

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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November 14, 2016

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 551012147

RE: In the Matter of a Petition by Minnesota Power for Approval of a Community Solar Garden Program, Eligibility of the Energy Docket No. E-015/M-15-825.

Dear Executive Secretary Daniel P. Wolf:

Members of the Northland Community Solar Coalition (NCSC) respectfully submit the following comments in response to the Commission's October 11, 2016 Notice of Comment Period regarding Minnesota Power's (or the "Company") community solar garden ("CSG") compliance filings filed on October 3, 2016.

In this letter, we are providing comments on Minnesota's stakeholder processes, specifically,
(1) Minnesota Power's stakeholder process for the draft RFP for non-utility CSG projects.
(2) Minnesota Power's inclusion of the Commission's July 27th Order Point 10 in this filing.

(1) RFP Process

NCSC had participants at all 5 meetings in which there was active participation outside of the Company. NCSC appreciates the time and effort Minnesota Power placed into this process, including the inclusion of an outside facilitator to oversee the stakeholder process, the community involvement in the facilitator hiring process, and the gracious reception and treatment of participants during the stakeholder process itself.

However, NCSC has numerous concerns with aspects of the facilitation process, including issues with timeliness, inclusiveness, and transparency. We provide this feedback to provide context for the results of the process and to suggestions to Minnesota Power for future stakeholder processes.

Timeliness

The short timeframe for the stakeholder process did not give adequate time for robust participation.

Stakeholders were notified of meetings one week prior to the first meeting date. This short lead time limited participation and preparation. Given this short notice, NCSC did appreciate the opportunity to provide comments via email; however, stakeholders were only given 6 days to submit comments. In addition, stakeholders were only given 6 hours to respond to the facilitator's draft of meeting comments prior to its submission to the Company. This did not allow any meaningful review of meeting documentation prior to submission to the Company or the Commission.

The short timeframe of this process did not allow for back and forth between stakeholders and the Company, meaning many issues that NCSC believes could have been resolved before the RFP draft was submitted to the Commission are instead being discussed in the docket.

Inclusiveness

NCSC submitted a list of interested stakeholders to the Company and appreciated the inclusion of all of those individuals in the facilitator's outreach. However, the facilitator did not allow for remote participation in stakeholder meetings, despite stakeholder request, which further limited participation.

Given the topic of community solar gardens is of interest to many community members, NCSC would have liked to see an opportunity for public engagement in this stakeholder process. The Company and Facilitator specifically did not make public announcements for the stakeholder meetings, in the interest of having only parties of genuine interest at the discussions, as explained by the facilitator. NCSC maintains that it is difficult to ascertain which community entities and individuals would have interest in participating in a public stakeholder process with limited announcements.

Facilitation

NCSC appreciated the facilitation by an outside party chosen with community input. While the facilitator was gracious and respectful to participants, stakeholders shared concerns on a few topics.

Some meeting participants did not feel like their suggestions or comments were reported accurately. The facilitator often did not record comments verbatim but instead generalized/rewrote comments. In addition, stakeholders do not see the notes reflecting areas with strong consensus, creating the perception that views on certain issues, such as SRECs, ownership, etc., were equally split among participants when this was not the perception of those in the room.

Additionally, the Company was presented as "just another stakeholder" in this process, which does not accurately reflect the Company's participation given this is the Company's program,

the Company hired the facilitator and was ultimately responsible for the draft RFP to the Commission.

Recommendations

NCSC appreciated its ability to participate in the facilitation process and offers the following recommendations to improve future stakeholder processes:

- Provide notice of meetings at least two weeks in advance.
- Provide at least one week of response time to Company or facilitator for drafts or meeting notes.
- Allow the possibility of remote participation or advance submission of concerns and recommendations.
- Provide opportunity for public participation with appropriate public announcement.
- Record actual comments by participants rather than generalize them
- Identify comments specifically made by the Company, given the power imbalance between the Company and other participants in determining the end product.
- In future facilitated events where appropriate, identify the Company as the primary stakeholder and its relationship to the facilitator as employer.

(2) PUC Order Point 10

Order point 10 of the Commission's July 27th order states "Minnesota Power shall discuss with interested stakeholders whether and how pricing information on public-facing programs can be made public in the future."

Minnesota Power solicited comments on order point 10 during its Community Solar Garden Stakeholder meetings. Its filing reports "there were no specific suggestions related to public pricing of programs."

NCSC has concerns with this method of stakeholder engagement on this particular order point. These concerns were shared in at least one of the stakeholder sessions but were not included in the facilitator report.

Stakeholders were not informed that this question was to be posed during these meetings and therefore participants were not prepared with recommendations. Additionally, although there is certainly overlap, the list of stakeholders for this order point is likely different than for the RFP consultation.

NCSC recommends Minnesota Power convey a separate stakeholder process specifically for order point 10 that takes into account consideration feedback from the section above.

To conclude, we appreciate the Company's efforts in stakeholder outreach, and feel that with the improvements suggested, future stakeholder input from community processes can be more accurately gathered, encourage more public participation, and be of greater assistance in

lessening the need for extensive suggestions and modifications within the PUC public comment process.

Sincerely,

Arrowhead Regional Network, Minnesota Interfaith Power and Light

Conservation Minnesota

Peace United Church of Christ, FEET team (Food, Energy, and Environment)

Sierra Club Duluth Clean Energy Team

W. J. McCabe Chapter, Izaak Walton League of America