

September 9, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/M-20-464, E999/M-13-542

Dear Mr. Wolf:

On August 26, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comment on the 2019 SES Progress Reports submitted by utilities on June 1, 2020. In addition, the Commission seeks comment on a Commission Staff proposal to combine SES Progress Reports with the annual RES reporting beginning with the 2020 reports.

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in this matter. The Department supports combining the SES and RES reporting going forward, as clarified in the attached comments, and recommends **acceptance** of the 2019 SES Progress Reports. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Public Utility Rate Coordinator

SLP/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E999/M-20-464, E999/M-13-542

I. BACKGROUND INFORMATION

Minn. Stat. §216B.1691 was amended by the 2013 Legislature to require public utilities to generate or procure 1.5 percent of their Minnesota retail electric sales from solar energy by 2020. The statute also requires utilities to meet a portion of their solar energy standard (SES) requirement from small solar facilities (small solar carve-out). The statute required Xcel Energy to obtain at least 10 percent of the 1.5 percent SES requirement from solar facilities 20 kW of capacity or less.

The 2017 Minnesota Legislature amended the SES Statute to require Otter Tail Power Company (OTP) and Minnesota Power (MP) to obtain 10 percent of their 1.5 percent SES requirement from solar facilities with 40 kW of capacity or less. In addition, the SES statute now permits MP and OTP to apply individual customer solar garden subscriptions of less than 40 kW towards their small solar carve-out requirement. The statute permits utilities subject to the SES to exclude retail sales to the mining, paper mill and wood products manufacturing industries from the calculation of their SES requirement.

The 2018 Minnesota Legislature amended the SES Statute to raise the facility size associated with the small solar carve-out from 20 kW to 40 kW for Xcel Energy, consistent with the requirement for MP and OTP.

II. SUMMARY OF REPORTING REQUIREMENTS

The Minnesota Public Utilities Commission's (Commission) April 25, 2014 *Order Clarifying Solar Energy Standard Requirements and Setting Annual Reporting Requirements* in Docket No. E999/CI-13-542 requires utilities to submit the following information:

- Annual Minnesota retail sales;
- Annual excluded customer sales;
- A list of customers requesting exclusion and their North American Industry Classification System (NAICS) code;
- Total Minnesota retail sales for customers excluded from the SES requirement;
- Annual solar generation, the total number of units registered in M-RETS (Midwest Renewable Tracking System) and total S-RECs (solar renewable energy certificates) generated from those units;

- Estimated amount of solar generation in MWs the utility would be required to obtain in 2020;
- Estimated solar energy requirements to meet the SES in 2020;
- A short summary of ongoing efforts to obtain solar energy, including the anticipated mix of project sizes for SES compliance;
- A summary of progress toward the 10 percent carve out for systems under 20 kW;
- A brief summary of the state(s) in which the solar generation is located or anticipated to be located;
- Purchases and sales of S-RECs to meet the SES; and
- A breakdown of S-RECs from the following:
 1. Facilities receiving a Value of Solar rate;
 2. Community Solar Gardens;
 3. Facilities under a net metering tariff;
 4. Utility-owned solar projects;
 5. Solar facilities that have entered a purchased power agreement (PPA) with the utility;
 6. Facilities receiving an incentive such as Solar*Rewards or Made in Minnesota.

The October 23, 2014 Order in Docket E999/CI-13-542 requires utilities subject to the SES to include the following:

1. Excluded sales only from customers that have requested and been approved by utilities for exclusion from the SES requirements;
2. Additional information supporting each utility's assumed capacity factor;
3. More detailed information on each utility's ongoing efforts to obtain solar energy on their systems;
4. Information on the effective load carrying capability and MISO capacity accreditation for existing or planned solar facilities;
5. Additional discussion on any challenges utilities face in registering small solar facilities; and
6. A discussion of how utilities weigh the uncertainty of the solar investment tax credit benefit to awaiting the potential for technology improvements which may reduce the costs of adding solar resources.

Finally, the Commission's August 26, 2020 *Notice of Comment Period* sought comment on a Commission Staff proposal to combine SES reporting with RES reporting beginning with the 2020 reporting year.

III. DEPARTMENT REVIEW

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed the annual SES reports and concludes that they include the requested information and therefore comply with the Commission's Orders. In general, the three utilities subject to the SES continue to evaluate solar projects that will be used to meet the SES. The Department provides a brief summary of each utility's efforts to meet the 2020 SES requirement.

A. OTTER TAIL POWER COMPANY (OTP)

OTP continues to evaluate utility-scale solar projects that will qualify as least-cost resources in all the jurisdictions in which it operates. In the meantime, OTP stated that it has purchased sufficient S-RECs to meet its 2020 SES requirement and part of its 2021 requirement. Meeting the small solar carve-out continues to be a challenge for OTP. OTP stated that it has constructed two Company-owned 40-kW projects which will be operational this summer, and has partnered with an area high school to develop a project on their property. OTP has three projects for a total of approximately 120 kW constructed through its Publicly Owned Property Solar (POP Solar) program. Finally, OTP continues to evaluate a possible utility-scale solar project with customer subscriptions, building additional Company-owned small solar facilities and the purchase of SRECs from smaller facilities.

B. MINNESOTA POWER (MP)

MP stated that it intends to meet its SES through its Camp Ripley (10 MW) project, and its Blanchard Solar PPA (10 MW). In addition, the Company has 1.04 MW of community solar gardens, and has expanded its SolarSense Customer Solar Program to assist with customer-sited solar projects in order to meet the small solar carve-out. MP also stated that it actively participates in the Minnesota Solar Pathways Initiative that aims to provide support and technical assistance toward meeting the 10 percent SES requirement by 2030.

C. XCEL ENERGY

Xcel reported that it had approximately 25.5 MW in solar from facilities of 40 kW or less, and 752.4 MW of solar capacity from facilities over 40 kW. Xcel has 262 MW of utility-scale solar projects, some of which are earmarked for its Renewable*Connect green pricing pilot. The Company continues to offer incentives for the installation of rooftop solar through its Solar*Rewards program. The Second Generation Solar*Rewards program offers incentives based on the system's energy production to customers installing solar systems of less than 40 kW.

In its most recent Integrated Resource Plan (IRP) filing (Docket E002/RP-19-368), Xcel proposed to add 4,000 MW of solar facilities over the forecast period, 2020-2034.

D. PROPOSAL TO COMBINE SES AND RES REPORTING

The Department is generally in agreement with Staff's proposal to combine RES and SES reporting into a single report. With respect to item 5 on Attachment B to the *Notice*, the annual solar generation on the utilities' system for the previous calendar year, the Department notes that generation should be broken down between facilities with 40 kW capacity or less, and those over 40 kW. For utilities able to use community solar garden (CSGs) subscriptions to meet the small solar carve-out, separate identification of generation from CSGs would also need to be reported.

Finally, the Department recommends that responses to items 8, 9 and 14, all of which request a written summary of efforts to meet future SES requirements, be provided with the biennial reporting.

IV. DEPARTMENT RECOMMENDATION

The Department recommends the Commission accept the Annual SES Reports submitted by Xcel Energy, Minnesota Power and Otter Tail Power Company.

The Department also supports Commission Staff's proposal to combine future SES and RES reporting, with the following clarifications:

- reporting annual solar generation on the utilities' system for the previous calendar year should be broken down between facilities with 40 kW capacity or less, and those over 40 kW,
- For utilities able to use community solar garden (CSGs) subscriptions to meet the small solar carve-out, separate identification of generation from CSGs should also be reported, and
- summaries of ongoing efforts to obtain solar energy, progress toward compliance with the 10 percent small solar carve out, and efforts to reach the 10 percent goal by 2030 should be included in the biennial reporting.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E999/M-20-464 and E999/M-13-542

Dated this 9th day of **September 2020**

/s/Sharon Ferguson

[illegible]

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