



## Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

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April 2, 2014

Dr. Burl Haar  
Executive Secretary  
Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

**VIA ELECTRONIC SERVICE**

*Re: In the Matter of a Rate for Large Solar PV Installations  
PUC Docket No.: E002/CI-13-315*

Dear Dr. Haar:

In connection to the above-referenced docket please find the enclosed Comments filed on behalf of Fresh Energy and the Izaak Walton League of America. Also attached is the Affidavit of Service.

Sincerely,

/s/ Leigh Currie  
Leigh Currie  
Staff Attorney

cc: Service List

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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Betsy Wergin	Commissioner

**In the Matter of a Rate for  
Large Solar PV Installations**

**Docket No. E002/CI-13-315**

**COMMENTS OF FRESH ENERGY  
AND IZAAK WALTON LEAGUE OF AMERICA**

On March 17, 2014, the Department of Commerce filed a recommendation to adopt the current interim demand credit of \$5.15 per kilowatt month for Xcel customer-sited solar facilities over 100kW. Fresh Energy and Izaak Walton League of America support this recommendation.

Fresh Energy and IWLA further recommends that the Commission require Xcel to file an update with the Commission every two years on whether any changes to the demand credit calculation are necessary, with the option to revisit more frequently if the Commission deems necessary.

Minnesota's existing solar deployment is estimated to increase almost thirtyfold by 2020 as a result of the state's solar energy standard. Additionally, as deployment experience increases, developers may increase their use of axis tracking and other configurations that increase the solar fleet's contribution to capacity value, which should accordingly result in an increase in the demand credit. Given that Minnesota's solar deployment is expected to change dramatically over the next seven years, it is appropriate to set a near-term timeframe to update the demand credit calculation.

We appreciate the opportunity to comment in this matter and look forward to further Commission and stakeholder discussion on this matter.

Dated: April 2, 2014

Very truly yours,

/s/ Erin Stojan Ruccolo

Erin Stojan Ruccolo  
Director, Electricity Markets  
Fresh Energy  
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/s/ Eric Jensen

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STATE OF MINNESOTA  
MINNESOTA PUBLIC UTILITIES COMMISSION

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In the Matter of a Rate for  
Large Solar PV Installations

**AFFIDAVIT OF SERVICE**

PUC Docket No. E002/CI-13-315

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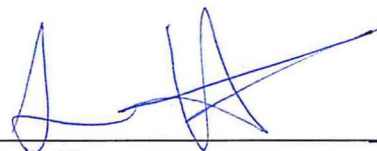
STATE OF MINNESOTA    )  
                                      )ss.  
COUNTY OF RAMSEY    )

Leah Harms being duly sworn, says that on the 2<sup>nd</sup> day of April 2014 she served via U.S. mail, e-dockets and e-mail the following:

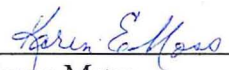
- Comments of Fresh Energy and Izaak Walton League of America

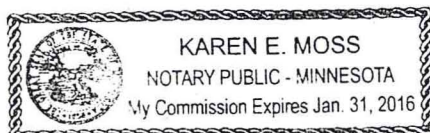
on the following persons, in this action, by filing through e-dockets and e-mail or mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at the last known mailing address of said persons:

Attached Service List

  
\_\_\_\_\_  
Leah Harms

Subscribed and sworn to before me  
this 2<sup>nd</sup> day of April 2014

  
\_\_\_\_\_  
Karen Moss



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13- 315_Interested Parties
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