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Minneapolis, MN 55401

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June 21, 2024

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: RESPONSE TO CO-LOCATION APPEAL BY SUNSHARE LLC
IN THE MATTER OF IMPLEMENTATION OF 2023 LEGISLATIVE CHANGES TO
XCEL ENERGY'S COMMUNITY SOLAR GARDEN PROGRAM AND IN THE MATTER
OF THE PETITION OF XCEL ENERGY FOR APPROVAL OF ITS PROPOSED
COMMUNITY SOLAR GARDEN PROGRAM
DOCKET NOS. E002/M-13-867 & E002/CI-23-335

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Response to Co-Location Appeal from SunShare LLC.

Attachment A of our Response is marked as “Non-Public” and is Protected Data as it contains certain customer-specific information and is Trade Secret pursuant to Minn. Stat. § 13.37, subd. 1(b); is considered to be nonpublic data with regard to data not on individuals under Minn. Stat. §13.02, subd. 9; and, is protected by the Commission orders as to what constitutes private account information in Docket No. E,G999/CI-12-1344. This information is subject to efforts from the customer to maintain its secrecy. This information derives independent economic value, actual or potential, to Xcel Energy, its customers, suppliers, and competitors, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Kristen Ruud at Kristen.S.Ruud@xcelenergy.com or (612) 216-7979 if you have any questions regarding this filing.

Sincerely,

/s/

IAN DOBSON
LEAD ASSISTANT GENERAL COUNSEL

Enclosures
cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF IMPLEMENTATION
OF 2023 LEGISLATIVE CHANGES TO
XCEL ENERGY'S COMMUNITY SOLAR
GARDEN PROGRAM

DOCKET No. E002/CI-23-335

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ITS PROPOSED
COMMUNITY SOLAR GARDENS
PROGRAM

DOCKET No. E002/M-13-867

**RESPONSE TO CO-LOCATION APPEAL
BY SUNSHARE LLC**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), provides this Response to a Co-Location Appeal (Appeal) submitted by SunShare, LLC (SunShare) on June 7, 2024. The Company agrees with the Department of Commerce's (Department) May 31, 2024 Decision on Co-Location (Decision), which included a thorough analysis of the facts and a well-reasoned conclusion that the SunShare applications at nine project sites are co-located. Accordingly, we request that the Commission affirm the Department's Decision and confirm that the Company's Section 9 Tariff provisions regarding co-location for the Legacy Community Solar Garden (CSG) program apply to SunShare applications that were submitted to the Legacy CSG program through the Legacy CSG application portal.

The Department determined that the nine sets of SunShare applications ranging from 3 MW to 5 MW in total capacity for each set are co-located, because they circumvent the 1 MW CSG size limit applicable to the Legacy CSG program. The Department's Decision states: "Here, there is no dispute that SunShare's projects are co-located under the Legacy CSG Program rules and SunShare applied for interconnection through Xcel [Energy's] Legacy CSG Program portal."¹

Throughout the fall 2023 and early 2024, the Company has consistently communicated to the developer community that although Legacy CSG applications may transition to the Low and Moderate Income (LMI) Accessible CSG program (if deemed complete before January 1, 2024 and not yet operational), any applications submitted to the Legacy CSG program must follow the rules of that program, including prohibition of co-location. Most developers have followed this guidance, and we continue to believe that SunShare would gain an unfair advantage compared to other developers who followed this directive if it is granted an exception to the co-location rules.

The Legacy CSG portal was closed to new applications on December 31, 2023. All 44.6 MW of applications that to date have been accepted by the Department into the LMI Accessible CSG program were submitted first in the Company's Legacy CSG portal. These applications have complied with the Legacy tariff requirements and not violated the 1 MW Legacy co-location rule. The Company on May 16, 2024 began to accept through the Distributed Generation (DG) portal applications up to 5 MW that may later apply to the Department for participation in the LMI Accessible CSG program. This is consistent with the direction provided at the Commission's April 4, 2024 hearing and related May 30, 2024 Order in Docket Nos. E002/CI-23-335 and E002/M-13-867. SunShare has jumped the starting line for submitting applications over 1 MW to the LMI Accessible CSG program, and is essentially seeking a variance to the Legacy CSG Tariff's co-location rule to gain a competitive advantage over other developers who have followed this co-location rule.

¹ Department's May 31, 2024 Decision, p. 6.

RESPONSE

I. SCOPE OF THE DISPUTE

SunShare submitted nine sets of 1 MW Legacy CSG applications (39 MW total) in fall 2023 and most of them were Deemed Complete in December 2023. The Company followed the tariffed process for determining co-location, specific to the Legacy CSG program, and issued a Notice of Co-Location to SunShare on April 17, 2024.

SunShare timely appealed the Co-Location Notice to the Department on May 1, 2024. The Department determined that the nine sets of applications ranging from 3 MW to 5 MW in total capacity for each set are co-located, because they circumvent the 1 MW CSG size limit applicable to the Legacy CSG program. SunShare appealed the Department's Decision to the Commission on June 7, 2024. The Company's Response is due in ten business days, on or before June 21, 2024.

The Legacy CSG program prohibits co-locating applications so that they together exceed the 1 MW CSG size limit. The Company's Tariff Sheet 68.17 states: "For any application submitted after September 25, 2015, no more than 1 MW (AC) will be allowed at a Community Solar Garden Site in the aggregate." The process for determining and challenging co-locations is defined at Tariff Sheet 9-68.19. Our May 8, 2024 Response submitted to the Department, included as Attachment A to this filing and incorporated here in its entirety, describes in more detail the process for determining co-location as well as the history of past Commission decisions regarding co-location. It also lists details in Table 1 for the 39 projects subject to this dispute.

The question for this dispute is not about the definition of co-location or whether the 1 MW projects in each set of applications are co-located, exceeding the 1 MW size limit for the Legacy CSG program. As the Appeal states, SunShare does not dispute that each set of the applications are co-located. Instead, SunShare argues that a 5 MW limit for co-location should be applied because the projects are intending to participate in the Department's LMI Accessible CSG program, which has a 5 MW limit for CSG size. As SunShare states, "the issue in this Appeal is not whether the Applications are co-located, but whether the Applications should have been reviewed for co-location under the Legacy Program rules at all."

Accordingly, the scope of this proceeding is narrow: whether the Company should have applied the 1 MW CSG size limit to the nine sets of co-located projects submitted to the Legacy CSG program. In its past Orders regarding co-location, the Commission has explicitly stated that the decisions only apply to the specific projects subject to the dispute and their circumstances. Accordingly, we do not believe the Commission should address general program or policy issues raised by SunShare, such as the Company's initial plan to open a separate portal for new LMI CSG applications and therefore in 2023 not accepting up to 5 MW applications through the Legacy CSG portal or the generic DG portal for projects intending to apply to the LMI Accessible CSG program.

This view is shared in the Department's Decision, which states that these types of questions that are related to the statute or the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) are beyond the scope of this co-location dispute and appeal.² That being said, the Company in good faith worked throughout fall 2023 to design and launch a separate LMI CSG portal, which was ready to open on January 2, 2024 (the first Business Day of 2024) to accept interconnection applications for projects that intend to apply to the LMI Accessible CSG program. As described below, however, this portal was abandoned.

II. LEGACY CSG TARIFFED RULES SHOULD APPLY TO LEGACY CSG APPLICATIONS

The SunShare applications subject to this dispute were submitted to the Legacy CSG portal between the months of September and December.³ The majority of the projects were then Deemed Complete in December 2023, before the portal was closed to new applications at the end of the Business Day on December 31, 2023. Since our Initial Comments were submitted in August 2023 in Docket No. E002/CI-23-335, the Company consistently communicated that it was not yet accepting interconnection applications for projects that intend to apply to the LMI Accessible CSG program until a portal for those applications had been launched. The Company

² Department's Decision, p.6, 11.

³ Completeness Review is dependent upon information provided by the developer and several details were missing from early applications.

had also completed the necessary design work and was ready to open the new portal on January 2, 2024. However, since objections were filed to our LMI Accessible CSG tariff compliance filing, the opening of the portal was delayed until the Commission took action on the objections in its April 4, 2024 hearing in Docket No. E002/CI-23-335, and issued its related Order on May 30, 2024. Our email communications in December 2023 and January 2024 informed the developer community that the portal opening was postponed and applications for the LMI Accessible CSG program cannot be accepted until the Commission has addressed the objections and effective tariffs are in place. During the April 4, 2024 hearing, the Commission verbally approved a decision option that required the Company to use its generic DG portal for all interconnection applications, including those that will apply to the LMI Accessible CSG program. As a result, the re-designed DG portal opened on May 16, 2024,⁴ and this was the first date that the Company began to accepted interconnection applications larger than 1 MW for the LMI Accessible CSG program.

All applications subject to this dispute were submitted in the Legacy CSG portal before the legislative date of January 1, 2024, when the LMI Accessible CSG program became available. Therefore, the Legacy CSG program rules and tariff should apply. While it is possible for Legacy CSG projects to be transferred to the LMI Accessible CSG program per Minn. Stat. §216B.1641, Subd. 14(b), Minn. Stat. §216B.1641 is clear that those projects approved prior to January 1, 2024 under the Legacy CSG program must follow the rules outlined for the Legacy CSG program (see Minn. Stat. §216B.1641, Subd. 1(i)). Contrary to SunShare’s allegations, it is clear that the 2023 legislation only closed the Legacy CSG program to new applications as of January 1, 2024, but did not otherwise materially amend the Legacy CSG program provisions contained at Minn. Stat. §216B.1641, Subd. 1 or in the Company’s Tariff. Neither is there any evidence or indication of a legislative intent to allow for co-location for Legacy CSG applications.

The Company has followed the statutory language of Minn. Stat. §216B.1641, Subd. 14(b), which states that “An application for the legacy program that is approved on or before December 31, 2023, is eligible to become a community solar garden under subdivisions 3 to 12...” A valid Legacy CSG application up to 1 MW may stay in the

⁴ The written ORDER IMPLEMENTING NEW LEGISLATION GOVERNING COMMUNITY SOLAR Gardens was issued on May 30, 2024.

Legacy CSG portal and apply to the LMI Accessible CSG program,⁵ but co-located applications that exceed the 1 MW limit are not valid Legacy CSG applications and do not belong to the Legacy CSG program. To date, 44.6 MW of valid Legacy CSG applications with interconnection agreements have been approved to the LMI Accessible CSG program.

III. EQUAL TREATMENT OF LEGACY CSG APPLICATIONS

Starting with our Initial Comments submitted in August 2023 in Docket No. E002/CI-23-335, the Company has consistently communicated that any applications submitted to the Legacy CSG program, even with the intent to transition later to the LMI Accessible CSG program, must follow the co-location rules of the Legacy CSG program. For example, our October 9, 2023 Reply Comments stated that any applications submitted to the Legacy CSG program prior to January 2024 as a 1 MW project cannot be later combined with other projects for a combined 5 MW project under the LMI Accessible CSG program and keep their queue position. Similarly, we noted that if a developer has co-located several Legacy CSG applications, we would only consider the earliest in queue project (i.e., up to the 1 MW size limit) to be valid. An excerpt of our Reply Comments was included (as Attachment E) to our May 8, 2024 Response, and is in Attachment A to this filing.

Also, on October 11, 2023, the Company sent an email communication to the developer community that included additional details regarding the transition from the Legacy CSG program to the LMI Accessible CSG program. This email clearly stated that “the Legacy CSG program does not accept applications larger than 1 MW” and that “the Legacy CSG program does not allow for Co-Location.” This communication was included (as Attachment F) to our May 8, 2024 Response, and is in Attachment A to this filing.

⁵ Our June 7, 2024 tariff compliance filing includes the following language at Sheet 9-99.09 about transitioning Legacy CSG applications: “If an applicant has filed a Community Solar Garden application for the Legacy CSG Program, and later for the same facility submits and is approved by the Department for the LMI Accessible CSG Program, then the application can remain in the Legacy CSG portal and the Company will adjust the treatment of the application so that the Subscriber Organization will be able to load and update Subscriber information for the LMI Accessible CSG program subject otherwise to the same LMI Accessible CSG program tariff provisions for managing subscriptions.

The Company believes it is critical that the co-location rules are applied equitably to all Legacy CSG applications and that developers that have followed our communications and guidance regarding co-location are not disadvantaged by doing so. SunShare has attempted to gain early advantage in the interconnection queue by submitting larger, co-located applications that take capacity away from other projects over 1 MW that try to interconnect on the same feeder/substation or that may also seek to apply to the LMI Accessible CSG program. By disregarding the direction provided by the Company, SunShare is seeking financial advantage over the majority of developers who have followed the tariffed co-location rules and the Company's guidance. While other developers have waited until the DG portal opened on May 16, 2024 to submit larger than 1 MW interconnection applications to the LMI Accessible CSG program, SunShare has tried to gain unfair benefit by submitting larger than 1 MW co-located applications to the Legacy CSG portal several months earlier.

As SunShare states, the Commission's May 30, 2024 Order was prospective and directed the Company to use the generic DG portal for all future interconnection applications, including those that intend to apply to the LMI Accessible CSG program. However, this Order did not address the Legacy CSG program rules or application portal. SunShare asks the Commission to "clarify" how its May 30, 2024 Order should apply to co-location of Legacy CSG applications, when that Order did not address this issue at all. We do not believe it would be appropriate for the Commission to retroactively determine that certain Legacy CSG applications can be co-located. Also, as noted by SunShare, it is quite possible that some Legacy CSG applications that intend to apply to the LMI Accessible CSG program will not be accepted by the Department to that program due to program caps or other reasons. It would be impracticable and unreasonable first not to apply the co-location rules to these Legacy CSG applications, and then later change that position and apply co-location rules if the applications are not accepted to the LMI Accessible CSG program.

If the Commission determines co-location, only the first in queue 1 MW application in each set of co-located projects should be able to keep its queue position and continue the interconnection process. The other applications cannot stay in the Legacy CSG portal, will be withdrawn, and would need to submit new applications in

the DG portal to begin the interconnection process, with a new queue position determined by the new Deemed Complete date.

IV. OTHER ISSUES RAISED BY SUNSHARE

We addressed the timing of issuing the Co-Location Questionnaires and Co-Location Notices to SunShare's Legacy CSG applications in our May 8, 2024 Response (page 6). The Company sent a Co-Location Questionnaire for a one set of applications on October 25, 2023, the rest of the applications received Co-Location Questionnaires on February 8, 2024. Except for one application, they were all Deemed Complete in December 2023. The Company issued the Co-Location Notices on April 17, 2024. As noted in Tariff Sheet 9-68.19, the Company will check for co-location at two times: 1.) ...on or about the time of the determination of Initial Application Completeness; and 2.) on or before the Date of Commercial Operation. At the time of our initial co-location check and review, which prompted us to send the Co-Location Questionnaire to SunShare in early February 2024, these applications were still in the initial stage of review. SunShare's Appeal states (at page 6) that none of its applications have progressed to the study stage of the interconnection process. Therefore, these would still be at or near the Deemed Complete stage of the interconnection process – which is very early in the interconnection process. Per our February 1, 2024 Queue Report, at the time when the Co-Location Questionnaires were sent to SunShare, only one project was in the System Impact Study stage (scoping meeting), nine projects were in initial engineering screening (pending applicant decision or custom options meeting), and 29 projects were on hold waiting for a sequential review in the queue order on constrained feeders/substations. No interconnection agreements have been signed or funded to-date for these projects. In other words, most of the projects had not advanced beyond the Deemed Complete stage in the interconnection process. In addition, the regulatory environment was fluid on CSG issues during this time period, and not until the conclusion of the Commission's April 4, 2024 hearing was this situation relatively stabilized. The Company submitted its Co-Location Notices just two weeks later – on April 17, 2024. Therefore, the timing of the Company's Co-Location Notices has been appropriate.

Contrary to SunShare's allegation, we have continued to process their Legacy CSG applications until the Department's Decision finding co-location was issued on May

31, 2024. However, as Table 1 to our May 8, 2024 Response (Attachment A) shows, 29 projects located on capacity constrained feeders/substations have been on hold because they are waiting for the sequential engineering study in the queue.

CONCLUSION

We respectfully request that the Commission affirm the Department's May 31, 2024 Decision and determine that the nine sets of SunShare's Legacy CSG applications are co-located.

Dated: June 21, 2024

Northern States Power Company

STATE OF MINNESOTA
BEFORE
THE MINNESOTA DEPARTMENT OF COMMERCE

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ITS PROPOSED
COMMUNITY SOLAR GARDENS
PROGRAM

May 8, 2024

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EXCISED
RESPONSE TO CO-LOCATION DISPUTE
SUNSHARE

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), provides this Response to a Co-Location Dispute submitted to the Minnesota Department of Commerce (Department). This dispute involves nine sets of projects that were submitted by SunShare as Legacy Community Solar Garden (CSG) applications and therefore must follow our Section 9 Tariff for the Solar*Rewards Community program, which limits the CSG size to 1 MW. Circumventing the 1 MW size limit by co-locating projects is prohibited, and these co-location rules are defined at Sheet 9-68.17 in the Company's Tariff and the process for determining and challenging co-location is outlined at Tariff Sheet 9-68.19. The nine sets of Legacy CSG applications are listed in Table 1 of this Response.

SunShare first received a Co-Location Questionnaire for **[PROTECTED DATA BEGINS HERE** **PROTECTED DATA ENDS HERE]** on October 25, 2023. Additional Co-Location Questionnaires were sent on February 8, 2024, and on February 15, 2024, SunShare responded to the Company's Co-Location Questionnaire, acknowledging that these projects meet the criteria for co-location, but arguing that the Company should apply a 5 MW limit for co-location because the projects are intending to apply to the new Low- and Moderate Income (LMI) Accessible CSG program, which provides a 5 MW limit for CSG size. The Company issued a Co-Location Notice to SunShare on April 17, 2024 and they timely appealed

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this notice to the Department on May 1, 2024. Our response to that appeal is due within five business days, on or before May 8, 2024.

The Company has consistently communicated to the solar developer community throughout the fall 2023 and early 2024 that applications to the LMI Accessible CSG program must be submitted through a separate portal and cannot be submitted through the Legacy CSG portal. Although Legacy CSG applications may transition to the LMI Accessible CSG program, if deemed complete before January 1, 2024 and not operational, the Company has also been clear that applications submitted to the Legacy CSG program must follow the rules of that program, including co-location rules. Most developers have followed this guidance, and we believe it would not be fair to make exceptions for SunShare.

Sunshare agrees that the set of projects violate the co-location rules for the Legacy CSG program and exceed the 1 MW size limit, but that the Company should have applied the 5 MW size limit applicable to the LMI Accessible CSG program. We request the Department determine that the Company should apply the co-location rules equally to all applications submitted under the Legacy CSG program, regardless of whether they intend to transfer to the LMI Accessible CSG program. This decision will determine whether SunShare receives an advantage over other Distributed Energy Resource (DER) projects within the interconnection queue despite the clear direction provided by the Company regarding co-locating CSG projects. If the Department agrees that these sets of SunShare projects are co-located, the size of the co-located projects will be reduced to 1 MW by allowing only the first in queue 1 MW project to continue. If the Department agrees that these sets of SunShare projects are co-located, the size of the co-located projects will be reduced to 1 MW by allowing only the first in queue 1 MW project in each of the nine sets of projects to continue.

RESPONSE

SunShare submitted seventeen interconnection applications at nine sites on various dates in December 2023. Table 1 summarizes project details.

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Table 1: SunShare Project Details
[Protected Data Shaded]

SRC #	Garden Name	Feeder	Status	MW	Queue Date
5526561		MGN211	Initial Engineering Screen	1	12/14/2023
5526563		MGN211	Initial Engineering Screen	1	12/29/2023
5526556		MGN211	Supplemental Review	1	12/29/2023
5526568		MGN211	Initial Engineering Screen	1	12/29/2023
5612339		FRA211	On Hold	1	12/26/2023
5612420		FRA211	On Hold	1	12/22/2023
5612502		FRA001	Supplemental Review	1	12/21/2023
5612567		FRA001	On Hold	1	12/29/2023
5612544		FRA001	System Impact Study	1	12/21/2023
5526581		SCH211	On Hold	1	12/20/2023
5526584		SCH211	On Hold	1	12/20/2023
5526587		SCH211	On Hold	1	12/20/2023
5526590		SCH211	On Hold	1	1/10/2024
5605597		RNV021	On Hold	1	12/21/2023
5605599		RNV021	On Hold	1	12/21/2023
5605601		RNV021	On Hold	1	12/21/2023
5612262		WWK311	Initial Engineering Screen	1	12/21/2023
5612268		WWK311	Initial Engineering Screen	1	12/26/2023
5612275		WWK311	Initial Engineering Screen	1	12/22/2023
5612269		WWK311	Initial Engineering Screen	1	12/22/2023
5660743		MTV021	On Hold	1	12/29/2023
5660772		MTV021	On Hold	1	12/29/2023
5600779		MTV021	On Hold	1	12/29/2023
5660783		MTV021	On Hold	1	12/29/2023
5660763		MTV021	On Hold	1	12/29/2023
5657248		CHI311	On Hold	1	12/29/2023
5657215		CHI311	On Hold	1	12/29/2023
5657253		CHI311	On Hold	1	12/28/2023
5657250		CHI311	On Hold	1	12/28/2023
5660541		CHI311	On Hold	1	12/28/2023
5660589		CHI311	On Hold	1	12/28/2023
5660623		CHI311	On Hold	1	12/29/2023
5660661		CHI311	On Hold	1	12/29/2023
5660696		CHI311	On Hold	1	12/29/2023
5657289		BRO021	On Hold	1	12/29/2023
5657293		BRO021	On Hold	1	12/29/2023
5657295		BRO021	On Hold	1	12/29/2023

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SRC #	Garden Name	Feeder	Status	MW	Queue Date
5657297		BRO021	On Hold	1	12/29/2023
5657300		BRO021	On Hold	1	12/29/2023

SunShare appeals our co-location determination because they believe that the Company violated Minn. Stat. §216B.1641 by applying its co-location screen for the Legacy CSG program to applications eligible under the LMI Accessible CSG program. In addition, they argue that the Company did not timely apply the co-location screen.

I. Background

The Minnesota Public Utilities Commission (Commission) has addressed co-location in several prior Orders in Docket No. E002/M-13-867, including Orders issued on August 6, 2015, December 15, 2015, February 21, 2017, December 21, 2017, November 19, 2019, and May 29, 2020. The Commission initially defined co-location in its December 15, 2015 Order by listing factors that are characteristics of a single development, such as common ownership structure, umbrella sales arrangement, shared interconnection, revenue sharing arrangements and common debt or equity financing.¹ This non-exclusive list of factors is included in the Company's Tariff (Sheet 9-68.17). The determination of what is considered to be co-located has evolved as a result of a series of subsequent Commission Orders. The Commission clarified in its February 21, 2017 Order that all relevant factors must be considered when co-location is determined. The Commission also stated that no single factor is dispositive in determining co-location and the determination is based on the totality of circumstances in a particular case.²

In its December 21, 2017 Order, the Commission reaffirmed that the five factors listed in the Tariff are “merely illustrative of the kinds of information the Commission

¹ *In the Matter of the Petition of Northern States Power Company for Approval of Its Proposed Community Solar Gardens Program*, Docket No. E002/M-13-867, ORDER APPROVING TARIFFS AS MODIFIED AND REQUIRING FILING, December 15, 2015.

² Docket No. E002/M-13-867, ORDER DENYING CO-LOCATION APPEALS, February 21, 2017.

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might consider”³ and then considered various factors in finding co-location, such as close timing of applications, similar site control, identical site plans, sharing costs and financing, coordinated permitting and agreements between the developers. The Commission granted an exception to the co-location cap in this case on the condition that each of the developers committed to statements that the adjacent gardens will not become a single development in the future and will remain independent projects owned and operated separately.

The Commission’s November 19, 2019 Order and May 29, 2020 Order required assurances that project owners do not have any arrangements with each other, that projects will have separate marketing efforts and no plan to share subscribers, and that the projects will not effectively become a single development.⁴ For example, the Commission’s November 19, 2019 Order required that:

- The community solar garden operator does not have any arrangement of any nature with the owner of the adjacent garden or any affiliate of the owner of the adjacent garden;
- The community solar garden and the adjacent garden are separate independent developments with separate owners, leased separately, constructed separately, and owned and operated separately;
- The community solar garden and the adjacent garden will never share any equipment, permanent debt financing, or marketing efforts and will not have a plan to share subscribers; and
- The community solar garden and the adjacent garden are not dependent on the other in any way.

Based on this prior guidance by the Commission, the SunShare projects in each of the nine sites are co-located and exceed the 1 MW limit for the Legacy CSG program. Sunshare has not disputed this fact but argues that a 5 MW limit applicable to the LMI Accessible CSG program should apply.

³ Docket No. E002/M-13-867, ORDER FINDING CO-LOCATION, BUT GRANTING EXCEPTION SUBJECT TO CONDITIONS, December 21, 2017, page 9.

⁴ Docket No. E002/M-13-867, ORDER AFFIRMING DECISION OF THE DEPARTMENT OF COMMERCE, November 19, 2019 and ORDER AFFIRMING DEPARTMENT DECISION AND REQUIRING FILING, May 29, 2020.

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II. Timing of Co-Location Review

SunShare first received a Co-Location Questionnaire for **[PROTECTED DATA BEGINS HERE PROTECTED DATA ENDS HERE]** on October 25, 2023. Additional Co-Location Questionnaires were sent on February 8, 2024, and on February 15, 2024, SunShare responded to the Company's Co-Location Questionnaire. These documents are provided as Attachment A. The Company then issued a Notice of Co-Location on April 17, 2024 to SunShare and also copied the Department. This is provided as Attachment B. SunShare submitted a timely appeal to the Department on May 1, 2024, which is provided as Attachment C.

SunShare argued in its appeal that we did not provide a timely Notice of Co-Location. However, as noted in our Section 9 Tariff at Sheet 68.19, the Company will check for co-location at two times: 1.) ...on or about the time of the determination of Initial Application Completeness; and 2.) on or before the Date of Commercial Operation. At the time of our initial co-location check and review, which prompted us to send the Co-Location Questionnaire to SunShare in early February 2024, these applications were still in the initial stage of review. In fact, as noted in Table 1, only one of these projects is currently in Study Review.

III. Legacy CSG Rules Apply

SunShare argues that the Company violated the law, but it is inaccurate to state that these CSG applications had the option to choose between the Legacy program and the LMI Accessible CSG program by just submitting an application to the Legacy CSG portal.

These projects were all submitted prior to the legislative date of January 1, 2024 when the LMI Accessible program became available, and therefore the Legacy CSG program rules should dictate how these projects should move forward. While it is possible for Legacy CSG projects to be transferred to the LMI Accessible program per Minn. Stat. §216B.1641 Subd. 14(b), the Minn. Stat. §216B.1641 is clear that those projects approved prior to December 31, 2023 under the Legacy CSG program must

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follow the rules outlined for the Legacy CSG program (see Minn. Stat. §216B.1641Subd. 1, (h) (2) (i)).

As communicated by the Company since August 2023, the Company was not accepting applications intended to the LMI Accessible CSG program until the Company's Tariffs had been approved by the Commission. Because of filed objections, the Commission was still having an active proceeding to review the LMI Accessible Company Tariffs until April of 2024; without an effective Tariff applying to the LMI Accessible CSG program the Company could only continue to process applications to the Legacy CSG program that were submitted prior to January 1, 2024.

Of further note, there were also developer concerns and objections about the Company requiring a specific portal for accepting interconnection applications to the LMI Accessible CSG program. Therefore, the Company was not able to move forward with opening a portal and to date has not yet been accepting applications to the LMI Accessible CSG program. Email communications to the developer community in December 2023 and January 2024 regarding this delay have been included as Attachment D.⁵ For example, the January 24, 2024 email stated: "Since an objection to our tariff filing was submitted to the Commission on January 18, 2024, the Company cannot accept applications in its portal for the Non-Legacy CSG Product until the Commission has addressed the objection and the Company has effective tariffs in place." In its April 4, 2024, hearing in Docket No. E002/CI-23-335, the Commission verbally approved a decision option that requires the Company to use its distributed generation portal for all interconnection applications, including those that will apply to the LMI Accessible CSG program. The Company believes this is relevant, considering SunShare's interpretation that we should apply a 5 MW size limit for co-location, applicable to LMI CSG projects. Furthermore, none of SunShare's projects subject to this dispute have been approved by the Department for participation in the LMI-Accessible CSG program. Instead, these projects were submitted to the Company's Legacy CSG program and therefore should follow the rules of that program.

⁵ These were also filed in Docket No. E002/CI-23-335 on January 2, 2024 and January 25, 2024.

PUBLIC DOCUMENT

IV. Equability in Applying Communicated Co-Location Rules

Since our Initial Comments submitted in August 2023 in Docket No. E002/CI-23-335, the Company has communicated that it is not yet accepting applications to the LMI Accessible CSG program. In addition, our communications have consistently stated that any applications submitted to the Legacy CSG program, even with the intent to transition later to the LMI Accessible CSG program, must follow the co-location rules of the Legacy CSG program. For example, our October 9, 2023 Reply Comments stated that any applications submitted to the Legacy CSG program prior to January 2024 as a 1 MW project cannot be later combined with other projects for a combined 5 MW project under the LMI Accessible CSG program and keep their queue position. Similarly, we noted that if a developer has co-located several Legacy CSG applications, we would only consider the earliest in queue project (i.e., up to the 1 MW size limit) to be valid. An excerpt of our Reply Comments is included as Attachment E.

Also, we on October 11, 2023 sent an email communication to the developer community that included additional details regarding the transition from the Legacy CSG program to the LMI Accessible CSG program. This email clearly stated that “the Legacy CSG program does not accept applications larger than 1 MW” and that “the Legacy CSG program does not allow for Co-Location.” This communication is included as Attachment F.

The Company’s concern regarding these applications is that the co-location rules are applied equitably and that developers who have followed our communications on co-location rules are not disadvantaged by doing so. SunShare’s intent in submitting these co-located Legacy CSG applications was to circumvent the rules and get ahead in the DER Queue. The advantage of doing so is that being first can result in full capacity for their larger, co-located projects. By disregarding the direction provided by the Company, SunShare has essentially given themselves a financial advantage over other projects trying to interconnect in these areas and over the majority of developers who have followed the Company’s direction regarding co-location.

PUBLIC DOCUMENT

Equity in the DER interconnection process should be considered as part of the co-location analysis and the Company believes that SunShare's appeal of the Notice of Co-Location should be denied.

CONCLUSION

For the reasons described above, we request that the Department determine the five sets of SunShare's Legacy CSG projects are co-located. If the Department confirms co-location, the first in queue 1 MW application in each set of co-located projects will be allowed to move forward, and the other applications will be cancelled.

Dated: May 8, 2024

Northern States Power Company

Attachment A is Non-Public in Entirety.

Attachment B is Non-Public in Entirety.

Attachment C is Non-Public in Entirety.

From: [Solar Rewards Community MN](#)
Subject: New CSG Product Availability Delayed!
Date: Friday, December 29, 2023 10:26:30 AM
Attachments: [image.png](#)
[image.png](#)
Importance: High

Community Solar Garden Update

December 29, 2023

New CSG Product Delayed!

The availability of the new Non-Legacy CSG Product in the portal, for applications intending to apply to the Departments of Commerce's Low-to-Moderate Income (LMI) Accessible CSG program to become a garden, that was originally scheduled to be available on January 2, 2024, will now be **delayed**. This delay is due to the requirements set forth in the [Order](#) received December 28, 2023 in Docket No. E002/CI-23-335.

The Order, at pages 24-26, clearly mandates that the Company shall file the updated CSG tariff within 30 days of the Order, but that following this tariff filing there is a 20-day period for objections to be made prior to the tariff becoming effective. If any objection is filed within this 20 day period, then the tariff will not be effective. Xcel Energy cannot accept applications in its portal for the new Non-Legacy CSG Product until it first has an effective tariff schedule on file for this new CSG product. (Minn. Stat. §216B.05 and §216B.06).

Consistent with this, the Company cannot launch the new Non-Legacy CSG Product for applications until either of the following has been met:

- The 20-day period following our tariff filing has expired with no objection being filed; or
- If an objection is filed, then the MN PUC rules on the objection and issues a Written Order, and the Company subsequently files compliance tariffs consistent with that Order.

The Office Hour originally scheduled for December 29th on logistics for submitting applications in the portal for the new Non-Legacy CSG Product will be rescheduled closer to when the Company can lawfully accept applications in the portal for this product.

The Company will provide additional updates in future emails.

Respectfully,

The Community Solar Garden Program Team
Xcel Energy
E: SolarRewardsCommMN@xcelenergy.com

Attachment D

[Community Solar Garden Developers | Xcel Energy](#)

Visit our website for more information about interconnecting a community garden with Xcel Energy!



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- For questions about your electric service/account: Call Customer Service - 1-800-895-4999
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 - Residential customers: Call the Energy Experts – 1-800-824-1688
 - Commercial customers: Call the Business Solutions Center – 1-800-481-4700
- For questions regarding meter orders/scheduling: Call the Metering Shop - 1-800-422-0782

From: [Solar Rewards Community MN](#)
Subject: Non-Legacy (LMI CSG) Product Delay Update
Date: Wednesday, January 24, 2024 2:46:19 PM
Attachments: [image.png](#)
[New CSG Product Availability Delayed.msg](#)
[image.png](#)
Importance: High

Community Solar Update

January 24, 2024

Non-Legacy Low-to-Moderate Income (LMI) Community Solar Garden (CSG) Product Delay Update

This is an update on the email that was sent on December 29, 2023 (see attached) regarding the availability of the Non-Legacy CSG Product in the Company's portal for applications intending to apply to the Department of Commerce's Low-to-Moderate Income (LMI) Accessible CSG program.

The Minnesota Public Utilities Commission's December 28, 2023 Order in Docket No. E002/CI-23-335 established a 20-day period for filing objections to our Non-Legacy CSG tariff compliance filing, which we submitted to the Commission on January 5, 2024. If an objection is filed, the Company cannot launch the new Non-Legacy CSG Product for applications until the Commission rules on the objection and issues a written Order, and the Company subsequently files updated tariffs consistent with that Order.

Since an objection to our tariff filing was submitted to the Commission on January 18, 2024, the Company cannot accept applications in its portal for the Non-Legacy CSG Product until the Commission has addressed the objection and the Company has effective tariffs in place.

The Company will provide additional updates in future emails.

Respectfully,

The Community Solar Garden Program Team

Xcel Energy

E: SolarRewardsCommMN@xcelenergy.com

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 - Commercial customers: Call the Business Solutions Center – 1-800-481-4700 / bsc@xcelenergy.com.
- For questions regarding meter orders/scheduling: email the Metering Shop at MNElectricMeterScheduling@xcelenergy.com.

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Attachment E



414 Nicollet Mall
Minneapolis, MN 55401

October 9, 2023

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
IN THE MATTER OF IMPLEMENTATION OF 2023 LEGISLATIVE CHANGES TO
XCEL ENERGY'S COMMUNITY SOLAR GARDEN PROGRAM &
IN THE MATTER OF NORTHERN STATES POWER COMPANY, DBA XCEL ENERGY,
FOR APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDEN PROGRAM
DOCKET NOS. E002/CI-23-335 & E002/M-13-867

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company), submits these Reply Comments to the Minnesota Public Utilities Commission (Commission) in response to the Commission's Notice of Comment Period issued on July 26, 2023 and Initial Comments filed September 28, 2023 by the following parties: Clean Energy Economy of Minnesota (CEEM), Cooperative Energy Futures (CEF), Department of Commerce (Department), International Union of Operating Engineers Local 49 (IUOE Local 49), Laborers International Union of North America of Minnesota and North Dakota (LIUNA), the North Central States Regional Council of Carpenters (Carpenters), Joint Solar Associations (JSA), Nokomis Energy (Nokomis), Sunrise Energy Ventures (Sunrise), and United States Solar Corporation (US Solar).

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at jessica.k.peterson@xcelenergy.com or Kristen Ruud at kristen.s.ruud@xcelenergy.com if you have any questions regarding this filing.

Sincerely,
/s/

JESSICA PETERSON
MANAGER, PROGRAM POLICY
cc: Service List

the legislative intent, the Commission should take action to set an appropriate definition for the term “approved.” We believe defining the meaning of “approved” as having a signed and funded Interconnection Agreement before January 1, 2024 would align with legislative expectations that the Legacy program is not unduly extended.

B. Active Projects

Under our proposal, projects without a signed and funded Interconnection Agreement before January 1, 2024 would have to either re-apply to the Non-Legacy program or continue interconnection as distributed generation (DG) solar project. We believe it would be reasonable for projects (1 MW and under) that choose to continue as a DG project or apply to the Non-Legacy program to keep their current interconnection queue position. However, these projects would need to submit a new interconnection application (without Material Modifications to the PV system or adjustment to size) in order to set them up for the appropriate payment at the end of those processes.

We note that any applications submitted before January 2024 as a 1 MW project cannot be later combined with four other projects for a 5 MW project under the Non-Legacy program and keep their queue position. Similarly, if a developer has co-located Legacy CSG applications, we would only consider the earliest in queue of these applications to be valid and would not intend to have the other co-located applications be eligible to apply to the Non-Legacy program in their prior queue position.

Further, if a developer has submitted a non-CSG DER interconnection application (which is not submitted through the CSG Application Portal, and not submitted as a Non-Legacy CSG) and later attempts to transfer that non-CSG DER interconnection application (or its queue position) to a CSG application (Page 6, Response), it will not be allowed. Our Application Portal cannot accommodate this type of transfer. Stakeholders have been apprised that we will not allow this, and most developers have not only relied on this communication but also followed this procedure. It would be unfair and inconsistent to make exceptions.

Our August 28, 2023 Response included details regarding the status of pending CSG applications in Table 2 derived from our August 2023 Monthly Queue Report. We believe this table may have given the impression that several projects would be left behind in the transition to the Non-Legacy program, which was not our intent. The graphic below, derived from our October 2023 Monthly Queue Report, identifies the status of pending CSG projects. As shown, 52 percent of projects will likely have an

From: [Solar Rewards Community MN](#)
Subject: Community Solar Garden Program Transition
Date: Wednesday, October 11, 2023 11:52:32 AM
Attachments: [image.png](#)
[image.png](#)
Importance: High

Solar*Rewards Community Update

October 11, 2023

Community Solar Garden Program Transition

We've received questions regarding the transition from the Legacy to the Non-Legacy community solar garden program. Our August 28, 2023 filings (Response and Petition) to the Minnesota Public Utilities Commission in Docket Nos. E002/CI-23-335 & E002/M-13-867 provide information on the transition from the Legacy CSG Program to the Non-Legacy CSG Program. See below for key details and clarification from that filing and other background information:

Applying to the Legacy Program:

- The Legacy CSG Program does not accept applications larger than 1 MW (Current [Section 9 Tariff](#)).
- The Legacy CSG Program does not allow for Co-Location (Current Section 9 Tariff).

Applications to the Legacy Program *approved* before January 1, 2024:

- A Legacy CSG application that is *approved* before January 1, 2024 will continue to be processed as a Legacy CSG. It is our understanding that these applications may also choose to apply to the Non-Legacy program if the Non-Legacy program requirements are met (Page 8, Response).

Applications to the Legacy Program not *approved* before January 1, 2024:

- The Legacy Program will close for any Legacy CSG applications not *approved* before January 1, 2024. The Company will process Legacy CSG applications that have not yet been *approved* until December 31, 2023. It is our understanding that a Legacy CSG application that is not *approved* before January 1, 2024 will be eligible to apply to the Non-Legacy program, if the Non-Legacy CSG program requirements are met. We have also proposed that a Legacy CSG project that re-applies to the Non-Legacy program may keep its existing queue position as long as there are no Material Modifications to the PV system (Page 11, Response).
- The definition of "approved" is not yet determined. The Company recommended

the approach of a signed and funded Interconnection Agreement (Pages 9 and 10, Response). We expect the Commission to make a policy decision regarding the appropriate approach later this year.

Applying to the *Non-Legacy* Program:

- A new program is being created in our Application Portal for the Non-Legacy Program because the structure in our Legacy CSG Application Portal is not applicable to the Non-Legacy CSG program. (Page 6, Response).
- We are requiring that new interconnection applications for the Non-Legacy program utilize the Application Portal for the Non-Legacy Program when applying for interconnection. This will allow for specific treatment of Non-Legacy applications, including the appropriate Non-Legacy bill credit structure, consolidated billing, etc., after the Department of Commerce has approved the application to the Non-Legacy program and other interconnection requirements are met.
- This means that developers cannot submit a non-CSG DER interconnection application (which is not submitted through the CSG Application Portal, and which is not submitted as a Non-Legacy CSG) and later attempt to transfer that non-CSG DER interconnection application (or its queue position) to a Non-Legacy CSG application (Page 6, Response). Our Application Portal cannot accommodate this type of transfer. All stakeholders have been apprised that we will not allow this, and most developers have relied on this communication and followed this procedure. It would be unfair and inconsistent to make exceptions.
- Applications must be submitted via the Interconnection Portal – [Login \(site.com\)](#)

Similar explanations can be found in our Petition on pages 5 and 6 and proposed tariff Sheets 9-66.1 and 9-99.09 attached to our Petition.

Next Steps:

- Xcel Energy provided Reply Comments in the docket on Monday, October 9, 2023.
- The Commission will have an Agenda Meeting we believe likely in December 2023 where we anticipate verbal votes clarifying the requirements of the new program's implementation.
- The Portal will be able to intake applications for the new program following the Commission's written order from its December 2023 meeting, and Xcel Energy filing compliance tariffs as provided for in that written order. We currently anticipate that this will be sometime in January 2024.

For additional guidance and information, please refer to the following in Docket Nos. E002/CI-23-335 & E002/M-13-867: Xcel Energy's August 28, 2023 Response: [searchDocuments.do \(state.mn.us\)](#) and Petition/Proposed Tariff: [searchDocuments.do \(state.mn.us\)](#)

Attachment F

Respectfully,

The Solar*Rewards Community Program Team
Xcel Energy
E: SolarRewardsCommMN@xcelenergy.com

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CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET NOS. E002/M-13-867 AND E002/CI-23-335

Dated this 21st day of June 2024

/s/

Marie Horner
Regulatory Administrator

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_13-867_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-867_Official
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Kristel	Porter	kristel@mnrenewablenow.org	MN Renewable Now	N/A	Electronic Service	No	OFF_SL_23-335_Official

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_23-335_Official
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