

April 30, 2015



**VIA ELECTRONIC FILING**

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

**Re: Reply Comments  
Community Solar Garden Program  
Docket No. E002/M-13-867**

Dear Dr. Haar,

SunShare respectfully submits the attached *Reply Comments by SunShare, LLC* in response to the Commission's March 13, 2015 Notice of Comment Period filed in the above-mentioned docket.

Please do not hesitate to contact me if you have any questions.

Sincerely,

s/ Ross Abbey  
Ross Abbey

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*On behalf of SunShare, LLC*

Cc: Appended Service List

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PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

April 30, 2015

**In the Matter of the Petition of Northern States  
Power Company, dba Xcel Energy, for Approval of  
Its Proposed Community Solar Garden Program**

**Docket No. E002/M-13-867**

**REPLY COMMENTS BY SUNSHARE, LLC  
IN REPLY TO THE COMMISSION'S  
MARCH 13, 2015 NOTICE OF COMMENT PERIOD**

SunShare, LLC respectfully submits these Reply Comments in response to the Commission's March 13, 2015 Notice in in this docket. SunShare continues to request prompt Commission action to address many urgent outstanding issues with Xcel Energy's implementation of its Community Solar Garden program, including but not limited to the issues reiterated below.

**INTRODUCTION**

While the S\*RC program continues to face a number of first-year implementation challenges, we appreciate the effort of all stakeholders (including the Commission) for all their hard work in helping to stand up this pioneering Community Solar program. In particular, we would like to thank Xcel Energy for continuing to convene the S\*RC Working Group and retaining a experienced facilitator to assist the group in better identifying and addressing implementation concerns going forward.

SunShare is proud to be part of this exciting, competitive community-solar market that is set to deliver significant economic development, community benefits, job creation, and environmental benefits for Minnesota in both the near and long term.

As described below, SunShare requests that the Commission take the following actions:

- a. Take swift action to enable 2015 CSG construction;
- b. Direct Xcel to provide developers with a substation capacity and interconnection application status "snapshot" report upon request;
- c. Allow assignment of deposits to the third-party deposit lender; and

- d. Preserve rate certainty by clarifying that Xcel cannot retroactively revoke a CSG application's "deemed complete" status (incl. due to a single change in the project location).<sup>1</sup>

1) 2015 Interconnection and Construction Timeline

We agree with MnSEIA's recent comments and concerns regarding the fast-closing window for CSG interconnection approval in time for 2015 construction.<sup>2</sup>

As SunShare has previously said, our intent is to begin construction of our first Minnesota CSG projects in 2015, to immediately begin delivering on the many environmental, subscriber, and community benefits associated with Community Solar.<sup>3</sup> And we do believe that 2015 CSG construction is still possible – but only if Xcel can meet its timeline requirements under tariff Sections 9 and 10, including by making a good faith effort to complete its required interconnection tasks as quickly as possible (*i.e.*, not taking the full 40 working days available during Section 10 Step 4 unless reasonably necessary).<sup>4</sup>

As pointed out by MnSEIA, Xcel's CSG interconnection process penalizes applicants that fail to perform their Section 10 interconnection steps in a timely manner.<sup>5</sup> Assuming that this business rule is applied fairly, SunShare sees the feature as beneficial; it should help reduce queue congestion and keep the interconnection process moving on a predictable schedule. By the same token, the CSG interconnection process might benefit if the company was given a clear inducement to perform its CSG interconnection steps in the required timely manner.<sup>6</sup> The Commission could, for example, draw a parallel to other utility-generator contracts that obligate the utility to provide reasonable compensation for revenue lost due to avoidable utility-side delays.<sup>7</sup>

We thus respectfully request that the Commission and Xcel take swift action to enable 2015 CSG construction to, among other things, "protect the subscribers' interests and not subject them to unnecessary delay in the receipt of beneficial services."<sup>8</sup>

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<sup>1</sup> Note, this short list is not intended to be exclusive or to supersede other reasonable requests made by SunShare or other stakeholders in this docket.

<sup>2</sup> Minnesota Solar Energy Industry Association (MnSEIA) April 28, 2015 Initial Reply Comments re: Program Implementation Issues, 13-867.

<sup>3</sup> See SunShare March 2, 2015 Reply Comments, 13-867, at 1 (requesting that "the Commission move quickly to provide the . . . market and interconnection certainty necessary to allow for a successful 2015 CSG construction and residential-marketing season.")

<sup>4</sup> See MnSEIA April 28, 2015 Initial Reply Comments at 6 ("any avoidable interconnection delays will have a direct negative impact on the 2015 construction season.")

<sup>5</sup> MnSEIA April 28, 2015 Initial Reply Comments at 2.

<sup>6</sup> Regarding "timely manner," see MnSEIA April 28, 2015 Initial Reply Comments at 2-6.

<sup>7</sup> See, e.g., Commission Feb. 27, 2014 Order, 13-1002.

<sup>8</sup> MnSEIA April 28, 2015 Initial Reply Comments, at 4.

## 2) CSG Interconnection Issues

First, we want to thank Xcel and other CSG developers for engaging in a fruitful, ongoing engineering-level discussion regarding the appropriate process for Xcel to work with MISO (if necessary) to address any potential impacts on the transmission system. Together with other developers, we have put a detailed procedural proposal on the table for Xcel's consideration. We look forward the company's response and near-term adoption of a process that works for CSG developers, Xcel, and MISO.

Second, SunShare continues to maintain that granting developers access to a "snapshot" report on the available capacity for a given substation "would allow CSG developers to more-easily identify available interconnection capacity [and] spread out their project sites . . . in response to Xcel's concerns regarding over-concentration[.]"<sup>9</sup>

This issue has been raised and discussed within the S\*RC workgroup. Unfortunately, the group was not able to come to a full consensus about the shape, characteristics, and price of this proposed "snapshot" report in the limited time allowed for group discussion.<sup>10</sup>

Xcel has committed to providing a public report showing the number of CSG applications in queue for interconnection for each substation.<sup>11</sup> But this report will provide only a portion of the substation capacity information requested by numerous parties in this docket.<sup>12</sup> For example, it will show only one subset of Section 10 applications (declared CSG projects), meaning it will only provide a partial picture of available substation capacity.

For this reason, we refresh our suggestion "that the Commission direct Xcel to develop a . . . process under which CSG developers could pay Xcel for . . . a snapshot of the current available substation capacity, the number of DG interconnection applications (and requested MW capacity) currently in line for a given substation and/or feeder, the status of these interconnection requests, and other relevant information (incl. transformer loading)."<sup>13</sup>

Third, we note that there a number of additional interconnection-related concerns, along with potential new concerns that are likely to arise in the coming months, that Xcel and the S\*RC workgroup will likely have to identify and address going forward.

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<sup>9</sup> SunShare March 4, 2015 Reply Comments at 2. See *also* SunShare Feb. 24, 2015 Comments, 13-867, at 4 ("As shown in other states, increased interconnection transparency and cost-predictability will lead to better site planning and lower development and interconnection costs – benefiting Xcel, CSG developers, and their subscribers.").

<sup>10</sup> Xcel April 16, 2015 Compliance Filing – Stakeholder Minutes, 13-867, at Attachment A.

<sup>11</sup> *Id.* at Attachment A, page 10.

<sup>12</sup> See, e.g., MnSEIA April 2, 2015 Comments, 13-867, at 4; Minnesota Community Solar April 2, 2015 Comments, 13-867, at 3; Department of Commerce March 4, 2015 Comments, 13-867, at 1.

<sup>13</sup> SunShare Feb. 24, 2015 Comments at 1-2. See *also* FERC Order 792, <http://www.ferc.gov/whats-new/comm-meet/2013/112113/E-1.pdf>, at 28-29 (Nov. 22, 2013)

3) Enabling the Financing of S\*RC Program Deposits

As described in our February 24 comments, the current inability for developers to assign the return of S\*RC deposits increases deposit-lender risk, hampering the financing of Community Solar Gardens.<sup>14</sup>

Since that time, various stakeholders have suggested other potential ways to improve the recording and financial security of S\*RC deposits paid to Xcel (such as the use of an experienced third-party escrow agent). But the company has not yet adopted any concrete proposals that address our stated concerns, despite the fact that it is now holding approximately \$50 million or more in co-mingled developer deposits without best practices around capital security and balance and interest statements.

For that reason, we renew our request for the Commission to clarify that Xcel should “allow a developer to assign the return of S\*RC project deposits directly to the deposit lender to reduce lender risk and enable the creation and financing of Community Solar Gardens.”<sup>15</sup> We note that the Department of Commerce has made a similar request.<sup>16</sup>

In its March 4 comments, Xcel argued that it would be inappropriate to reduce deposit-lender risk by enabling assignment of the deposit return:

The Company should not be in the position of having to eliminate all business risk and uncertainty for solar developers. Ensuring the developer is undertaking some of its own risk is important to protect subscribers by ensuring developers have the incentive to only submit serious project proposals.<sup>17</sup>

But Xcel’s arguments are not persuasive. CSG applicants already have to put plenty of “skin in the game” to develop a project. As Kandiyo Consulting explained, “[t]o advance its Community Solar application, a developer is required to pay an initial non-refundable fee, and will need to expend funds for legal expenses, engineering, permits and other expenses that give the developer a vested interest or ‘skin in the game’ on its projects.”<sup>18</sup>

In addition, applicants that borrow money to satisfy the S\*RC deposit requirement must pay lender interest and related transaction costs. S\*RC applicants thus have a built-in

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<sup>14</sup> See SunShare Feb. 24, 2015 Comments at 6 (describing deposit assignment as necessary to “allow CSG developers to obtain lower-cost financing and increase the tempo at which recalled deposit fees may be redeployed in service of 2015 and 2016 CSG project construction.”). See also SunShare March 4, 2015 Reply Comments at 4; SunShare April 2, 2015 Comments at 2.

<sup>15</sup> *Id.*

<sup>16</sup> Department of Commerce March 4, 2015 Comments at 1.

<sup>17</sup> Xcel Energy March 4, 2015 Comments, 13-867, at 14.

<sup>18</sup> Kandiyo Consulting April 2, 2015 Comments, 13-867, at 3.

incentive to cancel non-viable S\*RC project applications (to recall the deposit money), which would not be undermined by this requested rule clarification.<sup>19</sup>

4) S\*RC Project Rate Certainty

As the Department of Commerce has explained, rate certainty was a “prominent theme of past Commission meetings in this docket.”<sup>20</sup> According to the Department, the Commission “addressed rate certainty” in its September 17, 2014 order by:

determining that the REC price for a particular CSG is locked in when the CSG application is deemed complete and that CSG customers will be compensated at the applicable retail rate for the full span of the 25-year contract.<sup>21</sup>

Since that time, however, Xcel has identified and articulated a potential way around the Commission’s September 17, 2014 order regarding rate certainty.

According to the company, it may now retroactively undo its determination that a given CSG application is “deemed complete.”<sup>22</sup> If allowed, this would have the direct effect of voiding the project’s rate-reservation letter and undermining its rate certainty. For that reason, a number of stakeholders have argued that Xcel should not be allowed to undermine rate certainty by retroactively retracting a “deemed complete” determination.<sup>23</sup>

It is important here to distinguish between (i) the S\*RC application under Section 9, and (ii) the associated interconnection application under Section 10. For example, the interconnection application for given CSG project may be canceled by the applicant (e.g., due to prohibitive interconnection costs at a given location). But that doesn’t justify an Xcel-side cancellation of the associated Section 9 application – especially since Section 9 by its plain language gives S\*RC applications 24 months (from the date of being “deemed complete”) to achieve project commissioning.<sup>24</sup> Under Section 9, the company may only

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<sup>19</sup> CSG developers are also exposed to a variety of other program-related business risks, making Xcel’s concern that this clarification would “eliminate all business risk and uncertainty for solar developers” manifestly unjustified. Xcel Energy March 4, 2015 Comments at 14.

<sup>20</sup> Department of Commerce April 2, 2015 Comments, 13-867, at 4-5 (citing Commission Sept. 17, 2014 Order at 9-10).

<sup>21</sup> Department of Commerce April 2, 2015 Comments at 4-5.

<sup>22</sup> Xcel April 7, 2015 Compliance Filing – Stakeholder Minutes, 13-867, at Attachment A, page 9.

<sup>23</sup> SunShare Feb. 24, 2015 Comments at 5; Department of Commerce March 4, 2015 Reply Comments at 1; SunShare April 2, 2015 Comments at 2; MnSEIA April 2, 2015 Comments at 4.

<sup>24</sup> Xcel Energy Rate Book, Section 9, Sheet 67.

cancel an S\*RC application and return the associated deposit monies without the applicant's request after the 24-month period has elapsed.<sup>25</sup>

Finally, for the record please note that the S\*RC workgroup has reached no "full consensus"<sup>26</sup> on the question of whether S\*RC applicants may change their project location (as allowed under Xcel's Colorado rules).<sup>27</sup>

We thus refresh our statement that "CSG developers should have the flexibility to change the project site location (for legitimate reasons) without having to submit a new S\*RC application" and ask "the Commission to clarify that once an S\*RC project application has been deemed initially 'Complete,' Xcel cannot later revoke that finding of completeness."<sup>28</sup>

#### 5) Other Rate Considerations

We agree with the Joint Commenters' assertion that "the bill credit formula for larger co-located projects could potentially be modified to reflect economies of scale associated with those projects."<sup>29</sup> As such, we respectfully disagree with the Department to the extent that its April 2, 2015 Comments could be read to imply that a pricing mechanism designed to reflect site-specific economies of scale would be unworkable.<sup>30</sup> Indeed, the current bill-credit rate structure already includes a project-size-based break point (at 250 kilowatts), and there has been no assertion in this docket that this break point has been problematic or unworkable.<sup>31</sup>

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<sup>25</sup> Xcel Energy Rate Book, Section 9, Sheet 67. (with a day-for-day extension to account for "failure of the company to meet the timeframes for completing engineering studies and interconnection cost estimate set forth in the Commission's September 28, 2004 Order").

<sup>26</sup> See Xcel April 16, 2015 Compliance Filing – Stakeholder Minutes, 13-867, at Attachment A, page 3. In contrast, the workgroup did come to a "full consensus" regarding the allowance of clerical corrections and/or changes to the street address for an existing Section 9 application. *Id.*

<sup>27</sup> SunShare Feb. 24, 2015 Comments, 13-867, at 5-6.

<sup>28</sup> *Id.*

<sup>29</sup> Fresh Energy, ELPC, ILSR, and IWLA April 2, 2015 Comments, 13-867, at 2 ("However, any future adjustments to co-location rules or bill credit formulas should be set through an open transparent process led by the Commission, not through unilateral interpretations of the intent of the statute reached by Xcel or any other party."). See also SunShare April 2, 2015 Comments at 3.

<sup>30</sup> Department of Commerce April 2, 2015 Comments at 4.

<sup>31</sup> See Xcel Energy Rate Book, Section 9, at 9-64 (showing differential bill-credit rates based on project size).

## CONCLUSION

While there has been some positive motion in the S\*RC workgroup (for which we thank the company and other stakeholders), there are still significant gaps that must be addressed as described above. We thus respectfully request that the Commission take all necessary action, as requested herein and elsewhere in this docket, to resolve the outstanding implementation issues regarding Xcel's S\*RC program to enable a successful 2015 CSG construction season and allow the near-term delivery of subscriber and ratepayer benefits.<sup>32</sup>

Very truly yours,

/s/ Ross Abbey

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*On behalf of SunShare, LLC*

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<sup>32</sup> See MnSEIA April 28, 2015 Initial Reply Comments, at 7 (“losing the 2015 season . . . would unreasonably restrict or prevent the delivery of subscriber benefits, CSG-related job growth, economic development, and all the other benefits that flow from locally generated clean solar energy.”).



CERTIFICATE OF SERVICE

I, Ross Abbey, hereby certify that on April 30, 2015, I served copies of the following document on the attached list of persons by electronic filing, certified mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Comments by SunShare LLC

Docket No. E002/M-13-867

Certified this 30<sup>th</sup> day of April, 2015

s/ Ross Abbey

Ross Abbey

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