

July 21, 2022

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-18-714

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of Xcel Energy's Compliance Filing Regarding a Cost Sharing Implementation Plan and Tariff Interconnection Standards for Distributed Generation

The Cost-Sharing Proposal was filed on May 27, 2022, by:

Jessica Peterson
Manager, Program and Strategy
Xcel Energy

The Department recommends approval of Xcel Energy's Cost-Sharing Proposal with additional reporting requirements and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ WILL NISSEN
Public Utilities Rates Analyst

WN/ja



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-18-714

I. INTRODUCTION

On March 31, 2022, the Minnesota Public Utilities Commission (Commission) issued its ORDER MODIFYING PRACTICES AND SETTING REPORTING REQUIREMENTS.¹ Order Point 10 required Xcel Energy (Xcel or the Company) to file an interconnection cost-sharing proposal for Xcel customers with less than 40 kW distributed generation projects within 60 days of the Order, for implementation by August 31, 2022. The Commission capped the level of individual upgrade costs at \$15,000.

On May 27, 2022, Xcel filed its cost-sharing proposal (Filing).

On June 3, 2022, the Commission issued a notice of comment period.

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides the following analysis and recommendations.

II. SUMMARY OF THE COST SHARING PROPOSAL

Xcel proposed a cost sharing fee of \$200 per interconnection application on solar projects with less than 40 kW capacity. The funds generated by the cost sharing fee would be used by other customers with projects less than 40 kW to pay for project interconnection costs up to a total \$15,000 for an individual upgrade. In its filing, the Company provided a summary of the number of projects less than 40 kW that were interconnected in 2021, as shown in Table 1 below.

Table 1. Xcel 2021 Projects <40kW and Associated Fees

	# of Applications	Upgrade Costs Assessed	Avg. Project Cost
Total Deemed Complete	1,960	N/A	N/A
Supplemental Review	272	\$54,400	\$200
Distribution Upgrades	63	\$249,543	\$3,960

¹ *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established under Minn. Stat. §216B.1611*, ORDER MODIFYING PRACTICES AND SETTING REPORTING REQUIREMENTS, March 31, 2022, Docket E999/CI-16-521.

For 2021, Xcel had 1,960 interconnection applications for projects less than 40 kW that were deemed complete, of which 335 projects had a combined total of \$303,943 (\$54,400 + \$249,543) in upgrade costs. Spreading the upgrade costs across all projects less than 40 kW results in an application fee of \$155. Xcel stated it rounded the fee up to \$200 per application to help provide initial funding, account for inflationary costs and supply chain price fluctuation, and potential withdrawal and reapplication of projects with high interconnection costs.

Xcel stated the funds would be available on a first-come, first-served basis. In the event insufficient funds were available to pay for a customer's interconnection costs, the customer would be responsible for paying those costs. The Company proposed that the cost-sharing fee could be modified with a 30-day negative check-off process, should the need arise.

III. DEPARTMENT ANALYSIS

The Department is generally supportive of Xcel's proposed cost-sharing plan to spread the cost of interconnecting small DG projects to its grid through a cost-sharing fee assessed on those smaller projects. The impetus for the cost-sharing arrangement was the result of a subset of smaller projects requiring costly distribution system upgrades to interconnect. By spreading the cost across all projects less than 40 kW, the costs are assigned to the subset of cost causers without unduly burdening any one interconnection customer.

The Department has some concerns with the Company's proposal to make funds available on a first-come, first-served basis until depleted, after which an interconnection customer would be responsible for their own interconnection costs. However, the Commission's Order did not contemplate start-up funds, and the Department is reluctant to require such funding from Xcel as it will increase the likelihood of spreading cost recovery to all Xcel ratepayers, instead of the subset of cost causers with projects less than 40 kW. The Department notes that in 2021, the assessment of a \$200 interconnection fee on all projects less than 40 kW would have resulted in a fund of \$392,200 (1,961 x \$200) and a net balance at year-end of \$88,259, thus reasonably covering the costs of all applicants and ensuring coverage of costs up to the \$15,000 cap for any one project. In addition, the Department notes that the cost-sharing fund is entirely funded by cost-causing projects less than 40 kW, the balance of the cost-sharing fund cannot go negative, and if the fund is empty any remaining costs are borne by the projects seeking interconnection.² The Department determines that non-participating ratepayers are adequately protected from bearing any costs associated with the proposal.

² Filing. Page 9.

The Department recommends that the Commission approve Xcel's cost sharing proposal, including the 30-day negative check-off process for tariff modifications, and require that Xcel report on the status of the fund after its first year of operation. The report should include a summary of the number of applications, the amount of total fees received, the number of projects with interconnection costs and the costs of those projects, the number of projects for which funds were not available, the amount of the fund shortfall and whether a customer chose to withdraw the project or pay the remaining interconnection costs, and the number of projects reaching the cost cap of \$15,000. The Department further recommends that Xcel provide an assessment of whether an adjustment to the \$200 interconnection fee is warranted in the status report.

IV. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission approve Xcel's interconnection cost sharing proposal for projects less than 40 kW, including the 30-day negative checkoff process for tariff modifications. The Department also recommends that Xcel provide the following information for the first year of operation of the cost sharing fund:

1. The number of interconnection applications less than 40 kW deemed complete;
2. the total amount of fees received;
3. the number of projects with interconnection costs paid by the fund, and the interconnection costs from those projects;
4. the number of projects for which funds were not available, either in whole or in part, the amount of the fund shortfall, and whether the customer chose to withdraw the project or pay the shortfall amount;
5. the number of projects reaching the cost cap of \$15,000; and,
6. an evaluation of whether an adjustment to the \$200 interconnection fee is warranted.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-18-714

Dated this **21st** day of **July 2022**

/s/Sharon Ferguson

[illegible]

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-714_M-18-714
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_18-714_M-18-714
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-714_M-18-714
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-714_M-18-714
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-714_M-18-714
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-714_M-18-714
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_18-714_M-18-714
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714

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Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_18-714_M-18-714
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-714_M-18-714
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-714_M-18-714
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-714_M-18-714
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_18-714_M-18-714
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-714_M-18-714
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-714_M-18-714
Heidi	Ries	hries@umn.edu	University of Minnesota	Institute on the Environment ,	Electronic Service	No	OFF_SL_18-714_M-18-714
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_18-714_M-18-714

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_18-714_M-18-714
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Kenric	Scheevel	Kenric.scheevel@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_18-714_M-18-714
Jacob J.	Schlesinger	jschlesinger@keyesfox.com	Keyes & Fox LLP	1580 Lincoln St Ste 880 Denver, CO 80203	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	Schoenecker	jschoenecker@dakotaelectric.com	Dakota Electric Association	4300 220th Street W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-714_M-18-714
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_18-714_M-18-714
Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-714_M-18-714
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-714_M-18-714
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_18-714_M-18-714
Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_18-714_M-18-714

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Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_18-714_M-18-714
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-714_M-18-714
Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC	5411 Bartlett Blvd Mound, MN 55364	Electronic Service	No	OFF_SL_18-714_M-18-714
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-714_M-18-714
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-714_M-18-714
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_18-714_M-18-714
Marcia	Solie	m.solie@bcrea.coop	Brown County Rural Electrical Assn.	24386 State Hwy. 4, PO Box 529 Sleepy Eye, Minnesota 56085	Electronic Service	No	OFF_SL_18-714_M-18-714
Robyn	Sonstegard	robyn.s@northstarelectric.coop	North Star Electric Cooperative, Inc.	PO BOX 719 Baudette, MN 56623	Electronic Service	No	OFF_SL_18-714_M-18-714

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Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-714_M-18-714
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_18-714_M-18-714
Peter	Teigland	pteigland@mnseia.org	Minnesota Solar Energy Industries Association	2288 University Ave W Saint Paul, MN 55114	Electronic Service	No	OFF_SL_18-714_M-18-714
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-714_M-18-714
Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_18-714_M-18-714
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_18-714_M-18-714
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_18-714_M-18-714

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Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition	3055 Clearview Way San Mateo, MN 94402	Electronic Service	No	OFF_SL_18-714_M-18-714
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_18-714_M-18-714
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_18-714_M-18-714
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-714_M-18-714
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_18-714_M-18-714
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_18-714_M-18-714
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-714_M-18-714
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-714_M-18-714

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