



414 Nicollet Mall
Minneapolis, MN 55401

June 11, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th 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. Attachment A includes the agenda and meeting minutes for May 6, 2015. Additionally, we have included a revised set of meeting minutes originally filed on May 12, 2015. As a member of the Working group, Fresh Energy requested revisions to the original document. These revisions were reviewed and approved by the Workgroup on June 3, 2015. These can be found in Attachment B.

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 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, Attachment

Meeting Agenda: S*RC Implementation Working Group

Date: May 6, 2015	
Start Time: 1:30 pm Central	Location: Minneapolis Central Library; N-202
End Time: 3:30 pm Central	Phone: NA

TOPIC	LEADER	DESIRED OUTCOME
Welcome and approval of minutes	Phyllis R.	
4/28 Xcel Energy supplemental comments	Phyllis R.	30 min. Discussion
Update on communication with XE engineering	David S./Thor B.	Update
- Update on MnSEIA/Xcel Energy discussion regarding communication expectations		
Proposal for subscription marketing oversight	David S.	Discussion
Deposit proposal	Ross A.	Discussion
Other items		Discussion

S*RC Implementation Workgroup

Meeting Minutes

May 6, 2015

OPENING

The S*RC Implementation Workgroup was called to order at 1:30 pm on May 6, 2015 at Xcel Energy by Phyllis Reha the workgroup facilitator.

PRESENT

May 6 14 Companies	
<ul style="list-style-type: none">• Nathan Franzen, Geronimo Energy• Steve Coleman, MN Community Solar• Brian Swanson, MPUC• Susan Mackenzie, MPUC• Ron Nelsen, OAG• Ross Abbey, Sunshare• Marty Morud, TruNorth Solar• Shawn Bagley, Xcel Energy• Thor Bjork, Xcel Energy• Jessie Peterson, Xcel Energy• John Wold, Xcel Energy• David Shaffer, MnSEIA• Patrick Dalton, Xcel Energy• Sue Peirce, DOC	<ul style="list-style-type: none">• Virginia Rutter, Eutectics• Allen Gleckner, Fresh Energy• Ralph Jacobsen, Innovative Power Systems• Michelle Mathews, MN Community Solar• Braden Solum, Novel Energy• Dan Patry, SunEdison• Dean Leischow, Sunrise Energy• Joe DeVito, Solarstone Partners

APPROVAL OF MINUTES

Minutes from March 24, April 1, April 9 and April 15 were approved by workgroup attendees.

DISCUSSION/RESULTS

Topic 1: Xcel Energy 4/28 Supplemental Comments

Xcel Energy provided a brief overview of submitted comments and an update on how they will enforce the 1 MW limit within the 31-days. The company further noted an ongoing process to determine compliance to the 1 MW requirement and that no projects would be canceled until each Garden Operator was notified of enforcement details and had an opportunity to respond back to Xcel Energy (within a 10 day period *(expected)*).

The current process was noted by Commission Staff: The Department has requested a Show Cause request by the Commission, several stakeholders have requested expedited relief, the Commission asked for further comment due on May 18th. The Solar Garden hearing is scheduled on June 25.

Developers had several questions for Xcel Energy including:

- Will this update include new projects our all projects in the queue? Answer: All projects
- How is the Company defining “close proximity”? Answer: Xcel Energy provide this information in earlier filings and will continue to define through further communication with developers
- Is Xcel Energy asking for a reconsideration of the Commission Order? Answer: No, the Company is following statute.
- Is the Company currently processing applications or has that stopped? Answer: Xcel Energy is currently following the existing process until developers are notified.
- What happens if Xcel Energy takes this step and then the Commission disagrees in June? Answer: The Company is keeping track of Salesforce (application data), but it will be a snapshot in time. Refunds will be given and it will be a challenge to back track.
- Was there a specific reason for the 31-days noted? Answer: Not that those present are aware of.
- Can projects that have a Section 10 interconnection move forward even if they are noted as community garden projects? Answer: Xcel Energy wasn't sure.

One developer asked whether or not there was an appetite for compromising on a 10 MW co-location limit. There was little agreement on going a direction outside of an additional Commission Order.

Next Steps/Resolution: Comments are due to the Commission on May 18, 2015. Developers will be sent further communications regarding projects found to be non-compliant with the 1MW requirement by Xcel Energy.

Topic 2: Open Issues - Updates

- **MISO Review Process** – a meeting to be held on 5/7 will include a review the draft document; next steps are to bring it to the workgroup for final approval – Sunshare and Xcel Energy leading
- **Unsubscribed RECs** – the Department noted that their position on this was defined within their 4/30 Reply Comments to the Commission. The Department is not taking a strong position on the price of the REC but leave that to the Commission to decide. MNSEIA is still working with smaller developers to determine impact; next steps are to continue these discussions.
- **Public Queue** –Xcel Energy has run into a system issue that they are working through; next steps are to update on the web as soon as possible.

Topic 3: Prescreen

Xcel Energy noted that they are looking at moving forward with a prescreen option, as noted in meeting minutes from March 24 – April 15, but has determined that they will do so outside of a resolution by the workgroup.

Next Steps/Resolution: None.

Topic 3: Communication with Xcel Energy Engineering – Process and Expectations

MNSEIA and Xcel Energy began discussions regarding best practices in requesting information from Xcel Energy engineering. The intent is to have MNSEIA bring these best practices to the workgroup during our next meeting. Documenting best practices will help limit ineffective communications and allow for clearer understanding between engineers and developers.

Next Steps/Resolution: MnSEIA and Xcel Energy to continue discussions and bring best practices to workgroup.

Topic 4: Deposit Proposal

Several weeks ago the workgroup discussed the intent of the deposit and necessity of borrowing money. Several ideas were tossed out regarding how to make the deposit (required by Xcel Energy for the S*RC program) easier to process and obtain from a bank by the developer. One idea was for Xcel Energy to hire a third-party escrow agent that could handle the deposits with the intent is to provide better documentation and create more assurance. Developers are concerned with how Xcel Energy handles the deposits – they want standard business practices. The workgroup decided a few developers could bring back some ideas on how to address this issue in the future.

Sunshare and Sunrise Energy worked on a proposal to bring to the group (*attached*).

Proposal Summary: Xcel would enter into an escrow agreement with a bank, Xcel would give the deposit (current) to the bank, new ones would go directly to the bank, at project completion or application withdrawal, Xcel Energy would authorize the bank to release the deposit to the developer.

The workgroup had a lot of discussion regarding how it works with the bank. Xcel Energy noted that they had not had the opportunity to review with their corporate teams nor had enough information to do so.

Developers liked the proposal, but Xcel Energy was not sure it was doable. Further discussion is needed.

Next Steps/Resolution: Full proposal to be sent to the workgroup via email, Xcel Energy to refine questions and details needed from developers to determine the ability to accomplish or not and why.

Topic 5: Subscription Marketing Oversight

MnSEIA brought forward a suggestion on marketing oversight for the solar trade. MnSEIA suggested building in a by-law at MnSEIA requiring certain advertising/marketing requirements to be part of the organization. The concern is whether or not there is any “teeth” to this approach given not everyone is a member of MnSEIA. This practice is fairly common in trade organizations for differing issues.

Xcel Energy noted that they could require MnSEIA membership as a certification of compliance within the application process to give it more of a regulatory requirement.

There was a lot of discussion regarding the topic. Developers don't feel it is necessary to add one more thing to the application process, but agree that some oversight is needed. MnSEIA noted this is something they can and will likely do on their own either way.

Xcel Energy further noted the workgroup was tasked by the Commission to address marketing/advertising concerns as part of subscriber protections. The Company appreciated MnSEIA bring this up and taking lead on such an important topic.

There was further discussion regarding who really can regulated this: the Commission, OAG?

Next Steps/Resolution: The workgroup agrees that best practices are needed. Best practices will be created with MnSEIA taking the lead and developing a small group to work on how to enforce/regulate practices.

MISC. TOPICS – N/A

FOLLOW-UP BY PARTIES/ SUB-GROUP DISCUSSIONS

- MnSEIA will be working with Xcel Energy to determine best practices when communicating with Xcel Energy engineering
- MnSEIA will continue to get input from smaller developers regarding unsubscribed REC pricing
- MnSEIA will gather a small group to discuss best practices in advertising/marketing
- Sunshare/Sunrise Energy will continue to work with Xcel Energy on their deposit proposal
- Xcel Energy will lead a small group to finalize the MISO process discussion

NEXT MEETING

The next meeting of the Implementation Workgroup will be held on June 3, 2015 at 1:30, 414 Nicollet Mall 1D. Agenda items include: MISO Process, SCADA, Engineering Costs and May 18th Comment discussion.

Minutes submitted by: Jessie Peterson, Xcel Energy

Approved by: June 3, 2015 by those in attendance to the Workgroup

S*RC Implementation Workgroup

Meeting Minutes

March 24, April 1, April 9 & April 15

OPENING

A special session of the S*RC Implementation Workgroup was requested by Xcel Energy for the following dates: March 24, April 1, April 9 & April 15. The first two sessions were led by Thor Bjork, Xcel Energy. The final two were led by a third-party moderator, Phyllis Reha, ParEnergy Solutions. The purpose of these four meetings was to address specific issues as a result of the Solar Garden Docket. The intent was to come to some agreement where possible to limit outstanding issues with the Commission for a hearing date set on June 25, 2015.

PRESENT

March 24 14 Companies	April 1 13 Companies	April 9 9 Companies	April 15 14 Companies
<ul style="list-style-type: none"> • Alan Gleckner, Fresh Energy • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Ian Schonwald, Eutectics • Steve Coleman, MN Community Solar • Lynn Hinkle, MnSEIA • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Laura Hannah, Sunshare • Ross Abbey, Sunshare • Mike Michaud, Sunshare • Marty Morud, TruNorth Solar • Shawn Bagley, Xcel Energy • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • David Shaffer, MnSEIA • Patrick Dalton, Xcel Energy • Joe Tierney, Sunrise Energy • Sue Peirce, DOC 	<ul style="list-style-type: none"> • Holly Lahd, DOC • Virginia Rutter, Eutectics • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Steve Coleman, MN Community Solar • Lynn Hinkle, MnSEIA • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Dean Leischow, Sunrise Energy • Ross Abbey, Sunshare • Marty Morud, TruNorth Solar • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • Kevin Cray, Xcel Energy • Joe Tierney, Sunrise Energy 	<ul style="list-style-type: none"> • Holly Lahd, DOC • Nathan Franzen, Geronimo Energy • Ian Schonwald, Eutectics • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Steve Coleman, MN Community Solar • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Joe DeVito, SolarStone Partners • Ross Abbey, Sunshare • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • Kevin Cray, Xcel Energy • Patrick Dalton, Xcel Energy 	<ul style="list-style-type: none"> • Virginia Rutter, Eutectics • Nathan Franzen, Geronimo Energy • Michael Krause, Kandiyo • Steve Coleman, MN Community Solar • Duane Hebert, Novel Energy • Brian Swanson, MPUC • Susan Mackenzie, MPUC • Ron Nelsen, OAG • Sue Peirce, DOC • Joe Tierney, Sunrise Energy • Joe DeVito, Solarstone Partners • Ross Abbey, Sunshare • Marty Morud, TruNorth Solar • Thor Bjork, Xcel Energy • Jessie Peterson, Xcel Energy • John Wold, Xcel Energy • Shawn Bagley, Xcel Energy • Patrick Dalton, Xcel Energy • David Shaffer, MnSEIA

APPROVAL OF MINUTES

No minutes were approved (compiling all four extra meetings from March 24-April 15 together for review on May 6th.)

DISCUSSION/RESULTS

Topic 1: MISO Review Process

Applications are reviewed by distribution engineering to assess their potential to affect the transmission system, and may need to go through a review process by MISO given potential transmission impact. Xcel Energy presented an overview of the process on March 24.

Developers showed concern with where in the process this would take place and requested milestones and specific timing of when this review process will take place. Xcel Energy noted that this is a new process for the Company as well. MISO review can technically occur during any part of the interconnection process. MISO also has their own processes in which the Company doesn't have control over. For example, MISO is under no obligation to provide milestones or provide a time limit for review.

Developers asked whether or not there was a potential for cost sharing between the developer and utility if transmission upgrade studies were needed. Xcel Energy confirmed that there are no dollars earmarked for transmission studies within our engineering study process – which addresses distribution upgrades and not transmission upgrades.

Continued discussion ensued during these set of meetings as well as outside these discussions since March 24. Geronimo, SunShare, and Xcel Energy began working together to define the process in more detail. The Companies noted above began with original language and have been adding further detail to the process. Language was being adjusted to match MISO terms and definitions. It was further noted that a flow-chart format was also being discussed to make the clearly articulate the process. The Companies requested a sub-group meeting with their engineers to finalize the documentation. The group was supportive of this direction.

An additional topic ~~addressing~~ addressed when and whether a project can reduce in size in order to avoid transmission impacts. Xcel Energy will review further as part of the subgroup effort.

Next Steps/Resolution: Subgroup to make edits to process and discuss at a future meeting.

Topic 2: Distribution System and DG Queue Transparency

In response to the ~~implementation group discussions~~ Implementation Workgroup, Xcel Energy offered a solution to providing specific details regarding the capacity of projects ahead of them in the queue, substation capacity and transformer size, and minimum daytime load. The Company presented this information on March 24th to be provided to developers once an application was deemed complete per Section 9, and prior to issuing a Statement of Work for engineering studies.

There was concern with providing particular pieces of information (specifically capacity ahead of them in the queue). Some developers believe that if ~~we are~~ Xcel Energy is going to provide information it should be made public. Xcel Energy noted that public information is currently outside the scope of solar alone

and would prefer to address public data (such as maps) in other forums, but could provide details by project.

There was consensus by the Workgroup that this could be provided and that the developers would appreciate the information Xcel Energy could provide. One Garden Operator dissented from this consensus requesting also that developers know who is behind them in the queue as well and that this information should be made public. A majority of developers agreed that additional queue transparency would be helpful. If Xcel Energy takes one step, why can they not go a step further—a majority of developers agreed.

Xcel Energy noted their preference to not provide any further detail outside of a yes/no to applications ahead of others in the queue until a full consensus was reached. The Company agreed that ideally ~~we~~it would like to have a full DG view on our website, however, this isn't possible today given the systems ~~we~~the Company has ~~have~~ available. No resolution was obtained during the March 24th meeting.

Xcel Energy offered another solution on April 1, 2015, this time including information that would be available publicly without submitting an application:including a public document including: SRC ID, Substation, County, Date Application Reviewed for Completeness, and Size (kW). The Company acknowledged this is a short term solution, but recommended that the group ~~accepting~~ this significant step towards ~~full~~ queue transparency.

Once Xcel Energy presented their public information proposal, some dDevelopers proposed additional components had additional requirements and/or changes to add to the proposed solution including an addition of a time stamp rather than date and clarification regarding “deemed complete” titles. Xcel Energy agreed to add these two items. The group further determined additional columns may be beneficial as projects move to construction and are complete. For the time being, the Company will include a column for status including rejected projects. Others may be added in the future. It was also discussed as to how frequently this would be updated – the Company agreed to update monthly.

Developers ~~also~~ requested that the document be provided as an excel file rather than pdf. Xcel Energy will check to verify this is viable via the Company's ~~our~~ website.

A vote was conducted and the group reached full consensus on the proposed solution as a first step towards queue transparency.

Next Steps/Resolution: Xcel Energy will begin to offer information on their website once a few issues are resolved based on our system of record and pulling requested data.

Topic 3: Prescreen

In response to developer requests, the Company proposed to make a pre-screen option available to applicants and potential applicants. Following consensus on making the SRC queue public, the group discussed whether or not there was still a need for a prescreen process. The group determined that a prescreen would still be beneficial. Xcel Energy offered specific prescreen proposal details including , feeder voltage, distance from substation, substation capacity and loading, substation transformer capacity and loading, and whether other DG projects had already applied for interconnection at that substation, in a prescreen report for a fee of \$500. At the workgroup meeting the Company did not provide specific details regarding how it arrived at a \$500 fee.

The group suggested that the price may not be appropriate and discussed other pre-screen options including a similar mechanism required by the Federal Energy Regulatory Commission and in use by transmission operators, and the option available in Colorado. The group determined that additional information was needed prior to moving forward with a full prescreening decision.

Next Steps/Resolution: No final resolution. The Workgroup is looking towards further discussion on May 6th.

Topic 4: Secure Cancellation and Return of Deposit

Xcel Energy stated that the Company cannot agree to assign repayment to a third-party, however, we the Company has have taken steps to look into updating the Salesforce process to allow Garden Operators to withdraw their applications and designate the account information for return of the deposit from within the application system.

The group also discussed the purpose of the deposit, evaluating the deposit for effectiveness, future adjustments, and the uncertainty lenders have with the process. Requiring a title company to hold the deposit was also suggested as a means of solving a number of concerns. The Company is open to this solution, but asked that the developers bring back more information on how it would work.

Developers also discussed further changes to Salesforce allowing more than one log in so different people could be assigned to different areas (such as assignment of deposit versus adding subscribers).

Next Steps/Resolution: No final resolution.

- Xcel Energy to review updating deposit letter, provided that we receive actionable edits (Dean Leischow)
- Xcel Energy to provide, in writing, how we intend to do cancellations/withdrawals – to account specified by the project manager during cancellation/withdrawal
- Various parties were to review other options for a third-party holding the deposits
- Marty Morud reviewed needs for additional log in accounts and how that may look in practice; he will continue to work with Xcel Energy and provide updates at further Workgroup meetings

Topic 5: RECs for Unsubscribed Energy

The Workgroup discussed RECs for Unsubscribed Energy in the April 1, 9, and 15th meeting.

On April 1, the group began the discussion point around RECs and current rules. Xcel Energy noted that a REC price for RECs from unsubscribed energy isn't addressed in supported by the Section 9 Tariff or the Commission's Orders. H, however, agrees that it would be more straightforward to pay something for these RECS. The Company suggested that 2-3 cents per REC identified in the Commission's Order for subscribed energy was excessive for payment of unsubscribed energy.

The group discussed what a price may look like and specific concerns regarding projects less than 40 kW on an A50 retail rate. Many group members agreed that encouraging unsubscribed gardens was not in the best interest of the program. Additionally it was suggested that there be a time limit on unsubscribed energy or an overall percentage of garden that could receive the REC price for unsubscribed energy.

A price per REC for unsubscribed energy was also discussed. One developer stated that nNational voluntary REC prices for all RECs, not just sRECS, were ~~stated to be~~ around \$0.003 per kWh. The group was to have gone back to their Companies to discuss appropriate costs.

Xcel Energy stated tThe ~~plain-plain~~ language of Section 9 Tariff states Xcel Energy~~the Company~~ will receive the RECS in the absence of the developer choosing to claim them within a 6 month period. The Company also stated that tThe tariff today doesn't require Xcel Energy to pay a REC price for unsubscribed energy. Other group members interpret the plain language differently. No conclusions were drawn as to what the REC price should be set at during the April 1, meeting however it was unanimous by developers that a REC price should be paid for unsubscribed energy.

Discussions began on April 9, with discussion on how a new rate would be addressed given it doesn't exist within the current Section 9 Tariff. Xcel Energy clarified that it would have to be brought to the Commission through a tariff filing. With full consensus on a rate, Xcel Energy could possibly include within their 4/30 comments to the Commission. Without consensus it would have to go into the Commission process through a misc. tariff adjustment and go through the normal process; likely taking 3+ months to adjust. The next agenda meeting for the Commission on Solar Gardens will be June 25.

Xcel Energy recommended the group adopt one rate for unsubscribed energy at \$0.01 per kWh. There was some agreement among the group that this would be a beneficial change and higher than current national REC prices. Other members felt that the REC price should remain consistent with those that are paid for subscribed energy given the following:

- The current rate paid for unsubscribed energy is already being discounted to the utility's avoided cost
- It could be administratively burdensome to Xcel Energy to not keep it consistent

Xcel Energy ~~reminded the group~~noted that the REC price would be on top of the \$0.03 to \$0.11 cent (for gardens under 40 kW) co-generation costs paid for unsubscribed energy. Additionally, there is a choice for developers to sell the RECs or keep them. However, current rules do not allow developers to sell some RECs and not others to the utility.

It was further noted that smaller projects would be impacted the most by the REC rate of \$0.01 per kWh – these groups are not represented well within the current make-up of the Workgroup.

The Department noted that Commission Order can be interpreted such that a REC price should be provided at the same REC price as subscribed energy, as the Commission Orders do distinguish between subscribed and unsubscribed energy when referring to the RECs. Additionally, the REC price has already been vetted through the Regulatory process. ~~It was also discussed~~The workgroup discussed that ~~it the Orders and Tariff~~ can be interpreted to be read differently. ~~—as noted by the approval of the Xcel Energy's Section 9 Tariff.~~

The majority of the group agreed that RECs should be paid for if Xcel Energy is to acquire them. The group also discussed the impact on subscriber contracts. Cancellation details will be built around the decision of REC price for unsubscribed energy.

The group was polled for consensus on Xcel Energy's proposal. No consensus was reached.

However, the Workgroup did agree that Xcel Energy should offer up a price for unsubscribed energy and clarify the issue within their Section 9 Tariff. The group requested to discuss Xcel Energy's proposal further within their individual companies.

The topic was addressed again on April 15. Xcel Energy noted that consensus on this item was important and that without one the company would not be sending a recommendation to the Commission. The group discussed Xcel Energy's proposal of \$0.01/kWh for unsubscribed energy. Several developers agreed to this proposal.

The Department ~~continued to question~~ed whether the amount of REC payment was appropriate and suggested a formula of sorts could be reached to discourage unsubscribed energy, building off of an idea offered by another group member. Xcel Energy discouraged complicated formulas given the difficulty to track and implement within our billing system.

Other developers ~~continued to question~~ed whether an unsubscribed amount should be different than the subscribed REC payment. No consensus was reached.

Next Steps/Resolution: No final resolution. No action items given no consensus status.

Topic 6: RECs for Made in Minnesota and Solar*Rewards

Made in Minnesota and Solar*Rewards incentive recipients that operate as gardens receive incentives for 10 years versus the 25 years allotted for S*RC.

Since this issue did not concern everyone in the group given the size of these projects, Xcel Energy suggested that this topic be addressed within a sub-group.

It was also noted that other rules are in process through an official rule making process for MiM, although it was determined that the REC price for these projects doesn't belong within this rule making process.

The Workgroup came to consensus to take this up with a small sub-group. MnSEIA volunteered to lead the subgroup. The Department was to also provide contacts for MiM and parties involved in the rule making process.

Xcel Energy noted that this issue could be resolved through a contract modification through the Commission process, ~~Some~~ some parties felt ~~strongly~~ that this was an issue that should be addressed with the Tariff.

Next Steps/Resolution: Small Group discussions current being explored.

Topic 7: 1 MW limitation

The goal of the discussion as noted by the facilitator was to get the "lay of the land" so to speak. The issue of co-located gardens has also been raised in previous workgroup meetings. Developers believe that the 1MW definition is based on the point of common coupling, as defined in the definition of community solar garden site in the Commission's Order. Xcel Energy continues to note that nameplate capacity is the definition in the Minnesota State Statute. ~~The utility company~~ Xcel Energy feels that many of the current gardens within the queue are utility scale projects disguised as "solar gardens".

The group discussed what Xcel Energy felt would be a reasonable limit. The Company reiterated ~~their~~ its concerns and noted statutory requirements. ~~The Company stated that~~ ~~Co~~co-location rules are not being contested, as long as they don't exceed 1 MW as defined by statute.

Parties agreed that it would be beneficial to work something out prior to the June Commission hearing, however, the majority of parties felt any size limit change/clarification/ enforcement (language depends on the party) ~~of the 1MW limit~~ should be a prospective adjustment. Prospective adjustments don't address the impacts of current applications.

Benefits of large gardens were discussed including cost-efficiencies. Additionally the group discussed the strategy of applying for several MW's during the application process and having them naturally drop off depending on grid capacity.

Some developers voiced concern that certain parties exploited the rules and therefore limited the addition of smaller gardens – given that time is running out to build these projects it may not be in the best interest of solar gardens to continue this as a prospective rule making process for future program adjustments.

Further questions were asked of Xcel Energy regarding their intent for solar (the Company continues to be committed to solar growth) and limits that exist today on distributed generation (Section 10 Tariffs do have a 10 MW limitation).

Parties discussed a functional approach to the issue such as determining functionality or technical ability, price, income tax, etc. However, the Workgroup did not come to a consensus of how to move forward without the involvement of the Commission given the differing viewpoints. Additionally there is significant concern that projects were developed based on the September 2014 Order and significant investments have already been made. ~~regardless of what the intention of the statute was.~~

Further, the Workgroup's ability to interpret rules was called into question. Many developers felt that it was not the intent of the group to interpret rules, however, Xcel Energy noted that several of the program rules and processes have been interpreted by the group to administer the program and continues to help move the program forward.

Next Steps/Resolution: No resolution reached.

MISC. TOPICS

Updates

Xcel Energy provided a reminder regarding new interconnection fees ordered by the PUC and updates on www.xcelenergy.com with engineering requirements for interconnection.

FOLLOW-UP BY PARTIES/ SUB-GROUP DISCUSSIONS

- MISO subgroup discussion to be scheduled by Xcel Energy
- Xcel Energy to review updating deposit letter provided that we receive actionable edits (Dean Leischow)

- Small Group discussion to be scheduled by MnSEIA regarding REC prices for MiM and S*R

NEXT MEETING

Our next meeting will be held on May 6th. Topics will include how to work with the engineering contacts and further details regarding prescreen options.

Additionally, the following topics have been suggested for upcoming meetings:

- Definition of transformer minimum daytime load

Minutes submitted by: Jessie Peterson

Approved by: Implementation Workgroup members on 5/6/2105.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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 11th day of June 2015

/s/

Lynnette Sweet
Administrative Assistant

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
Ross	Abbey	ross@mysunshare.com	SunShare, LLC	609 S. 10th Street Suite 210 Minneapolis, MN 55404	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
Sara	Baldwin Auck	sarab@irecusa.org	Interstate Renewable Energy Council, Inc.	774 E 3rd Ave Salt Lake City, UT 84103	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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Duane	Hebert	duane.hebert@novelenergy.biz	Novel Energy Solutions	1628 2nd Ave SE Rochester, MN 55904	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
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
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	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
John S.	Jaffray	jjaffray@jirpower.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-e-group.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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Madeleine	Klein	mklein@socoreenergy.com	SoCore Energy	225 W Hubbard Street Suite 200 Chicago, IL 60654	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
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, Minnesota 55415	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Dean	Leischow	dean@sunriseenergyventures.com	Sunrise Energy Ventures	601 Carlson Parkway, Suite 1050 Minneapolis, MN 55305	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
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

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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
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	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
Regulatory	Records	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
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Matthew J.	Schuenger 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

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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
Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	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