

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

Nancy Lange	Chair
Dan Lipschultz	Vice Chair
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Northern States Power  
Company's Affiliated Interest Request and  
Informational Filing

Docket No. E002/AI-17-577

**COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) respectfully submits these Comments in response to the June 28, 2017, Petition of an Affiliated Interest Request and Information Filing (“Petition”) of Northern States Power Company d/b/a Xcel Energy (“Xcel” or “the Company”). In its Petition, Xcel requests approval for two contracts between the Company and its affiliate, Nicollet Projects I, LLC (“Nicollet”), that is in the process of purchasing a portfolio of Community Solar Garden (“CSG”) projects within the Solar Rewards Community program. The first contract is the tariffed interconnection agreement. The second contract is the Company’s Solar Rewards Community contract. Approval of the Petition would allow Nicollet, a subsidiary owned by Xcel’s corporate parent, to take ownership of CSGs.

The Commission should reject Xcel’s Petition with prejudice for two primary reasons. First, neither Xcel nor sister companies within the Northern States Power Company system should be permitted to participate in the community solar garden market because they would have a competitive advantage against other firms that are not owned by Xcel. Second, if Xcel is allowed to own CSGs, the Company will have a vested interest in the method in which CSG owners are compensated, which could create a conflict of interest in which the Company’s

financial interest is not consistent with the best interests of its ratepayers. This creates a clear and powerful conflict of interest within the Company. These two reasons make it clear that Xcel's Petition is not within the public interest and should be rejected with prejudice.

**I. THE COMMISSION HAS THE DISCRETION TO DENY XCEL'S REQUEST FOR AN AFFILIATE TO OWN COMMUNITY SOLAR GARDENS.**

As a threshold matter, the CSG statute, Minnesota Statutes § 216B.1641, provides that “[t]he owner of [a] community solar garden *may* be a public utility.”<sup>1</sup> While this language would permit Nicollet to own a CSG, it does not *require* that the Commission allow it to do so.

First, the statutory language referring to a “public utility” does not apply in this instance because Nicollet is not a “public utility.” Instead, it is an unregulated affiliate owned by Xcel Energy, Inc. As such, the language stating that public utilities “may” own CSGs does not require the Commission to approve this ownership proposal.

Second, even if the “public utility” language did apply to Nicollet, the plain language of the statute indicates that the Commission has the discretion to decide whether the proposal should be approved or denied. The CSG statute provides that utilities “may” be the owner of a CSG.<sup>2</sup> The legislature specifically chose to use this permissive language, rather than prescriptive language that would require approval of utility ownership. By indicating that public utilities “may” own CSGs, the legislature intended to preserve the Commission's authority to decide whether a utility *should* be permitted to do so. In each instance where a utility or utility-affiliate seeks CSG ownership, the Commission should be guided by its duty to ensure just and reasonable rates, and to protect the public interest.

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<sup>1</sup> Minn. Stat. § 216B.1641(a) (emphasis added).

<sup>2</sup> *Id.*

Ultimately, the Commission has the authority to decide whether to approve or deny Xcel's petition in order to protect the public interest. While Nicollet may be legally permitted to own CSGs, the Commission has the discretion to decide whether they should be allowed to do so. In this instance, the Commission should deny Xcel's request in order to protect the public interest and the community solar garden program.

## **II. XCEL WILL HAVE A COMPETITIVE ADVANTAGE OVER OTHER COMMUNITY SOLAR GARDEN OWNERS.**

The Commission should reject Xcel's Petition because CSGs owned by an affiliate of Xcel may have a competitive advantage over other third-party CSG owners in at least two ways.

First, as a regulated public utility with a long history, Xcel enjoys a special relationship with its customers that other CSG developers do not have and cannot benefit from. Based on this relationship, CSGs that are owned by an affiliate of Xcel may have an advantage over CSGs owned by third-parties when marketing to customers. For example, customers may prefer to choose a CSG developed by the utility they are familiar with over one developed by a third-party they are not familiar with. These are only a few examples of ways in which a CSG owned by an affiliate of the utility may have advantages in obtaining subscriptions from customers.

Second, as the Commission is aware, there have been significant disputes regarding the technical details of interconnection. While Nicollet has already completed the interconnection process, allowing an affiliate of Xcel to own a CSG is a significant first step towards allowing Xcel or other Xcel-affiliates to participate in the market. Any instance in which a company related to Xcel is considering participation in the early-stages of the CSG market would create a situation in which Xcel has the opportunity to give preference to its own investments, or the investments of its parent company or affiliates. Regardless of whether Xcel acts on that opportunity, it is not in the public interest to allow the situation to exist. The mere knowledge

that the third party may have to compete against CSGs affiliated with Xcel could discourage developers from participating in the market in Minnesota.

### **III. XCEL WILL HAVE A VESTED INTEREST IN HOW COMMUNITY SOLAR GARDENS ARE COMPENSATED.**

The Commission also should reject Xcel's Petition because allowing the Company to own CSGs would create a conflict of interest with how CSGs are compensated. If Xcel is allowed to own CSGs, the Company would have a financial interest in maximizing the compensation rate paid to CSG subscribers. The bill credit paid to CSG subscribers is one of the primary factors in the subscription rates that CSG developers can offer to consumers – as the CSG bill credit rate goes up, developers can ask for higher subscription payments. Allowing Xcel to own CSGs would give the Company a financial interest in a high bill credit rate, because it would allow the Company to obtain a higher subscription rate from subscribers.

Xcel currently has some interest in keeping power-purchase prices, including the bill credit paid to CSG subscribers, low in order to preserve the competitiveness of its electricity rates. This incentive is a good one, because it aligns Xcel's financial incentives with the public interest in keeping utility rates low.

Allowing Xcel to own CSGs would create a new incentive for the Company to maximize the price it sells CSG subscriptions for, and this new incentive would conflict with Xcel's interest in keeping prices low. It does not matter whether or not Xcel has taken or would take any actions in response to the new incentive – the concern is that it is not in the public interest to provide new incentives to the utility that are not aligned with the interests of ratepayers.

Xcel's participation at the Commission and at the Legislature also has the potential to influence the structure of the CSG program. Allowing Xcel to own CSGs could incent it to oppose future beneficial reforms to the CSG program. For example, Xcel may oppose reforms

that would bring down the cost to ratepayers by lowering the profits of CSG owners and developers, such as market-based procurement. Creating this incentive would not be in the public interest.

#### **IV. CONCLUSION**

The Commission should reject Xcel's Petition with prejudice because it is not within the public interest. Allowing Xcel to own CSGs will provide the Company with a competitive advantage, and create new economic incentives that could lead to additional inefficiencies within the CSG program, including its structure and compensation mechanism.

Dated: October 25, 2017

Respectfully submitted,

**s/ Ron Nelson**

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**s/ Ryan Barlow**

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October 25, 2017

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

**RE: *In the Matter of Northern States Power Company's Affiliated Interest Request  
and Informational Filing***  
**Docket No. E002/AI-17-577**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Comments of the Office of the Attorney General - Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is enclosed.

Sincerely,

s/ **Ryan P. Barlow**

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RYAN P. BARLOW

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Enclosures

AFFIDAVIT OF SERVICE

**RE: *In the Matter of Northern States Power Company’s Affiliated Interest Request  
and Informational Filing***  
**Docket No. E002/AI-17-577**

STATE OF MINNESOTA    )  
                                  ) ss.  
COUNTY OF RAMSEY    )

I, Judy Sigal, hereby state that on the 25th day of October, 2017, I e-filed with eDockets **Comments of the Office of the Attorney General – Residential Utilities and Antitrust Division** and served the same upon all parties listed on the attached service list via electronic submission and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ *Judy Sigal*  
JUDY SIGAL

Subscribed and sworn to before me  
this 25th day of October, 2017

s/ *Patricia Jotblad*  
Notary Public  
My Commission expires: January 31, 2020.

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