



September 15, 2017

Via Electronic Filing

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: Comments
Xcel Energy Customer Access Joint Pilot Program
Docket no. E002/M-17-527

Dear Mr. Wolf:

In response to the Minnesota Public Utilities Commission notice of comment period on Xcel Energy's Customer Access Joint Pilot Program, issued on July 10th, 2017, Ampion hereby submits the following comments. Ampion limits the scope of our comments to the topic of the net bill credit proposed for use in this program.

Ampion appreciates your consideration and the opportunity to contribute to the Customer Access Joint Pilot Program.

Respectfully submitted,

Emily Cosbar
Market Policy Analyst, Ampion

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF MINNESOTA

Docket no. E002/M-17-527 – In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Customer Access Joint Pilot Program

I. Introduction

Ampion is a software as a service (“SaaS”) provider supporting distributed energy resources (“DER”) developers across the United States. Ampion is an active participant in DER-related proceedings in many markets, including: the New York Value of Distributed Energy Resources (“VDER”) program, the Massachusetts Net Metering program, and the development of the future Solar Massachusetts Renewable Target (“SMART”) program. In addition to promoting equitable distributed renewable policy for all stakeholders, Ampion has advocated for uniform and transparent methods of data exchange between utility companies and project developers in DER markets across the country.

Previously, Ampion (then branded Acadia Micro) also participated in the Collaborative Working Group Regarding Community Distributed Generation for Low-Income Customers as part of the Community Net Metering proceeding in New York¹. In general, Ampion commends the work of Xcel Energy and the Minnesota Public Utilities Commission (“PUC”) in implementing the Customer Access Joint Pilot Program. However, based on our experience in the Collaborative Working Group mentioned above, as well as providing billing and payment services for community solar and virtual net metering programs in other states, Ampion respectfully submits the following comments regarding the net bill credit for the Customer Access Joint Pilot Program (the “Program”).

II. Net Bill Credit Concerns

Ampion’s experience providing billing and payment services to distributed renewable developers, including customer service for subscribers and other customer relationship management functionality, suggests that the current proposed net bill credit will likely lead to subscriber misunderstandings upon implementation of the Program. Subscribers in other markets often question utilities and nonutility developers alike regarding how their bill credits were calculated. The lack of traceability to the exact bill credit and cost of participation breakdown inherent in providing a single line item for these credits will only exacerbate this issue, preventing consumers from properly assessing the costs and benefits of the program on a monthly basis. This question can be preempted by providing a more granular breakdown of these calculations on subscriber bills.

¹ Case 15-E-0082, Summary of the Collaborative Working Group Reports Regarding Community Distributed Generation for Low-Income Customers (August 15, 2016)

However, the problem of customer misunderstanding pales in comparison to the second issue concerning Minn. Stat. § 216B.1641, (e)(3), which requires that the Minnesota PUC “not apply different requirements to utility and nonutility community solar garden facilities.” Ampion asserts that allowing Xcel to offer a “consolidated billing” mechanism as part of the Program (i.e., by displaying both bill credits *and* participation costs on the off-taker bill) and **not** amending nonutility Community Solar garden rules to provide for the same consolidated billing mechanism as an option to third-party Community Solar developers constitutes a violation of this statute.

Ampion therefore proposes that the Commission consider modifying existing Community Solar program rules such that nonutility developers may elect to pursue a consolidated billing scheme for collection of their subscription payments. In doing so, Ampion advocates that the Commission establish data exchange provisions that allow for the instantaneous transfer of necessary information, such as ongoing customer allocation and subscription payment information, between the utility and project developer (and/or a third-party agent of the developer) each month in order to facilitate such consolidated billing mechanism.

III. Conclusion

Ampion commends the Commission’s leadership in this proceeding and thanks the Commission for the opportunity to provide feedback on the Customer Access Joint Pilot Program. Please contact Emily Cosbar (617-202-3143) with any questions regarding this filing.

Respectfully submitted,



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