July 20, 2022

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

Re: In the Matter of Northern State Power d/b/a Xcel Energy's Cost Sharing Implementation
        Plan and Tariff on Interconnection Standards for Distributed Generation
        PUC Docket Number(s): E002/M-18-714

        Docket Nos. E002/M-18-714

Dear Mr. Seuffert:

All Energy Solar respectfully submits these initial comments in response to the June 3, 2022
Notice of Comment Period relating to the Cost Sharing Implementation Plan as proposed by
Xcel Energy.

All Energy Solar believes that the following changes or clarifications should be made to the Cost
Share Proposal as presented by Xcel:

- Consistent with Xcel's refund policy on interconnection application fees; the cost share
  fee should be refundable up until the point the application has been Deemed Complete.[1]
- Any tree trimming, traffic control, restoration, winter construction, etc. that may be
  necessary as part of the upgrades should be presented in an itemized breakdown of the
  facility upgrade costs.
- Within reason, the interconnecting customer or applicant agent has the right to request
  when the construction of facilities take place. For example; if the facilities study was
  completed in the winter, the customer could request non-winter construction to avoid the
  additional costs.
- Order Point No. 12 of the March 31, 2022 Order should be included, where Xcel is
  required to "provide a detailed report of the costs incurred and technical rationale for
  each upgrade". We believe that the Commission chose to include Order Point No. 12 in

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[1] Redline Tariff section 6.2 *Fee applicable to applications*

their Order for any proposal selected. It is especially important in the Cost Share proposal as it will allow the interconnection customers and stakeholders to be able to review the reports to ensure their money is being allocated properly.

- The supplemental review fee is included in the cost-share fee and cannot be charged to the customer during the interconnection process should the cost-share account balance not have sufficient funding.[2]
- As presented in the Cost-Share proposal, the accounting for the pool of funds will allow any insufficient funds for upgrades in Year 1 to be recovered by an increase in the cost-share fee in Year 2 and so forth. Xcel should temporarily cover the costs similar to their proposal in Docket 22-170.[3] An alternative option would be for a waitlist where applications are placed on hold until there is adequate funding for their upgrades.
- In addition to the items Xcel listed they will report on, the following should also be included:
  - Type of upgrade(s) required
  - Proposed fee change and why, including accounting
  - Program performance
  - Impact of the cost-share program on timely completion of process steps
- The redline tariff should not include the cost share dollar amount as it is likely to change annually and until approved could cause interconnection queue delays. Instead, during annual reporting, Xcel's proposed change to the fee will be included and have a 30 day negative check-off period.
- Xcel states that the Facilities Study costs are not included in the cost-share fee and we understand that is because Xcel does not charge behind-the-meter interconnection customers any fee to complete the Facilities Study. We would like to request Xcel to provide details on scenarios in which they would charge a fee to complete the Facilities Study. We would also like to see that they provide notification to the Commission in this docket prior to implementation of this fee in any scenario and give reasoning as to why.

We thank the Commission for opening a public comment period and look forward to the implementation of the Cost Share program.

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Michael Allen
CEO
All Energy Solar

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[2] Redline Tariff section 6.5 *Authorization to Proceed with Supplemental Review*
[3] Redline Tariff section 6.4 *First Come, First Served*