

October 1, 2013

—Via Electronic Filing—

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

RE: RATE FOR LARGE SOLAR PHOTOVOLTAIC INSTALLATIONS

DOCKET NO. E002/CI-13-315

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the attached petition to extend the interim solar Standby Service capacity credit of \$5.15 per kW per month for Large Solar Photovoltaic installations until the Commission has made a determination on the Department's Value of Solar methodology, which is expected in spring 2014. The Commission's May 13, 2013 Order in the current docket was issued prior to the passage of legislation establishing the timeline to develop a value of solar methodology. Since the capacity value of solar will be addressed in the Department's methodology, and is related to our calculation of a Large Photovoltaic rate, we believe a final rate proposal would be premature at this time.

The revised Effective Load Carrying Capability (ELCC) study that is necessary to support a final Large Solar Photovoltaic rate is not yet complete. We shared a preliminary version of the ELCC study on August 14, 2013, and since that time we have incorporated comments and suggestions received from stakeholders through the comment process and stakeholder meetings. We require additional time to adequately reflect these comments and vet the final model results. We propose to submit the final study by October 31, 2013.

Pursuant to Minn. Stat. § 216B.17, Xcel Energy has electronically filed this document with the Minnesota Public Utilities Commission, the Office of the Attorney General and the Department of Commerce. Copies of the Summary

Dr. Burl W. Haar Page 2 of 2 October 1, 2013

of Filing have been served on parties listed on the attached service lists. Please contact me at amy.a.liberkowski@xcelenergy.com or 612-330-6613 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI MANAGER REGULATORY ANALYSIS

Enclosure c: Service List

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A RATE FOR LARGE SOLAR PHOTOVOLTAIC INSTALLATIONS DOCKET NO. E002/M-13-315

PETITION

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval to continue the interim solar Standby Service capacity credit of \$5.15 per kW/month for Large Solar Photovoltaic installations. We propose to revisit the credit once the Commission has approved a Value of Solar (VOS) methodology. In accordance with recent legislative changes, the Department must submit the methodology by January 31, 2014 and the Commission has 60 days to make its determination on the methodology. The VOS methodology is currently being developed by the Department with input from the Company and other stakeholders.

We respectfully request Commission approval of continuation of the current interim solar Standby Service capacity credit, which will provide compensation to large solar customers for the capacity value of their solar installations while the VOS methodology is developed and evaluated.

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as: Xcel Energy 414 Nicollet Mall Minneapolis, MN 55401 (612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

James Denniston Assistant General Counsel Xcel Energy 414 Nicollet Mall, 5th Floor Minneapolis, MN 55401 (612) 215-4656

C. Date of Filing

The date of this filing is October 1, 2013. The proposed interim solar Standby Service capacity credit will be effective upon Commission approval.

D. Statute Controlling Schedule for Processing the Filing

Because no determination of Xcel Energy's general revenue requirement is necessary, this filing falls within the definition of a miscellaneous tariff filing under Min. R. 7829.0100, subp. 11. Pursuant to Minn. R. 7829.1400, subps. 1 and 4, initial comments on a miscellaneous tariff filing are due within 30 days of

filing, and replies are due 10 days from expiration of the original comment period.

E. Utility Employee Responsible for Filing

Amy Liberkowski Manager, Regulatory Analysis Xcel Energy 414 Nicollet Mall, 7th Floor Minneapolis, MN 55401 (612) 330-6613

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

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Assistant General Counsel

Xcel Energy

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Minneapolis, MN 55401

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SaGonna Thompson

Records Analyst

Xcel Energy

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Any information requests in this proceeding should be submitted to Ms. Thompson at the Regulatory Records email address above.

V. DESCRIPTION AND PURPOSE OF FILING

A. Background

As part of the Settlement Agreement in our 2010 general electric rate case (Docket No. E002/GR-10-971), the Company agreed to study the load profile of larger solar generation facilities. The Commission's May 14, 2012 FINDINGS OF FACT, CONCLUSIONS AND ORDER in the rate case docket required the study results to be filed with the Commission and shared with the Department of Commerce. The Company filed public and non-public versions of the Solar Load Profile Study on August 24, 2012. The Company resubmitted the study on September 14, 2012 with all previously redacted information made public.

The Commission's May 13, 2013 ORDER SETTING INTERIM RATE AND ESTABLISHING NEW SOLAR RATE DOCKET approved the Company's solar load profile study as satisfying the requirements of the May 14 rate case Order and required the Company to implement an interim solar Standby Service capacity credit of \$5.15 per kW/ month beginning with bills issued on or after June 1, 2013. The Order also required the Company to 1) complete an Effective Load Carrying Capability (ELCC) study and file the preliminary results on May 1, and 2) meet with stakeholders to discuss the results and possible revisions. The Company convened stakeholders on June 11 to review the results and provided a written update on July 1, as required by the Order. A subsequent stakeholder meeting on August 14 reviewed the changes being made to the ELCC analysis to reflect stakeholder comments.

Related to this docket, on July 31, 2013 in Docket No. E002/M-13-642, the Company filed for approval of proposed tariff modifications necessary to provisionally implement certain requirements of the Omnibus Energy Bill, as represented in amendments to Minn. Stat. § 21B.164. Among the changes is the removal of mandatory standby service for systems up to 100 kW. However, we proposed that customers with systems less than 100 kW have the ability to opt-in to Standby Service, as the interim Standby Service solar capacity credit may result in lower bills if those customers take Standby Service. That matter is currently pending.

B. Purpose of Filing

In accordance with Order Point No. 8 of the Commission's May 13 Order, we are filing a Large Solar Photovoltaic rate proposal that addresses the interim solar Standby Service capacity credit. In this Petition, we seek Commission approval to continue an interim solar Standby Service capacity credit of \$5.15 per kW/ month. The existing Tariff Sheet No. 101, revision 12, is provided as Attachment A.

C. Updated ELCC Results

An ELCC analysis is performed using the Prosym dispatch simulation model to estimate the contribution of intermittent resources, such as solar and wind, to meet our customers' peak demand. The Midwest Independent System Operator (MISO) has used the ELCC methodology to set the accredited capacity for wind for several years and the methodology is generally accepted as

the industry standard. As a result of stakeholder comments on our preliminary ELCC study, we agreed to modify and expand the analysis to reflect their suggestions. These suggestions included the following:

- Use of actual hourly load from 2008, 2009, and 2010;
- Use of actual hourly solar radiation data from the same years to accurately correlate load and PV generation;
- Evaluation of multiple panel orientations to evaluate the impact on contribution to peak load; and
- Collection of solar data from multiple sites around the Xcel Energy service territory to evaluate the impact of geographic diversification.

We have completed collection of the load and solar radiation data and have begun model simulations to update our ELCC values. Final ELCC results are expected to be available soon and we plan to provide an update to our May 1st ELCC study by October 31, 2013.

D. Rate Analysis

The Commission's May 13, 2013 Order in the current docket was issued prior to the passage of legislation establishing the timeline to develop a VOS methodology. Since the capacity value of solar will be addressed in the Department's methodology, and is related to our calculation of a Large Photovoltaic rate, we believe a final rate proposal would be premature at this time.

In addition, without the revised final ELCC study, we are not able incorporate the results into the calculation of a final rate. The preliminary May 1st ELCC, which does not reflect the additional data and suggestions from stakeholders that we are now incorporating into the final ELCC, resulted in the following values:

May ELCC Results	ELCC Relative to Maximum AC Output	ELCC Relative to Maximum DC Output*
Fixed Panel PV	42.9%	36.5%
1-Axis Tracking PV	48.1%	40.9%

^{*} Assumes an inverter efficiency of 85%.

When the preliminary ELCC values are inserted into the four capacity credit methodologies proposed by parties, the result is a capacity credit range of \$2.14

to \$4.56 for fixed panel systems and \$2.40 to \$5.11 for a one-axis tracking system as shown below. Therefore, in this instance, since the \$5.15 interim credit is near the upper-end of the respective capacity credit ranges, we believe it to be a reasonable to continue to use this figure on an interim basis while the VOS methodology is in the development and approval phase.

Capacity Credit Calculation Results

-		Prelin	ninary - A	ugust 14,	2013
		Fixed	Panel	1-A	axis
	Original	ELCC	MISO	ELCC	MISO
	Position	42.9%	45.4%	48.1%	52.3%
Solar Rate Reform Group	\$8.14	\$4.37	\$4.62	\$4.89	\$5.32
Department of Commerce	\$7.44	\$4.56	\$4.83	\$5.11	\$5.56
Xcel Energy (Gen. Only - Low End)	\$2.14	\$2.14	\$2.27	\$2.40	\$2.61
Xcel Energy (Gen. + Trans High End)	\$3.93	\$3.22	\$3.41	\$3.61	\$3.93

Additionally, stakeholders have raised questions regarding the applicability of the photovoltaic solar credit during the grace period months when the Standby Service capacity charges are not applied to customer bills, and whether the credit should be based on the maximum kW of the solar facility or the billed kW used for the Standby Service capacity charges. The Company will work with stakeholders on these two issues to determine if a resolution can be reached prior to filing a final rate proposal.

Ε. **Next Steps**

As previously mentioned, the Department is currently developing the VOS methodology. In assessing the VOS, the Department must account for "the value of energy and its delivery, generation capacity, transmission capacity, transmission and distribution line losses, and environmental value." In addition, the Department "may, based on known and measurable evidence of the cost or benefit of solar operation to the utility, incorporate other values into the methodology, including credit for locally manufactured or assembled energy systems, systems installed at high-value locations on the distribution grid, and other factors."² The Department is required by January 31, 2014 to establish the VOS methodology and the Commission has 60 days to take action on the proposal.

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¹ Minn. Stat § 216B.164, Subd. 10

² *Id*.

Because the Department and stakeholders will be evaluating the capacity value of solar as part of the VOS development, we propose to revisit the solar Standby Service capacity credit upon Commission approval of a methodology.

VI. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

There is no increase in Xcel Energy's revenue as a result of continued implementation of the solar Standby Service capacity credit.

CONCLUSION

Xcel Energy respectfully requests that the Commission approve continuation of the existing solar Standby Service capacity credit of \$5.15 per kW/ month. The Company proposes to revisit the capacity credit upon Commission approval of a Value of Solar methodology.

Dated: October 1, 2013

Northern States Power Company

Respectfully submitted by:

/s/

Amy Liberkowski Manager Regulatory Analysis

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF A RATE FOR LARGE SOLAR PHOTOVOLTAIC INSTALLATIONS DOCKET NO. E002/M-13-315

PETITION

SUMMARY OF FILING

Please take notice that on October 1, 2013, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition for approval of continuation of the existing interim solar Standby Service capacity credit of \$5.15 per kW/ month. The Company proposes to revisit the capacity credit upon Commission approval of a Value of Solar methodology.

STANDBY SERVICE RIDER

Section No. 5 12th Revised Sheet No. 101

AVAILABILITY

Applicable to customers that use an alternative generation source with a capacity greater than 60 kW, where the alternative generation serves all or a portion of customer's electric energy requirements and where customer chooses to use the Company's electric service to serve that load when the alternative generation is either partly or wholly unavailable.

Under this tariff the Company will provide Standby Service in accordance with the provisions of this tariff as well as those of Section 2.4 of the General Rules and Regulations.

RESERVATION RATE

	Firm S	<u>Standby</u>	Non-Firm
	Unscheduled Maintenance	Scheduled <u>Maintenance</u>	<u>Standby</u>
Customer Charge per Month	\$24.61	\$24.61	\$24.61
Demand Charge per Month per kW of Contracted Standby Capa	acity		
Secondary Voltage Service	\$3.00	\$2.90	\$2.10
Primary Voltage Service	\$2.15	\$2.05	\$1.25
Transmission Transformed Voltage Service	\$1.50	\$1.40	\$0.60
Transmission Voltage Service	\$0.90	\$0.80	\$0.00
Hours per kW of Contracted Standby Capacity - Annual Grace Period Use of Unscheduled Standby, Exemption from the Demand Charge Component of the "Usage Rates" below.	964	964	0

USAGE RATES

<u>Demand Charge per kW of Standby Capacity Used.</u> After the Annual Grace Period hours provided for Unscheduled and Scheduled Service are used up, the Demand Charge of the base tariff, to which this Rider is attached, replaces the above Reservation Rate.

<u>Energy Charge per kWh of Standby Energy Used.</u> All energy used under this Rider will be charged at the applicable energy rate of the base tariff to which this Rider is attached.

INTERIM PHOTOVOLTAIC SOLAR CREDIT

A capacity credit of \$5.15 per month per kW is applicable when the alternative generation source used by the customer is photovoltaic solar. This credit shall be applied to the applicable Demand Charge of the base tariff for the demand component of the Usage Rates.

In addition, customer bills under this rate are subject to the following adjustments and/or charges.

FUEL CLAUSE

Bills are subject to the adjustments provided for in the Fuel Clause Rider.

(Continued on Sheet No. 5-102)

Date Filed: 05-30-13 By: David M. Sparby Effective Date: 06-01-13

President and CEO of Northern States Power Company, a Minnesota corporation

Docket No. E002/GR-10-971, E002/M-10-1278 & E002/CI-13-315 Order Date: 05-13-13

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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:

- <u>xx</u> 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

DOCKET NO. E002/CI-13-315

Dated this 1 st day of October, 2013	
/s/	
SaGonna Thompson	

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Lloyd	Grooms	Igrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Stree Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 Fourth Ave. S., Ste 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Samuel	Hanson	N/A	Briggs And Morgan, P.A.	2200 IDS Center E 80 South Eighth Stree Minneapolis, MN 55402	Paper Service t	No	SPL_SL_13-315_Solar Stakeholders List
Brandon	Heath	bheath@misoenergy.org	MISO Energy	1125 Energy Park Drive St. Paul, MN 55108-5001	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Lynn	Hinkle	Ihinkle@mnseia.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Holly	Hinman	holly.r.hinman@xcelenergy .com	Xcel Energy	414 Nicollet Mall, 6th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
David	Horneck	david.g.horneck@xcelener gy.com	Xcel Energy	1800 Larimer Street Denver, CO 80202	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jan	Hubbard	Jan@AppliedEnergyInnova tions.org	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Bould Saint Paul, MN 55102	Electronic Service evard	No	SPL_SL_13-315_Solar Stakeholders List
Steve	Huso	steve.huso@xcelenergy.co m	Xcel Energy	G.O. 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Ralph	Jacobson	N/A	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1 Saint Paul, MN 55109-1555	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Dwight	Jelle	dkjelle@gmail.com	Best Power International, LLC	P.O. 5126 Hopkins, MN 55343	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
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Kerry	Klemm	kerry.r.klemm@xcelenergy.	Xcel Energy Services, Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mara	Koeller	mara.n.koeller@xcelenergy .com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Allen	Krug	allen.krug@xcelenergy.co m	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
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Bob	Long	rlong@larkinhoffman.com	Larkin Hoffman (Silicon Energy)	1500 Wells Fargo Plaza 7900 Xerxes Ave S Bloomington, MN 55431	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
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Paula	Maccabee	Pmaccabee@visi.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
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Susan	Mackenzie	susan.mackenzie@state.m n.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 551012147	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
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Brian	Millberg	Brian.Millberg@minneapoli smn.gov	City of Minneapolis	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Su 500 St. Paul, MN 55101	Electronic Service te	No	SPL_SL_13-315_Solar Stakeholders List
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Michael	Noble		Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List
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Nick	Paluck	nick.paluck@xcelenergy.co m	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
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Donna	Pickard	dpickard@aladdinsolar.co m	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
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Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List
Kevin	Schwain	Kevin.D.Schwain@xcelene rgy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-315_Solar Stakeholders List

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Jason	Willett	N/A	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Paper Service	No	SPL_SL_13-315_Solar Stakeholders List

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