

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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| John Tuma         | Commissioner |

**In the Matter of the Petition for approval of Northern States Power Company, dba Xcel Energy, for approval of its Community Solar Garden Program**

**May 19, 2019**

**MINNESOTA SOLAR ENERGY INDUSTRIES ASSOCIATION'S EXTENSION REQUEST**

**Docket No. E-002/M-13-867**

**EXTENSION REQUEST OF THE MINNESOTA SOLAR ENERGY INDUSTRIES ASSOCIATION**

The Minnesota Solar Energy Industries Association (MnSEIA) offers the following extension request for the June 20, 2019 comment period for Docket No. E-002/M-13-867, which was noticed on May 20, 2019. We request an extra month to draft commentary for the initial reply comment period, and that the reply comment period be two weeks after that. This would bring the filing dates to approximately Friday, July 19, 2019 and Friday, August 2, 2019, respectively. There are four rationales for the extension request.

First, MnSEIA has been struggling with this comment period from a practical and policy development standpoint. This comment period is about changing the Value of Solar (VOS) methodology, which was designed through a rigorous stakeholder process that the Department of Commerce initiated with the help of an external consultant, Clean Power Research. Now the Commission is looking to re-evaluate a portion of that methodology through a docketed process, but is attempting to do so without outside expertise. This gives Xcel Energy (Xcel) a significant leg-up on the industry, as it is a monopoly utility with significantly more resources at its immediate disposal.

MnSEIA is currently capable of developing critiques on what Xcel Energy has initially proposed, but without additional expert assistance, it has been challenging to develop alternatives that would reduce the volatility of the current framework but would not overly devalue the component as Xcel's methodology seems to do. We are not interested in solely arguing against Xcel's alternative, we would like to also contribute to the process in a meaningful and constructive manner. So far MnSEIA has been actively looking to retain an expert, and has even contacted Clean Power Research directly, but has so far been unable to attain someone. Having

an extra month of time will help us find and retain a suitable expert, if one exists and is willing to assist in the process. We of course, cannot guarantee with an extra month we will be able to find someone, but it would be nice to have a good opportunity to try.

Second, Xcel Energy plans to hold a meeting on the new VOS calculation on July 10, 2019. This is the date that Xcel intends to unveil the new 2020 VOS, which will presumably include the 2020 distribution capacity component, as currently calculated, in it. MnSEIA believes that this valuation is a crucial piece of information for this dialogue that Xcel has previously been unwilling or unable to provide to the industry. There is some expectation that this value will increase this year, but before filing comments we believe it is incredibly important to see 1) if this is in fact the case that the credit goes up, and 2) if it does go up, to what extent it increases.

Third, there does not appear to be any urgency on this particular item at this time. Since the VOS has been applied to Community Solar Gardens (i.e. from the 2017 rate to the current 2019 rate) the distribution capacity component has averaged only .273 cents per kWh. If current trends continue, then it is unclear whether there is much volatility in the credit at all. Furthermore, if the Commission had adopted Xcel's methodology in 2017, then the average bill credit impact for customers would have been .28 cents per kWh. The last three years illustrate that the onus to improve this credit calculation, if we do so at all, is on the industry, because there are two years without any valuation but an average value that is similar to Xcel's alternative methodology. As such, there is no immediacy to updating this component that would preclude an extra month of in this process.

Lastly, there is a staffing conflict during this period that will prevent MnSEIA from adequately commenting on behalf of the industry and submitting adequate responses in the current time frame. This filing date, as currently noticed, poses a significant challenge to MnSEIA and we would like to fully participate in this matter. In conclusion, we hereby request an extra month for the initial comments and an extra two weeks thereafter for the reply comment period.

Thank you for considering our extension request.

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