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September 17, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: REPLY COMMENTS
INTERCONNECTION TARIFF CHANGES
DOCKET NO. E002/M-14-648

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the August 26, 2014 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket regarding proposed changes to our Interconnection Tariffs.

The Department's August 26, 2014 Comments recommended that Xcel Energy explain the increase in the application and engineering study charges for generation facilities less than 20 kW. The Department also recommended that Xcel Energy provide information on its efforts to "streamline the process, improve the efficiency, and reduce the costs of interconnecting small generation facilities."

We appreciate the Department's review of our Petition and in this brief Reply we offer our response to the items they requested that we clarify.

Reply

A. Tariff Modifications

We acknowledge the Department's concern that the Company is proposing a \$250 charge for interconnecting facilities less than 20 kW when the current charge for facilities of this size range is \$0 or \$100, depending on the type of interconnection. With this tariff modification proposal, the Company is attempting to align the cost responsibility associated with processing the interconnection application and the

engineering study to the appropriate customers and to be consistent with the fees charged to facilities of this size processed through Solar*Rewards.

The majority of the interconnection applications we currently receive for facilities less than 20 kW are submitted through the Solar*Rewards program, and these applications are assessed a \$250 fee as found in tariff section 9, sheets 13 and 33. Since the first generation of Solar*Rewards launched in 2010, we have received a total of 638 applications for generation facilities less than 20 kW. Eighty-six percent of these applications were for customers participating in the Solar*Rewards program. This \$250 fee for Solar*Rewards applicants covers costs associated with engineering review for interconnection. The Company's proposed tariff modification is an effort to offer consistency across all customers with applications for facilities less than 20 kW.

In addition to covering costs, a fee paid in conjunction with a customer's interconnection request helps ensure that when customers submit requests, the projects are indeed moving forward and are submitted in good faith. We believe the relatively low fee amount would not pose a barrier to customers who wish to install a solar facility less than 20 kW.

B. Streamlining the Application Process

As noted in our Petition, the Company proposed these tariff changes in order to streamline the process by combining the fees for interconnection application and engineering study into one charge.

The Company has made significant investments to optimize the delivery of the Solar*Rewards program and increase efficiency, integration, and transparency. This has been done in part through the use of a new software system called Salesforce.com, as well as a revised application process. Salesforce.com creates a number of efficiencies in the application process by automating approval requests and compliance reminders, streamlining the application process resulting in fewer touch points with customers throughout and creating an improved customer experience. There is also automatic updating between Salesforce.com and other systems, which reduces the need for manual entry of data into other programs.

These improvements have helped to reduce costs, increase efficiency, and streamline the process for interconnecting small generation facilities. As a result of the success of the initial system upgrade, the Company is exploring migrating the non-Solar*Rewards, under 20 kW projects onto the Salesforce.com platform as well.

C. Tariff Revision

Consistent with the Department's recommendation, we agree to revise the fee structure table title on Tariff Sheet 10-93 from "Generation Interconnection Application Fees" to "Generation Interconnection Application and Engineering Study Fees" to clarify that the proposed fees cover both application and engineering costs. This revision will be reflected in our compliance filing.

In summary, we appreciate the Department's review of our Petition, accept the Department's recommendations, and respectfully request the Commission to approve our request, as amended by this Reply.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6613 or amy.a.liberkowski@xcelenergy.com if you have any questions.

SINCERELY,

/s/

AMY LIBERKOWSKI
MANAGER, REGULATORY ANALYSIS

Enclosures
c: Service List

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies or summaries 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-14-648

Dated this 17th day of September 2014

/s/

SaGonna Thompson
Regulatory Administrator

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