



Sundial Solar

A Brighter Idea

Burl W. Haar
Public Utilities Commission
PUC Docket Number: E-002/M-13-315

February 7, 2014

In the Matter of a Rate for Large Solar Photovoltaic Installations

Dear Dr. Haar-

We appreciate the ability to comment on this matter. Sundial Solar is more acutely tuned to this docket than any other company because it directly affects our business model. The vast majority of our clients are commercial and industrial businesses located in the Minnesota Xcel service territory. They are the very backbone of Minnesota's business community. These businesses want to install solar PV systems. All they ask is fair compensation in doing so.

Please consider these suggestions:

- 1) This docket should be kept separate from all others. Inasmuch as the Value of Solar Rate docket relies on voluntary adoption by the utility, it would be imprudent to comingle them.
- 2) We strongly urge the Commission to rule for a final Capacity Credit value that is higher than the Interim rate presently in force. Sundial believes \$8.35/kw/month is justifiable and reasonable.
- 3) The ruling in this matter should apply to all solar PV systems which are greater than 60kw.
- 4) In the event Xcel adopts a Value of Solar (VOS) rate which applies to systems up to 1MW, then those systems which qualify for Capacity Credit should be allowed the option of collecting the VOS or Capacity Credit, but not both.
- 5) The Capacity Credit rate should track proportionately with Xcel's Demand charges and increase periodically whenever Demand charges go up.
- 6) The SRECs in these systems should remain with the owner who may, at their option, sell them to Xcel or other entity.

With our business model and a strong Solar Capacity Credit, Sundial could install upwards of 20MW of solar PV each year. We are ready – all we need is this one tool.

Sincerely,

Jon Kramer, CEO