

Paulson Law Office, Ltd.
7301 Ohms Lane
Suite 325
Edina, MN 55439

Telephone (952)835-0055
Facsimile (952)835-2984
e-mail jeff.jcplaw@comcast.net

October 1, 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2198

Re: MN Community Solar, LLC
PUC Docket No. E002/M-13-867
Comments

Dear Dr. Haar:

We represent MN Community Solar, LLC and are eFiling and eServing the attached Comments of MN Community Solar LLC With Respect to Value of Solar Adder and Certificate of Service on their behalf in the above-captioned matter.

Please feel free to contact me with any questions you may have.

Yours truly,



Patricia A. Treseler
Legal Assistant to Jeffrey C. Paulson

cc: Parties; MN Community Solar, LLC

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

**In the Matter of the Petition of Northern States
Power Company, dba Xcel Energy, for
Approval of Its Proposed Community Solar
Gardens Program**

DOCKET NO. E-002/M-13-867

**COMMENTS OF MN COMMUNITY SOLAR
WITH RESPECT TO VALUE OF SOLAR ADDER**

INTRODUCTION

This proceeding was initiated to approve implementation of Northern States Power Company's (NSP) community solar garden (CSG) program in accordance with Minn. Stat. Section 216B.1641(2013). After several rounds of comments and hearings, on September 17, 2014, the Commission issued an Order deciding the outstanding issues still pending, including initial use of the applicable retail rate for CSGs rather than the Value-of-Solar (VOS) rate preferred by many parties. In its Order, however, the Commission directed the parties to engage in further discussions and to file comments identifying an appropriate adder to the proposed VOS rate which, if used, would meet the statutory requirements for viability of CSGs. Order Approving Solar Garden Plan With Modifications, Docket E002/M-13-867 dated September 17, 2014 at 6, 10 and 19 (order point 4). MN Community Solar, LLC (MNCS) participated actively in this matter with respect to the applicable rate for use with CSGs and, since the Commission hearing on August 7, has participated, along with many other stakeholders, in a MNSEIA community solar working group to discuss what an appropriate adder to the VOS rate might be. MNCS submits these comments as to what it believes that adder must be.

COMMENTS

In this proceeding, MNCS has taken the position that the applicable retail rate, as modified in the Commission's September 17 Order, is the rate and structure that is necessary to allow CSGs to be successful. If the Commission elects to transition to use of a VOS rate with an adder, the adder must be sufficient when combined with the VOS to provide similar rates.

In the September 17, 2014 Order at page 6 the various VOS rates as calculated by NSP and the Department of Commerce were set forth. NSP's most recent calculation of the VOS rate is \$.094/kWh in year 1 and \$.1208/kWh levelized. The levelized rate is below the \$.15/kWh levelized rate that the Commission determined is minimally necessary to allow for the financing and viability of CSGs. September 17 Order at 7. As a result, MN Community Solar believes that any combined VOS rate and adder must be equivalent at a minimum to the \$.15/kWh levelized rate or the applicable retail rate as adopted by the Commission.

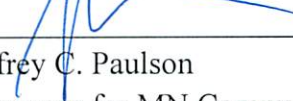
The first year rate is also important and cannot be too low. The calculated VOS rates are too low in the early years to finance and sustain a CSG. MNCS believes the VOS rate and adder in the first year must be greater than \$.12/kWh with an escalation rate sufficient to, at a minimum, create the \$.15/kWh levelized rate over time.

The specific adder, any escalator, and related mechanisms can be defined after additional discussions and proceedings as suggested by the Department of Commerce.

Respectfully submitted,

PAULSON LAW OFFICE, LTD.

Dated: October, 1 2014

By  _____
Jeffrey C. Paulson
Attorneys for MN Community Solar, LLC
Attorney I.D. No. 182382
7301 Ohms Lane
Suite 325
Edina, MN 55439
(952) 835-0055
jeff.jcplaw@comcast.net

CERTIFICATE OF SERVICE

I, Patricia A. Treseler, hereby certify that I have this 1st day of October, 2014, served a true and correct copy of Comments of MN Community Solar with Respect to Value of Solar Adder in Docket No. E002/M-13-867, on all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same in an envelope with postage paid in the United States mail at Edina, Minnesota.



Patricia A. Treseler

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Kenneth	Bradley	kbradley1965@gmail.com		2837 Emerson Ave S Apt CW112 Minneapolis, MN 55408	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Landscapes	234 Jackson Ave N Hopkins, MN 55343	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Dustin	Denison	dustin@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_13-867_Community Solar Garden - Xcel
Bill	Droessler	N/A	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202 Saint Paul, MN 55104	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Nathan	Franzen	nathan@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Hal	Galvin	halgalvin@comcast.net	Provectus Energy Development llc	1936 Kenwood Parkway Minneapolis, MN 55405	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Timothy	Gulden	info@winonarenewableenergy.com	Winona Renewable Energy, LLC	1449 Ridgewood Dr Winona, MN 55987	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynn	Hinkle	lhinkle@mnsela.org	Minnesota Solar Energy Industries Association	2512 33rd Ave South #2 Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jan	Hubbard	jan.hubbard@comcast.net		7730 Mississippi Lane Brooklyn Park, MN 55444	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John S.	Jaffray	jjaffray@jirpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road Sunfish Lake, Minnesota 55118	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
John	Kluempke	jkluempke@winlectric.com	Elk River Winlectric	12777 Meadowvale Rd Elk River, MN 55330	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Jon	Kramer	jk2surf@aol.com	Sundial Solar	4708 york ave. S Minneapolis, MN 55410	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Rebecca	Lundberg	rebecca.lundberg@powerfullygreen.com	Powerfully Green	11451 Oregon Ave N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Casey	MacCallum	casay@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Erica	McConnell	emcconnell@kfwlaw.com	Keyes, Fox & Wiedman LLP	436 14th Street, Suite 1305 Oakland, California 94612	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Melone	Thomas.Melone@AlcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Martin	Morud	mmorud@trunorthsolar.com	Tru North Solar	5115 45th Ave S Minneapolis, MN 55417	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	7301 Ohms Ln Ste 325 Edina, MN 55439	Paper Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
Dan	Rogers	drogers@sunedison.com	SunEdison	N/A	Electronic Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel
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- 867_Community Solar Garden - Xcel
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Avenue South Minneapolis, MN 55408	Paper Service	No	SPL_SL_13- 867_Community Solar Garden - Xcel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Paper Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel
Daniel	Williams	DanWilliams.mg@gmail.com	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Electronic Service	No	SPL_SL_13-867_Community Solar Garden - Xcel