STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, D/B/A XCEL ENERGY, FOR APPROVAL OF ITS COMMUNITY SOLAR GARDEN PROGRAM	COMMENTS OF THE JOINT SOLAR ASSOCIATIONS
February 3, 2021	DOCKET NO. E-002/M-13-867

Joint Solar Associations REPLY COMMENTS

The Minnesota Solar Energy Industries Association (MnSEIA) is a 501(c)(6) nonprofit trade association that represents our state's solar businesses, with over 110 member companies, which employ over 4,200 Minnesotans.

The Coalition for Community Solar Access (CCSA) is a 501(c)(6) national nonprofit trade association that represents the community solar industry, with 68 member companies and active efforts in 17 states as well as at the federal level.

BACKGROUND

The Commission's October 13, 2020 Order directed Northern States Power Company, doing business as Xcel Energy ("Xcel"), to file a detailed summary of CSG stakeholder workgroup discussions regarding planned outages for CSGs.[1] Xcel filed a compliance report on November 2, 2020,[2] and on November 10, 2020, the Commission issued a Notice of Comment Period related to the compliance report.

The Joint Solar Associations, their members, and other commenters submitted extensive comments detailing Xcel's arbitrary and discriminatory disconnection practices for CSGs, and Xcel's inadequate technical justifications for those practices. We have subsequently received

[1] *See* ORDER ACCEPTING NOTIFICATION PROPOSAL, In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Its Proposed Community Solar Garden Program, Doc. Id. 202010-167243-01 (October 13, 2020).

[2] *See* Northern States Power, d/b/a Xcel Energy, COMPLIANCE REPORT – PLANNED OUTAGES COMMUNITY SOLAR GARDENS PROGRAM DOCKET NO. E002/M-13-867, Doc. Id. 202011-167953-01 (November 2, 2020). Hereinafter "Xcel filing."

additional data from CSG owners and operators reflecting the impacts of these disconnections. We wish to use these Reply Comments to provide more information on the scale of this problem.

SAMPLE DATA

The Joint Solar Associations have received availability data from ten (10) owners/operators of CSGs in Xcel territory in Minnesota. The "availability" represents the percentage of time that a given facility could connect to the grid, after accounting for Xcel disconnections. In a typical distribution grid, which is to say every other market for which we have data, the availability would be at least 99%. Independent Engineers, who assess system performance for underwriting, assume at least 99% availability in their models. It is quite literally the industry standard floor, except in Xcel territory in Minnesota.

The self-reported availability data we have received, totaling approximately **259.25MW ac**, is attached in graph and table form. The average facility availability across that sample is **95.23%**. This is over 3.75% lower than the industry standard, and each percentage point has a dramatic impact on the market.

Xcel's most recent quarterly report[3] reveals a total of 208 outage days during the 4th quarter of 2020, 149 of which stemmed from utility-directed maintenance, 56 to upgrade facilities for additional DER, and 3 for city and county work.

FINANCIAL IMPACT ESTIMATE

The information we have received on availability allows us to calculate estimates of actual financial impact from Xcel's practices. Looking at the 259.25 MW ac sample, if we conservatively assume production is 1,350 kWh/kW[4], and assume an average bill credit rate of $0.125[5], a one percent (1%) change in availability represents approximately **$437,484** in lost bill credits each year. Pursuant to the availability rates that have been reported to us, those subscribers and owner/operators are losing approximately **$1,650,837** each year as compared to the industry floor of 99%.

If we extrapolate that calculation to represent the entire CGS market, which is approximately 784 MW ac[6], the annual lost revenue from a 1% change in availability is approximately **$1,323,000**. If we assume the same availability rate as our sample, Xcel's disconnection practice is costing Solar*Rewards Community subscribers **$4,992,309** every year this continues. That is after assuming a 1% loss, which is the absolute floor in the industry. Most markets do not typically even see that 1% loss.

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[3] See Xcel Energy, QUARTERLY COMPLIANCE REPORT, In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of Its Proposed Community Solar Garden Program, Doc. Id. 20211-170270-01 (January 26, 2021) at 8, *hereinafter* Xcel Compliance Filing.

[4] Tracker-based systems will provide 1500-1700 kWh/kW.

[5] *See* Xcel Compliance Filing, "Table 1, Subscription Metrics" at 2 (showing approximately $6M bill credits/48M kWh).

[6] Id, at 1.

These calculations are further explained in the attached chart. Regardless of the exact annual availability in the CSG market, the bottom line is that Xcel's arbitrary and discriminatory disconnection practice is costing CSG owners and operators millions of dollars each year.

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