



March 17, 2015

VIA E-FILING

Dan Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101-2147

**RE: IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER
COMPANY FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR
GARDENS PROGRAM
MPUC DOCKET NO. E002/M-13-867**

Dear Mr. Wolf:

The Minnesota Chamber of Commerce (“Chamber”) has a long history of supporting customer self-generation as long as it does not result in cross subsidization among or within the customer classes. The Chamber hoped that stakeholders and the Commission would create a Community Solar Garden (“CSG”) program where customers were fairly treated for the benefits they might bring to the system and that these customers would also pay their fair share of system costs. The Chamber became concerned that this objective would not be met based on an analysis of the March 4, 2015 Reply Comments submitted by Xcel Energy in this docket.¹

¹ See Xcel Energy Community Solar Gardens Reply Comments at 10, March 4, 2015, Docket No. E002/M-13-867 (“Xcel Reply Comments”).

Xcel estimates that customers are likely to see a 6% increase in their fuel rates within the first year of adding 431MW of CSG projects to the system.² The impacts from this increase are compounded for commercial and industrial (“C&I”) customers as they consume more electricity than residential customers and their rates tend to be greater than their cost of service. Furthermore, the CSG increase will come at a time when Minnesota C&I ratepayers face increasing cost pressures. The Chamber fails to comprehend how the Commission can justify allowing ratepayers to pay \$0.0468/kWh more for CSG projects than competitively acquired utility scale solar.³

The Chamber urges the Commission to carefully consider the comments from Xcel and other stakeholders and resolve this issue as soon as practicable. Xcel correctly states, “there is a way to strike the right balance between moving forward with community solar garden projects while recognizing that approving utility scale projects at CSG rates is not in the best interest of our customers or sustainable for the long-term.”⁴ The Chamber hopes the Commission, Xcel, and other stakeholders will work on creating a system that advances CSG’s, but does so in a way that does not force other customers to subsidize CSG participants and ensures that any new solar resources are acquired at the lowest cost possible, given the status of solar technology. This approach is the only way to implement the CSG program without further eroding the competitiveness of Xcel and other affected utilities’ rates.

² See *id.*

³ See *id.*

⁴ See *id.* at 3.

DATED: March 17, 2015

Respectfully submitted,

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AFFIDAVIT OF SERVICE

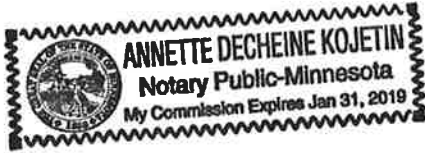
STATE OF MINNESOTA)
)
COUNTY OF RAMSEY)

Joan Harmon, being first duly sworn on oath, deposes and says she served the attached Comments of the Minnesota Chamber of Commerce in MPUC DOCKET Nos. E002/M-13-867 via e-filing to the Minnesota PUC as well as those requesting electronic service on the service list and to all others on the service list via U.S. Mail at the city of St. Paul.

Joan Harmon /s/Joan Harmon
Joan Harmon

Subscribed and sworn to before me
this 17th day of March, 2015.

Anette Kojetin
/s/Anette Kojetin
Anette Kojetin, Notary Public
My Commission expires 1/31/2019



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
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