



September 28, 2020

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of Utilities' Annual Reports on
Progress in Achieving the Solar Energy Standard
Docket No. E999/M-20-464
Docket No. E015/M-13-542
Initial Comments - Notice of Comment Period**

Dear Mr. Seuffert:

Minnesota Power (or the "Company") submits to the Minnesota Public Utilities Commission ("Commission") its Initial Comments in response to the Commission's *Notice of Comment Period* filed on August 26, 2020, in the above-referenced Dockets. Topics open for comment include:

- Should the Commission accept the 2019 SES Progress Reports?
- Feedback on Commission Staff's proposal (Attachment B) for future SES reporting, and SES compliance.
- Are there other issues or concerns related to this matter?

Minnesota Power first recommends that the Commission accept the Company's 2019 Solar Energy Standard ("SES") Progress Report. As shown in the 2019 SES Progress Report, Minnesota Power is in compliance with the SES and Commission information reporting. The Company continues to focus its efforts on positioning itself for a balanced approach to comply with the SES in 2020 and beyond. The remainder of Minnesota Power's comments focus on the Commission Staff's proposal (Attachment B) for future SES reporting, and SES compliance.

In Attachment B Commission Staff proposes continued reporting of most data that is currently being reported in the SES compliance filing that is due on June 1st of each year. This data would no longer be reported through the SES compliance filing; instead, Staff directs specific data (Items 1, 4, 5, 8, 9, 11 and 14) to be reported in the established Renewable Energy Standard (“RES”) Report (-12 docket) which is also due June 1st of each year. The RES Reporting Template would be modified to include a new tab titled “4. SES Retail Sales,” as well as a new tab titled “7. REC Purchase & Sales” for biennial reporting. Minnesota Power supports Staff’s proposal.

Staff directs data specific to excluded customers sales, including a list of customers requesting exclusions from the requirement of the SES (Items 2 and 3), be reported in new utility-specific SES exemption dockets. Although Minnesota Power finds Staff’s proposal to be reasonable, the Company’s preference is to incorporate reporting this data into the RES Reporting Template as well. This would eliminate an additional filing for utilities to track and prepare, as well as Commission review and approval.

In compliance with Order Point 3 of the February 10, 2017 Order in Minnesota Power’s SolarSense Customer Solar Program Docket (Docket No. E015/M-16-485), and Order Point 15 of the July 27, 2016 Order in the Community Solar Garden Pilot Program Docket (Docket No. E015/M-15-825), the Company has been reporting the required information annually in the SES Compliance Report. Staff proposes that Minnesota Power report this information in their respective dockets. Currently, the Company is not required to submit annual compliance filings in these dockets; this proposal adds additional compliance filings to track and prepare, as well as regulators and stakeholders to review and to act upon. Minnesota Power’s preference is to report this information in an already established compliance filing such as the RES Report. Alternatively, the Company supports providing this information in the same utility-specific filing being proposed for reporting excluded customers sales data, as discussed above, if the filing is approved.

Finally, Staff proposes to eliminate future reporting of certain data (Items 6, 7, 10, 12, 13, 15, and 16). The Company supports eliminating the proposed items.

Minnesota Power appreciates the opportunity to provide comments on future reporting of the information that has been provided in the annual SES Progress Report. The Company supports continuing to provide the information proposed by Commission Staff and respectfully requests that the Commission use this opportunity to determine new reporting mechanisms that result in greater efficiency for all parties and minimizes new compliance filings.

Please contact me at (218) 355-3601 or lhoyum@mnpower.com if you have any questions regarding this filing.

Yours truly,

A handwritten signature in black ink, appearing to read "Lori Hoyum", with a stylized flourish at the end.

Lori Hoyum
Regulatory Compliance Administrator

LMH:th

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 28th day of September, 2020, she served Minnesota Power's Initial Comments in **Docket No. E999/M-20-464** and **E015/M-13-542** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger