



# Sundial Solar

*A Brighter Idea*

8-31-15

**Minnesota Public Utilities Commission**

**PUC docket: E-002/m-13-867**

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

Commissioners,

Sundial is one of the oldest and most respected solar developers in Minnesota, servicing both residential and commercial clients throughout the state. We have several community solar projects in our plans and therefore have a vested interest in these proceedings.

It has become increasingly apparent the well-intentioned Minnesota Community Solar Gardens program has run into serious difficulties. It is obvious the underlying reason for this is a conflict between the intent of the original CSG language and the interpretation of same by many solar developers.

Sundial believes in the Community Solar Garden approach. However, we are dismayed by the actions of several large solar companies to effectively flood the market and overwhelm the process with applications now totaling over 1GW in size. These giant solar projects are not, in our opinion, in keeping with the intent nor spirit of the original legislation.

Clearly the intention of the original plan was to limit the size of these projects to 1MW in an effort to make them work for communities that cannot otherwise enjoy a solar option. The proposed giant solar facilities do little to meet that intent.

We recommend that the Commission:

- 1) **Order Xcel to expedite work on all applications that are for solar facilities less than 1MW** at any single interconnection point. These smaller projects rely heavily on the Federal tax advantages presently available, but could be seriously negatively impacted if they are not built by close of 2016.
- 2) **Reexamine its latest Order.** We feel it has too much ambiguity and latitude for misinterpretation. We encourage the Commission to reaffirm the 1MW limit of the original language. The definition of same should be specific and clear.
- 3) **Study the potential of implementing a utility scale solar program** with the intention of encouraging state-wide deployment.
- 4) **Investigate the potential of creating a Solar Renewable Energy Certificates (SRECs) market** as both a tool in adopting the EPA Clean Rower Plan and facilitating state-wide solar deployment.

We appreciate the Commission's efforts in this process which, by any measure, has been anything but easy.

Sincerely,

Jon Kramer, CEO