

March 4, 2015

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-13-867

Dear Mr. Wolf:

On February 13, 2015, the Minnesota Public Utilities Commission (Commission) issued a Notice Seeking Comments in the above-referenced Docket. On February 24, 2015, the Minnesota Department of Commerce (Department) and other parties submitted comments in response to the Commission's notice.

The Department reviewed other parties' comments. At this time the Department has no further comments on co-location of solar gardens or on rate pressure. The Department does wish to comment on other parties' comments related to the interconnection process.

A smooth application and interconnection process for existing applications is important to accurately inform parties and the Commission of how the existing program rules work. Unnecessary delays and complications in the interconnection process will distort the cost and project completion data that is needed by parties to make informed recommendations on future changes to the program.

The Department supports Sunshare's interconnection recommendations listed in points a through f on pages 2 and 3 of their comments. The section 10 tariff does not provide the detail requested in Sunshare's recommendations, and the experiences shared by developers in the community solar implementation workgroup show that clarification on these issues is needed for smooth implementation.

Sincerely,

/s/ HOLLY LAHD
Rates Analyst

HL/It

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. E002/M-13-867

Dated this 4th day of March 2015

/s/Sharon Ferguson

| 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 |
| 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 |
| 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 |
| 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 |
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| 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 |
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| 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 |

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| 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 |
| Jan | Hubbard | jan.hubbard@comcast.net | | 7730 Mississippi Lane Brooklyn Park, MN 55444 | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |
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| John S. | Jaffray | jjaffray@jrpowers.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-egroup.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 |
| 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 |
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| 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 |

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| 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 |
| 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 |
| 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 |
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| Dan | Rogers | drogers@sunedison.com | SunEdison | N/A | Electronic Service | No | SPL_SL_13-867_Community Solar Garden - Xcel |

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| Matthew J. | Schuerger 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 |
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| 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 |
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