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January 22, 2024

VIA eDOCKETS

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

Re: *In the Matter of Petition for Approval of Northern States Power Company dba Xcel Energy, for Approval of its Community Solar Garden Program*
MPUC Docket No. E002/M-13-867
XCEL PROPOSAL TO MOVE ARR-ERA CSG TO VALUE OF SOLAR RATES

Dear Mr. Seuffert:

Thank you for the opportunity to comment on Xcel Energy's proposal to move Applicable Retail Rate (ARR)-era Community Solar Garden (CSG) subscriptions to Value of Solar (VOS) rates. This letter represents the views of the Suburban Rate Authority (SRA), a 30-member city joint powers association. The SRA was formed to intervene in and otherwise pursue matters affecting gas, electric, and telephone services and rates charged to municipalities and their residents and businesses. The SRA does not have formal intervenor status in this matter and is instead submitting this letter as public comments. Collectively though, the SRA represents a substantial portion of Xcel Energy's customer base, totaling over one million people, and the many residents and businesses that comprise our communities.

The SRA would like to submit these comments in strong opposition to Xcel Energy's proposal to change from ARR-era CSG rates to VOS rates. This change would have a large negative impact on the CSG program and its subscribers. In particular, a number of our member cities signed subscription contracts with third party operators. Some of these cities have submitted separate public comments. They, like all municipal subscribers to ARR-era CSG rates, would be significantly impacted by this change by Xcel Energy.

These municipal subscribers projected significant energy savings over the term of their contracts. They subsequently relied on savings from ARR-era CSG rates in budgeting and planning. Those savings were invested in our communities. They assisted with maintaining lower property taxes. Municipal subscribers often chose CSG subscription over other renewable options, such as a rooftop solar installation, due to these projected savings and lack of up-front cost. They often forewent or

are now ineligible for other clean energy programs and financial incentives, including under the Inflation Reduction Act.

If the Commission approves this change, some of our member cities would lose millions of dollars in projected savings under ARR-era CSG rates. In some cases, municipal subscribers have determined that their projected remaining savings would decrease by over 90 percent. These cities would be required to significantly re-evaluate their long-term financial decisions. They would not have entered into these contracts had they known their financial credits would be modified so drastically. To add to the frustration, there was no adequate advanced notice from Xcel Energy regarding this proposal to municipal subscribers.

The cities that were early adopters of CSG subscriptions played a critical role in the nation's largest community solar garden program. Municipalities have often cited their subscriptions to residents as a demonstration that they used energy from clean, renewable, and cost-effective sources. They directly assisted with keeping utility fees and rates low across Xcel Energy's entire service area.

Finally, this change undermines the willingness of municipalities to invest and partner with Xcel and other utility operators in local renewable energy development. As other commenters have detailed, this change would cause direct harm to Minnesota's ability to develop solar energy across the state and undermine the environmental benefit of that development. It would undermine our shared goal to provide affordable, clean energy to all of our residents.

The SRA strongly urges the Commission to reject the proposal from Xcel. At a minimum, the SRA requests that the Commission thoroughly investigate and make findings on the financial impact and other effects on ARR-era municipal subscribers. On behalf of the SRA and its member cities, I appreciate your consideration of these comments.

Sincerely,

/s/ Robert J.V. Vose

Robert J.V. Vose
General Counsel
Suburban Rate Authority

SUBURBAN RATE AUTHORITY MEMBER CITIES

Bloomington

Minnetonka

Brooklyn Park

Mound

Burnsville

Orono

Carver

Plymouth

Chanhassen

Robbinsdale

Circle Pines

Rogers

Deephaven

Roseville

Eden Prairie

St. Anthony Village

Edina

St. Louis Park

Fridley

Shoreview

Golden Valley

Spring Lake Park

Hopkins

Spring Park

Lauderdale

Victoria

Maple Grove

Wayzata

Maplewood

Woodbury

Re: *In the Matter of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Garden Program – Proposal for Switching ARR-Era Community Solar Gardens to an Appropriate VOS Rate*
MPUC DOCKET NO. E002/M-13-867

CERTIFICATE OF SERVICE

I, Lisa Larson, hereby certify that I have this day served copies of the following document:

Comments of the Suburban Rate Authority

on:

the list of persons on the attached Service List

by electronic filing and serving in the eDockets system, and/or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

Dated this 22nd day of January, 2024.

/s/ Lisa Larson

Lisa Larson

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