414 Nicollet Mall
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October 31, 2013

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF THE PETITION FOR APPROVAL OF TARIFF MODIFICATIONS IMPLEMENTING NET METERED FACILITY PROVISIONS, STANDBY SERVICE EXEMPTIONS, AND METER AGGREGATIONS PURSUANT TO THE 2013 OMNIBUS ENERGY BILL
DOCKET NO. E002/M-13-642

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the September 30, 2013 Comments of the Minnesota Department of Commerce, Wal-Mart and Distributed Renewables Advocates in the above noted docket.

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 amy.a.liberkowski@xcelenergy.com or (612) 330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY A LIBERKOWSKI
MANAGER, REGULATORY ANALYSIS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION FOR APPROVAL OF TARIFF MODIFICATIONS IMPLEMENTING NET METERED FACILITY PROVISIONS, STANDBY SERVICE EXEMPTIONS, AND METER AGGREGATION PURSUANT TO THE 2013 OMNIBUS ENERGY BILL	DOCKET NO. E002/M-13-642 **REPLY COMMENTS**

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, appreciates the opportunity to respond to the September 30, 2013 Comments of the Minnesota Department of Commerce, Wal-Mart and Distributed Renewables Advocates (DRA)[1] in the above-noted docket. Our Reply also suggests that the Commission could move certain matters from this docket to the Commission's net metering Rulemaking docket, Docket No. E999/R-13-729, which was opened on August 22, 2013.

REPLY

A. Background

Our initial Petition in this docket was submitted on July 31, 2013 to achieve basic compliance with certain portions of the 2013 Energy Legislation. Our intent was to propose implementation of non-contentious provisions on a provisional basis. The Petition incorporated the following key statutory requirements into our tariff:

- Expanded net metering and associated benefits and obligations to customers with qualifying distributed generation systems between 40 kW and less than 1000 kW capacity;

[1] DRA includes the Alliance for Solar Choice, Environmental Law & Policy Center, Fresh Energy, Institute for Local Self Reliance, Interstate Renewable Energy Council, Inc., and Vote Solar Initiative.

- Included standby service exemption language for systems less than 100 kW as required by the new statute; and
- Provided the ability to aggregate meters on contiguous property of a customer.

Most of the statutory compliance relates to the Distributed Generation tariff, Section 10 our Minnesota Electric Rate Book (Rate Book), which contains the operating and interconnection rules for larger distributed generation, and the Standby Service tariff. Section 10 was developed through a stakeholder process several years ago to drive consistent distributed generation operational rules throughout the state of Minnesota. To maintain the connection with the operational rules that are required for facilities of this size, the Company added the statutory right to net-meter for facilities between 40 kW and 1000 kW into this tariff.

Section 9 of the Company's Rate Book is largely applicable to small qualifying facilities under 40 kW and is essentially crafted from current Minnesota Rules 7835.3300, 7835.3400, 7835.3500, and 7835.9910. We made minor edits tothe tariff to comply with the new statutory language and mainly agree with additional modifications recommended by the Department, as discussed in more detail below.

As mentioned above, shortly after our initial Petition was filed in the present docket, the Commission opened a rulemaking docket, Docket No. E999/R-13-729 (Rulemaking), to consider rule amendments that cover these issues and other issues. The Department suggested that certain issues proposed in our Petition be addressed in said Rulemaking or in a generic proceeding. To the extent to which we have introduced contentious issues more worthy of being addressed in a rulemaking or generic proceeding, it might be appropriate to allow us to withdraw certain issues from the current docket to allow broader and more in-depth development of these issues on a statewide basis. To the extent parties have raised issues which could also be addressed in the Rulemaking, the comments of the parties could be moved into that docket. However, in the event that the Commission wants to consider some or all of the issues in the present docket, the Company responds in further detail below.

B. Reply Comments

In order to more concisely reply to parties' Comments, we have organized our Reply by issue since parties, in some cases, provided feedback on the same compliance item.

1. Standby Service Tariff

The Company is not opposed to the Department's recommended generic proceeding to evaluate the appropriateness of existing standby charges.[2] In fact, the standby

[2] Department Comments at page 2

issue is one of the issues the Commission mentioned for possible inclusion in Rulemaking.

However, we disagree with the Department's suggestion that the Company may not impose standby charges on facilities over 100 kW until a Commission order is issued in that generic proceeding. A position similar to the Department is taken by Wal-Mart at page 1, while the DRA at pages 9-10 wants the standby tariff clarified. We acknowledge the statutory definition of standby charge,[3] and we consider previous Commission orders approving our current standby charges to provide us the authorization we need for distributed generation facilities over 100 kW. In September 2004, the Commission examined the standby issue and issued an Order providing that a DG facility of 60 kW or less is exempted from paying any standby charges. As noted in the September 2004 Order, prior to this the Company's tariff had included a provision that exempted DG customers with capacity of 100 kW or less from paying such charges.[4] The September 2004 Order established the allowable costs to be recovered through standby charges and provided guidelines.[5] The Company has a Standby Service Rider in Sheet No. 5-101 of its Rate Book, and the rates for this service have been updated during our recent rate cases.

2. RECs

The Company included a provision for the transfer of RECs in the tariff contract as a means of helping to demonstrate compliance with the solar energy standard. The Department at page 5 of its oCmments suggests that this issue could be addressed in the pending Rulemaking, and the Company is agreeable with this. In addition, the Commission has established a separate docket, E999/CI-13-720, to deal with REC ownership issues.

The Department in addressing this issue also references a part of the Company's responses to Information Request No DOC-006 to support its reasoning opposing assigning the RECs to the Company for net metered facilities not receiving the Value of Solar credit. The DRA similarly opposed the assignment of RECs at pages 3-6 of its Comments. We include the Company's complete response to this Information Request as Attachment A, which explains our argument as to why the RECs should be assigned to the Company.

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[3] Minnesota Statutes Section 216B.164, Subd 2a Definitions (i) "Standby charge" means a charge imposed by an electric utility upon a distributed generation facility for the recovery of costs for the provision of standby services, as provided for in a utility's tariffs approved by the commission, necessary to make electricity service available to the distributed generation facility."

[4] *In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities under Minnesota Laws 2001, Chapter 212*, Docket No. E999/CI-01-1023, September 28, 2004 (September 2004 Order), at pages 17-18.

[5] September 2004 Order at page 13.

In addition to the arguments in Attachment A, we view prior Commission precedent as establishing that if the Company pays more than avoided cost for renewable energy that it should be entitled to the RECs associated with this energy. The Commission has treated ownership of RECs in contracts entered into pursuant to the renewable mandates differently than in contacts entered into pursuant to PURPA. This issue was addressed as part of Docket No. E002/M-08-440, also known as the Silent REC docket.[6] In that docket the Commission stated that Wind and Biomass Mandates should be treated differently than in contracts entered into pursuant to PURPA, such that Xcel owns the RECs for energy produced under the Wind and Renewable Mandate statutes unless a generator can demonstrate that the power purchase agreement at issue is not silent as to REC ownership and explicitly provides otherwise.[7] The Commission noted that energy purchased without these renewable attributes would not have satisfied the statutory renewable requirements, and the Commission would have been unlikely to approve a contract if it had not been understood that the rights to claim the generation as renewable did not belong to the purchasing utility and its ratepayers.[8] The Commission agreed with the position of the Department that if the Company paid more than avoided cost to purchase the power, it would appear that the Company purchased, and ratepayers paid for, more than energy.[9] Thus, in cases where the rate paid for energy exceeds avoided cost and the contract is silent on REC ownership, the Commission found that the Company has the right to the RECs.

Following the principles established in the Silent REC docket, a contract entered for purposes of complying with the Solar Energy Standard that has a contract price above the avoided cost rate should result in the Company receiving the RECs. This ensures that customers receive the full benefit of energy purchased to fulfill renewable energy requirements. Absent these RECs, the Company may need to procure additional renewable energy to satisfy its requirements, which would increase costs to customers.

The Company also does not agree with the Department's position that the assignment of RECs in a net metering situation should depend on net metering customers receiving the Value of Solar credit. The Value of Solar tariff would be a "buy-all/sell-all" tariff.[10] This is fundamentally different from net metering. Additionally, the Value of Solar tariff would "… apply to customers' interconnections occurring after …" the date the Value of Solar tariff is approved and would be "… in lieu of …" the

[6] *In the Matter of Xcel Energy's Petition for a Determination of Entitlement to Renewable Attributes of Energy Purchases Pursuant to Renewable Energy Requirements,* Docket No. E002/M-08-440, September 9, 2010 (September 2010 Order), at pages 9-10.
[7] September 2010 Order, at p. 7
[8] September 2010 Order, at p. 8
[9] September 2010 Order, at p. 10
[10] See Minn. Stat. § 216B.164, Subd. 10, pars. (c)(3) and (4)

rates available for net metered facilities.[11] Accordingly, under the Department's suggested approach the Company would never receive the RECs for interconnections occurring under the proposed net metered tariff because the Value of Solar rate would never apply to net metered facilities at issue in this proceeding.

3. Metering

The Company affirms the need for the production meter related to net metering facilities in response to the Department's position at page 5 of its Comments. Per Sheet No.10-149, 5.Aiv of our Rate Book, for generation systems that sell power and are greater than 40 kW in size, separate metering of the generation and of the load is required. A single meter recording the power flow at the Point of Common Coupling for both the generation and the load is not allowed by the rules under which the area transmission system is operated. Xcel Energy is required to report to the regional reliability council the total peak load requirements and is also required to own or have contracted for accredited generation capacity of 115 percent of the experienced peak load level for each month of the year. Failure to meet this requirement results in a large monetary penalty for Xcel Energy.

The production meter is used to measure the energy production from the distributed generating system, and we compile and summarize the production meter information in order to comply with reporting requirements. Metering issues, including the use of production meters, were discussed and addressed by the participating parties when the Commission established generic standards for utility tariffs for interconnection and operation of distributed generation facilities. The September 2004 Order established the uniform framework for use by Minnesota utilities in their DG tariffs today. The Company believes the current Generation Metering, Monitoring and Control on Sheet Nos. 10-147 – 10-149 of our Rate Book are in compliance with the Order and no further change on the production meter issue is necessary.

In response to the DRA position at pages 6-7 of its Comments, the specific proposed monthly metering charge is consistent with the A51 tariff on Sheet No. 9-3 of our Rate Book, and is therefore not a proposed increase in the rate. The Company agrees that future adjustments to the metering rate may be needed to account for the increased size of net metered facilities. The Company would employ the process outlined in Minnesota Rules to receive approval of any future change in the metering charge.

4. Aggregated Metering Provision

The Department at pages 2-4 of its Comments requests that the Company add aggregated metering provisions to its Net Energy Billing Service Tariff (which applies

[11] Minn. Stat. § 216B.164, Subd. 10, par. (b)

to facilities under 40 kW capacity) similar to what the Company has proposed for facilities between 40 kW and under 1,000 kW capacity. While we believe this change would be reasonable, a variance may be required to change the contract because any contract tariff changes to implement Minn. Statute § 216b.164 requirements applicable to distributed generation below 40 kW would need to be implemented through a generic proceeding and uniform statewide contract applicable to all utilities based on the language in Minn. Stat. § 216b.164, subd. 6. This is a topic better addressed in the contemplated Rulemaking proceeding.

5. Nameplate Capacity

The Department has requested at page 2 of its Comments that the Company modify its existing standby tariff to reflect that the standby tariff applies to facilities with over 100 kW alternating current (AC) capability as measured at the point of interconnection between a distributed generation facility and a utility's electric system. The Company agrees that "capacity" is defined per Minn. § Stat. 216B.164 subd 2a (c) as alternating current at the point of interconnection. However, the Company in this case is referring to "nameplate capacity" in its tariff where it uses the term "capacity" since solar distributed generation systems produce electricity in direct current (DC) the measure of their size can be most practically measured in terms of DC nameplate capacity. Therefore, the Company recommends replacing the term "capacity" with the term "nameplate capacity" in its Standby Service and Distributed Generation facilities tariffs in order to directly refer to the generating unit nameplate for purposes of determining eligibility for service under these tariffs.

The new energy law also used DC as the way to measure "nameplate capacity" with its creation of Minn. Stat. § 116C.7792,[12] and with its creation of Minn. Stat. § 216C.415.[13] Additionally, measuring DC capacity would maintain consistency with the current Solar*Rewards net metering program in our Rate Book.[14]

However, the new law is not consistent. For example, the new law applies size limits of 120 percent of production for the net metered facilities at issue based on alternating current.[15] (It is for this reason that the proposed tariff for net metered facilities was drafted using the AC methodology. To help create clarity, paragraph 11 of the proposed net metered facilities contract shows how the AC methodology is to be used when addressing the standby charges, and states as follows:

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[12] "The utility subject to section 116C.779 shall operate a program to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 20 kilowatts direct current."

[13] "Incentive payments may be made under this section only to an owner of grid-connected solar photovoltaic modules with a total nameplate capacity below 40 kilowatts direct current."

[14] Sheet Nos. 9-13 through 9-32 of our Rate Book

[15] See, Minn. Stat. § 216B.164, Subd. 4a, "… for solar photovoltaic and other distributed generation limiting the total generation system annual energy production kilowatt hours alternating current to 120 percent of the customer's on-site annual electric energy consumption."

> "Standby charge" means a charge imposed by an electric utility upon a distributed generation facility for the recovery of costs for the provision of standby services, as provided for in a utility's tariffs approved by the commission, necessary to make electricity service available to the distributed generation facility. Standby charges apply if the Net-Metered Facility System has an AC nameplate capacity of more than 100 kW. No standby charges apply if the Net-Metered Facility System has an AC nameplate capacity of 100 kW or less.

On a related note, the DRA, at pages 9-10 of its Comments, requests that the Company clarify what it meant by the phrase "AC nameplate capacity" in the above cited paragraph 11 of the contract since solar panel capacity is expressed in DC. The Company agrees that this wording can create confusion, and we suggest the proposed tariff provision be rephrased to state "AC capacity" in that paragraph.

6. Estimate of maximum demand and average annual consumption

The Company agrees with the Department's Comments at page 4 that the Rulemaking should address the process for estimating consumption data to determine compliance with the 120 percent size rule where existing information is not available.

Alternatively, the Company could include in its tariffs the process detailed in our response to Information Request No. DOC-005 which was attached to the Department's Comments.

7. Net Metering Billing Service – Net-Excess Energy Payment

DRA at page 6 of its Comments noted that it wanted additional information on how the compensation rate for net-generation in the proposed tariff was calculated. This rate is the average retail utility energy rate. This energy rate is included in the Net Metering Billing Tariff, A51 on Sheet No. 9-3 of our Rate Book, and is filed with the Commission annually and calculated per Minn. Rule 7835.0100, Subp. 2a: Average retail utility energy rate.

8. Third-Party Ownership

DRA at pages 7-9 of its Comments asserts that third parties, who are not customers, should be able to enter into the Net Metered Facilities Contract with the Company. As detailed in Minn. Stat. § 216B.164, Subd 3a, net metering compensates the customer for the customer's net input into the utility system in the form of a credit on the customer's energy bill. Therefore only customers can enter into this contract.

DRA also notes that third parties should be able to have an ownership interest in the net metered facilities. Our tariffs are designed for a customer having DG of 10 MW

or less of interconnected capacity on its site. The Commission in the past has indicated that the customer need not be the owner of these DG facilities.[16]

9. Additional Questions Regarding the Value of Solar

While the on-going Value of Solar process is not directly related to our petition, DRA raised two Value of Solar issues in its Comments. At page 6, it inquired about how the Value of Solar rate relates to any updates to the net metering rate. As explained above, the two are not related. The net metering rate will be updated annually while the tariff is in effect consistent with the updates to the applicable rate in the A51 tariff on Sheet No. 9-3 of our Rate Book.

The DRA at page 11 of its Comments argues that the Net Metered Facilities Tariff should still be available for new interconnections occurring after the Commission approves a Company-proposed Value of Solar tariff. The DRA does not cite any statute to support its position. The pertinent state statute provides otherwise, and states that the Value of Solar tariff would "… apply to customers' interconnections occurring after …" the date the Value of Solar tariff is approved and would be "… in lieu of …" the rates available for net metered facilities.[17] The DRA further argues, without any support, that any existing net metered customers at the time the Value of Solar tariff is adopted would not be bound by the net metered contract but should be allowed to exit the contract. Customers should be bound to the contract they have signed and should not be allowed to unilaterally "exit" the net metered contract before the end of the 20 year term of that contract.

CONCLUSION

We appreciate the opportunity to respond to the Department's and other parties' Comments. We recommend that that the Commission adopt the Company's original proposal as modified in this Reply. We recommend that certain identified issues be moved to the Rulemaking or other generic dockets. If, however, the Commission determines that it is best to move all items from this docket to the Rulemaking proceeding, then the Commission should grant the Company permission to withdraw its current Petition.

Dated: October 31, 2013

Northern States Power Company

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[16] September 2004 Order, at page 7.

[17] Minn. Stat. § 216B.164, Subd. 10, par. (b)

Respectfully submitted by:

/s/

AMY A. LIBERKOWSKI
MANAGER
REGULATORY ANALYSIS

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☐ **Public Document – Trade Secret Data Excised**
☒ **Public Document**

Xcel Energy
Docket No.: E002/M-13-642
Response To: Department of Commerce Information Request No. 006
Requestor: Susan L. Peirce
Date Received: August 9, 2013

Question:

Please provide the basis for requiring that all REC's produced by net-metered facilities not subject to the Value of Solar tariff be assigned to the Company.

Response:

A primary purpose of the 2013 Omnibus Energy Bill is to encourage the production of solar energy and other renewable distributed generation resources and includes a requirement that each public utility shall generate or procure sufficient electricity generated by solar energy so that by the end of 2020 at least 1.5 percent of the utility's total retail sales to retail customers in Minnesota is generated by solar energy (Minn. Stat. § 216B.1691, Subd. 2f(a)).

Part of this new legislation includes providing services for net metered facilities pursuant to Minn. Stat. § 216B.164, Subd. 3a (the Net Metered Facility statute). The Net Metered Facility statute does not directly address who should get the RECs produced by net-metered facilities.

However, certain relevant guidance is provided as part of this the new law to be codified in Minn. Stat. § 216B.1691, Subd. 2f(f), which specifies how RECs for solar PV systems should be handled:

> (f) Notwithstanding any law to the contrary, a solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after the effective date of this act but before 2020 may be used to meet the solar energy standard established under this subdivision.

Allowing the Company to receive the RECs for solar distributed generation is also consistent with current practice. The Company receives the solar RECs under existing solar distributed generation programs, such as Solar*Rewards (tariff Section 9, Sheet 15) and Minnesota Bonus Rebate which is an addendum to the Solar*Rewards contract and found in the Company tariff Section 9, Sheets 29-32.

Further, allowing the Company to receive the solar RECs for the net metered facilities at issue in this proceeding would also be good public policy. It would allow the Company to use the existing process in Minnesota for tracking RECs through the M-RETS process as established by the Minnesota Public Utilities Commission on October 9, 2007 in Docket No. E-999/CI-04-1616. While other methods could be used to track the compliance with the solar energy standard or other renewable mandates, using the M-RETS method would allow for implementation of documenting compliance with the solar energy standard while at the same time avoiding the need to establish a brand new Minnesota process. Also, allowing the Company to obtain the RECs as detailed in its proposed tariff would avoid imposing additional costs on the ratepayers who might otherwise need to pay additional amounts for the Company to obtain these RECS.

Preparer: James R. Denniston
Title: Assistant General Counsel
Department: Deputy General Counsel
Telephone: 612-215-4656
Date: August 21, 2013

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

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

xx via electronic filing

MPUC DOCKET NO. E002/M-13-642

Dated this 31st day of October 2013

/s/

SaGonna Thompson

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