

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Daniel Lipschultz	Commissioner
Matt Schuenger	Commissioner
John Tuma	Commissioner

**In the Matter of a Commission  
Inquiry into Standby Service  
Tariffs**

**November 9, 2016**

**MINNESOTA SOLAR ENERGY  
INDUSTRIES ASSOCIATION'S  
REPLY COMMENTS ON  
VARIOUS INVESTOR OWNED  
UTILITIES' FILED STANDBY  
TARIFFS**

**Docket No. E999/CI-15-115**

**REPLY COMMENTS OF THE MINNESOTA  
SOLAR ENERGY INDUSTRIES ASSOCIATION**

In lieu of the multitude of similar comments filed on the initial filing period, and the relative dearth of oppositional comments, we will be brief.

In addition to our previous comments, we support the proposition posited by iDeal Energies, Novel Energy Solutions, and SunDial Solar that the credit be “made permanent” or that it is contractually required for at least 10 years. The additional certainty that this would create helps customers make informed decisions and purchase systems with an understanding of a realistic payback period.

We also support the Department of Commerce’s probe into the dearth of solar capacity credits around the state. We appreciate their service of Information Requests on the rate regulated utilities, and we look forward to their answers. Because the Rate Regulated Utilities will be filing capacity credit calculations and will be presumably discussing their applicability in Reply, we request that the Commission consider another comment period after the Reply period to allow parties to adequately address any Capacity Credit formulation.

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