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December 17, 2013

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E999/CI-13-542

Dear Dr. Haar:

On December 3, 2013, the Minnesota Public Utilities Commission (Commission) issued a Notice for Comment on Customer Exclusions from the Solar Energy Standard – Phase 2. Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rates Analyst

SP/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/CI-13-542

**I. BACKGROUND**

In the 2013 legislative session, Minn. Stat. §216B.1691 was amended to add a Solar Energy Standard (SES). In addition to the Renewable Energy Standard (RES), public utilities are required to generate or procure electricity from solar energy sufficient to serve 1.5 percent of the utility's Minnesota retail electric sales. Specifically, the statute states,

Subd. 2f. Solar energy standard. (a) In addition to the requirements of subdivisions 2a and 2b, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy. At least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kilowatts or less.

In addition to the standard set forth above, the statute specifically exempts the retail sales to certain customer groups from the calculation of "retail sales" subject to the SES. Minn. Stat. §216B.1691, Subd. 2f (d) states:

For the purposes of calculating the total retail electric sales of a public utility under this subdivision, there shall be excluded retail electric sales to customers that are:

- (1) An iron mining extraction and processing facility, including a scam mining facility as defined in Minnesota Rules, part 6130.0100, subpart 16; or
- (2) A paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer.

Those customers may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified by this subdivision.

In its November 20, 2013 Order Establishing NAICS Codes as Initial Screen to Determine Exclusion from Solar Energy Standard and Setting Further Requirements, the Commission determined that North American Industrial Classification System (NAICS) codes should be the initial screen for determining exclusion from the SES. In addition, the Commission determined that each utility shall file a proposal for notifying its customers of potential eligibility for exclusion along with a proposed form or template for customers to use in applying for exclusion, and that customers must file requests for exclusion from the SES with their utility. Finally, the Commission required utilities to file a list of customers who have requested exclusion along with the basis for each request with the Commission.

On December 3, 2013, the Commission issued an additional Notice for Comment on Customer Exclusions from the Solar Energy Standard. In its latest Notice, the Commission sought comment on:

- The specific NAICS codes that should be used to screen customers who are potentially eligible for exclusion from the SES, and why?
- What criteria other than NAICS codes, if any, should be used to make a final determination of customer eligibility?
- What information should customers who apply for exclusion be required to provide?

The Department offers the following comments on each topic.

## **II. DEPARTMENT ANALYSIS**

### **A. *SPECIFIC NAICS CODES TO USE IN DETERMINING ELIGIBILITY FOR EXCLUSION FROM THE SES***

The North American Industry Classification System (NAICS) is a coding system used to classify business establishments according to their primary business activity. The NAICS replaced the Standard Industrial Classification (SIC) system in 1997 for classifying business activity. In its August 29, 2013 comments in this docket, the Department observed that the following NAICS codes appear to correspond to the categories reflected in statute.

NAICS Code	Category
212210	Iron Ore Mining
321113	Sawmills
321114	Wood Preservation
321211	Hardwood Veneer and Plywood Manufacturing
321212	Softwood Veneer and Plywood Manufacturing
321213	Engineered Wood member (Except truss) Mfg.
321214	Truss Manufacturing
321219	Reconstituted Wood Product Mfg.
321911	Wood Window and Door Mfg.
321912	Cut Stock, Resawing Lumber and Planing
321918	Other Millwork (incl. flooring)
321920	Wood Container and Pallet Mfg.
321991	Manufactured Home (mobile Home) Mfg.
321992	Prefabricated Wood Building Mfg.
321999	All Other Misc. Wood Product Mfg.
322110	Pulp Mills
322121	Paper (except Newsprint) Mills
322122	Newsprint Mills
322130	Paperboard Mills
322211	Corrugated and Solid Fiber Box Mfg.
322212	Folding Paperboard Box Mfg.
322219	Other Paperboard Container Mfg.
322220	Paper Bag and Coated and Treated Paper Mfg.
322230	Stationery Product Mfg.
322291	Sanitary Paper Product Mfg.
322299	All Other Converted Paper Product Mfg.

The Department continues to recommend the use of these NAICS codes to screen customers for exclusion from the SES. The Department notes that the NAICS codes has replaced the Standard Industrial Classification Codes (SIC Codes) in 1997. To the extent a utility identifies customers by SIC code, the Department notes that it has found websites that will provide corresponding NAICS codes for a given SIC code.<sup>1</sup>

#### ***B. OTHER SCREENING CRITERIA***

As noted in the Department's initial comments, the SES Statute does not identify any other criteria on which to base an exemption from the SES calculation and rates other than the industry classification. Consequently, the Department recommends that customers whose primary business activity falls into one of the NAICS codes listed above be deemed eligible for exclusion.

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<sup>1</sup> See: <http://naicscode.com/>

In addition, Minn. Stat. §216B.03 requires rates to be just and reasonable, and states, “rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers.” Because the SES statute broadly excludes certain industry groups from the SES requirements, including cost recovery, the Department concludes that there is no basis in statute for screening eligibility based on kW demand or kWh usage levels.

The Department understands the Legislative discussion of the statute was focused on excluding certain large power customers in the specified industries; however, the statute is silent on size requirements for exclusion. As a practical matter, the information submitted by the utilities in response to the Commission Initial Request for Comment indicates that with the exception of Minnesota Power, the SES requirement for the remaining utilities would decrease by approximately 11,000 MWh (approximately 13 MW assuming the MISO accredited capacity factor of 10 percent) assuming all reported customer exclusions. Consequently, the SES requirements and cost recovery are unlikely to be significantly affected for any utility except Minnesota Power. In addition, the Department does not support efforts to limit the exclusion by meter (i.e. exclude only meters associated with manufacturing facilities, not administrative offices) because the administrative burden of the differentiation would exceed the benefits.

### *C. CUSTOMER INFORMATION FOR AN EXCLUSION*

The Department recommends that customers provide the following information in order to be excluded from the SES requirements:

- The primary NAICS code associated with their manufacturing activity.
- The account number and name
- Contact information for the Company

As indicated in the Commission’s November 20, 2013 Order, the utility should provide a summary of its customers who have requested exclusion. The Department recommends the list of customers and their annual usage be submitted by with the utilities annual RES compliance information. Providing this information at the time of annual RES compliance reporting will allow the Department to more accurately assess a utility’s SES requirement and its progress toward that standard.

### **III. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission adopt the following list of NAICS codes for exclusion from the SES standard.

NAICS Code	Category
212210	Iron Ore Mining
321113	Sawmills
321114	Wood Preservation
321211	Hardwood Veneer and Plywood Manufacturing
321212	Softwood Veneer and Plywood Manufacturing
321213	Engineered Wood member (Except truss) Mfg.
321214	Truss Manufacturing
321219	Reconstituted Wood Product Mfg.
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321920	Wood Container and Pallet Mfg.
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321992	Prefabricated Wood Building Mfg.
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322220	Paper Bag and Coated and Treated Paper Mfg.
322230	Stationery Product Mfg.
322291	Sanitary Paper Product Mfg.
322299	All Other Converted Paper Product Mfg.

The Department recommends that utilities be directed to include a list of the customers requesting exclusion, the primary NAICS code associated with their manufacturing activity, and their annual kWh usage as part of the annual RES compliance reporting.

/lt

## **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  
Comments**

**Docket No. E999/CI-13-542**

Dated this 17<sup>th</sup> day of **December, 2013**

**/s/Sharon Ferguson**

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