



414 Nicollet Mall
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December 6, 2013

—Via Electronic Filing—

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

RE: SUPPLEMENTAL REPLY COMMENTS
SOLAR EFFECTIVE LOAD CARRYING CAPABILITY (ELCC) STUDY
DOCKET NO. E002/CI-13-315

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the attached Supplemental Reply Comments in response to the Minnesota Public Utilities Commission's November 7, 2013 Notice of Comment Period submitted in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

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

Enclosures
c: Service Lists

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/CI-13-315

SUPPLEMENTAL REPLY COMMENTS

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Supplemental Reply Comments regarding our proposed interim solar Standby Service capacity credit for Large Solar Photovoltaic (PV) installations. We received Reply Comments from the Department of Commerce and the Minnesota Solar Energy Industry Association (MnSEIA).

We believe the schedule the Department has proposed for the review of the Effective Load Carrying Capability (ELCC) study, as modified by a request from the Solar Rate Reform Group (SRRG), will allow parties to continue work on a final rate and still allows the Company to potentially incorporate information from the Value of Solar (VOS) process being led by the Department.

REPLY

A. Interim Rate Basis

The \$5.15 per kW/month current interim solar Standby Service capacity credit was approved by the Commission after much discussion in the docket and supported by several parties to be a reasonable interim rate. The interim capacity credit was a midpoint value between parties' position and not the direct result of a specific

methodology or cost basis, or ELCC Study result.¹ While we believe this basis is reasonable for an interim rate, we do not believe it is an adequate basis for a final rate.

Further, the \$8.35 per kW/month rate that some parties are advocating for was also not the result of a specific methodology or cost basis. Similar to the \$5.15 rate, the \$8.35 rate was based on the midpoint of an estimate used by the Department and the SRRG that estimated a range of PV capacity values of approximately 70-90 percent of solar rated capacity.² To the best of our knowledge, no study has been filed in this docket that supports an ELCC rating of 70-90 percent.

If the Commission did want to set a final rate at this point, we believe the updated credit from the ELCC Study filed in this docket on October 31, 2013 would be more appropriate due to the fact that this rate would actually be based on an ELCC Study and this ELCC Study incorporated much input from stakeholders. The updated study supports a credit in the range of \$1.72 to \$4.75 for a fixed panel system, or \$2.17 to \$6.11 for a 1-axis system. In addition, it is also our understanding that these ELCC results are in line with a study completed by Clean Power Research based in a northern US region³ and many other studies performed nationwide.⁴

B. ELCC Study

We agreed to study the load profile of larger solar generation facilities as part of a settlement agreement in our 2010 rate case (Docket No. E002/10-971), which was approved on May 14, 2012. We filed this initial study in August 2012. Our agreement to perform an ELCC in addition to the initial study was due to parties' input that an ELCC was necessary and was the industry standard used to calculate capacity credits. Throughout the course of these proceedings, we have modified our ELCC modeling assumptions based on input from interested parties. The modifications we made to our ELCC do not indicate that our previous models were flawed or inaccurate, such as MnSEIA suggests. The modeling changes are simply the result of differing assumptions on many complex issues.

¹ The \$5.15 per kW/month was recommended by the Department in their January 18, 2013 Reply Comments in Docket Nos. E002/M-10-1278 and E002/GR-10-971 noting that the amount was halfway between the midpoint of the range identified by the Department and the SRRG, \$8.35, and value suggested by Xcel's initial study, \$2.00.

² As cited by the Department's January 18, 2013 Reply Comments in Docket Nos. E002/M-10-1278 and E002/GR-10-971, the SRRG focused on Xcel's peak period and estimated a range of PV capacity values of approximately 70 to 80 percent of the solar rated capacity (this resulted in an estimated range of \$7.13 to \$8.14 per kW/month). The Department used MISO's peak period and estimated a range of PV capacity value of 70 to 90 percent of solar capacity (this resulted in an estimated range of \$7.44 to \$9.57 per kW/month). The \$8.35 rate is the midpoint of the overall range identified by the Department and the SRRG.

³ November 2012, THE VALUE OF DISTRIBUTED SOLAR ELECTRIC GENERATION TO NEW JERSEY AND PENNSYLVANIA, Clean Power Research.

⁴ APS 2009, APS 2013, and AE/CPR

With regards to MnSEIA's comment about the timeframe required to complete the ELCC, we note that it takes considerable time to conduct the study, meet with stakeholders to explain and discuss the assumptions and preliminary results, allow parties to comment and file information requests, and then incorporate parties' modifications. The timeframe necessary to complete the ELCC was recognized by the Commission when they implemented an interim credit on May 12, 2013 in this docket to allow time for the ELCC to be prepared and reviewed and a proposal to be developed.

CONCLUSION

We appreciate parties' Reply Comments. Our goal is provide a fair value for a solar Standby Service capacity credit, as a credit that is more than fair raises costs for our other customers. We believe the schedule the Department has proposed for the review of the updated ELCC study, as modified by a request from the Solar Rate Reform Group, will allow parties to continue work on a final rate and still allows the Company to potentially incorporate information from the VOS process being led by the Department.

Dated: December 6, 2013

Northern States Power Company

Respectfully submitted by:

/s/

AMY LIBERKOWSKI
MANAGER
REGULATORY ANALYSIS

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:

xx 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 6th day of December 2013

/s/

SaGonna Thompson

[illegible]

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