



March 2, 2015

Mr. Dan Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: January 28, 2015 Notice of Comment  
PUC Docket No. E022/M-13-867  
Xcel Community Solar Garden Program**

Sunrise Energy Ventures, LLC, through its affiliate SEV MN1 LLC, has several pending applications in Xcel Energy's new community solar garden program. We know from Xcel's comments surrounding the January 15, 2015 hearing that it received the vast majority of the approximately 430 MW worth of projects in its program queue on December 12, 2014 - the very day the program opened. Sunrise was among this group that applied immediately on December 12, 2014 and knows from communications subsequently with Xcel within their 30-day review period that we have submitted everything required from Xcel to have our applications deemed complete. As of the date of this letter well over the 30-day time period are still awaiting formal completeness determinations.

We have been carefully following this docket and understood the Commission's order in last September approving the program, to have intended to allow the program to open under a workable rate structure that support the development of CSGs here in Minnesota, while also allowing stakeholders time to work out a longer-range solution for a VOS rate package that would comport with statutory requirements. We also appreciate the Commission's careful direction in previous orders aimed at giving developers the certainty they need to develop CSG projects, specifically clarifying that any adjustments to the REC prices made by the Commission in later years only apply to new community-solar-garden project applications.

Out of an abundance of caution, however, we write to ask the Commission to continue its efforts to ensure that any potential tweaks to the program or rate are done on a prospective basis only and any applications pending filed but pending completion would be grandfathered in at the rules and rates as of the day of this letter. We raise the issue because previous orders have focused on the stability granted a developer "when it has submitted a complete application." Were completeness determinations moving forward as expected and within the tariff rules, there may be no cause for concern here because most of the existing projects would already have a set place in line with a firm rate structure. But that is not the case. Parties are working with Xcel to resolve its concerns, leaving some applications pending without a completeness determination. We are of course happy to work with Xcel in this regard. But please note that we have been marketing our projects with existing applications under the current Commission-approved rate and program structure. Any change impacting these existing applications could upend the projects.



Therefore, we specifically ask the Commission to ensure that any decisions made with respect to the REC pricing or eventual transition to a VOS rate (with an enhancement or not) be prospective and not applicable to existing applicants for whom completeness has not yet been determined by Xcel. While we are well aware of the fact the ARR will be adjusted every year, we want to make sure the overall rate structure that includes the REC Adder is not adjusted retroactively with respect to existing applicants who are not yet deemed complete by Xcel.

Respectfully,

Dean Leischow

A handwritten signature in black ink, appearing to read "DL", is positioned above the typed name.

/s/ Dean Leischow  
Managing Director  
Sunrise Energy Ventures  
601 Carlson Parkway, Suite 1050  
Minnetonka, MN 55305  
(612) 293-9900

**CERTIFICATE OF SERVICE**

I, Angie Schreiner, herby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.

**REPLY COMMENT OF BEHALF OF SUNRISE ENERGY VENTURES, LLC**

In the Matter of the Xcel Energy's Plan for a Community  
Solar Garden Program Pursuant to MINN. STAT. § 216B.1641  
Docket No. E-002/M-13-867

Dated this 2<sup>nd</sup> day of March, 2015.

*/s/ Angie Schreiner*

---

Angie Schreiner

| 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<br><br>St. Paul,<br>MN<br>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<br><br>Minneapolis,<br>Minnesota<br>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<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012134 | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Kenneth    | Bradley   | kbradley1965@gmail.com              |                                    | 2837 Emerson Ave S Apt CW112<br><br>Minneapolis,<br>MN<br>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<br><br>Minneapolis,<br>MN<br>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<br>Suite 500<br>St. Paul,<br>MN<br>55101         | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Joel       | Cannon    | jcannon@tenksolar.com               | Tenk Solar, Inc.                   | 9549 Penn Avenue S<br><br>Bloomington,<br>MN<br>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<br><br>Irvine,<br>California<br>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<br><br>Hopkins,<br>MN<br>55343                   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Dustin     | Denison   | dustin@appliedenergyinnovations.org | Applied Energy Innovations         | 4000 Minnehaha Ave S<br><br>Minneapolis,<br>MN<br>55406            | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
|            |           |                                     |                                    |  |                    |                   |   |

| First Name | Last Name | Email                            | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name                           |
|------------|-----------|----------------------------------|------------------------------------|---|--------------------|-------------------|---|
| James      | Denniston | james.r.denniston@xcelenergy.com | Xcel Energy Services, Inc.         | 414 Nicollet Mall, Fifth Floor<br><br>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<br>445 Minnesota Street, 1400<br>BRM Tower<br>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<br><br>Saint Paul, MN 55104   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Betsy      | Engelking | betsy@geronimoenergy.com         | Geronimo Energy                    | 7650 Edinborough Way Suite 725<br>Edina, MN 55435   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| John       | Farrell   | jfarrell@ilsr.org                | Institute for Local Self-Reliance  | 1313 5th St SE #303<br><br>Minneapolis, MN 55414  | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Sharon     | Ferguson  | sharon.ferguson@state.mn.us      | Department of Commerce             | 85 7th Place E Ste 500<br><br>Saint Paul, MN 551012198  | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Nathan     | Franzen   | nathan@geronimoenergy.com        | Geronimo Energy                    | 7650 Edinborough Way Suite 725<br>Edina, MN 55435   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Hal        | Galvin    | halgalvin@comcast.net            | Provectus Energy Development llc   | 1936 Kenwood Parkway<br><br>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<br><br>Winona, MN 55987   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |

| First Name | Last Name | Email                                | Company Name                                  | Address   | Delivery Method    | View Trade Secret | Service List Name                           |
|------------|-----------|--------------------------------------|---|---|--------------------|-------------------|---|
| Lynn       | Hinkle    | lhinkle@mnseia.org                   | Minnesota Solar Energy Industries Association | 2512 33rd Ave South #2<br><br>Minneapolis,<br>MN<br>55406                   | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Jan        | Hubbard   | jan.hubbard@comcast.net              |   | 7730 Mississippi Lane<br><br>Brooklyn Park,<br>MN<br>55444                  | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Tiffany    | Hughes    | Regulatory.Records@xcelenergy.com    | Xcel Energy                                   | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993               | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| John S.    | Jaffray   | jjaffray@jrpowers.com                | JJR Power                                     | 350 Highway 7 Suite 236<br><br>Excelsior,<br>MN<br>55331                    | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Eric       | Jensen    | ejensen@iwla.org                     | Izaak Walton League of America                | Suite 202<br>1619 Dayton Avenue<br>St. Paul,<br>MN<br>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<br><br>Sunfish Lake,<br>Minnesota<br>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<br><br>Suite 1600<br>Chicago,<br>IL<br>60601 | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| John       | Kluempke  | jwkluempke@winlectric.com            | Elk River Winlectric                          | 12777 Meadowvale Rd<br><br>Elk River,<br>MN<br>55330                        | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Jon        | Kramer    | jk2surf@aol.com                      | Sundial Solar                                 | 4708 york ave. S<br><br>Minneapolis,<br>MN<br>55410                         | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Rebecca    | Lundberg  | rebecca.lundberg@powerfullygreen.com | Powerfully Green                              | 11451 Oregon Ave N<br><br>Champlin,<br>MN<br>55316                          | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |

| First Name | Last Name | Email                              | Company Name                | Address  | Delivery Method    | View Trade Secret | Service List Name                           |
|------------|-----------|------------------------------------|-----------------------------|--|--------------------|-------------------|---|
| Casey      | MacCallum | casey@appliedenergyinnovations.org | Applied Energy Innovations  | 4000 Minnehaha Ave S<br><br>Minneapolis,<br>MN<br>55406                  | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Erica      | McConnell | emcconnell@kfwlaw.com              | Keyes, Fox & Wiedman LLP    | 436 14th Street, Suite 1305<br><br>Oakland,<br>California<br>94612       | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Thomas     | Melone    | Thomas.Melone@AllcoUS.com          | Minnesota Go Solar LLC      | 222 South 9th Street<br>Suite 1600<br>Minneapolis,<br>Minnesota<br>55120 | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Andrew     | Moratzka  | apmoratzka@stoel.com               | Stoel Rives LLP             | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402       | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Martin     | Morud     | mmorud@trunorthsolar.com           | Tru North Solar             | 5115 45th Ave S<br><br>Minneapolis,<br>MN<br>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<br><br>Minneapolis,<br>MN<br>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<br><br>Edina,<br>MN<br>55439                        | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Donna      | Pickard   | dpickard@aladdinsolar.com          | Aladdin Solar               | 1215 Lilac Lane<br><br>Excelsior,<br>MN<br>55331                         | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Gayle      | Prest     | gayle.prest@minneapolismn.gov      | City of Mpls Sustainability | 350 South 5th St, #315<br><br>Minneapolis,<br>MN<br>55415                | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Dan        | Rogers    | drogers@sunedison.com              | SunEdison                   | N/A  | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |

| First Name | Last Name      | Email                           | Company Name                            | Address   | Delivery Method    | View Trade Secret | Service List Name                           |
|------------|----------------|---------------------------------|---|---|--------------------|-------------------|---|
| Matthew J. | Schuerger P.E. | mjsreg@earthlink.net            | Energy Systems Consulting Services, LLC | PO Box 16129<br><br>St. Paul,<br>MN<br>55116                              | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Doug       | Shoemaker      | dougs@mnRenewables.org          | MRES                                    | 2928 5th Ave S<br><br>Minneapolis,<br>MN<br>55408                         | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Eric       | Swanson        | eswanson@winthrop.com           | Winthrop Weinstine                      | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Thomas P.  | Sweeney III    | tom.sweeney@easycleanenergy.com | Clean Energy Collective                 | P O Box 1828<br><br>Boulder,<br>CO<br>80306-1828                          | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Pat        | Treseler       | pat.jcplaw@comcast.net          | Paulson Law Office LTD                  | Suite 325<br>7301 Ohms Lane<br>Edina,<br>MN<br>55439                      | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |
| Daniel     | Williams       | DanWilliams.mg@gmail.com        | Powerfully Green                        | 11451 Oregon Avenue N<br><br>Champlin,<br>MN<br>55316                     | Electronic Service | No                | SPL_SL_13-867_Community Solar Garden - Xcel |