



**ENVIRONMENTAL LAW & POLICY CENTER**  
Protecting the Midwest's Environment and Natural Heritage

September 15, 2017

Daniel P. Wolf  
Executive Secretary  
Minnesota Office of Administrative Hearings  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**RE: In the Matter of the Petition of Northern States Power Company, dba Xcel Energy,  
for Approval of Customer Access Joint Pilot Program**

**Docket No. E-002/M-17-527**

Dear Mr. Wolf,

On behalf of Environmental Law & Policy Center, enclosed please find the *Comments of the Environmental Law & Policy Center*. These documents have been electronically filed and served through the eFiling system.

Please feel free to contact with any questions you may have regarding this filing.

Respectfully submitted,

/s/ MeLena Hessel

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In the Matter of the Petition of Northern States  
Power Company, dba Xcel Energy, for  
Approval of a Customer Access Joint Pilot  
Program

DOCKET NO. E-002/m-17-527

**COMMENTS OF THE ENVIRONMENTAL LAW & POLICY CENTER**

The Environmental Law and Policy Center (“ELPC”) appreciates the opportunity to comment on Xcel Energy’s (“Xcel”) pilot proposal for its Customer Access Joint Pilot Program, also known as Rehabilitation and Efficiency: Neighborhood Energy Works or RENEW, which Xcel filed with the Public Utilities Commission on June 30, 2017. ELPC applauds the Public Utilities Commission (“Commission”) and Xcel for working proactively to address barriers to community solar garden (“CSG”) access for low-income customers. ELPC has been active in the Commission’s proceedings to develop the CSG program in Minnesota and has experience working on community solar and low-income solar programs in Illinois and other Midwest states.

ELPC’s comments pertain to the community solar portion of the RENEW program, and are guided by the goal of building a lasting, equitable community solar market in Minnesota that serves the needs of all customers, including low-income ones, promotes robust participation from the competitive market, and is in the best interest of rate-payers. ELPC has coordinated with Fresh Energy and the Institute for Local Self Reliance (ILSR) in our review of the Xcel proposal and generally supports the comments and recommendations both parties have made.

Broadly speaking, ELPC believes the Xcel proposal represents a thoughtful approach to a low-income community solar garden with strong community partners, that addresses some of the major barriers to low-income access while taking relevant steps to ensure non-discriminatory treatment of competitive market participants. In short, the proposal is generally well-designed.

**However, ELPC urges the Commission to require Xcel to more clearly address two important issues – transparency and scalability – as well as to enable third party use of the unique bill payment approach proposed, before approving the proposal.**

### **Transparency**

Transparency is an important piece of the regulatory compact between public utility and regulator. In this instance, transparency – both into project finances as well as general program operations and partner responsibilities – is critical, not only to ensure that actions taken are serving the public interest, but also to ensure replicability given that RENEW is a pilot project attempting to break new ground by furthering community solar garden access for low income customers. The current proposal provides no detail on Xcel’s anticipated solar development and program costs, making it impossible to evaluate Xcel’s costs against the market, or contextualize the value program subscribers receive. Likewise, there is inadequate discussion of how Xcel will share the program design details (operations, partner responsibilities, etc.) needed to enable replication or generate lessons learned. ELPC respectfully suggests that the Commission require more detailed cost disclosures and reporting on program design/operations, as well as more frequent program reporting, before approving the petition (as discussed further below). ELPC suggests that quarterly reports, rather than annual reports, would be appropriate for this type of important pilot program.

## **Scalability**

The ability to scale the RENEW program from a single pilot to a market-wide effort is key in addressing the systemic barriers that plague low-income community solar garden access. The current Xcel proposal describes a one-time, one-neighborhood project that will utilize a unique set of community partners to address these barriers to low-income participation. ELPC does not doubt that this model is scalable; however, Xcel does not discuss any plans to replicate the project in other communities throughout its territory. Therefore, if this proposal is approved, ELPC urges the Commission to require Xcel to address and periodically report on the Company's plans to evaluate, modify, and scale this program or similar low-income programs beyond the Railroad Island neighborhood.

## **Bill Payment**

The Xcel proposal involves a novel approach to how the CSG is to pay for the costs it incurs. Unlike a normal CSG where a customer must pay the CSG provider directly for their subscription and then receives a credit using the Value of Solar ("VOS") rate for their subscription on their utility bill, Xcel proposes that the CSG customer pay nothing for their subscription, instead allowing the CSG provider (in this case Xcel) to recover the cost of the resource and the program administration directly from the VOS rate (Xcel filing at 10) – essentially enabling on-bill payment. While ELPC believes that Xcel should separately break out subscription costs and bill credits on the bill (rather than a single blended credit), the overall mechanism of allowing on-bill payment is an important innovation. It effectively addresses two key barriers to low-income solar access: low/no credit scores and requirements for any sort of payment from cash-strapped participants. It also simplifies the process of participating in community solar, overcoming barriers related to program complexity that limit not only low-

income participation but all small customer participation in community solar. In order to expand low-income solar access, and to avoid unfair competitive advantages, the Commission should require Xcel to enable this on-bill payment mechanism for all third party providers. Limiting the use of this mechanism to the utility alone would provide an unfair competitive advantage to utility-sponsored CSG programs and could limit access to community solar for low-income subscribers generally.

Below are ELPC's responses to the Commission's questions, including more specific comments and recommendations.

**1. Is Xcel's proposal for a low-income pilot in the public interest?**

Generally speaking, ELPC believes Xcel's proposal for a low-income pilot is appropriate and in the public interest, although there are a few key areas where improvements would better align the proposal with the public interest. There is much to praise in the proposal. Xcel, in partnership with Energy CENTS Coalition, Dayton's Bluff Neighborhood Housing Association and the Center for Energy and the Environment, aims to do more than pay lip service to solar access with its low-income community solar garden. The proposal takes a truly neighborhood-oriented approach by partnering with community organizations and addresses a number of clearly-enumerated barriers to low-income participation. The CSG would be located on a brownfield, and the identified solar developer is minority-owned. Furthermore the proposal includes principles that Xcel will follow to try to ensure non-discriminatory treatment and fair competition.

Critically, the combined energy efficiency and CSG proposal makes an effort to ensure economic value to low-income participants through the energy efficiency component of the program. Maximizing economic value to low-income participants in energy programs is an

important element of effective program design and should be prioritized across all elements of the program, not just energy efficiency. Xcel proposes a \$0.005 per kWh starting net credit for CSG participants (Xcel filing at 11), but fails to provide detail around the costs of the program and the formula for calculating the bill credit that result in this credit level. This is of particular interest because, as ILSR points out in its comments, the Xcel net credit seems to offer a lower value proposition to subscribers than other Minnesota community solar gardens (ILSR comments at 3).

The lack of detail around anticipated costs and the calculation of the bill credit for the community solar garden make it difficult to fully evaluate the value proposition of the community solar element of the proposal. The Commission should correct this before approving the program. ELPC recognizes that project costs are not yet set, but some range of estimates must be available to project any bill credit. In order to enable a full evaluation of the proposal, ELPC recommends that the Commission require Xcel to provide greater detail on anticipated costs and the bill credit calculation. Transparency around costs and benefits is important to maximizing value to low-income participants.

Additionally, as ELPC has already discussed above, scaling programs to serve low-income customers beyond a single neighborhood is important. To address this issue, ELPC recommends the Commission consider Fresh Energy's recommendations regarding expanding the program to other neighborhoods and areas within Xcel's service territory, as well as requiring Xcel to submit a scaling plan within 6 months of pilot project approval. In particular, ELPC urges the Commission to require that scaling plan to address what steps Xcel will take to lower program costs to increase the value proposition offered to participants from the \$0.005 kWh starting net credit in this initial pilot.

Finally, one approach to getting low-income community solar garden access to scale is to encourage other CSG providers to serve this market segment. One easy way to enable more third-party CSG providers to serve the low-income market segment is to enable on-bill payment using the VOS rate in the same way Xcel proposes to recover its own costs for program delivery, as discussed above (Xcel filing at 10).

**2. Is the proposal consistent with Minn. Stat. § 216B.1641, the Commission’s September 6, 2016 Order (in Docket No. E-002/M-13-867), and other relevant law?**

In its comments, Fresh Energy identifies a few important inconsistencies between the Xcel proposal and Minn. Stat. § 216B.1641. These include the intention to provide a single line item on the customer’s bill reflecting a net credit, as well as the ability of the net credit to be adjusted at any time. ELPC notes that in addition to misalignment with statute, these practices would undermine program transparency and the ability of low-income subscribers to compare value received to other CSG projects. Fresh Energy also raises concerns over the 5-year maximum subscription term. ELPC echoes these concerns and suggests that the Commission require Xcel to correct these inconsistencies.

**3. Does Xcel’s proposal to work with non-Xcel project partners (Energy CENTS Coalition, Dayton’s Bluff Neighborhood Housing Association, Center for Energy and Environment and THOR Construction) raise any issues for Commission consideration?**

ELPC generally supports the use of partnerships with community organizations as a relevant mechanism for enabling program design that is responsive to community interests and needs. In this proposal, community partnerships are key to overcoming important barriers to community solar garden access, including establishing trusted messengers and understandable messages. Due to the efficiencies created through effective messengers as well as the coordination with energy efficiency programs, these partnerships should serve to substantially

reduce both friction and cost associated with low-income customer acquisition. This is an important benefit, and the Commission should encourage Xcel to report on partner roles, lessons learned, and the potential for replication as part of its periodic reporting.

Furthermore, ELPC notes that non-discrimination will be an important issue to attend to as Xcel scales its pilot program and that additional principles/review may be necessary to ensure non-discrimination in the future.

- 4. Minn. Stat. § 216B.1641, (e)(3) requires that any CSG plan approved by the Commission “not apply different requirements to utility and nonutility community solar garden facilities.” In addressing this statutory provision, Xcel was guided by three key principles of non-discrimination (described on pages 17-18 in the Petition). However, are there other issues of discrimination concerning non-utility developers/operators that the Commission should consider?**

Ensuring non-discrimination between utility and non-utility CSG developers/owners is critical, and ELPC commends Xcel for clearly identifying principles of non-discrimination up-front, against which anyone can evaluate its proposal. Enabling fair and equal access to the market is necessary to maximize the ability of multiple parties to innovate better solutions for low-income customers, ultimately furthering community solar garden access.

As already discussed, ELPC believes there is at least one discriminatory outcome not addressed by Xcel’s principles: the ability of Xcel and Xcel only, at present, to offer no-cost subscriptions to low-income subscribers by using the VOS rate to pay for the costs of the resource and program administration (Xcel at 10). This should be addressed by allowing on-bill payment of third party CSG subscribers using the VOS rate.

- 5. To implement the pilot program, Xcel is seeking approval of new tariff sheets (included as Attachment C to the Petition). Please comment on the proposed tariff sheets.**

ELPC supports Fresh Energy’s recommendation that the Commission require Xcel to separate the different components of the Net Bill Credit on customers’ bills. In addition to



ensuring compliance with Minn. Stat. § 216B.1641, (e)(3), this will ensure transparency around the costs and benefits of the program.

**6. Please comment on the guiding principles, best practices and recommendations for low-income program design filed by ILSR on March 1, 2017. How do they relate to Xcel's low-income pilot proposal?**

ILSR's principles, best practices, and recommendations for low-income program design are intended for an entire community solar program, not a single community solar garden.

Xcel's low-income pilot proposal aligns with many of ILSR's principles and recommendations, but it cannot encompass them all. In particular, Xcel's proposal cannot serve customers through the entirety of its utility service territory and does not include options for subscriber-ownership. This underscores the importance of ensuring that, 1) if approved, a plan is in place to scale the Xcel program beyond the Railroad Island neighborhood and 2) the development of a utility-supported model does not preclude other models of low-income community solar garden access.

Perhaps most importantly, the Xcel proposal, in its own words offers only "modest" bill savings to participants (Xcel filing at 11). This raises an important policy question of whether the CSG side of the proposal aligns with the principle of Financial Value for low-income participants. Furthermore, this question is difficult to begin to answer without more information on anticipated program costs. ELPC urges the Commission to require Xcel to make this information available. ELPC also agrees with ILSR's comments regarding not artificially limiting subscription sizes in order to maximize participation at the expense of individual savings (ILSR at 2). Maximizing individual savings is an important aspect of providing financial value to low-income participants.

Finally, ELPC supports a number of ILSR's recommendations that were encompassed within the Xcel proposal, particularly around mechanisms that overcome barriers related to credit

risk for low-income solar providers (e.g. backup subscribers). Further work to implement these recommendations and best practices would be to the benefit of low-income CSG access.

**7. Xcel proposed annual reporting for the pilot. Should any other information, in addition to that proposed, be included in the Company's annual report to the Commission?**

As discussed above, ELPC suggests that the Commission consider requiring quarterly rather than annual reporting for this important program. In addition to the periodic reporting proposed, ELPC recommends that the Commission require Xcel to report on the following items:

- Broken out, comprehensive costs for the CSG element of the broader RENEW program. If these costs go beyond administration, outreach, equipment, and delivery labor to categories such as capital expenditures, ongoing operational, or other costs, these costs should also be reported.
- CSG customer turnover rates.

ELPC also supports Fresh Energy's recommended additions to periodic reports, including around participation, customer interest/disinterest, and customers served.

Once a year, Xcel should conduct interviews with program participants and stakeholders to gather qualitative feedback on program operations, successes and challenges. This information should be shared once a year, through the periodic reports.

Finally, in addition to periodic reporting, the Commission should require Xcel to provide additional information and case studies detailing program operations as well as partner contributions and responsibilities with regard to project delivery. Transparent reporting of these details is important to enabling replication of successes achieved and, in the event of challenges, understanding lessons learned.

**8. Should the Commission take up the issue of cost recovery separately at a later time?**

ELPC has no specific position regarding cost recovery at this time, other than to reiterate the need for additional details on program costs and benefits as described above.

**9. What other parts of Xcel’s proposal require additional clarification?**

Throughout Xcel’s proposal there is a repeated, underlying theme that community solar gardens are not about saving money. ELPC believes that this discussion, aside from often being of little direct relevance to the actual proposal, is untrue. While not every community solar subscriber or part-owner saves money from their community solar participation, there are many examples of those who do, including right here in Minnesota. Furthermore just because the model proposed by Xcel offers only “modest” bill savings to low-income subscribers (Xcel filing at 11), does not mean that future CSG projects targeting low-income populations could not offer more substantial bill savings. Xcel is breaking new ground with this proposal and there will undoubtedly be lessons to learn and efficiencies that can be achieved. To that end, ELPC reemphasizes its recommendation that, if this proposal is approved, the Commission require Xcel to submit a plan for scaling the pilot into a program that includes opportunities to cut costs and offer greater bill savings, including through the use of competitive processes and RFPs, which do not seem to have been used for this proposal.

**Conclusion**

For the reasons discussed above, prior to approval, ELPC recommends that the Commission require Xcel to:

- Refile their proposal with detailed information on the anticipated costs of the community solar garden development and operation and how those costs and any other inputs factor into the calculation of the bill credit.

- Modify the proposed tariff (sheet 100, terms and conditions 3) to provide both the full subscription cost of CSG program delivery as well as the full VOS bill credit, in addition to the net credit.
- Change the proposed reporting period from annual to quarterly and include the additional metrics/items detailed above and commit to additional reporting via case studies on program details and partner responsibilities.
- File a scaling plan within 6 months of Commission approval of the proposal detailing:
  - How Xcel will expand its CSG low-income customer access program beyond a single project in a single neighborhood, including through the use of competitive bidding, and
  - What steps Xcel will take to try and increase the economic value of the CSG to low-income participants.
- Either as a part of the scaling plan or in a separate submittal within 6 months of Commission approval, file a proposal to enable on-bill payment for all third-party community solar garden providers.

Respectfully Submitted,

DATED: September 15, 2017

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**CERTIFICATE OF SERVICE**

**Docket No. E-002/M-17-527**

I, John Agada, hereby certify that I have this day, served a true and correct copy of *Comments of the Environmental Law & Policy Center* to all persons at the addresses indicated on the attached service list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Chicago, Illinois.

September 15, 2017

/s/ John Agada

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