

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange
Daniel Lipschultz
Matt Schuerger
Katie Sieben
John Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

**In the Matter of Solar*Rewards
Program and Community Solar
Garden Tariff Updates**

**MINNESOTA SOLAR ENERGY
INDUSTRIES ASSOCIATION'S
REPLY COMMENTS ON
SOLAR REWARDS**

September 26, 2018

Docket No. E002/M-18-381

**REPLY COMMENTS OF THE MINNESOTA
SOLAR ENERGY INDUSTRIES ASSOCIATION**

MNSEIA submits these reply comments in response to the Notice of Supplemental Comment Period issued by the Minnesota Public Utilities Commission (“Commission”) on August 27, 2018 in the above-referenced docket. For the reasons stated in its comments submitted on September 17 and in the reply comments below, MNSEIA requests that the Commission decline to adopt Xcel Energy’s (“Xcel”) proposed tariff revisions and order Xcel to submit modified tariff revisions consistent with the actual and intended requirements of Minn. Stat. § 116C.7792, as revised.

On behalf of Minnesota’s solar industry, it is MNSEIA’s position that Xcel Energy’s proposed interpretation of Minn. Stat. § 116C.7792 is incorrect and inconsistent with both the legislative record and our experience with working with the bill sponsors, our members, and Xcel Energy during the development of Minn. Stat. § 116C.7792. MNSEIA agrees with iDEAL Energies’ and Sundial Solar’s interpretation of the statutory language filed in their September 17 comments.

Xcel’s proposed interpretation would have a detrimental impact across the commercial solar industry by disqualifying many solar customers that would like to participate in the Solar*Rewards program, and by essentially barring these customers who participate in the Solar*Rewards program after June 1st, 2018 from installing any additional solar through the Photovoltaic Demand Credit Rider, or any future commercial solar incentive program for the next 10 years.

MNSEIA is especially concerned about Made in Minnesota customers currently participating in the Solar*Rewards program for their existing projects: these customers will not be eligible for Solar*Rewards incentives because of this determination.

MNSEIA requests that Xcel honor preexisting parallel systems installed prior to June 1, 2018. Assuming they meet the 120% rule for combined systems, preexisting parallel systems should be allowed both the parallel Solar*Rewards and PV Demand Credit Rider, as was advised by Xcel during the Docket stage of the Rider. These customers – compliant with program requirements and direction from Xcel management – have expended significant capital in good faith anticipation of this result.

Respectfully submitted,

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