

Attachment D:

E-Mail from Xcel Energy dated October 11, 2023

E-Mail from Xcel Energy dated April 15, 2024

Subject: Community Solar Garden Program Transition
Date: Wednesday, October 11, 2023 at 11:46:49 AM Central Daylight Time
From: Anderson, Casey M
To: Solar Rewards Community MN
Priority: High
Attachments: image001.png, image003.png

Solar*Rewards Community Update



October 11, 2023

Community Solar Garden Program Transition

We've received questions regarding the transition from the Legacy to the Non-Legacy community solar garden program. Our August 28, 2023 filings (Response and Petition) to the Minnesota Public Utilities Commission in Docket Nos. E002/CI-23-335 & E002/M-13-867 provide information on the transition from the Legacy CSG Program to the Non-Legacy CSG Program. See below for key details and clarification from that filing and other background information:

Applying to the Legacy Program:

- The Legacy CSG Program does not accept applications larger than 1 MW (Current [Section 9 Tariff](#)).
- The Legacy CSG Program does not allow for Co-Location (Current Section 9 Tariff).

Applications to the Legacy Program *approved* before January 1, 2024:

- A Legacy CSG application that is *approved* before January 1, 2024 will continue to be processed as a Legacy CSG. It is our understanding that these applications may also choose to apply to the Non-Legacy program if the Non-Legacy program requirements are met (Page 8, Response).

Applications to the Legacy Program not approved before January 1, 2024:

- The Legacy Program will close for any Legacy CSG applications not *approved* before January 1, 2024. The Company will process Legacy CSG applications that have not yet been *approved* until December 31, 2023. It is our understanding that a Legacy CSG application that is not *approved* before January 1, 2024 will be eligible to apply to the Non-Legacy program, if the Non-Legacy CSG program requirements are met. We have also proposed that a Legacy CSG project that re-applies to the Non-Legacy program may keep its existing queue position as long as there are no

Material Modifications to the PV system (Page 11, Response).

- The definition of “approved” is not yet determined. The Company recommended the approach of a signed and funded Interconnection Agreement (Pages 9 and 10, Response). We expect the Commission to make a policy decision regarding the appropriate approach later this year.

Applying to the *Non-Legacy* Program:

- A new program is being created in our Application Portal for the Non-Legacy Program because the structure in our Legacy CSG Application Portal is not applicable to the Non-Legacy CSG program. (Page 6, Response).
- We are requiring that new interconnection applications for the Non-Legacy program utilize the Application Portal for the Non-Legacy Program when applying for interconnection. This will allow for specific treatment of Non-Legacy applications, including the appropriate Non-Legacy bill credit structure, consolidated billing, etc., after the Department of Commerce has approved the application to the Non-Legacy program and other interconnection requirements are met.
- This means that developers cannot submit a non-CSG DER interconnection application (which is not submitted through the CSG Application Portal, and which is not submitted as a Non-Legacy CSG) and later attempt to transfer that non-CSG DER interconnection application (or its queue position) to a Non-Legacy CSG application (Page 6, Response). Our Application Portal cannot accommodate this type of transfer. All stakeholders have been apprised that we will not allow this, and most developers have relied on this communication and followed this procedure. It would be unfair and inconsistent to make exceptions.
- Applications must be submitted via the Interconnection Portal – [Login \(site.com\)](#)

Similar explanations can be found in our Petition on pages 5 and 6 and proposed tariff Sheets 9-66.1 and 9-99.09 attached to our Petition.

Next Steps:

- Xcel Energy provided Reply Comments in the docket on Monday, October 9, 2023.
- The Commission will have an Agenda Meeting we believe likely in December 2023 where we anticipate verbal votes clarifying the requirements of the new program's implementation.
- The Portal will be able to intake applications for the new program following the Commission's written order from its December 2023 meeting, and Xcel Energy filing compliance tariffs as provided for in that written order. We currently anticipate that this will be sometime in January 2024.

For additional guidance and information, please refer to the following in Docket Nos. E002/CI-23-335 & E002/M-13-867: Xcel Energy's August 28, 2023 Response: [searchDocuments.do \(state.mn.us\)](#) and Petition/Proposed Tariff: [searchDocuments.do \(state.mn.us\)](#)

Respectfully,

The Solar*Rewards Community Program Team

Xcel Energy

E: SolarRewardsCommMN@xcelenergy.com

[Community Solar Garden Developers | Xcel Energy](#)

Visit our website for more information about interconnecting a community garden with Xcel Energy!



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Subject: Community Solar Update - Application Submittal
Date: Monday, April 15, 2024 at 9:06:50 AM Central Daylight Time
From: Anderson, Casey M
To: Solar Rewards Community MN
Attachments: image001.png, image002.png

Community Solar Update

April 15, 2024



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Community Solar Garden Interconnection Applications Submittal via Distributed Generation Portal

The Company appreciates the enthusiasm and excitement for the LMI Accessible CSG program. We understand applicants likely wish to move through the interconnection process to receive an interconnection agreement to submit to the Department of Commerce's Low-to-Moderate Income (LMI) Accessible CSG program.

As the developer community understands, there are many complexities in implementing this new program and ensuring we follow the MN Commission's recently provided direction. One of our top priorities is ensuring that our rollout of the interconnection application process is fair and equitable for all applications.

Consistent with our Notice to stakeholders on January 23, 2024, the Company is still not accepting interconnection applications that later intend to be associated with the LMI CSG Program. As communicated in the regulatory process, the Company continues to work expeditiously to build out our new application process to accept interconnection applications for large behind the meter projects that want the flexibility to later be community solar gardens. While our timeline for implementation is still not certain, we expect our internal work to be finalized in the coming weeks.

Consistent with our goal to be equitable to all applicants, we commit to make a broad announcement before we start accepting these types of applications. In addition, we will have a workgroup session prior to the implementation date to demonstrate how to effectively submit applications – as the process will differ from the current process. This workgroup session will also be recorded. Together, the steps in this process will place all developers on equal footing within the DER queue.

The Company also notes that applications for DER interconnections that wish to later be associated with the LMI Accessible CSG program must be submitted through the online application process on our website. This ensure the applications are completed in the same manner, submitted in the same way, and are timestamped. The Company cannot and will not accept any applications received in any other format (email, fax, mail, etc).

We thank you for your patience and look forward to implementing this exciting new program in the very near future!

Respectfully,

The Community Solar Garden Program Team
Xcel Energy

E: SolarRewardsCommMN@xcelenergy.com

[Community Solar Garden Developers | Xcel Energy](#)

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- For questions regarding meter orders/scheduling: email the Metering Shop at MNElectricMeterScheduling@xcelenergy.com.