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August 29, 2013

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

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/CI-13-542

Dear Dr. Haar

On July 25, 2013, the Minnesota Public Utilities Commission (Commission) issued a notice requesting comment on the customers excluded from the Solar Energy Standard (SES) under Minn. Stat. §216B.1691, subd. 2f. Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst

SLP/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/CI-13-542

I. BACKGROUND INFORMATION

In the 2013 legislative session, Minn. Stat. §216B.1691 was amended to add a Solar Energy Standard (SES). In addition to the Renewable Energy Standard (RES), public utilities are required to generate or procure electricity from solar energy sufficient to serve 1.5 percent of the utility's Minnesota retail electric sales. Specifically, the statute states,

Subd. 2f. Solar energy standard. (a) In addition to the requirements of subdivisions 2a and 2b, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy. At least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kilowatts or less.

In addition to the standard set forth above, the statute specifically exempts the retail sales to certain customer groups from the calculation of "retail sales" subject to the SES. Minn. Stat. §216B.1691, Subd. 2f (d) states:

For the purposes of calculating the total retail electric sales of a public utility under this subdivision, there shall be excluded retail electric sales to customers that are:

- (1) An iron mining extraction and processing facility, including a scam mining facility as defined in Minnesota Rules, part 6130.0100, subpart 16; or

- (2) A paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer.

Those customers may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified by this subdivision.

In its *Notice of Request for Filings from Electric Utilities on Customers Excluded from the Solar Energy Standard and opportunity to Comment on Filings*, the Commission requested that the public utilities subject to the SES submit the following information:

1. Minnesota retail electric sales in kWh by major customer classes and in total for 2012, along with an explanation of how sales numbers may differ from the sales reported in Docket E999/PR-13-186.
2. Calculation of 1.5 % of retail electric sales, and 10% of the 1.5% goal, based on 2012 sales.
3. A list of current customers the utility believes will be excluded from their SES obligations under Minn. Stat. §216BH.1691, subd. 2f(d)(1) and (2). For each customer identify the statutory category (i.e. paper mill, saw mill), the customer class, total kWh consumed in 2012, and maximum kW demand; also provide total customer and kWh numbers by class and overall
4. Description of how the customers to be excluded were identified.
5. Calculation of 1.5% of retail electric sales and 10% of the 1.5% goal, based on 2012 sales after exclusions; and
6. An estimate of SES requirements with and without customer exclusions for 2020.

In addition, the Commission requested comment on the following issues:

1. Have the utilities provided reasonable estimates of their SES obligations?
2. Should the Commission establish criteria to be used by utilities in determining customer exclusions, such as kW demand, kWh usage, NAICS codes?
3. Should the Commission establish procedures and/or require utilities to file tariffs related to customer exclusions which address verification procedures, reporting requirements, customer petitions or other related issues?

The Department offers the following comments.

II. DEPARTMENT ANALYSIS

A. UTILITY ESTIMATES OF SES REQUIREMENTS

Northern States Power Company, d/b/a Xcel Energy (Xcel), Minnesota Power (MP), Interstate Power & Light (IPL) and Otter Tail Power (OTP) all submitted estimates of their SES requirements and customer exclusions in response to the Commission Notice. Table 1, below, summarizes the utilities' reported 2012 sales, along with their estimated exemptions.

Table 1: Summary of 2012 SES Requirements

	2012 MN Retail Sales (MWhs)	Sales to Excluded Customer Groups (MWhs)	Exclusions as a % of Total Sales	1.5% SES Req. Total	1.5% SES Req. w/ Exclusions
IPL	839,466	11,430	1.4%	12,592	12,421
MP	9,388,538	6,546,065	69.7%	140,828	42,637
OTP	2,072,980	69,182	3.3%	31,095	30,057
Xcel	31,319,198	653,506	2.1%	469,788	459,985

Several of the utilities indicated differences between the sales numbers reported in Docket No. E999/PR-13-168 for their Renewable Energy Standard (RES) compliance and the numbers reported in this proceeding. The differences are accounted for by the broader RES statutory requirement to include not only Minnesota retail sales, but also the retail sales “of a distribution utility to which the electric utility provides wholesale electric service” in the calculation of the RES requirement. Given the broader RES requirement, the utilities reported higher sales subject to RES requirements than for the SES.

B. CRITERIA FOR DETERMINING CUSTOMER EXCLUSIONS

The SES Statute exempts retail sales to iron mining extraction and processing facilities, including scam mining and paper mills, wood products manufacturers, sawmills, and oriented strand board manufacturers from a utility’s calculation of its SES requirement, and further provides that the costs of the SES not be reflected in the rates charged to these customers.

The North American Industry Classification System (NAICS) is a coding system used to classify business establishments according to their primary business activity. The NAICS replaced the Standard Industrial Classification (SIC) system in 1997 for classifying business activity. The following NAICS codes appear to correspond to the categories reflected in statute.

NAICS Code	Category
212210	Iron Ore Mining
321113	Sawmills
321114	Wood Preservation
321211	Hardwood Veneer and Plywood Manufacturing
321212	Softwood Veneer and Plywood Manufacturing
321213	Engineered Wood member (Except truss) Mfg.
321214	Truss Manufacturing
321219	Reconstituted Wood Product Mfg.
321911	Wood Window and Door Mfg.
321912	Cut Stock, Resawing Lumber and Planning
321918	Other Millwork (incl. flooring)
321920	Wood Container and Pallet Mfg.
321991	Manufactured Home (mobile Home) Mfg.
321992	Prefabricated Wood Building Mfg.
321999	All Other Misc. Wood Product Mfg.
322110	Pulp Mills
322121	Paper (except Newsprint) Mills
322122	Newsprint Mills
322130	Paperboard Mills
322211	Corrugated and Solid Fiber Box Mfg.
322212	Folding Paperboard Box Mfg.
322219	Other Paperboard Container Mfg.
322220	Paper Bag and Coated and Treated Paper Mfg.
322230	Stationery Product Mfg.
322291	Sanitary Paper Product Mfg.
322299	All Other Converted Paper Product Mfg.

In general, the utilities utilized the NAICS codes above to determine the customers to be excluded from the SES calculation. Xcel appears to have used SIC codes rather than NAICS. In addition, Xcel also excluded customers whose primary focus is retail sales of lumber, plywood and other building materials. Because the statute specifically excludes only manufacturing entities, the Department does not believe retail establishments such as lumber yards, and retail home improvement companies qualify for the exclusion under the statute.

The SES Statute does not identify any other criteria on which to base an exemption from the SES calculation and rates other than the industry classification. In contrast, Minn. Stat. §216B.241 allows large customers to petition for exemption from certain conservation improvement (CIP) requirements, but requires approval of the Commission, and includes a definition of a large customer facility.

In addition, Minn. Stat. §216B.03 requires rates to be just and reasonable, and states, “rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers.” Because the SES statute broadly excludes certain industry groups from the SES requirements the Department concludes that there is no basis in statute for including the retail sales for only a subset of those customers within the industry classification from the SES calculation and rates based on usage levels such as kWh sales or kW demand. In other words, the statute directs that all customers within the industry groups be excluded regardless of size or electric consumption levels.

C. REPORTING REQUIREMENTS

The Commission sought comment on whether utilities should be required to file tariffs relating to customer exclusions, address verification procedures, customer petitions and reporting requirements. As noted above, the Department believes the statute requires certain broad categories of customers be excluded from the SES requirement calculation and any associated costs with meeting the requirement.

With respect to verification, the Department believes the utilities are best situated to address the issue of properly identifying NAICS codes for their customers. Once cost recovery is sought for projects undertaken to meet the SES, the issue of identifying and billing the appropriate customers will require the utilities to file tariffs identifying the excluded customer groups. To the extent energy is obtained under a power purchase agreement, the costs of which are typically recovered through the fuel adjustment charge (FCA), the utilities may need to file tariffs separately identifying SES-related charges on the bill to accommodate the excluded customers from recovery.

Finally, the Department recommends the Commission direct the Companies to report their progress toward meeting their SES requirements on an annual basis. Reporting could be included with the utilities annual RES reporting (June 1st for the previous calendar year), and should include the annual Minnesota retail sales, annual excluded customer sales, and annual solar generation.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends the Commission identify and adopt a list of NAICS codes to be excluded from SES calculations and cost recovery.

Beginning June 1st, 2014, the Commission should direct the utilities subject to the SES to include information on annual Minnesota retail sales, annual excluded customer sales, and annual solar generation for the previous calendar year in their annual RES compliance reports.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E999/CI-13-542

Dated this 29th day of August, 2013

/s/Sharon Ferguson

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