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October 28, 2013

Burl W. Haar
Public Utilities Commission
PUC Docket Number: E-002/M-13-315

In the Matter of a Rate for Solar Photovoltaic Installations over 60kW

Dear Dr. Haar-

As an interested stakeholder in the above matter I am asking the commission to hold Xcel accountable and not let them get away with devaluing the solar industry and the progress we have worked so hard to make thus far.

Earlier this year the PUC ordered Xcel to pay an interim rate for Capacity Credits of \$5.15 per kW per month. It is our opinion this is too low and does not reflect the true monetary value of solar energy in its contribution to the grid. We urge the Commission to order Xcel to pay \$8.35/kw/mo starting right away– a number that is much more fair in our estimation.

I strongly disagree with Xcel wanting to table the Capacity Credit discussion and also advise against their attempt to combine it with the Value of Solar (VOS) negotiations. **VOS and Capacity Credits MUST remain separate issues.** The solar photovoltaic contribution to Effective Load Carrying Capacity has been in play for several years and is NOT part of the new legislation. Let's keep the two separated.

SREC ownership is another thing which concerns me. Xcel appears to be maneuvering the VOS negotiations to in effect garner themselves a monopoly on SREC ownership. Please do not let this happen. A PV installation greater than 60kW must retain the option of accepting Capacity Credits and keeping SREC ownership, or trade the SRECs for the VOS rate. If these owners are forced against their will to only receive VOS as compensation for their PV installations, then we are seriously limiting the potential of solar deployment.

Thank you for your consideration of the information presented above, for the value and integrity of the Solar industry as a whole.

Art Crowell