Minority View** - refers to a proposal where a small number of people support the recommendation. This can happen in response to a **Consensus**, **Strong support but significant opposition**, and **No Consensus**; or, it can happen in cases where there is neither support nor opposition to a suggestion made by a small number of individuals.

In cases of **Consensus**, **Strong support but significant opposition**, and **No Consensus**, an effort should be made to document that variance in viewpoint and to present any **Minority View** recommendations that may have been made. Documentation of **Minority View** recommendations normally depends on text offered by the proponent(s). In all cases of **Divergence**, the Working Group leads should encourage the submission of minority viewpoint(s).

**Closure:**

The Working Group will terminate April 7, 2015, unless otherwise ordered, or the Working Group wishes to continue.

<b>Contact:</b>	Thor Bjork	<b>Email:</b>	Thor.s.bjork@xcelenergy.com
-----------------	------------	---------------	-----------------------------



**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> September 17, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1D; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Administrative Items</b>	Thor	Discussion
1. TBD meeting locations 2. Additional meeting with additional attendees to cover topics outside of application process		
<b>Review Application Process</b>	Craig	Discussion
<b>Other items</b>		
<b>New Action items</b>		
<b>Old Action items</b>		

**From:** MNSEIA  
**Subject:** Solar\*Rewards Community Implementation Workgroup  
**Date:** September 17, 2014

---

**Meeting Minutes  
September 17, 2014**

**Welcome and Introduction**

Thor Bjork noted that meeting notes from 9/4 were distributed to all Working Group members. Group lead Marty Morud added that he shared the meeting notes with the broader MnSEIA Community working group list, which includes about 65 members.

Thor mentioned that he plans to offer an additional meeting to address issues beyond the application process related to SRC program. The meeting will include representatives from organizations beyond Garden Operators that are not directly involved in the application process, and is scheduled for 10/1 at 3:00 p.m. at 414 Nicollet Mall.

**Discussion**

Product Manager, Craig Konz, began walking through the application process that is currently in place in Colorado. The intent was to provide a high level overview so that the Work Group could discuss and comment on the process.

The process includes a six step process:

- Step 1: Initial Application and Deposit
- Step 2: Subscriber Validation
- Step 3: Engineering Review
- Step 4: Documents and Contract Submission
- Step 5: Application Completion
- Step 6: Garden Active

Discussion items:

**Application Fee and Deposit**

Either a mailed check or wire transfer will work

**System size and AC/DC**

\$100/deposit is based on the reported AC size of the system.

Discussion around when AC would be used vs. DC. AC is used to ensure compliance with the 1MW limit. Subscriptions are sized in DC for the purposes of allocating bill credits to subscribers and for determining unsubscribed energy.

Additional discussion around how this provision of the contract (Section 9, Sheet 78) would be administered

K. Inverter Capacity. The Community Solar Garden must have an inverter with a capacity of no more than

one (1) megawatt alternating current (AC) to assure that the Community Solar Garden has a nameplate capacity of no more than one (1) megawatt AC.

The group was concerned that this may not be the best way to determine the 1 MW size limit because the design of the inverter may change e.g. an inverter becoming unavailable for purchase. Some parties suggested that the interconnection agreement contains the maximum output of the system and would be a better way of enforcing the size limit.

The group agreed to report the maximum size of the inverter (based on current design of the PV system) in the initial application step to determine the deposit amount, then to also enforce the size limit through the interconnection process.

#### **Application timeline and determining completeness**

The Group had questions around how Xcel will determine application completeness and when the clock began for the 30 day timeline started. The group reviewed the requirements in Section 9, Sheet 67 (excerpted below). The group noted that, as currently designed, Xcel's application process has the subscriber validation step in the incorrect order (before engineering documents). The subscriber validation step requires the Garden Operator to input at least 5 subscribers before moving to Step 3 – 'Engineering documents'. Xcel Energy agreed that if the group suggests it, we would work to remedy the situation by either removing that step or moving it to a later step.

- a. the applicant's contact information,
- b. garden information including system location and specifications,
- c. application fee and deposit,
- d. engineering documents, including one-line diagrams, site plan, and Interconnection Application;

The group agreed in concept that the 30 day time period for determining completeness begins when a-d above are completed.

The group discussed the 60 day timeline to review and approve an application and how that worked within the application process and the interconnection process. The group did not have time to complete the discussion and agreed to continue at the next meeting.

#### **Topics to Continue in Discussion for 10/1 meeting**

- Review discussion on the 30 day timeline to determine completeness
- Continue discussion on how to administer the 60 day timeline to approve or reject
- Continue review of process

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> October 1, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> LL3; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Contract item</b>	Thor	Discussion
6. F. Annual Report		
<b>Continue Review of Application Process</b>	Craig	Discussion
<b>New Action items</b>		
<b>Old Action items</b>		
Group to examine how best to administer the 30 days to determine completeness and the 60 days to approve or reject		

**From:** MNSEIA  
**Subject:** Solar\*Rewards Community Implementation Workgroup  
**Date:** October 1, 2014

---

**Meeting Minutes**  
**10/1/2014**

**Welcome**

Thor Bjork noted that meeting notes from 9/17 were distributed to the workgroup members and MNSEIA contacts.

There were 19 people in attendance. Including:

Shawn Bagley, Patrick Dalton, John Wold, Jessie Peterson, Thor Bjork, Craig Konz, Nathan Franzen, Duane Herbet , Holly Lahd, Dan Rogers, Ken Bradley, Joe Divito, Marty Morud, Steve Coleman, Ben Ranson, Virginia Rutter, Ralph Kaehler, Ross Abbey, Mike Krause and Rick Condon

The agenda for this meeting included the following topics:

- Annual Reporting
- Continued Review of Application Process
- Application Timing
- New Items

**Discussion items:**

**1. Annual Report**

There were issues raised as to what should be included in the annual reporting requirement within the Solar\*Rewards Community Contract. The language reads (concerning requirement italicized), “The Solar Garden Operator shall issue (and provide the Company and each Subscriber) public annual reports as of the end of the calendar or other fiscal year containing, at a minimum, the energy produced by the Community Solar Garden; *audited financial statements including a balance sheet, income statement, and sources uses of funds statement*; and the management and Operatorship of the Community Solar Garden Operator.” In order to address the issue, suggestions were provided including:

- Xcel Energy and Garden Operators have the ability to remove parts of this language as part of contract negotiations - each amended contracts would need to be filed with the PUC with the opportunity for other parties to comment Permanently delete the language regarding audited financial statements and file a petition with the PUC

It was decided that this language could be burdensome and therefore, at this times should be dealt with as part of contract negotiation.

**2. Inverter Sizing**

Application fees will be determined by the AC size of the inverter. Subscription sizes are recorded in the application system in DC, however. Parties mentioned that the DC size of the system may change through the design phase. Xcel Energy is aware this will likely adjust as the project moves forward, but as long as it is below 1MW it should be fine.

### **3. 30/60 Day time frames**

Time frames were once again discussed by the group. It was determined that the 30 days was determined by moving through requirements a-e within the tariff. Subscribers are not required to complete the application process, but will be required before commercial operation in order to meet statute requirements. Xcel Energy is determining whether the application can be adjusted to reflect this clarification.

There is then 15 days for engineering review before the 60 day clock starts. The Department indicated that these time frames were put in place to keep the process moving – a concern for many of the parties involved in gardens.

A question was raised as to whether there are time frames in which the operator must move through the application process. There are no time frames other than the 24 month requirement.

Additionally, concern was raised as to how prepared Xcel Energy is to handle several MW of requested solar gardens at one time. Suggestions were made to perhaps ask MNSEIA to help prepare a projection of the number of “day 1” applications and inform our engineers to help them plan ahead to meet approved timelines.

### **4. Interconnection Details**

- The issue of pre-certified systems versus non pre-certified systems was discussed at length. While many of the gardens will not fall into this category of review, some may. Xcel Energy will provide further clarification on what it means to be “pre-certified” by Section 10.
- A concern was raised as to who may be first in line for engineering review. The common suggestion is that since the program has not officially been launched, that whoever goes into the system will be “first”. However, this is likely dependent on engineering review – some projects may already be reviewed or process of review – and the specific details and location of the project. It will be difficult to determine these details until after program launch. Xcel Energy is working on best practices around how to work within the program and Section 10 boundaries.

There was some disagreement within this conversation. It was felt that existing interconnection agreements should be honored and that the Section 10 interconnection process should remain separate from the program.

#### 5. Launch

Launch will be dependent upon final Commission approval of our tariffs and any additional comments that are provided to the Commission in the current 15 day timeframe. Additionally, we will need to make adjustments to the system as discussed and determined within these workgroups. The program will not be launched in October.

Commission comments require training 45 days prior to launch, but the group was consistent in the thoughts that that would not be necessary.

#### 6. Equipment and installed cost

A question came up on why the program requires the garden operator to report the installed cost of the PV system. Xcel committed to research that question and reply with the answer.

Minn. Stat. § 216B.1611 subd. 3a. requires utilities to collect and report installed costs of distributed generation.

### **Project information.**

(a) Beginning July 1, 2014, each electric utility shall request an applicant for interconnection of distributed renewable energy generation to provide the following information, in a format prescribed by the commissioner:

(1) the nameplate capacity of the facility in the application;

(2) the preincentive installed cost and cost components of the generation system at the facility;

(3) the energy source of the facility; and

(4) the zip code in which the facility is to be located.

(b) The commissioner shall develop or identify a system to collect and process the information under this subdivision for each utility, and make non-project-specific data available to the public on a periodic basis as determined by the commissioner, and in a format determined by the commissioner. The commissioner may solicit proposals from outside parties to develop the system. The commissioner may only collect data authorized in paragraph (a), and may not require submission of any additional data that could be used to personally identify any individual applicant or utility customer.

(c) Electric utilities collecting and transferring data under this subdivision are not responsible for the accuracy, completeness, or quality of the information under this subdivision.

(d) Except as provided in paragraph (b), any information provided by an applicant to the commissioner under this subdivision is nonpublic data as defined in section 13.02, subdivision 9.

**Topics to Continue in Discussion for 10/15 meeting**

- Continued Review of application process



**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> October 1, 2014	
<b>Start Time:</b> 3:00 pm Central	<b>Location:</b> LL3; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 4:30 pm Central	<b>Phone:</b> NA

**Attendees:**

	Thor Bjork					
	John Wold					
	Jessica Peterson					
	Craig Konz					

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Introductions</b>	Thor	
<b>Subscriber and Subscription Overview</b>	Thor	Update
<b>Subscriber Protections</b>	Thor	Discussion
<b>Public Agency Discussion</b>	Thor	Discussion
<b>Other Items</b>		
<b>New Action items</b>		

**From:** MNSEIA  
**Subject:** Solar\*Rewards Community Implementation Workgroup -- **SUBGROUP**  
**Date:** October 1, 2014

---

**Meeting Minutes**  
**10/1/2014**

**Welcome**

Thor Bjork welcomed the group and noted that the meeting was held as request by potential subscribers and interesting parties to discuss solar community garden issues. This meeting was not intended to be an Xcel Energy meeting.

There were 20+ people in attendance including various stakeholders from the state, garden operators, cities and counties, and potential subscribers. Including:

Ralph Jacobson, Laura Burrington, Holly Hinman, Bridget McLaughlin, Scott Getty, John Dunlop, John Wold, Jessie Peterson, Thor Bjork, Nathan Franzen, Ani Becka, Ken Bradley, Jim Denniston, Virginia Rutter, Marty Morud, Craig Konz, Holly Lahd, Duane Herbet, Dan Rogers, Gayle Prest, Lissa Pawlish, Ralph Kaehler, Ross Abbey, Brian Millberg and Jim Pearson

The agenda for this meeting included the following topics:

- Subscriber and Subscription Overview
- Subscriber Protection
- Public Agency Discussion

**Discussion items:**

**1. Subscriber and Subscription Overview**

Xcel Energy provided further detail as what they considered a subscriber and subscription relationship in regards to the 40% and 120% rulings. (See attached) It was clarified that a meter is not the same as a customer. Specifically there is a hierarchy of customer, account, premise and meter. Subscriptions are based on the customer and as suggested by tariff falls into the requirements of Solar Garden Operators to monitor statutory compliance.

Clarification around the 120% rule was also discussed, specifically around what happens when a customer moves. There is three times in which Xcel Energy will check for compliance on 120%.

- a. When the subscriber is entered into the system
- b. If the person moves from one premise to another
- c. If the customer/Operator wants to resize the subscription

During a situation in which a customer moves, Xcel Energy can either base the 120% requirement on the previous 12 months of billed history at the new location or utilize a home estimator tool developed to help determine sizing. The Department raised concerns regarding this estimator and the accuracy of its use. Another suggestion was made to have the customer complete a load analysis to provide to the utility. Solar Garden Operators suggested that this may be resolved with how contracts are written between the Operator and Subscriber – such things as selling or transferring subscriptions. This remains an open concern of parties. It is likely we'll need to wait for the market to begin before making further determinations.

The potential risk of additional taxes due to a solar subscription was noted, but no final rules are currently determined by the IRS at this time.

Further topics were discussed including unsubscribed energy, production requirements, a request to see the year end production credit easily, among others.

## **2. Subscriber Protection**

There was great concern regarding how to protect subscribers and how to explain how this process will work. It is a bit of a mystery as to what customers can expect regarding contracts between subscribers and operators.

Xcel Energy removed the checklist of requirements for Operators however; several groups including the MN Interfaith Power & Light as well as CERTS have been working towards creating documents to help provide further information to subscribers. The CERTS document is included within these notes as attachment A. CERTS has asked that comments be sent to Lisa Pawlisch for inclusion in their ongoing efforts. She can be reached at: pawl0048@umn.edu. Xcel Energy has offered to include these types of documents and discussions in our FAQs to be added to our website once complete.

Operators suggested that financing wouldn't be available to gardens that aren't viable – protecting subscribers. They've also noted that a lot of the marketing details were put on hold while a final program was determined – now they are getting ready to begin working towards those goals again. Garden Operators will also be providing PV production reporting services to their customers as a value added service – noting that this isn't the utilities responsibility.

The OAG has not had the opportunity to be part of these discussions, so it was suggested Xcel Energy reach out to them again.

## **3. Public Agency**

The same rules apply to agencies as do subscribers. An agency can be considered a customer if set-up that way. The state of MN is a great example as they have several agencies that may be considered subscribers. This is usually a legal determination by customer and/or Garden Operator. The group suggested that the Company develop materials and policy interpretation guides to post on our website that will help customers understand the Subscriber definition with more certainty.

#### **4. Solar\*Rewards Community versus Made in Minnesota**

The Department brought up a concern of what happens with RECS after the 10 year contract for MiM and Solar\*Rewards expires. For solar gardens that are also part of MiM and Solar\*Rewards, what happens to the RECS in year 11?

Several discussion points were raised regarding this discussion. The Garden Operator can, by tariff, sell the RECs to Xcel Energy, but this should be in the upfront contract to subscribers. This would need to be determined on day one versus at a later date. There are likely changes that are to occur over the next 10 years, however, that will impact how these projects are treated and what type of incentive they may be able to obtain.

This remains an open conversation.

#### **Conclusion**

The group decided to delay a decision on whether additional meetings are needed until attendees have had a chance to review the minutes. CERTS and the DOC mentioned the possibility of other forums for discussing additional topics. Rick Condon extended an open invitation to participate in a group he is leading that is focused on subscriber education and communication.

## QUESTIONS SUBSCRIBERS SHOULD ASK

- How long have you been in business? How many installations have you done? Do you have references I can contact?
- Who owns the system?
- What is the subscription price? Do you believe that your subscription prices are affordable and competitive? Please explain.
- Approximately how much energy will the system produce, and what portion of energy use might I expect the system to offset annually?
- Based on your subscription rates, what would it cost me to cover all of my energy use?
- Do I have to pay upfront or do a pay a monthly fee? What is the term of my subscription (i.e. how long)?
- What am I actually buying with my subscription? Am I buying an actual panel? Does my subscription price include costs beyond the panels themselves, for example: the costs of future maintenance?
- Will I be able to log in anywhere to see how much my panels are producing? In real time?
- What types of modules are being specified? Are they high quality from a reputable company?
- Describe your production and maintenance warranties.
- Will the owner assess subscribers for unplanned maintenance?
- How long does the operator have to correct equipment failures?
- What happens if I move, want to cancel, or die? How will my shares be transferred? Is it my responsibility to sell it to someone else? How much will I be paid for my subscription at that time? Will I pay a penalty for cancelling my subscription?
- Who handles my subscription over time? Who do I call if I have questions?
- What kind of paperwork will I need to fill out?
- How soon do I need to commit?
- Will I be able to visit the system? Will you have materials I can use to show I'm participating?

## QUESTIONS COMMUNITIES SHOULD ASK

### COMPANY & APPROACH

- How long have you been in business? How many installations have you done? Do you have references we can contact?
- What do you see as your strategic advantage in this new Minnesota market?
- Are you in compliance with local, state, and federal laws and regulations, including tax, ownership, and securities laws and regulations?
- Who will develop, own, finance, install, operate, and maintain the system? Do you have a set of contractors you work with for these tasks? Do you plan to do them yourself?
- Will your process be open to an RFP with the opportunity for local contractors to be involved?
- Is the installer who will be performing the work NABCEP certified?

### YOUR MODEL

- Is your model a pre-paid plan or a pay-as-you-go plan (or a combination)?
- If pay-as-you-go, is there a long-term subscription? Penalty for early termination?
- If pre-paid, are there times when a subscriber might be asked to pay additional charges?
- What risks and benefits do you see with your model?
- Do you have a plan for how to engage lower income customers in your projects?
- What does your model look like for less than 10 subscribers?

### EQUIPMENT & MAINTENANCE

- What types of modules are being specified? Are they high quality from a reputable company?
- Describe your production and maintenance warranties.
- What is the lifetime of the equipment?
- What levels and types of insurance do you carry?
- Who will be the entity to conduct the maintenance on the system? How have you budgeted for those costs in your business model?

### PARTNERS & SITE SELECTION

- Are you open to working with host sites and community partners to tailor your projects?
- Can community groups participate in site selection?
- What are your expectations of roles and responsibilities of the community partners?
- Describe costs, both community partner costs and capital costs for the project.
- Who will handle the majority of the marketing—you, community partners, or a combo?
- Do you have a preference for host sites in terms of the type of entity and/or location?
- Do you have a preference for ground-mounted vs. rooftop installations?

### FOR SUBSCRIBERS

- What is the price per watt to a subscriber, and what is included in that price?
- How do you handle subscription transfers or buy backs?
- Who handles subscriptions over time?
- What is the smallest amount of solar a subscriber can purchase?
- How will you maximize incentives and how do they benefit subscribers? Who handles paperwork?
- Who owns the Solar Renewable Energy Certificates (SRECs)?

## FIND MORE RESOURCES

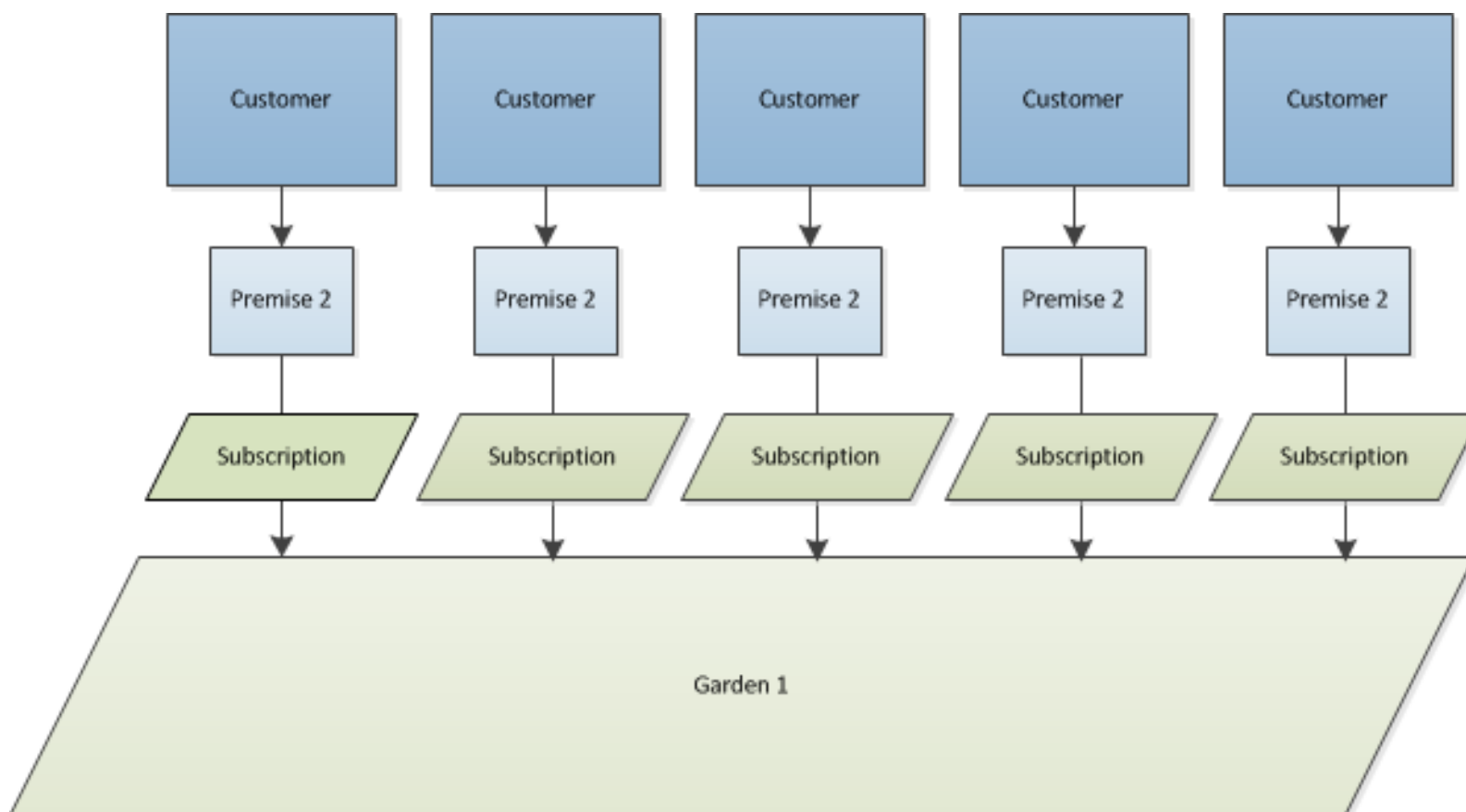
Learn more from the Clean Energy Resource Teams (CERTs) in our Guide to Community Solar Gardens, which includes a list of developers and operators, program updates, and frequently asked questions at <http://mncerts.org/solargardens>.

### SOURCES:

- Guide to Community Solar Gardens by Clean Energy Resource Teams (CERTs)  
<http://mncerts.org/solargardens>
- Questions for Hiring a Contractor by Minnesota Department of Commerce  
<http://mn.gov/commerce/energy/images/Hiring-Renewable-Energy-Installer.pdf>
- Michigan Community Solar Gardens Guidebook by Great Lakes Renewable Energy Association  
[www.michigan.gov/documents/mdcd/Michigan\\_Community\\_Solar\\_Guidebook\\_437888\\_7.pdf](http://www.michigan.gov/documents/mdcd/Michigan_Community_Solar_Guidebook_437888_7.pdf)
- Community Solar Garden Guide by National Renewable Energy Laboratory  
[www.nrel.gov/docs/fy11osti/49930.pdf](http://www.nrel.gov/docs/fy11osti/49930.pdf)
- Powerpoint by Rick Condon from MN Interfaith Power & Light, Wells Fargo  
[http://mncerts.org/sites/default/files/MNIPL\\_CSG\\_July\\_kickoff\\_2014-07-29\\_v2.pdf](http://mncerts.org/sites/default/files/MNIPL_CSG_July_kickoff_2014-07-29_v2.pdf)
- Community Solar Garden Program RFP by City of Palo Alto, CA  
[www.cityofpaloalto.org/civicax/filebank/documents/42868](http://www.cityofpaloalto.org/civicax/filebank/documents/42868)

## Garden

- Limited to 1MW AC
- Must have a minimum of 5 subscribers



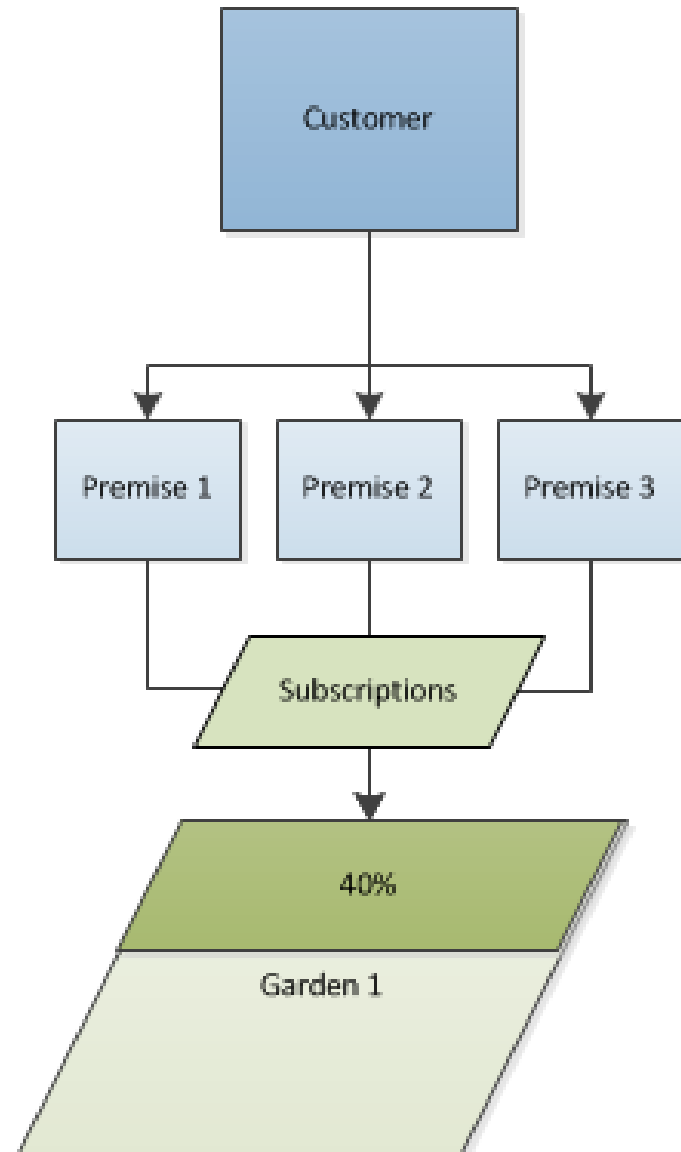


### Subscriber

- An Xcel Energy Retail Customer
- Responsibility of the Garden Operator to verify eligibility (Section 9, Sheet 80)
- Can subscribe to many different gardens
- In any one garden the aggregate of all of the subscriptions cannot exceed 40% of the garden capacity
- Receives bill credit based on the allocated production

### Subscription

- Assigned by customer to any premise
- 120% rule is applied based on the assigned premise
- A single premise could be assigned multiple subscriptions
- The aggregated subscriptions cannot exceed 120% of premise usage
- Minimum size of 200W DC



**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> October 15, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1D; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Interconnection</b>	Thor	Discussion
Review questions submitted since last meeting		
<b>Documents</b>	Craig	Discussion
Review documents required during application process		
<b>PUC request for comments</b>	Thor	Discussion
Looking for more information on bill credit/incentive Reply comments due Dec. 1		
<b>CERTs questions for Garden Operators</b>	Thor	Discussion
Discuss format and other ideas for standardization of information to be share with subscribers in order to comply with statute: "identify the information that must be provided to potential subscribers to ensure fair disclosure of future costs and benefits of subscriptions"		
<b>Action items</b>		

**TO:**  
**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** OCTOBER 15, 2014  
**CC:**

**Meeting Minutes  
 October 15, 2014**

**Attendees**

x	Thor Bjork	x	Marty Morud		Lynn Hinkle		Mike Harvey
x	John Wold	x	Ralph Jacobson	x	Rick Condon		Madeleine Klein
	Ian Dobson	x	Michael Krause	x	Dan Rogers		J.W. Postal
x	Holly Lahd	x	Steve Coleman	x	Duane Hebert		Tom Hunt
	Susan Peirce	x	Tom Green	x	Craig Konz		Ralph Kaehler
x	Jessie Peterson	x	Dean Leischow	x	Patrick Dalton	x	Bode Falade
x	Andy Catania	x	Tom Green	x	Virginia Rutter	x	Shawn Bagley
x	Kaya Tarhan	x	Ross Abbey	x	Andrew Catania		

**Administration**

- Reviewed Past Minutes
- Approved

**Interconnection – Q&A**

**Q:** Can you move a garden location?

**A:** If one location does not work out, but wish to move the project it is OK unless you have started the interconnection process. If engineering has review the applicaiton for that location, you would need to submit a new interconnection application and pay the associated fees.

**Q:** Can you co-locate multiple 1 MW systems?

**A:** There are no restrictions by Xcel Energy for this type of system to-date. However, there are concerns regarding location and lines. If there are 5 MWs in one location, Xcel Energy would need to look at them as a group, but the application process would review them as separate applications. There may also be technical limits of the total capacity the electric distribution system can accommodate.

**Q:** Why would we batch them? Why do we need to review them together?

**A:** There is an issue between the 60 to 90 day review once a project is larger than 1 MW. If Xcel Energy needs to look at 5 individual 1 MW projects we would consider the review greater than 1 MW and our tariff allows up to 90 days to review. There are differences between section 9 and section 10 tariffs on this.

**Q:** Can a 10 MW project be converted into 10 different 1 MW gardens?

**A:** No, 10 new interconnection applications need to be submitted.

### Interconnection Queuing

Existing interconnect applications continue on Section 10 Process. A supplemental study to an existing engineering study may be necessary, depending on changes to system proposal, but it may be of limited scope (example of 10MW PV and change to 1MW sites). Existing interconnection applicants still need to apply for the gardens and follow any queues that result in that process.

- As long as the payments are being made, engineering will provide a letter that the spot is reserved for 60 to pay fees and reserve their review spot in the queue. If the installer does not make reasonable progress on the projects, the application could be dropped.
- Installers say they were told that not to request interconnection review prior to the application system opening. Now it seems that others may get ahead with non-garden projects that can be converted to gardens. Xcel Energy needs to be clear on this project – a process document would be helpful.
- Concern that there will be a gold rush to get your project approved at the feeder before someone else and then that second applicant would need to pay for the system upgrades to allow the added demand on the system.
- How big is this problem? Are we going to have 30 MW stuck on one feeder?
  - Yes, there is going to be a problem in certain areas
  - Two years to build these things – biggest concern is that the engineering team won't keep up with it
  - Concern that the installers are going to do everything in the first minute because of a fear that they'll be missing out if they don't
- Installers feel Xcel Energy should not allow projects that were reviewed for interconnections not related to SRC.
- There are two problems that have arisen with no current solution.
  - There are SRC projects in the Section 10 Engineering study process already
- Suggestion to let the CSG application process control the queue of projects for approval – this is an issue given there are already ones in the engineering queue that have been paid for
- Can there be a shared feeder and interconnection cost by different operators? -- That is up to the operators and not something Xcel Energy can help with
- Xcel Energy suggested that we bring these issues to legal and address further at our next meeting on Oct. 29th

### Concerns

- The industry will look bad before the Commission if:
  - Huge number of applications submitted (100MW+) Many not being built.
  - Fighting among ourselves
  - Poor customer experience
- Can an informal survey be completed to give Xcel Energy an idea of what is coming in at launch? Would MnSEIA be the best choice for the survey – Marty suggested that MnSEIA would not be the best source to lead that survey

## Documents

- Application fee form – pretty easy, instructions for wire transfer, system size in DC on application (should be DC)
- Deposit Form: add interest to it; legally don't have to sign it too? No, you actually have to sign it and then make a copy
- Question on system access date? They would like it to look more official as we are talking about millions of dollars. No e-signature option for solar gardens per Craig.
- Reservation Letter
  - Not as important in Minnesota, include (you are in/accepted, you have this much time to complete)
  - All the emails have a time stamp on them and the application system records each step completed in the process with a time stamp.
  - Once you file your application as complete, you lock in the REC price for 25 years. (Complete is when you submit your engineering documents) this level of complete. Therefore a reservation letter does provide purpose
- Thor suggested to send out documents for further comment via email



Garden ID:

## Solar\*Rewards Community MN Deposit Form

**Garden Operator Name:**

**Garden Operator Address:**

**Garden ID #:**

**Deposit Amount:**

**System Size DC:**

**Date:**

The undersigned Garden Operator states that it is making a deposit (the Deposit) in the above amount with Xcel Energy in association with its application under the Solar\*Rewards Community program in the manner described below:

- Amount wired to Xcel Energy (wire transfer only- attach a copy of the wire transfer receipt)
- Check written to Xcel Energy (attach a copy of the check)

Within thirty (30) days after either the project is completed or the date when the garden operator informs the Company that it will no longer continue pursuing completion of the garden project, or if the project is not completed within the twenty four (24) month timeline (including day-for-day extension described in the Solar\*Rewards Community contract), the Company shall return to the garden operator the deposit. When the deposit qualifies to be returned to the garden operator, it shall also include interest as set forth in the Solar\*Rewards Community Contract.

**Applicant:**

Garden Operator Name Printed \_\_\_\_\_

Garden Operator Signature \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_

This form (with required attachment) must be uploaded to the Solar\*Rewards Community online application system. If remitting by check, payment must be sent either via overnight courier or via U.S. Mail, first class, postage prepaid.

The Garden Operator must sign this form whether or not it is the system owner.

**The Solar Garden ID (SRCXXXXXX) and word "Deposit" must be included on wire transfer slip (RFB or OBI line) or check.**

---

To be accepted, the Deposit shall be remitted to the following:

If by wire transfer:

Bank: Wells Fargo Bank, N.A.  
City/State: San Francisco, CA  
Routing/ABA: 121-000-248  
Acct No: 1010004305  
Acct Name: NSPM

If by mail:

Xcel Energy  
Solar\*Rewards Community MN  
P.O. Box 59  
Minneapolis, MN 55440-0059



Garden ID:

## Solar\*Rewards Community MN Application Fee Form

**Garden ID #:**

**Garden Operator Name:**

**Garden Operator Address:**

**Application Fee: \$1,200**

**System Size:**

**Date:**

The undersigned Garden Operator states that it is making a payment for the application fee in the above amount with Xcel Energy in association with its application under the Solar\*Rewards Community program in the manner described below:

- Amount wired to Xcel Energy (wire transfer only- attach a copy of the wire transfer receipt)
- Check written to Xcel Energy (attach a copy of the check)

The application fee is not refundable.

**Applicant:**

Garden Operator Name Printed \_\_\_\_\_

Garden Operator Signature \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_

This form (including required attachment) must be uploaded to the Solar\*Rewards Community online application system. If remitting by check, payment must be sent either via overnight courier or via U.S. Mail, first class, postage prepaid and postmarked at least five business days before the system access date listed above.

The Garden Operator must sign this form whether or not it is the system owner.

**The Solar Garden ID (SRCXXXXXX) and words "Application Fee" must be included on wire transfer slip (RFB or OBI line) or check.**

To be accepted, the Deposit shall be remitted to the following:

If by wire transfer:

Bank: Wells Fargo Bank, N.A.  
City/State: San Francisco, CA  
Routing/ABA: 121-000-248  
Acct No: 1010004305  
Acct Name: NSPM

If by mail:

Xcel Energy  
Solar\*Rewards Community MN  
P.O. Box 59  
Minneapolis, MN 55440-0059

For Internal Use:

BU: 853612

OA: 519195

Description: Solar Rewards Community MN Application Fee

Please send notice to [solarrewardscommunitymn@xcelenergy.com](mailto:solarrewardscommunitymn@xcelenergy.com) when this fee is received.



<Today's Date>  
<Garden Operator Name>  
<Mailing Address>, <Mailing City>, <Mailing State> <Mailing Zip>

Account Number: <Account Number>  
Garden ID: <Garden ID>

### **Xcel Energy Solar\*Rewards Community MN Reservation Letter**

Thank you for your interest in the Solar\*Rewards Community program. We are pleased to offer subscribers to your solar garden the <standard/enhanced > bill credit in effect on this date found in Section 9, Sheet 64. per kWh produced (for subscribed garden capacity). This is contingent upon approval of the completed photovoltaic project as specified below.

Garden location: <garden street> <garden city>, <garden state> <garden zip>  
PV system size: <total kW> kW  
PVWatts annual energy production estimate: <kWh> kWh

The project must be completed within two years of when the application is determined to be complete, which is 2 years from this date: <date application deemed complete>. If your project is not completed within 2 years, your application will be declined. You can re-apply if you are still interested, but the project will be subject to current program availability and the then-current bill credit rate. If there is any conflict with this document and the Solar\*Rewards Community contract, the terms of the contract control.

Please sign this letter and upload to the application website. If you have questions, you can contact us at [solarrewardscommunitymn@xcelenergy.com](mailto:solarrewardscommunitymn@xcelenergy.com).

I hereby confirm and accept this Reservation Letter to secure the offer:

\_\_\_\_\_  
Signature of Owner

Date \_\_\_\_/\_\_\_\_/\_\_\_\_



**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> October 29, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1B; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Interconnection</b>	Thor	Discussion
Review process		
<b>Documents</b>	Craig	Discussion
Review documents required during application process		
<b>CERTs questions for Garden Operators</b>	Group	Discussion
Discuss ideas for standardization of information to be share with subscribers in order to comply with statute: "identify the information that must be provided to potential subscribers to ensure fair disclosure of future costs and benefits of subscriptions"		
<b>Action items</b>		Discussion

**TO:**  
**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** OCTOBER 29, 2014  
**CC:**

---

**Meeting Minutes  
October 29, 2014**

**Attendees**

x	Thor Bjork	x	Marty Morud		Lynn Hinkle		Mike Harvey
x	John Wold		Ralph Jacobson	x	Allen Gleckner		Madeleine Klein
	Ian Dobson		Michael Krause		Dan Rogers		J.W. Postal
x	Holly Lahd	x	Steve Coleman	x	Duane Hebert		Tom Hunt
	Susan Peirce	x	Tom Green	x	Craig Konz		Ralph Kaehler
	Jessie Peterson	x	Dean Leischow	x	Patrick Dalton	x	Bode Falade
x	Andy Catania	x	Betsy Engleking	x	Virginia Rutter	x	Shawn Bagley
x	Kaya Tarhan	x	Ross Abbey	x	Andrew Catania	x	Dan Patry

**Administration**

- Reviewed Past Minutes
- Approved
- **Garden Operator Training** will occur on Thursday Nov. 13, 2014 from 8am – 10am at:  
Xcel Energy  
Bay 1, 414  
414 Nicollet Mall  
Minneapolis, Minnesota 55401

*Training will include a step-by-step walkthrough of the application process*

**Interconnection**

The working group recapped our earlier discussions on the interconnection process and clarified the treatment of Section 10 interconnection applications (IAs) prior to program launch.

**Previous Section 10 DG interconnection applications**

- Applications currently submitted for Section 10 DG interconnection will be treated accordingly depending on whether or not they conform to S\*RC program requirements: IAs that are currently in the queue conforming to the S\*RC program requirements (1MW AC or less) will maintain their queue position (or their claim to the necessary distribution system capacity) and can be 'converted' to a CSG.

- IAs that are currently in queue that do not conform to S\*RC program requirements (single applications that are greater than 1MW AC) will hold their place in the queue as per Section 10 rules, but would not hold their place in the queue if they were to be converted to the CSG program. If no other DG IAs have been applied for which impact the same distribution system area, then that project would not be impacted. However, if additional DG IAs have a secondary claim to the capacity, those would have precedent.

### **Interconnection Process and Timeline**

The Working Group also walked through the Distributed Generation Interconnection Process found in Section 10, Sheet 101 and discussed how the timelines there interact with the S\*RC program. We also discussed and came to a consensus on when the two year timeline begins. Consistent with the tariff, the two year timeline begins following Xcel Energy finding that the application information is complete, and application fee, deposit fee and IA fee have been paid.

### **Multiple CSGs in the same location**

Operators may notify Xcel Energy within their application that they have more than 1 CSG in close vicinity and request that those be studied together for the purposed of determining interconnection costs. The CSGs must still have distinct points of common coupling and distinct IAs. If projects are studied together, the Section 10 timelines for the size of the overall study apply rather than the 1MW or under timelines.

### **Document Review**

**Application Fee Form** – no comments or changes requested

**Reservation Letter** – Main purpose of the Reservation letter is to clearly define the bill credit structure that a specific CSG will be under for the full life of the contract. The reservation letter will be made available to the Garden Operator when the application is deemed complete following payment of application fee and deposit and engineering deeming the interconnection application information complete. We clarified that the two year deadline begins when all of those actions have been completed.

**Deposit Form** – Some in the Group requested changes, specifically mentioning the need for an ‘investment grade’ document for the deposit form. Xcel Energy requested that the group send suggested edits to Thor and we would discuss at a future meeting.

### **Subscriber Fair Disclosure**

The Working Group decided to focus on Subscriber fair disclosure issues at the next Working Group meeting on Nov. 12<sup>th</sup>.

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> November 12, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> LL Bay 3; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Training</b>	Thor	Request
Please RSVP to <a href="mailto:SRCMN@xcelenergy.com">SRCMN@xcelenergy.com</a>		
<b>Documents</b>	Thor	Request
Any suggested edits to documents should be sent to me.		
<b>Subscriber Disclosure</b>	Holly Lahd	Discussion
Review background and requirements		
<b>CERTs TipSheet</b>		Discussion
<b>Action items</b>		Discussion

**TO:**  
**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** NOVEMBER 11, 2014  
**CC:**

---

**Meeting Minutes  
November 11, 2014**

**Attendees**

x	Thor Bjork	x	Marty Morud	x	Danna Hollstrom	Mike Harvey
x	John Wold	x	Ralph Jacobson		Allen Gleckner	Madeleine Klein
x	Ian Dobson		Michael Krause	x	Dan Rogers	J.W. Postal
x	Holly Lahd	x	Steve Coleman	x	Duane Hebert	Tom Hunt
	Susan Peirce	x	Tom Green	x	Craig Konz	Ralph Kaehler
x	Brian Swanson	x	Richard Condon			
x	Jessie Peterson		Dean Leischow	x	Patrick Dalton	x Bode Falade
x	Lissa Pawlisch	x	Allen Gleckner	x	Virginia Rutter	Laura Burnington
x	Dean Leischon	x	Brian Millberg	x	Nathan Franzen	x Ron Nelson
x	Christina Horf	x	Ross Abbey	x	Andrew Catania	Dan Patry

**Administration**

- Training – held 11/13 @ Xcel Energy
- Reviewed Past Minutes
  - Dan Patry has emailed Xcel Energy his continued concern with how previous interconnection submissions will be handled
  - Sun Edison continues to acknowledge that the Workgroup has not unanimously agreed with the following statement.

*Applications currently submitted for Section 10 DG interconnection will be treated accordingly depending on whether or not they conform to S\*RC program requirements: Interconnection Applications that are currently in the queue conforming to the S\*RC program requirements (1MW AC or less) will maintain their queue position (or their claim to the necessary distribution system capacity) and can be ‘converted’ to a CSG.”*

- Xcel Energy clarified that if a current interconnection agreement is 10 MW it cannot break up into 10 1MW applications and thus proceed in the queue; a 1MW interconnection application (under Section 10) will remain in the queue as long as it meets all other S\*RC requirements.
- Xcel Energy further clarified that the decision to allow current applications to move through the process outside of the S\*RC program is a result of Section 10 tariff requirements (S\*RC and Section 10 are separate processes and therefore the Company

- cannot disregard current applications – Section 10 also doesn't ask whether the project is a S\*RC project)
- It was noted that many developers were told to hold off on interconnection documents prior to the S\*RC launch. They have done so in good faith. A good faith some developers feel has been detrimental to the launch now that certain industry players have gone around the program to begin projects through a separate Section 10 process.
- Process Documents
  - Please send edits so that we can continue to refine these prior to launch (the sooner these are received the faster we can update our systems for launch!)

## Subscriber Protection

### Required Disclosures

- Confusion remains on how the April 7<sup>th</sup> and September 17<sup>th</sup> Orders should be read. Two interpretations exist:
  - The April 7 Order sets the consumer protection requirements for Operators to follow, the September 17 Order clarifies that it isn't Xcel Energy's role to monitor, therefore removing from the Company Tariff
  - The April 7 Order sets the consumer protection requirements for Operators to follow, the September 17 Order removed that requirement entirely (no longer in the contract with the Company)
- CSG Operator must follow all other PUC requirements, including consumer protections in April 7 Order – interpretation of OAG, DOC and Xcel Energy
- Subscribers are recruited prior to the project starting construction – there are concerns that subscribers will want some certainty, the Order provides this clarification
- The group noted that the disclosure form could be viewed as best practices by a third-party for potential subscribers
  - Copy of warranty – discuss the warranty for 25 years – copy may not be available
  - Proof of intent of insurance and maintenance

### Standardization

- There is interest expressed by the OAG, Department, CERTS, and MRES that standard procedures are in place for subscriber projection
  - How will the Orders by the Commission be followed through?
  - Can there be a uniform requirement put in place?
  - What is the process?
- Who has oversight on subscriber agreements?
  - Commission likely has this oversight
  - OAG will only get involved when there is a specific complaint and unfortunately would likely be in court.
- Disclosure – a lot the disclosure items are in subscriber contracts, but some won't available at the time of subscriber contract execution (such as proof of insurance)

- Uniform documentation will be very difficult to achieve given the differences in production estimates and subscriber contracts – it is in the subscribers best interest to review different options
- There are no standards, currently, on production estimates
  - There are several modeling tools and it depends on how it is modeled
  - Independent engineers do underwrite them (however, it is relatively expensive to have this done at \$10,000+ for a residential rooftop system)
  - Modeling systems such as SAM, PV - Watts and PV-Assist exist
- Could CERTS produce a range of what things should look like in Minnesota – but it is the consumer’s right to get different quotes, etc.
  - DER has collected data on production of systems, so does Xcel Energy on S\*R – within value of solar document, but it was limited data
  - This is still an open discussion given the unknowns around installation to date
- Disclosure Form – Recommend from the Department
  - Pro forma for the industry
  - Model document (check list) – possibly use removed tariff language
  - Third-party should provide—Xcel Energy could connect to other site via the web
- There could be certifications, but who would do it and who would pay for it are questions that aren’t currently answered

### **Training Session held November 13**

Training for SRC MN occurred on November 13, 2014. The training covered the application process for solar gardens, including website location, initial application, SRC Application System steps, required documents, and timelines.

- Since the training, we have received questions from attendees on the initial web form and user id/password process. Applicants do not have to wait to get a username and password to submit multiple projects – all gardens must be applied for with individual web form submittals. New user ids will not be generated if the same email address and primary contact is used for each application.

**Community Solar Garden Subscriber Disclosure**  
Background Information for Solar\*Rewards Community Implementation Work Group  
November 12, 2014 Meeting

**I. Community Solar Garden Statute Language on Subscriber Disclosure**

Minnesota Statute 216B.1641 is the governing statute for Community Solar Gardens. Public utilities may file a community solar garden plan with the Minnesota Public Utilities Commission for approval.<sup>1</sup> The statute states:

(e) The commission may approve, disapprove, or modify a community solar garden program. Any plan approved by the commission must:

- (1) reasonably allow for the creation, financing, and accessibility of community solar gardens;
- (2) establish uniform standards, fees, and processes for the interconnection of community solar garden facilities that allow the utility to recover reasonable interconnection costs for each community solar garden;
- (3) not apply different requirements to utility and nonutility community solar garden facilities;
- (4) be consistent with the public interest;
- (5) identify the information that must be provided to potential subscribers to ensure fair disclosure of future costs and benefits of subscriptions;**
- (6) include a program implementation schedule;
- (7) identify all proposed rules, fees, and charges; and
- (8) identify the means by which the program will be promoted. [**emphasis added**]

**II. Subscriber Disclosure Issues Addressed in the Commission's April 7, 2014 Order**

The Commission's April 7, 2014 Order states:

The tariff and contract between Xcel and the solar-garden operator shall include the following subscriber-protection measures:

- a. A requirement that the solar-garden operator provide the subscriber with a statement that Xcel makes no representations concerning the taxable consequences to the subscriber of bill credits or other tax issues related to participating in the solar garden.
- b. A requirement that the solar-garden operator obtain opinion letters from attorneys and tax professionals providing assurance that the operator is not misleading a subscriber on any legal or tax benefits of participation.

<sup>1</sup> The statute requires Xcel to file a Community Solar Garden plan with the Commission by September 30, 2013.



c. A requirement that the solar-garden operator demonstrate that it has funds dedicated for its O&M expenses.

d. A requirement that the solar-garden operator provide the subscriber with the following information:

i. Future costs and benefits of the subscription, which shall include the following information:

- (a) All nonrecurring (i.e. one-time) charges;
- (b) All recurring charges;
- (c) Terms and conditions of service;
- (d) Whether any charges may increase during the course of service and, if so, how much advance notice is provided to the subscriber;
- (e) Whether the subscriber may be required to sign a term contract;
- (f) Terms and conditions for early termination;
- (g) Any penalties that the solar garden may charge to a subscriber;
- (h) The process for unsubscribing and any associated costs;
- (i) An explanation of the subscriber data that the solar-garden operator will share with Xcel and that Xcel will share with the solar-garden operator;
- (j) Xcel's data-privacy policy and solar-garden operator's data-privacy policy;
- (k) The method of providing notice to subscribers when the solar garden is out of service, including notice of the estimated length and loss of production;
- (l) Assurance that all installations, upgrades, and repairs will be under the direct supervision of a NABCEP-certified solar professional and that maintenance will be performed according to industry standards, including the recommendations of the manufacturers of solar panels and other operational components;
- (m) The allocation of unsubscribed production; and
- (n) A statement that the solar-garden operator is solely responsible for resolving any disputes with Xcel or the subscriber about the accuracy of the solar-garden production and that Xcel is solely responsible for resolving any disputes with the subscriber about the applicable rate used to determine the amount of the bill credit;

ii. A copy of the contract between the solar-garden operator and Xcel;

- iii. A copy of the solar-panel warranty;
- iv. Proof of insurance;
- v. Proof of a long-term maintenance plan;
- vi. The solar garden's production projections and a description of the methodology employed by the solar-garden operator in developing those projections; and
- vii. Solar-garden operator contact information for subscriber questions and complaints.

e. A requirement that Xcel include a bill message to solar-garden subscribers clarifying that questions or concerns related to their solar garden should be directed to the solar-garden operator, including a statement that the solar-garden operator is solely responsible for resolving any disputes with Xcel or the subscriber about the accuracy of the solar-garden production and that Xcel is solely responsible for resolving any disputes with the subscriber about the applicable rate used to determine the amount of the bill credit. The Commission delegates authority to the Executive Secretary to approve the specific language and frequency of the notice.

f. A requirement that Xcel disclose to subscribers that the Company recognizes that not all production risk factors, such as grid-failure events or atypically cloudy weather, are within the solar-garden operator's control.

### **III. Subscriber Disclosure Issues Addressed in the Commission's September 17, 2014 Order**

After receiving written and oral comments from parties, the Commission addressed subscriber disclosure in the following section of the Commission's September 17, 2014 Order:

#### **I. Simplifying Contract Language**

In its April 7 order, the Commission directed Xcel to require garden operators to provide subscribers with a number of disclosures, including the future costs and benefits of subscription, a copy of the solar-garden contract, a copy of the solar-panel warranty, proof of insurance, proof of a long-term maintenance plan, production projections, and operator contact information. Section 6(S) of the standard contract recites these and other disclosure requirements. MN Community Solar recommended simplifying section 6(S), arguing that the disclosure obligations are already contained in the Commission's previous order, and that including detailed disclosure requirements in the standard contract would unnecessarily involve Xcel in the relationship between an operator and subscriber.

The Commission concurs with MN Community Solar that the solar-garden contract need not list all disclosure requirements, and that doing so could needlessly involve Xcel in policing

those requirements. The Commission will therefore require Xcel to shorten section 6(S) of the standard contract to read as follows:

Fair Disclosure. Prior to the time when any person or entity becomes a Subscriber, the Community Solar Garden Operator will fairly disclose the future costs and benefits of the Subscription, and provide to the potential Subscriber a copy of this Contract. The Community Solar Garden Operator shall comply with all other requirements of the MPUC and applicable laws with respect to communications with subscribers.

#### IV. Xcel's CSG Tariff Language on Subscriber Disclosure

Xcel's Solar\*Rewards Community Tariff is found in section 9 of its electric rate book ([http://www.xcelenergy.com/staticfiles/xcel/Regulatory/Regulatory%20PDFs/rates/MN/Me\\_Section\\_9.pdf](http://www.xcelenergy.com/staticfiles/xcel/Regulatory/Regulatory%20PDFs/rates/MN/Me_Section_9.pdf)). Tariff language that is particularly relevant to subscriber disclosure include:

##### **Section 9, sheet 79:**

P. Certain Tax and Securities Law Issues. The Company makes no warranty or representation concerning the taxable consequences, if any, to Community Solar Garden Operator or its Subscribers with respect to its Bill Credits to the Subscribers for participation in the Community Solar Garden. Additionally, the Company makes no warranty or representation concerning the implication of any federal or state securities laws on how Subscriptions to the Community Solar Garden are handled. The Community Solar Garden Operator and Subscribers are urged to seek professional advice regarding these issues.

S. Fair Disclosure. Prior to the time when any person or entity becomes a Subscriber, the Community Solar Garden Operator will fairly disclose the future costs and benefits of the Subscription, and provide to the potential Subscriber a copy of this Contract. The Community Solar Garden Operator shall comply with all other requirements of the MPUC and applicable laws with respect to communications with Subscribers.

**Section 9, sheet 89:** see tariff book for Subscriber Agency Agreement and Consent Form

##### **Section 9, sheet 90:**

By signing this Solar\*Rewards Community Subscriber Agency Agreement and Consent Form, the Subscriber agrees to all of the following:

1. Assignment of Renewable Energy Credits ("RECs"), Energy and Capacity to Northern States Power Company, a Minnesota corporation. The Subscriber agrees that the Community Solar Garden Operator has authority to assign all energy produced and capacity associated with the photovoltaic energy system at the Community Solar Garden to Northern States Power Company, and the

Subscriber agrees that all energy produced, and capacity associated with the Subscriber's share of the photovoltaic energy system at the Community Solar Garden shall belong to Northern States Power Company. The Subscriber also agrees that the Community Solar Garden Operator has authority to assign all RECs associated with the photovoltaic energy system at the Community Solar Garden to Northern States Power Company, and that if the Community Solar Garden or a person or entity on its behalf has assigned the RECs to Northern States Power Company, then all RECs associated with the Subscriber's share of the photovoltaic energy system at the Community Solar Garden shall belong to Northern States Power Company.

2. Tax Implications. The Community Solar Garden Operator has provided the Subscriber with a statement that Northern States Power Company makes no representations concerning the taxable consequences to the Subscriber with respect to its Bill Credits to the Subscriber or other tax issues relating to participation in the Community Solar Garden.

**Section 9, sheet 91:**

3. Northern States Power Company hereby discloses to the Subscriber that it recognizes that not all production risk factors, such as grid-failure events or atypically cloudy weather, are within the Community Solar Garden Operator's control.

4. Information Sharing. Participating in the Solar\*Rewards Community Program will require sharing Subscriber's Account Information (name, account number, service address, telephone number, email address, web site URL, information on Subscriber participation in other distributed generation serving the premises of the Subscriber, Subscriber specific Bill Credit(s)) and Subscriber's Energy Use Data (the past, present and future electricity usage attributable to the Subscriber for the service address and account number identified for participation in the Community Solar Garden). The following outlines the type of information that will be shared, and how that information will be used.

a. Subscriber's Account Information and Subscriber Energy Usage Data. The Subscriber authorizes Northern States Power Company to provide the Community Solar Garden Operator (and the Community Solar Garden Operator's designated subcontractors and agents) with the Subscriber's Account Information and Subscriber's Energy Usage Data as described in Section 4 above. This information is needed to allow the Community Solar Garden Operator determine the extent to which the Subscriber is entitled to participate in the Community Solar Garden, and to validate the amount of the Bill Credits to be provided by Northern States Power Company to the Subscriber. The current data privacy policies of Northern States Power Company applicable to its Solar\*Rewards Community Program provided to the Subscriber by the Community Solar Garden Operator pursuant Section 3 above are attached as Exhibit 1 of this Solar\*Rewards Community Subscriber Agency Agreement and Consent Form. These privacy policies include definitions of "Subscriber's Account Information" and "Subscriber's Energy Usage Data."

**Section 9, sheet 92:**

4. Information Sharing. (Continued)

b. Subscriber's Subscription Information: The Subscriber authorizes the Community Solar Garden Operator to provide information to Northern States Power Company identifying the Subscriber (with the Subscriber's name, service address, and account number) and detailing the Subscriber's proportional share in kilowatts of the Community Solar Garden and to provide additional updates of this information to Northern States Power Company as circumstances change. This information is needed to allow Northern States Power Company to properly apply Bill Credits for the photovoltaic energy generated by the Community Solar Garden. Also, this information is needed to allow Northern States Power Company to send to the Subscriber notices or other mailings pertaining to their involvement in the Solar\*Rewards Community Program. The Community Solar Garden Operator shall not disclose Subscriber information in annual reports or other public documents absent explicit, informed consent from the Subscriber. The Community Solar Garden Operator will not release any Subscriber data to third parties except to fulfill the regulated purposes of the Solar\*Rewards Community Program, to comply with a legal or regulatory requirement, or upon explicit, informed consent from the Subscriber.

c. Aggregated Information. Aggregated information concerning production at the Community Solar Garden may be publicly disclosed to support regulatory oversight of the Solar\*Rewards Community Program. This includes annual reports available to the public related to specific Community Solar Gardens, including but not limited to production from the Community Solar Gardens; size, location and the type of Community Solar Garden subscriber groups; reporting on known complaints and the resolution of these complaints; lessons learned and any potential changes to the Solar\*Rewards Community Program; reporting on Bill Credits earned and paid; and reporting on the application process. Aggregated information will not identify individual Subscribers or provide Subscriber-Specific Account Information, Subscriber-Specific Energy Usage Data or Subscriber-specific Bill Credits unless a Subscriber provides explicit informed consent. Depending on the nature of the aggregated information, however, it may still be possible to infer the amount of production attributed to individual Subscribers to the Community Solar Garden. The Subscriber agrees to the inclusion of its production information in the creation of the aggregated information. The Community Solar Garden Operator will not use aggregated information for purposes unrelated to the Solar\*Rewards Community Program without first providing notice and obtaining further consent, unless the aggregated information is otherwise available as public information. The policies of Northern States Power Company related to sharing aggregated information are part of the data privacy policies contained in the attached Exhibit 1 of this Solar\*Rewards Community Subscriber Agency Agreement and Consent Form and should be provided to the Subscriber by the Community Solar Garden Operator pursuant Section 3 above.

d. Information Requests from the MPUC or the Department of Commerce. The Subscriber agrees that the Community Solar Garden Operator and Northern States Power Company are authorized to

provide any information they possess related to the Subscriber or the Subscriber's participation in the Community Solar Garden to the Minnesota Public Utilities Commission (MPUC), the Minnesota Department of Commerce, or the Minnesota Office of Attorney General. This information is needed to allow proper regulatory oversight of Northern States Power Company and of the Solar\*Rewards Community Program.

**Section 9, sheet 93:**

**4. Information Sharing. (Continued)**

e. **Liability Release.** Northern States Power Company shall not be responsible for monitoring or taking any steps to ensure that the Community Solar Garden Operator maintains the confidentiality of the Subscriber's Account Information, the Subscriber's Energy Usage or the Bill Credits received pertaining to the Subscriber's participation in the Community Solar Garden. However, Northern States Power Company shall remain liable for its own inappropriate release of Subscriber's Account Information and Subscriber's Energy Use Data.

f. **Duration of Consent.** The Subscriber's consent to this information sharing shall be ongoing for the Term of the Contract between the Community Solar Garden Operator and Northern States Power Company, or until the Subscriber no longer has a Subscription to the Community Solar Garden and the Community Solar Garden Operator notifies Northern States Power Company of this fact through the CSG Application System. Provided, however, the Subscriber's consent shall also apply thereafter to all such information of the Subscriber pertaining to that period of time during which the Subscriber had a Subscription to the Community Solar Garden.

g. **Modification.** The above provisions addressing data privacy and in Exhibit 1 shall remain in place until and unless other requirements are adopted by the MPUC in its generic privacy proceeding, Docket No. E,G999/CI-12-1344, or other MPUC Order. Northern States Power Company shall file necessary revisions to its tariffs and contracts within thirty (30) days of such Order.

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> December 3, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1B; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>Subscriber disclosure</b>	Marty	Discussion
Review process		
<b>Commission staff meeting</b>	Marty	Update/Discussion
Interconnection Marketing oversight		
<b>Application process</b>	Craig	Update/Discussion
Username/password Process document		
<b>Action items</b>		Discussion

**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** DECEMBER 3, 2014

**Meeting Minutes  
 December 3, 2014**

**Attendees**

x	Thor Bjork	x	Marty Morud		Danna Hollstrom	x	Chris Psihds
x	John Wold		Ralph Jacobson	x	Allen Gleckner	x	Rich Ragatz
	Ian Dobson	x	Michael Krause	x	Dan Rogers	x	Alan Weranke
x	Holly Lahd		Steve Coleman	x	Duane Hebert	x	Michelle Matthews
	Susan Peirce	x	Tom Green	x	Craig Konz	x	Kaya Tauhan
	Brian Swanson		Richard Condon	x	Joe DeVito	x	Joe Tierney
x	Jessie Peterson	x	Dean Leischow	x	Patrick Dalton	x	Shawn Bagley
	Lissa Pawlisch		Allen Gleckner	x	Virginia Rutter	x	Nathan Franzen
	Christina Horf	x	Ross Abbey	x	Andrew Catania		Dan Patry

**Administration—led by Thor Bjork**

- Minutes Approved

**Commission Staff Meeting – led by Marty Morud**

- Topics discussed
  - **Subscriber Disclosure** – According to Commission Staff, the April Order remains true; subscriber disclosure was not removed from Operator responsibility just the Xcel Energy tariff. There is a one pager that has been developed and appended to these minutes
  - **Marketing Guidelines** – Marty was hoping that Xcel Energy would have a suggested policy outlining appropriate claims that subscribers are allowed to make. Xcel Energy does not want to regulate these messages. The FTC is regulating this in a way – so be aware. Discuss with Marty for further question.
  - **Legislative Concern** –Common Coupling allows for large sites – the legislation may not have intended to have significant sites (large capacity) dominate this program.

**Application Process –led by Craig Konz**

- **Web form** – One username/password will be provided per garden per web form submittal. All gardens need to use the Web Form to be given a garden ID number and enter the unique garden information to start the application process.
  - The operations team at Xcel Energy will try to associate gardens that have the same garden operator and primary application manger so they only need to use one username/password. You can request to have us associate them, or if we see that they are similar we will be completing this step ourselves. – We can do this retroactively as well.



- Reviewed process (*see attached PDF file*)
- Questions on process:
  - **Step 2:** Subscribers don't need to be added, but state certificate of good standing does need to be added to complete this step – (*the process document has been updated to reflect this*)
  - **Reservation letter** can be downloaded at any time and is associated with a specific location (during step 1)
  - **Fee details** – engineering is covering interconnection details, administrative fees are covered by application and maintenance fees
  - **Is the system going to generate a receipt for deposit** – noted in application system (date is included)
  - **Deposit form**
    - Will always refundable
    - Requests for change in process of handling deposits received – we code it as a liability, it goes into general bank account (it is a liability)
    - What happens if we go bankrupted – developers would like this in writing.
  - **Data Privacy Form** – it has to be processed before subscribers are added – timeframe for processing is 5 business days. Data Privacy per subscriber for each subscription. Data Privacy is not generated by the system, but can be accessed on Xcelenergy.com
  - **Can deposit and interconnection fees be sent at the same time in the same wire transfer?** The fees can be sent as one wire, however, it must be noted clearly and appropriately so that the accounts receivable team can verify what the payments are for – can be in subject line, doing it separately, however, will cause less confusion
  - **How many area engineers are there for MN?** – 20 to 30 throughout the state
  - **Apply for new service** – can be done through Builder Call Line through our [www.xcelenergy.com](http://www.xcelenergy.com) website
  - When Operator submits the application with interconnection, we will complete the application (completeness) in 30 calendar days of fees received, the engineering process then takes 60 calendar days – what if there is an engineering study requirement, etc. 60 days includes “simple” study and normal processes
  - **Do you need account/premise to get interconnection approval?** Yes, you need the account/premise first.
    - You can't get a meter until the site can be verified – you can however receive a temp service.
  - **Site Relocation** –a permanent location (Legal US Postal Address) is required to create an account for the solar site.
    - Additional discussion on what the rules are for garden relocations. As a reminder, Xcel Energy assesses the completeness of the application following submittal of 1) Contact information, 2) Garden information including system location and specifications, 3) application fee and deposit, and 4) engineering documents, including one-line diagrams, site plan, and interconnection application.

- The working group previously had gained consensus that as soon as the application had been “deemed complete” by Xcel Energy, the rate structure and REC price were locked in. The working group (aside from Xcel Energy) had an expectation that for each SRC application the “completeness” status and the locked in rate structure and REC price would be unaffected if the garden site was moved to a new location, and new information submitted for steps 2 and 4 above. Xcel Energy noted during the meeting that they would follow-up on this item.
- Further clarification on Site Relocation: Xcel Energy reviewed the issue after the meeting and have the following comments:
  - Site location can change within the SRC application system until the time the interconnection process starts.
  - Changes made once the project is in the interconnection process will need to be addressed the following way:
    - Cancel existing application
    - Start a new application process with the new site location.
  - If the rate structure and/or the REC price has changed, the solar garden would lock in that new rate structure/REC price at the time the company determines the completeness of the new application
- Is there a site/location on reservation letter? Yes.
- Account/Premise is used for unsubscribed energy – monthly fees? Yes, these will hit this premise along with maintenance
- Where are all the forms? Online for Section 9 and 10. Can be viewed on [www.xcelenergy.com](http://www.xcelenergy.com).

#### Other areas of Discussion

- **Securities concern** – The Department of Commerce Securities Department is reviewing whether subscriptions could be considered a security.

### Community Solar Garden Subscriber Disclosure Checklist

The Minnesota Public Utility Commission issued an *Order* on April 7, 2014 on Xcel’s Community Solar Garden Program (Minnesota Public Utilities Docket No. E002/M-13-867). The *Order*, among other points, requires community solar garden operators to disclose to prospective subscribers the project information listed below. Subscribers and prospective subscribers in Xcel Energy’s service territory can contact the community solar garden operator to obtain the following information as part of any community solar garden project. All potential Community Solar Garden subscribers may use this form as a tool to review subscriber agreements.

On the left, subscribers can check to indicate they have reviewed this item. On the far right, operators and/or subscribers can note on which page numbers in the subscriber agreement the item is addressed.

<input type="checkbox"/> Future costs and benefits of the Subscription including:	Page #:
<input type="checkbox"/> All nonrecurring (i.e., one-time) charges	_____
<input type="checkbox"/> All recurring charges	_____
<input type="checkbox"/> Terms and conditions of service	_____
<input type="checkbox"/> Whether any charges may increase during the course of service, and if so, how much advance notice is provided to the Subscriber	_____
<input type="checkbox"/> Whether the Subscriber is required to sign a term contract	_____
<input type="checkbox"/> Terms and conditions for early termination	_____
<input type="checkbox"/> Any penalties that the Community Solar Garden may charge to the Subscriber	_____
<input type="checkbox"/> The process for unsubscribing and any associated costs	_____
<input type="checkbox"/> An explanation of how the Community Solar Garden Operator and the Utility will share the Subscribers data with each other	_____
<input type="checkbox"/> Data privacy policies the Utility of the Community Solar Garden Operator	_____
<input type="checkbox"/> Under what circumstance and by what method will notice to Subscribers be issued when the Community Solar Garden is out of service, including notice of estimated length and loss of production	_____
<input type="checkbox"/> Assurance that all installations, upgrades and repairs will be under direct supervision of a NABCEP-certified solar professional and that maintenance will be performed according to industry standards, including the recommendations of the manufacturers of solar panels and other operational components	_____
<input type="checkbox"/> Allocation of unsubscribed production	_____
<input type="checkbox"/> A statement that the Community Solar Garden Operator is solely responsible for resolving any disputes with Xcel Energy or the Subscriber about the accuracy of the Community Solar Garden <i>production</i>	_____
<input type="checkbox"/> A statement that Xcel Energy is solely responsible for resolving any disputes with the Subscriber about the applicable rate used to determine the amount of the Bill Credit	_____

- Copy of the contract with Xcel Energy (a.k.a, Northern States Power Company) for the Solar\*Rewards Community Program \_\_\_\_\_
- Copy of the solar panel warranty \_\_\_\_\_
- Definition of underperformance and a description of the compensation to be paid by the garden owner for any underperformance \_\_\_\_\_
- The type and level of insurance, and what insurance benefits protect subscribers \_\_\_\_\_
- Proof and description of a long-term maintenance plan including which services the plan includes (module or inverter failures, snow, etc.) \_\_\_\_\_
- Production projections and a description of the methodology used to develop production projections \_\_\_\_\_
- Community Solar Garden Operator contact information for questions and complaints and agreement to update and notify the subscriber if ownership changes hands. \_\_\_\_\_
- Demonstration to the Subscriber by the Community Solar Garden Operator that it has sufficient funds to operate and maintain the community solar garden \_\_\_\_\_

Verify that you have you reviewed this document with your Garden Developer/Operator by signing and noting the date below:

\_\_\_\_\_  
Subscriber Signature

\_\_\_\_\_  
Garden Operator Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

## Solar\*Rewards Community (S\*RC) – Online Application Process

Updated 12/4/14

Item	Completed By	Required Action	Xcel Energy Response Time
Web Form	Solar Garden Operator	Complete web form and Project info to gain access to S*RC Application System.	Login and credentials are emailed to Garden Operator <b><u>within 3 business days</u></b> of submission.
1. Complete <u>Step 1</u> in S*RC Application System – Submit Application fee and Deposit	Solar Garden Operator	Application and deposit forms can be downloaded from the S*RC Application System. Once they are signed, they can be uploaded back into the system. Application fees and deposits are wired or mailed.  Reservation letter can be downloaded for the site location noted at this time.	<ul style="list-style-type: none"> <li>Can be done at the installer’s preferred pace.</li> <li>Applications are moved to step 2 <b><u>within 3 business days</u></b> from payments and documents being received. Fees and deposit dates are recorded within the S*RC application system.</li> </ul>
2. Complete <u>Step 2</u> in S*RC Application System – Subscriber Validation and State Certificate	Solar Garden Operator	Step 2 requires the Solar Garden Operator to upload a State Certificate of Good Standing before moving on to Step 3.  This step also allows the Solar Garden Operator to begin adding subscribers to the garden. Data privacy forms must be processed before adding subscribers. Subscriber Agency Agreements can be downloaded, signed and uploaded at this time.  <b>Subscribers do not need to be entered to move to step 3.</b> A minimum of five subscribers will be required prior to Application Step 5.	<ul style="list-style-type: none"> <li>Application is moved to step 3 <b>automatically</b> upon uploading the Certificate of Good Standing and pressing “Submit Subscribers” button in S*RC Application System.</li> <li>Data Privacy forms are processed within <b><u>5 business days</u></b> of submission once entered.</li> </ul>
3a. Complete <u>Step 3</u> in S*RC Application System – Engineering Review	Solar Garden Operator	<ol style="list-style-type: none"> <li>Upload required engineering documents to S*RC Application System, documents include:           <ul style="list-style-type: none"> <li>line diagram</li> <li>site plan</li> <li>interconnection application to S*RC Application System</li> </ul> </li> <li>Submit Engineering Study Fee. Once application and engineering documents are uploaded and fees received, documents will be sent to the engineering team for review of “application completeness.”</li> <li>Solar Garden Operator must request Account/Premise numbers and electric service from Builders Call Line.</li> </ol>	<ul style="list-style-type: none"> <li>Program staff will send applications to Engineering <b><u>within 3 business days</u></b> of receiving documents and payment.</li> <li>Xcel Energy will provide approval for application completeness or comments for correction <b><u>within 30 calendar days</u></b> of receiving documents and payment of Engineering Study Fee. Garden Operator is notified by email and this date is noted within the S*RC application system.</li> </ul>

3b. Interconnection Approval	Xcel Energy	Xcel Energy Area Engineering, Meter Engineering, and Interconnection Design will approve or comment on system design and interconnection. The interconnection cost estimate and Interconnection Agreement will be sent to garden operator. The account and premise numbers will also be sent to Garden Operator.	We will provide engineering approval or comment for correction <b><u>within 60 calendar days of determining completeness. Garden Operator is notified by email and approval is noted in the S*RC System.</u></b> Application is moved to Step 4 within <b><u>3 business days</u></b> of receiving Engineering Approval.
4. Complete Step 4 in S*RC Application System – Executed Documents	Solar Garden Operator	<p>The following must be uploaded into the S*RC Application System:</p> <ul style="list-style-type: none"> <li>• Signed Reservation Letter</li> <li>• Signed Interconnection Agreement</li> <li>• Signed Standard Contract for S*RC</li> <li>• Total Project Cost Invoice</li> <li>• Proof of insurance</li> <li>• Electrical inspection report</li> </ul> <p>At this point garden must have a minimum of 5 valid subscribers in the S*RC Application System. Nothing further is required in the S*RC Application system by the Garden Operator other than subscriber management/maintenance.</p>	Can be done at the installer’s preferred pace.
5. Application Complete	Xcel Energy	Countersign and upload Interconnection Agreement and Standard Contract for S*RC.	Application is moved to Step 5 (Application Complete) within <b><u>3 business days</u></b> of receipt of all step 4 requirements.
6. Bill Credits and Incentive Payments	Xcel Energy	Bill Credits and Incentive Payments are calculated for subscribed energy production. Energy produced during the first (partial) month is classified as unsubscribed energy.	Bill credits are applied to accounts on the 10 <sup>th</sup> day of the month following production. Depending on the subscriber’s bill cycle, bill credits can have a lag time of one month from the solar production meter read date.

**Notes:**

- Garden Operators can view their process step dates in the S\*RC Application System under “Application Step Detail” on the solar garden page of the system.
- Community Solar Garden must be producing energy within two years from the date Xcel Energy found the application complete. This is a tariff requirement.

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> December 17, 2014	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1B; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**

Thor Bjork	Marty Morud	Lynn Hinkle	Mike Harvey
John Wold	Ralph Jacobson	Rick Condon	Madeleine Klein
Ian Dobson	Michael Krause	Dan Rogers	J.W. Postal
Holly Lahd	Steve Coleman	Duane Hebert	Tom Hunt
Susan Peirce	Tom Green	Craig Konz	Ralph Kaehler

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<b>User Assistance</b>	Thor	Update
Please use <a href="mailto:SRCMN@xcelenergy.com">SRCMN@xcelenergy.com</a>		
<b>Key Questions</b>	Marty/Thor	Discussion
<ol style="list-style-type: none"> <li>1. RECs for unsubscribed energy</li> <li>2. Existing Section 10 applications</li> <li>3. Site changes</li> <li>4. RECs in years 11-25 for Solar*Rewards and Made in MN</li> <li>5. Subscription transfers <ol style="list-style-type: none"> <li>a. 120% rule</li> <li>b. Process</li> </ol> </li> </ol>		
<b>Action items</b>		Discussion

**FROM:** MNSEIA  
**SUBJECT:** SOLAR\*REWARDS COMMUNITY IMPLEMENTATION WORKGROUP  
**DATE:** DECEMBER 17, 2014

---

**Meeting Minutes  
December 17, 2014**

**Attendees**

Name	Organization	Name	Organization
Thor Bjork	Xcel Energy	Marty Morud	TruNorth
Shawn Bagley	Xcel Energy	Laura Hannah	SunShare
Jessie Peterson	Xcel Energy	Dan Rogers	SunEdison
Patrick Dalton	Xcel Energy	Duane Hebert	Novel Energy Solutions
Craig Konz	Xcel Energy	Tom Green	SoCore Energy
Holly Lahd	DER	Nathan Franzen	Geronimo Energy
Steve Coleman	MN Community Solar	Virginia Rutter	Eutectics
Dean Leischow	Sunrise Energy	Ross Abbey	SunShare

**Administration—**

- December 3 meeting minutes reviewed
- Please send all questions or requests for process changes to [SRCMN@xcelenergy.com](mailto:SRCMN@xcelenergy.com); we are compiling a list of updates to the system as we move through the process
- Craig will be moving to a new position beginning January 5<sup>th</sup>
- Proposed Agenda
  - Propose Key Questions one at a time
  - Review Order Language
  - Discuss
  - Record Group Consensus/non-consensus
  - Next Question
- Definitions of Consensus
  - **Full consensus** - when no one in the group speaks against the Recommendation in its last readings. This is also sometimes referred to as Unanimous Consensus.
  - **Consensus** - a position where only a small minority disagrees, but most agree.
  - **Strong support but significant opposition** - a position where, while most of the group supports a Recommendation, there are a significant number of those who do not support it.
  - **Divergence** (also referred to as No Consensus) - a position where there isn't strong support for any particular position, but many different points of view. Sometimes this is due to irreconcilable differences of opinion and sometimes it is due to the fact that no one has a particularly strong or convincing viewpoint, but the members of the group agree that it is worth listing the issue in the report nonetheless.



- **Minority View** - refers to a proposal where a small number of people support the Recommendation. This can happen in response to a Consensus, Strong support but significant opposition, and No Consensus; or, it can happen in cases where there is neither support nor opposition to a suggestion made by a small number of individuals.
- In cases of Consensus, Strong support but significant opposition, and No Consensus, an effort should be made to document that variance in viewpoint and to present any Minority View Recommendations that may have been made. Documentation of Minority View Recommendations normally depends on text offered by the proponent(s). In all cases of Divergence, the Working Group leads should encourage the submission of minority viewpoint(s).

## Key Questions

### 1. RECs for unsubscribed energy

- a. Proposed Question: Should garden owners/operators Receive the REC payment in addition to the unsubscribed energy rate for unsubscribed energy?
- b. Review Order Language –
  - i. April 7 Order:  
Commission concurs with Xcel and will approve the Company's proposal to require solar-garden operators to maintain an active account with M-RETS in order to Receive RECs associated with unsubscribed energy.
  - ii. REC docket - all RECs must be purchased. All RECs should be compensated
  - iii. Section 9 Sheet 85  
The Company shall own and retain all RECs associated with Subscribed Energy produced by the Community Solar Garden. The Company will transfer the RECs associated with Unsubscribed Energy annually to the Community Solar Garden Operator, provided the Community Solar Garden Operator completes all actions required to Receive these RECs, including but not limited to maintaining an active account in the Midwest Renewable Energy Tracking System (M-RETS) or its successor and makes such requests within 6 months of the production of the Unsubscribed Energy.
- a. Discussion:
  - iv. There is no real desire for the developers to hold/own RECs
  - v. Xcel Energy should continue to pay the REC or transfer based on those rates
  - vi. Order and Tariff language does not provide support for forcing XE to purchase the RECS
  - vii. Unsubscribed Energy – the REC is tied to the energy and who pays for it
  - viii. Some developers may set up a MRETS accounts
- b. Record Group Consensus/non-consensus
  - ix. Proposed – Garden Operator chooses at project outset to sell or retain RECs – if you retain them you must create a MRETS account - **Full Consensus**
  - x. Proposed – if Garden Operator chooses to sell RECS, they should be paid the REC price for unsubscribed energy - **Consensus**
    - 1. XE point: proposed solution not supported by the Order or Tariff
- c. Next Step

- xi. Discussion to implement a change for handling unsubscribed energy RECs included either amending Individual SRC Contracts, or XE could file a modification to the standard contract for Commission approval.
  - 1. After further investigation, it appears that since there is no tariff that includes a stand-alone rate for RECs, a contract amendment will not work, and XE would need to file a new rate for approval PUC approval.

## 2. Existing Section 10 applications

- a. Propose Question: Should existing Section 10 interconnection applications maintain their queue position during the interconnection application portion of the SRC Community application process.
  - i. Because of SoCore's request for clarification, some parties recused themselves and the group could not assess Consensus/Non-consensus.
  - ii. The issue was addressed in previous meetings and the outcome was '**Strong Support but Significant Opposition**' to not allow existing Section 10 applications to maintain their queue position if that application were to be used for the SRC program.

## 3. Site changes

- a. Propose Question: If a host site change is required for any reason, should the application start completely over and be subject to new terms, conditions and rates should the utility program change during that time?
- b. Review Order Language:
  - i. September 17, 2014 Order; F-2 (in part)
    - community solar garden projects filing complete applications under the applicable retail rate should be allowed to lock in the REC price for the duration of the 25-year contract;
    - solar-garden projects approved under the applicable retail rate should be credited at the applicable retail rate in place at the time of energy generation for the duration of the 25-year contract; and
    - any adjustment to REC prices made by the Commission in later years should only apply to new community-solar-garden project applications.
  - ii. Section 9, Sheet 64.1 and 9, Sheet 67;
    - 1. A CSG locks in the current REC price and rate structure at the time Xcel Energy determines application completeness
- c. Discussion
  - i. Many in the Group think that completeness should be considered permanently granted to an application, regardless of changes made to that application, such as the location of the PV system.
  - ii. Others in the Group think that completeness needs to include all of the information required for interconnection. If that information changes, or is not available, the application is not complete.
  - iii. The discussion turned to certainty of the REC/rate structure vs. the integrity of the program.

1. Determining that an applicant who changes the location of the CSG still has a completed application would provide certainty that as long as a CSG was built, no matter where, that CSG would be able to have certainty in the REC price and rate structure and not be at the risk of future rate/REC changes.
  2. Determining that an applicant who changes the location of the CSG no longer has a complete application prevents developers from creating 'placeholder' applications in order to secure the current (presumably more favorable) REC/rate structure rather than accept a new REC/rate structure.
- d. Record Group Consensus/non-consensus
- i. The Group reached **Full Consensus** that for future program changes, including the REC/rate structure there should significant notice provided and a well-planned transition period to the new REC/rate structure.

### Other topics

#### 4. RECs in years 11-25 for Solar\*Rewards and Made in MN

- a. MiM and Solar\*Rewards issue – what happens after 10 years?
- b. Perhaps amend the Standard Contract to have Xcel Energy purchase in years 11-25 at the rate established when the garden first applied
- c. This is an issue in both SR and MiM outside of the SRC program and may need to be dealt with more broadly

#### 5. Subscription transfers

- a. Process
  - i. If a subscriber moves, from a program perspective the original subscription is now invalid.
  - ii. The Garden Operator will need to add a new subscription to the online subscriber management system and the 120% rule will be applied as with any new subscription.
  - iii. If the original subscription size does not comply with the 120% rule, the subscription size will have to be reduced so that it does comply.
- b. Discussion
  - i. From a Subscriber's perspective this process can be straightforward if managed properly. The only additional action the Subscriber needs to take from an SRC program perspective is to sign a new Subscriber Agency Agreement.
  - ii. The Subscriber contract with the Garden Operator should spell out the transfer terms
- c. Record Group Consensus/non-consensus
  - i. The Group reached **Consensus** that this process works and that it is up to the Garden Operator and the Subscriber Contract to describe the terms of a subscription transfer.
  - ii. Some parties still have concerns about how XE calculates premise consumption when there is a lack of data. Although this issue would apply not only to the SRC program.

#### 6. Future meetings

- a. The Group decided to discuss the future meeting schedule at our next meeting on January 7<sup>th</sup>.

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> January 7, 2015	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1B; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

**Attendees:**


TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor	Discussion
<ul style="list-style-type: none"> <li>Discuss update on next step for item #1</li> </ul>		
<b>Program Update</b>	Kevin	Update
<ul style="list-style-type: none"> <li>FAQ updates</li> <li>Applications by county posted to xcelenergy.com</li> <li>Q for discussion: When to list details of garden name/location/operator on website?</li> <li>PUC hearing on Jan. 15</li> </ul>		
<b>Bill Credit Example</b>	Thor	Discussion
<ul style="list-style-type: none"> <li>Multiple premise subscriber</li> </ul>		
<b>Dept. of Labor and Industry</b>		Discussion
<ul style="list-style-type: none"> <li>Published solar PV FAQ on 12/31/2014</li> </ul>		
<b>Subscriber Experience</b>	Group	Discussion
<ul style="list-style-type: none"> <li>Marketing efforts</li> <li>Common subscriber questions and concerns</li> </ul>		
<b>Future Meetings</b>	Group	Discussion
<ul style="list-style-type: none"> <li>Schedule, frequency</li> <li>Call for agenda items</li> </ul>		
<b>Other items</b>		Discussion

## S\*RC Implementation Workgroup

Meeting Minutes

January 7, 2015

### Opening

The regular meeting of the S\*RC Implementation Workgroup was called to order at 1:30 pm on January 7, 2015 at Xcel Energy General Offices by Thor Bjork.

### Present

	Name	Company		Name	Company
x	Thor Bjork	Xcel Energy	x	Nathan Franzen	Geronimo Energy
x	Kevin Cray	Xcel Energy	x	Virginia Rutter	Eutectics
x	Jessie Peterson	Xcel Energy	x	Ross Abbey	Sunshare
x	Shawn Bagley	Xcel Energy	x	Lindsey Ransom	SoCore
x	Holly Lahd	DOC	x	Susan MacKenzie	PUC
x	Steve Coleman	MN Community Solar	x	Brian Swanson	PUC
x	Dean Leischow	Sunrise Energy	x	Mike Michaud	Sunshare
x	Laura Hannah	Sunshare	x	Dan Rogers	SunEdison
			x	Duane Hebert	Novel Energy Solutions

### Approval of Minutes

The meeting minutes for 12/17/2014 were approved.

### Open Issues

**RECs Associated with Unsubscribed Energy:** Xcel Energy provided further information. The Company believes that amending the Standard Contract to add a REC price to the unsubscribed energy rates is not workable. There is no rate in our tariffs that show the actual rate (we will pay X REC price). Therefore, a new rate would need to be filed.

- Does the company want to move forward with this recommendation? Xcel Energy is reviewing the matter as it will likely incur additional costs within systems currently not designed for this function.
- Stakeholder Request: We should resolve this prior to the first garden reaching commercial operation. (This is a piece of the evaluation of financing; this needs to be resolved sooner rather than later)

**Commission Filing:** It was suggested that perhaps next steps for the Stakeholder Group would be to file a list of issues to be resolved at the Commission rather than wait until the April Compliance Filing.

**Location Issue:** it was discussed as to how to handle undeveloped land without an address. Xcel Energy requests a valid street address be included in the application, while some Stakeholders requested a GPS coordinate be accepted as noted within Section 10. This is an ongoing issue and will be taken into a Subgroup discussion by Workgroup members the week of January 12<sup>th</sup> (Subgroup report emailed along with these minutes).

**Program Updates:** FAQ's will be updated online this week. Garden's by County will be updated on or near the 15<sup>th</sup> of every month online. Engineering Fees are being adjusted in Section 10, that hearing was held Jan. 22.

**Future Meetings:** Future meetings will continue to be held at Xcel Energy on Wednesdays, but will be moved to the first Wednesday of every month.

## **New Business**

**Prequalified Systems:** Usually these systems are small scale, rooftop type applications. It is unlikely that S\*RC projects will fall in this category.

**Posting Developer Names:** Developers prefer to have their names added to the website once it is being built/ closer to construction.

## **Program Concerns:**

- Load analysis remains confusing – Xcel Energy will add further information online
- When will credits be available – once the system is in commercial operation, we measure in the first production month, credits are then provided in the next billing cycle
- Subscriber Marketing – are we getting common questions from subscribers?
  - CERTS would like a best answer
  - Consumer Affairs link should be on Operator's website
  - Who can claim they are solar powered? CERTS has information on this – Xcel Energy should include this information on their website

**Multiple Premise Information:** program administration showed an example of how this would work for subscribers and where the production credit will remain. The online subscriber management system will provide checks to ensure correct Account/Premise combinations and to verify compliance with the 120% rule; however it is the operator's responsibility to verify this is dealt with appropriately for subscribers in this situation.

## **Key Questions**

### **Transparency of interconnection**

- Question: Can Xcel Energy provide some more details on where the system constraints are etc.?
  - Review Order Language: n/a.
  - Discussion: Options

- Prescreen : Capacity available and Applications in Queue
- FERC Order 792 Request - \$300 for snapshot option (nonrefundable)
- MISO interconnection queue
- Why would this be an issue – we need to explore these and get back to the developers
- Send Thor an email regarding other ideas
- **Consensus/non-consensus - none requested for topic of conversation**
- Next Steps: Further discussion at next Stakeholder Meeting

FAQ– Department of Labor interpretations note that an electrician is required to do more work than what people feel is warranted

- Question: Is this something the Workgroup wants to discuss; perhaps send a letter?
  - Discussion: Not an issue for Workgroup –although it does have an impact on project cost. Conversations are being had at the DOC.
  - Consensus/non-consensus: Full consensus that it is outside our scope
  - Next Step: n/a

#### **Proposed Agenda for Next Meeting**

- *Distribution/Feeder Reporting*: Can we provide a feeder capacity report online? What goes into this and why may it be a problem?
- *Regulatory Activity*
- *Location of CSG subgroup recommendation*

#### **Adjournment**

Meeting was adjourned at 3:00 by Thor Bjork. The next general meeting will be at 1:30 on February 4, 2015, at Xcel Energy General Offices.

Minutes submitted by: Jessie Peterson

Approved by: Workgroup Attendees (Feb. 4, 2015)

**Meeting Agenda: S\*RC Implementation Working Group**

<b>Date:</b> February 4, 2015	
<b>Start Time:</b> 1:30 pm Central	<b>Location:</b> 1B; 414 Nicollet Mall, Mpls, MN
<b>End Time:</b> 3:00 pm Central	<b>Phone:</b> NA

TOPIC	LEADER	DESIRED OUTCOME
<b>Welcome and Approve Previous Minutes</b>	Thor B.	Discussion
<b>Regulatory Update</b>	Holly L.	Update
<ul style="list-style-type: none"> <li>• PUC verbal orders               <ul style="list-style-type: none"> <li>○ Clarification on the definition of a subscriber</li> <li>○ SoCore petition</li> <li>○ Working group</li> </ul> </li> </ul>		
<b>Implementation of Order</b>	Kevin C.	Discussion
<ul style="list-style-type: none"> <li>• Completeness process</li> <li>• Interconnection queue position impacts</li> <li>• Identifying retail customer</li> </ul>		
<b>Location identifier subgroup readout</b>	Thor B.	Discussion
<b>Issue Reporting</b>	Jessie P.	
<b>Other items</b>		Discussion



Meeting Minutes  
2/4/15

## S\*RC Implementation Workgroup

Meeting Minutes  
February 4, 2015

### Opening

The regular meeting of the S\*RC Implementation Workgroup was called to order at 1:30 pm on February 4, 2015 at Xcel Energy General Offices by Thor Bjork.

### Present

Name	Company	Name	Company
Thor Bjork	Xcel Energy	Nathan Franzen	Geronimo Energy
Kevin Cray	Xcel Energy	Virginia Rutter	Eutectics
Jessie Peterson	Xcel Energy	Susan Mackenzie	MPUC
Shawn Bagley	Xcel Energy	Brian Swanson	MPUC
Holly Lahd	DOC	Dan Rogers	SunEdison
Steve Coleman	MN Community Solar	Tom Green	SoCore Energy
Laura Hannah	Sunshare	Jack Hays	Westwood
John Wold	Xcel Energy	Doug Mutcher	Westwood
David Shaffer	MnSEIA	Duane Hebert	Novel Energy Solutions
Mike Michaud	SunShare	Aric Sorenson	Sundial

### Approval of Minutes

The meeting minutes for 1/7/15 were approved by those attending the meeting. Subgroup minutes approved via email and attached to 1/7/15 minutes.

**Address Change** – Held over for discussion at the next Working Group meeting.

### Open Issues

#### Regulatory Update – Holly Lahd

##### 1. Motions from 1/15/15 Hearing: Order to come out at the end of next week

- Clarify that the applications would enter and be reordered based on the complete application date (per Xcel Energy's determination).
- Engineering studies that have already paid will have to be redone (repaid)
- Monthly updates on the 427 applications and status. [What we are already doing, but in Order]
- Denied Subscriber Petition
- Make subscriber issue clear – on Xcel Energy website [15 days]
- Minutes (old and new) will be entered into the eDocket system

Meeting Minutes  
2/4/15

**2. Financeable Rate: Due March 2, 2015**

**3. VOS & ARR: Will be filed on March 2, 2015 by Xcel Energy**

**4. Working Group Discussion**

- How can we make the Working Group more affective? Commission isn't always in tune with the issues, if they have more information on the working group there would be less of a concern for what is put forth to the Commission
- The Department noted that we may need to expand the workgroup participation to those outside developers
- The Commission doesn't want to micromanage the program; program development should be done through the Workgroup. There have been a number of issues, there will be gray areas that weren't put forth in the Order – Parties suggested that either the Commission needs to approve these gray areas or provide the authority to the Workgroup to complete. Other parties did not think it would be possible to provide authority to Workgroup, rather the Workgroup should continue to work through any issues as best it can, and provide recommendations where regulatory action may be required.
- Concept of creating one report regarding the Workgroup for March 2 was discussed
- Xcel Energy has attempted to put together a document that will track issues and be clearer on things addressed in the workgroup.
- Some issues will require tariff adjustments

**Subscriber Discussion**

The PUC did not support a simple solution like premise, account, name on bill, etc. Xcel Energy will need to do a good job determining who is a “retail customer” and explaining on website/FAQ etc. The Company has committed to make a reasonable assessment of what a retail customer is for purposes of applying the 40% rule.

Example provided: School District, five different buildings, five different account numbers. Are they different customers? If all the payments come out of one checkbook, is it the same customer? The Company explained we would need to have the facts presented to determine.

Geronimo noted they determine this by looking at whether or not the customers share their own board, have their own financials and own tax statements.

The Department noted that separate divisions with different structures are usually different customers and eligible for a new 40 percent system – this is consistent with our filings

Timing of review was also discussed – the Company will attempt to answer within 2-3 days, however follow-up questions are likely.

**Implementation Order: How are we dealing the interconnection queue/ interpreting queue position on our deemed complete date – Kevin Cray**

- **[Update by Xcel Energy]** Once the final Order is received, applicants will receive an email providing step-by-step directions on how this process will be dealt with.
- As of the date we received the verbal Order, there were no projects deemed complete by Xcel Energy –therefore, we are working with first-serve positioning – meaning that we are

Meeting Minutes  
2/4/15

reviewing for completeness in the order that we received all of the required documentation and fees.

- The Company is dealing with 'early' Section 10 applications as if they don't yet have a corresponding SRC application.
- When an SRC application is deemed complete, and its queue position is determined, the 'early' section 10 application study may still be valid and useful. However if the queue position of the SRC application that corresponds to the 'early' Section 10 application is not the same, the study may need to be redone.
- Applicants will be provided information as to where they are in the queue upon being deemed complete and prior to receiving a statement of work that includes the interconnection study costs.
- Developers asked for a list or some way in which they could determine who was in front of them, whether it was a solar project, etc. – There is risk when you don't know who is on what feeder?
- Shuffling of Timelines is an issue; developers have no idea of where these studies are.
- Developers aren't going to be able to build anything in 2015 – these things have to be moved forward
- Xcel Energy should update the website more often than once a month

## **New Business**

### **When will the ARR/VOS become effective – Team Discussion**

Xcel Energy will provide new ARR/VOS numbers on March 2. The team determined that adjusting to the new rates immediately, as is done in practice today, makes sense. Moving to a different rate structure the same way would be worrisome to all parties. Commission staff requested that these types of discussions should also be included in the March 2 Comment period.

### **Potential Interconnection Docket**

- This may be something that needs to be taken up with the Commission
- Can Xcel Energy note substation and MW available today – No
- This would be a statewide docket on such issues as mapping. Department – this will take a long time and may not be able to address these questions in timeline that may be expected within the garden process today

## **Key Questions**

No specific Issues were addressed within this meeting

## **Proposed Agenda for Next Meeting**

- Meeting to be held on February 18
- Issue Tracker to be reviewed – agreement on what we have accomplished and what remains to be addressed [Tracker to be sent via email]
- Take up the address change subgroup recommendation address/new premise

**Adjournment**

Meeting was adjourned at 3:00 by Thor Bjork. The next general meeting will be at 1:30 on February 18, 2015, at Xcel Energy General Offices. Meeting notice has been sent

Minutes submitted by: Jessie Peterson

Approved by: Implementation Workgroup Attendees during 4/18 meeting

## CERTIFICATE OF SERVICE

I, Tiffany Hughes, 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-13-867**

Dated this 27th day of February 2015

/s/

---

Tiffany Hughes  
Records Analyst

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220  St. Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211  Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112  Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S  Bloomington, MN 55431	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200  Irvine, California 92618	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Landscapes	234 Jackson Ave N  Hopkins, MN 55343	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_13-867_Community Solar Garden - Xcel
Bill	Droessler	bdroessler@iwla.org	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202  Saint Paul, MN 55104	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway  Minneapolis, MN 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr  Winona, MN 55987	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynn	Hinkle	lhinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2  Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane  Brooklyn Park, MN 55444	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Tiffany	Hughes	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John S.	Jaffray	jjaffray@jrpowers.com	JJR Power	350 Highway 7 Suite 236  Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Kampmeyer	mkampmeyer@a-egroup.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600  Suite 1600 Chicago, IL 60601	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John	Kluempke	jwkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd  Elk River, MN 55330	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S  Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N  Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Casey	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Erica	McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305  Oakland, California 94612	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S  Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325  Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane  Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315  Minneapolis, MN 55415	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel