Xcel Energy®

414 Nicollet Mall
Minneapolis, MN 55401

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June 1, 2020

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: ANNUAL REPORT
SOLAR ENERGY STANDARD
DOCKET NO. E999/M-20-464

Dear Mr. Seuffert:

Enclosed for filing is the 2019 Annual Report on Progress in Achieving the Solar Energy Standard of Northern States Power Company, doing business as Xcel Energy, submitted in compliance with the Minnesota Public Utilities Commission's April 25, 2014 Order in Docket No. E999/CI-13-542, October 23, 2014 Order in Docket Nos. E999/CI-13-542 and E999/M-14-321, and November 28, 2016 Order in Docket Nos. E999/CI-13-542 and E999/M-16-342.

Please note that we have marked as "Not Public" certain information identifying customer names, locations, energy usage or bill credits. This is considered to be private data pursuant to Minn. Stat. §13.02, Subd. 9, and is non-public pursuant to Minn. Stat.§ 13.37, Subd.2.

We have also marked as "Not Public" capacity factor information relating to specific Purchase Power Agreements (PPAs). The terms of the Commission approved PPAs require that this information be non-public. Further, this is considered to be "nonpublic data" pursuant to Minn. Stat. §13.02, Subd.9, and is also "Trade Secret" information pursuant to Minn. Stat. §13.37, subd. 1(b) as it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

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 Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service List

Solar Energy Standard Annual Report

Due:	June 1, 2020
Reporting period:	January 1, 2019 – December 31, 2019
Statute/Rule reference:	216B.1691 Subd. 2f(g). (g) Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision. Order, issued April 25 in Docket No. E-999/CI-13-542 Order, issued October 23, 2014 in Docket No. E-999/M-14-321 Order, issued November 28, 2016 in Docket No. E-999/M-16-342 Order, issued October 20, 2017 in Docket No. E-999/M-17-283 Order, issued September 21, 2018 in Docket No. E-999/M-18-205 Order, issued September 11, 2019 in Docket No. E-999/M-19-276
Comments:	Please answer questions below and eFile as a PDF

Report Year	2019
Date Submitted	June 1, 2020
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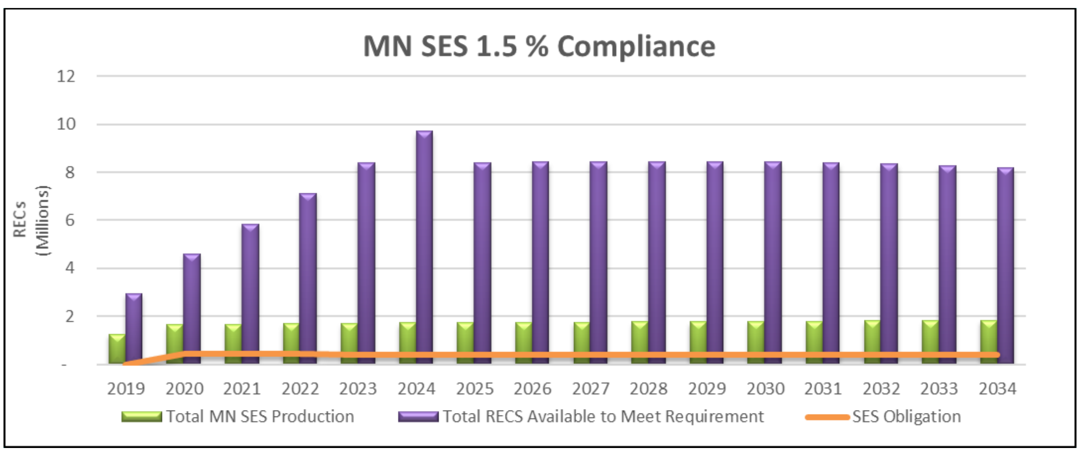
Comments/Notes	
Governor Walz signed H.F. 1842 into law on May 27, 2020. This legislation adjusted the allocation levels for our solar energy production incentive program and extended the program through 2022, which influences the Company’s small solar forecast. The data provided in this report reflects these changes.	

1. Summary of ongoing efforts to obtain solar energy, including a brief summary of the anticipated mix of project sizes for SES compliance.
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.H

For purposes of this Section 1, Solar Energy Standard (SES) compliance means the requirement set forth in Minn. Stat. § 216B.1691, Subd. 2f, whereby Xcel Energy, by the end of 2020, needs to generate or procure sufficient electricity generated by solar energy so that at least 1.5 percent of the Company's total retail electric sales to retail customers in Minnesota is generated by solar energy. The additional requirement in Subd. 2f regarding the ten percent solar carve-out requirement from systems of 40 kW (AC) or less is addressed in the Company's response to Question 2 below.

The Company has developed a large portfolio of resources and programs to provide renewable options to residential and commercial customers. Since the passage of the SES under the 2013 Energy Omnibus Bill, we have grown our utility portfolio of solar resources to expand access of solar benefits to all customers while achieving compliance in reporting year 2020. The expected cumulative impact of the programs and efforts detailed below are graphically displayed below in Graph 1, and in the attached Excel file (Tab 5 – Additional Graphs). The Company expects to accumulate and exceed the amount of solar RECs (SRECs) required to satisfy the MN SES compliance requirements beginning in 2020 and continue well beyond 2034. SRECs accumulated in the REC bank beyond what is needed for compliance requirements, will be applied towards the MN state RPS obligations to avoid any REC expirations.

Graph 1



A. Solar*Rewards – For PV installations of 40 kW_{AC} or less

Our Solar*Rewards program offers customers installing solar photovoltaic (PV) systems sized 40 kW_{AC} or less an incentive based on the system's energy production. The RECs generated under the Solar*Rewards program are assigned to the Company for the first 10 years of each installation unless applied for under the first generation of the program whereas they are assigned for the first 20 years of installation.[1]

[1] Docket No. E002/M-13-1015, Solar*Rewards, Deputy Commissioner Decision, February 24, 2014.

There are three generations of the Solar*Rewards program as described below. Regardless of which generation the applicant is under, differing production incentives are provided depending upon the project type for a 10-year or 20-year period under a Solar*Rewards contract. The Legislature under Minn. Stat. § 116C.77792 has authorized this program to be available through 2022 from funds withheld from the renewable development account. More details about the results of the program are available in our Solar*Rewards Annual Report.[2]

There are subtle differences in each of the program generations. We note the primary variations below:

- **Third Generation (2019+)**: The third generation of the program began on June 17, 2019 in combination with changes to the Minnesota Distributed Energy Resource Distribution Interconnection Process. Further, in 2019 we began offering specific income qualified incentives with an additional upfront incentive and the installation requirement changed to no more than 40 kW_{AC} rather than 40 kW_{DC} as previously required. A 10-year term contract applies.
- **Second Generation (2014-2019)**: The second generation of the program began with the passage of Minn. Stat. § 116C.7792 in 2013 which authorized the program to be allocated from the renewable development account. Production incentives for a 10-year period were established for customers who could install systems 20 kW_{DC} or less. In 2018, H.F. 3232 further revised this statute and increased allowable nameplate capacity from 20 kWdc to 40 kWdc. The Second Generation tariff ended in June 2019 with the onset of the Minnesota Distribution Interconnection Process. Existing contracts remain in place for their contract term. The contracts have assigned the RECs to the Company for the 10-year contract term.
- **First Generation (2010-2014)**: The first generation of Solar*Rewards was part of the Company's Conservation Improvement Program and provided one-time incentives for projects sized 40 kW_{DC} or less. The program was discontinued when the second generation Solar*Rewards program was redeveloped and closed for incoming applications in August 2014. Existing contracts remain in place for their contract term. These contracts have assigned the RECs to the Company for the 20-year contract term.

B. Made in Minnesota – For PV installations of 40 kW_{DC} or less

Established by legislation in 2013, the Made in Minnesota program provided incentives to systems manufactured in Minnesota that were up to 40 kW_{DC}, with the majority being over 20 kW_{DC}. The program was launched in 2014 and cancelled by the legislature in 2017 (Minn. Stat. § 216C.417). The program continues to be administered by the Department of Commerce. The RECs generated under this program by Company customers belong to the Company for 10 years from installation.

C. Buy-Back Option

In Docket Nos. E999/M-13-542 & E999/M-18-205, Commission staff suggested that the Company should continue to receive SRECs from these programs throughout the lifetime of the systems. Staff briefing papers on August 29, 2018 state:

[2] Annual Reports are filed on or around June 1 of every year beginning in 2015 in Docket No. E002/M-13-1015.

> "The easiest way for Xcel to maintain control over the coveted small SRECs would be a tariff option allowing customers to elect to sell their SRECs to the company after the expiration of a Solar*Rewards contract. Xcel could then enroll interested customers in this new tariff offering and use the existing metering infrastructure to continue the uninterrupted transfer of SRECs for SES compliance."[3]

Staff's recommended approach is an option for the Company to consider and we will review the recommendation closer to 2024 when contracts begin expiring. If that is the desired approach, we will file a Petition requesting approval of this program or tariff change closer to that time. For transparency purposes, Graph 3 provided in part 2 below includes a compliance look at an assumed Solar*Rewards SREC buyback program based on an assumed participation level of 75 percent.

D. Solar*Rewards Community – For PV installations up to 1 MW

The Company launched its community solar garden program, called Solar*Rewards Community, in December 2014.[4] Solar gardens are shared PV arrays up to one MW that interconnect with the distribution grid under a 25-year contract term. Customers who subscribe to a solar garden receive a bill credit for their portion of the system's production and the Company receives the RECs for the term of the contract.[5] There is no statutory budget or capacity limit for the Solar*Rewards Community program.

E. Universal Solar

Since the passage of the SES legislation, the Company has developed a portfolio of three universal scale solar projects. The Company has 162.25 MW of large-scale solar generation from two projects under Power Purchase Agreement (PPA) contracts, consisting of the North Star project (100 MW) and the Marshall Solar project (62.25 MW). These projects began operating in late 2016 and early 2017. These resources were approved by the Commission as part of a Solar Portfolio from a Request for Proposals process.[6] However, the Company has allotted as much as 25 percent of the expected output of the North Star facility to the Renewable*Connect program. The Company portfolio also includes the 100 MW Aurora Solar PPA which was approved through the Company's Competitive Acquisition Process proceeding.[7] This project is made up of multiple distributed generation solar sites. All phases of this project were in commercial operation by summer 2017. These projects will generate approximately 450,000 SRECs annually.

F. Renewable Development Fund (RDF)

The 1994 Legislature mandated the creation of the RDF for the purpose of developing renewable sources of electricity, including solar. Recipients of RDF grant funds that install

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[3] See Staff's briefing papers issued August 29, 2018 in Docket Nos. E999/M-13-542 & E999/M-18-205, Pages 3-4.
[4] See Docket No. E002/M-13-867.
[5] Prior to 2017, Garden Operators had the choice as to whether or not to receive the RECs directly. Currently, all community solar gardens have chosen to provide them to the Company.
[6] See Dockets No. E002/M-14-162, In the Matter of Xcel Energy's Petition for Approval of a Solar Portfolio to Meet Initial Solar Energy Standard.
[7] See Docket No. E002/CN-12/1240, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need.

renewable energy generators are required to assign and transfer all RECs created from the facility's renewable energy production for the life of that facility. The Company currently has a total of 18 installed and operating solar RDF facilities, for a total of 11.01 MW of capacity. An additional 4 RDF facilities are planned or under construction and will add an additional 3.376 MW of capacity. Legislation passed in 2017 made significant changes to the RDF statute (Minn. Stat. § 116C.779). These changes include the creation of the Renewable Development Account as a special account within the Minnesota treasury. Additional changes include the purposes for how funds may be expended and how projects are selected. Therefore, it is not known at this time if any new RDF facilities will be installed which affect the SES.

Table 1: RDF/RDA Solar Facilities
Through December 31, 2019*

Facility Size	Number	Capacity (MW)
Commissioned Facilities		
≤40 kW	1	0.09
>40 kW	17	11.001
Total Commissioned Facilities	**18**	**11.01**
Planned Facilities		
≤40 kW	0	0
>40 kW	4	3.3760
Total Planned Facilities	**4**	**3.376**
TOTAL RDF SOLAR FACILITIES	**22**	**14.131**

*Please note, Table 1: RDF/RDA Solar Facilities through December 31, 2018, provided in our 2018 Solar Energy Standard Report (Docket No. E999/M-19-276) incorrectly included all RDF projects rather than only RDF solar projects. The table above shows only RDF solar projects.

2. Progress towards the 10% carve-out for systems 40 kW_{ac} or less, including the method by which the utility will meet the carve-out.

Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.I

A subset of programs from Section 1 above, can be used towards our 10 percent small solar carve out. Table 2 describes these impacts. These are further detailed in this section.

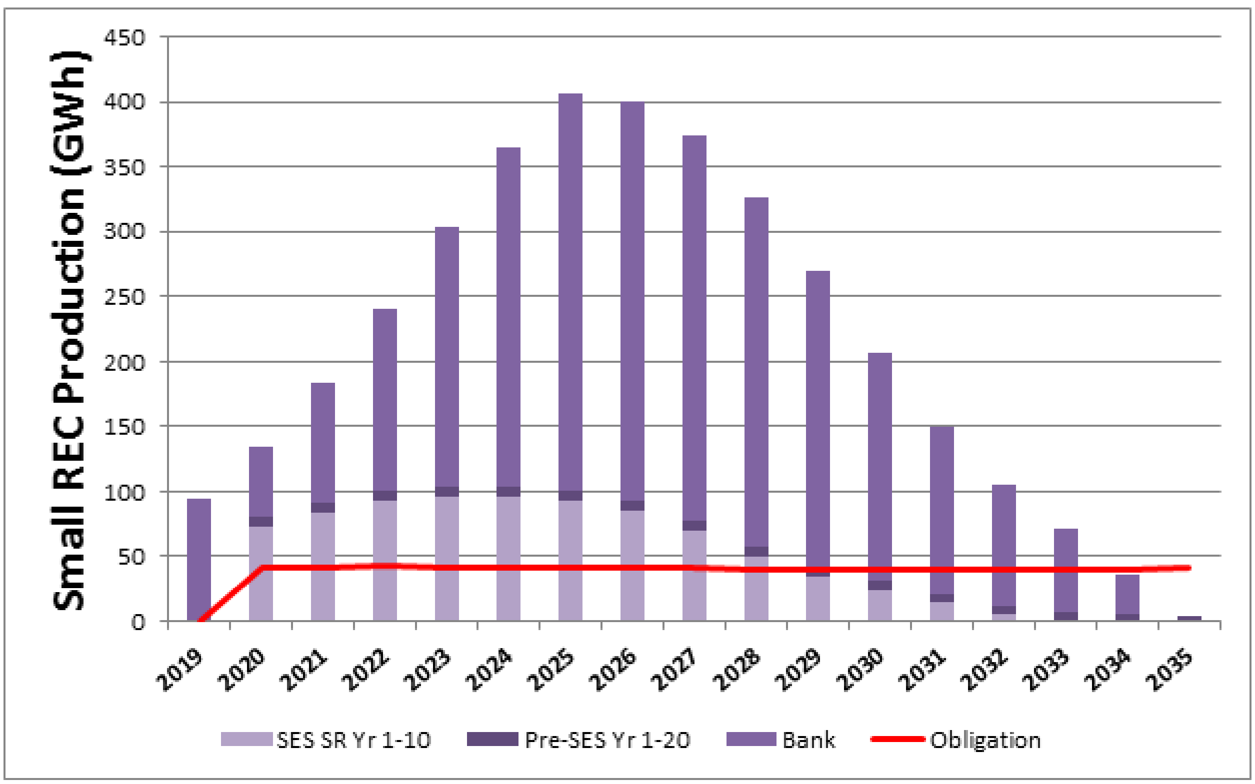
Table 2: Small Solar Carve Out – Programs

Program Name	Size	Years Available
Solar*Rewards (First Generation)	≤40 kW (DC)*	2010 – August 2014
Solar*Rewards (Second Generation)	≤ 20 kW (DC)* ≤ 40 kW (DC)*	August 2014 – May 2018 June 2018 – May 2019
Solar*Rewards (Third Generation)	≤ 40 kW (AC)	June 2019 - 2022
Made in Minnesota	≤40 kW	2014 – 2017

*Energy produced in DC goes through an inverter to get converted to AC. In this process there is energy loss, meaning that DC output results in a lower AC output.

Graph 2 below represents our current projection for REC compliance with the 10 percent small solar carve out. This chart shows the Company may be in compliance with the small solar carve out through 2033. However, this representation uses program assumptions and thus has embedded risk that the actual results could be significantly different than the forecast. The Company cannot predict what the market installation rate will be for small solar rooftop.

Graph 2[8]
Small SREC Production with Solar*Rewards Program Extension through 2021

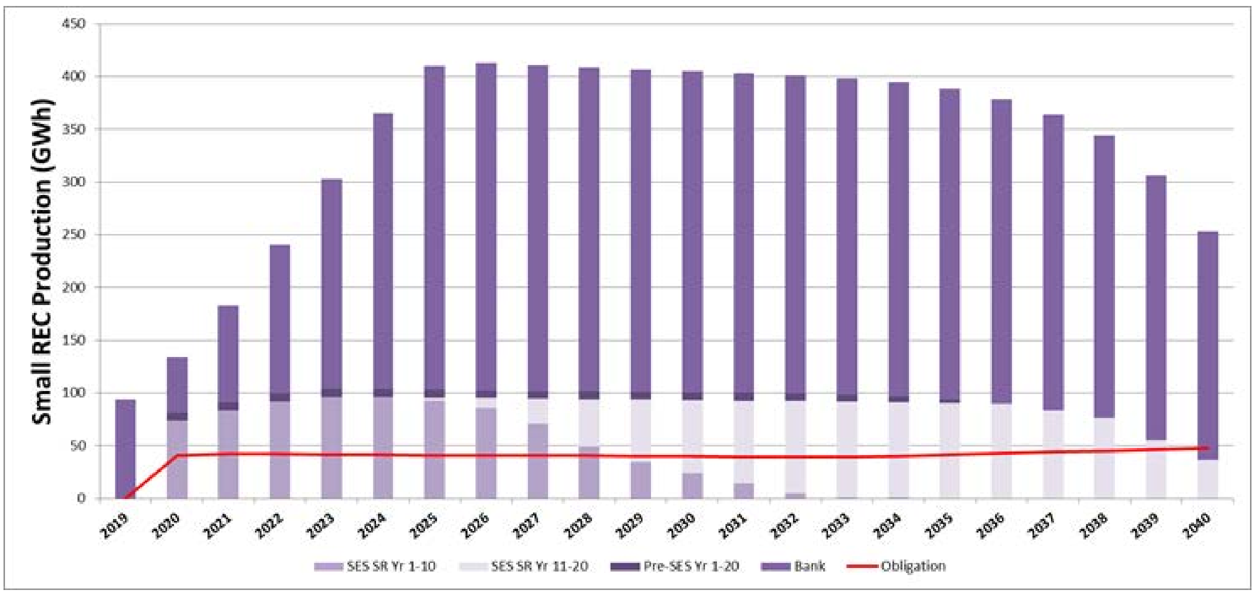


[8] Graph 2 and the supporting narrative reflect the passing of H.F. 1842.

The chart above assumes 100 percent of funds are awarded and that of these there will be an installation rate of 75 percent for the Solar*Rewards program. The Solar*Rewards program awarded 100 percent of the 2018 funding. If actual solar installations are lower than forecasted levels, the Company may not be able to meet the small solar carve-out requirements through 2033 as projected in the chart above.

Graph 3 below provides a projection for small solar carve out compliance with the addition of an assumed future buy-back option. The additional RECs would extend compliance with the small solar carve out beyond 2040. The Company cannot predict customer participation in a future program; however, an assumption of 75 percent participation is made for this projection.

Graph 3[9]
Small SREC Production with Solar*Rewards Program Extension with Buy-Back Option



Also, the above analysis is based on the understanding that the nameplate capacity for purposes of this statute is measured in alternating current (AC). This is consistent with the definition of capacity in Minn. Stat. § 216B.164, Subd. 2a.(c)., as well as how capacity is used or interpreted under the following statutes: Minn. Stat. §§ 216B.1611, Subd.2(a), and Subd.3a(a)(1); 216B.1613; 216B.164, and Subd. 4c; 216B.1641 (b).

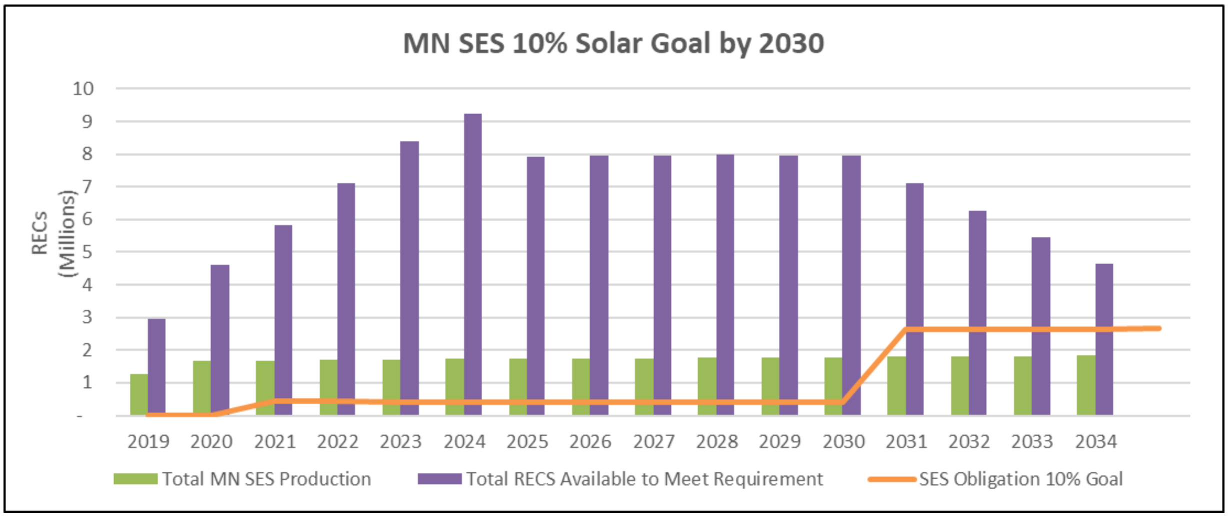
3. **Discussion on the utilities' efforts to reach, by 2030, the energy goal that ten percent of the retail electric sales in Minnesota be generated by solar energy.**
Docket Nos. E999/CI-13-542, E999/M-16-342, Commission Order (November 28, 2016)

[9] Graph 3 and the supporting narrative reflect the passing of H.F. 1842.

The 10 percent by 2030 goal is an energy goal of the state of Minnesota. We understand this question to be evaluating our current efforts to reach our proportional share of the state's energy goal.

As shown in Graph 4 below and in the attached Excel file (Tab 5 – Additional Graphs), the Company forecasts that we will meet the 10 percent by 2030 goal. The compliance fulfillment beyond 2030 will significantly be derived from the heavy use of our SREC bank that will have been accumulated up to that point. We expect our REC bank to carry us through several more years of demonstrated solar compliance; however, we plan to review the need of additional solar resources in a future resource plan in order to achieve the goal long-term.

Graph 4



4. Any additional comments or materials the utility may wish to include.

SES Cost Exclusion
No new SES exclusion applications were approved by the March 1, 2020, deadline for this report, and no applications are pending. We provide the production information and solar costs excluded for the two customers at six premises that became eligible for exclusion on June 1, 2017 in the attached Excel file (Tab 2 – Retail and Excluded). Per the exclusion process approved by the Commission in Docket No. E002/M-17-425, we issued bill credits in March 2020 to customers approved for exclusion for SES-eligible costs incurred between January 1 and December 31, 2019. See Tab 2 of the attached Excel file (Retail and Excluded) for the excluded customer sales and refund amount issued to each excluded premise.

Cost Recovery of 2019 SES Exclusion Amount
To recover the 2019 SES excluded costs from non-exempt customers, **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** will be included in the April 2020 fuel clause costs when we submit the 2020 fuel forecast true-up report on March 1, 2021 (Docket No. E002/AA-19-293; **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** was included in the CIP

Rider tracker filed in Docket No. E002/M-20-402 on April 1, 2020; and **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** will be added to the RDF tracker to be filed with the Commission by October 1, 2020.

Future SES Cost Exclusion

In its January 16, 2018 Order in Docket No. E002/M-17-425, the Commission found that only those costs associated with SRECs that are retired for the purpose of meeting the requirements of Minn. Stat. § 216B.1691, subd. 2f, can be excluded from rates charged to exempt customers. At some point in the future, however, we may begin generating more SRECs than are needed for SES compliance. If necessary, in a future annual report we will discuss refinements to our SES cost exclusion methodology

Future SES Reporting

Minn. Stat. §216B.1691 Subd. 2f(i) states:

> Beginning July 1, 2014, and each July 1 through 2020, each public utility shall file a report with the commission reporting its progress in achieving the solar energy standard established under this subdivision.

Based on the Statute above, we believe this is the final Annual Solar Energy Standard Report but expect to continue reporting in a compliance position starting next year given direction from the Commission. The Company recommends any compliance reporting be due after July 1 annually to better align with legislation changes that tend to become effective late in the Legislative Session in May.

With the move into compliance reporting, the Company would also recommend reporting requirements similar to those found in our Renewable Energy Standard (RES) report filed annually June 1. In our RES Report, we provide actual compliance for the current reporting year, and a forecast for the following three years.

Certificate of Service

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E999/M-20-464

Dated this 1st day of June 2020

/s/

Lynnette Sweet
Regulatory Administrator

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