

September 23, 2019

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

**RE: Supplemental Comments on the Commission Inquiry into Standby Service Tariffs  
Docket No. E999/CI-15-115**

Dear Mr. Wolf:

The Minnesota Solar Energy Industries Association (MnSEIA) appreciates the opportunity to respond to Department of Commerce's recommended action on the Xcel Energy PV Demand Credit Rider in the attached comment letter, pursuant to the current Minnesota Public Utilities Commission notice of comment period.

We appreciate your attention to this matter.

Very truly yours,

/s/ David Shaffer

David Shaffer, Esq.  
MnSEIA Executive Director

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

Katie J. Seiben	Chair
Daniel Lipschulz	Commissioner
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

**In the Matter of The Minnesota Public  
Utilities Commission’s Inquiry into  
Standby Service Tariffs**

**September 23, 2019**

**MINNESOTA SOLAR ENERGY  
INDUSTRIES ASSOCIATION’S  
COMMENTS**

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

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

**I. Introductory Remarks**

The Minnesota Solar Energy Industries Association (MnSEIA) appreciates the Minnesota Public Utilities Commission’s (PUC or the “Commission”) offering of a comment period to address the Department of Commerce’s (the “Department”) Supplemental Comments<sup>1</sup> and PV Demand Credit Rider recommendations filed with the Commission.

MnSEIA offers these comments on behalf of the Minnesota solar industry, and specifically the commercial and industrial solar business sector.

**II. Department of Commerce and Commercial Cohort Comments**

MnSEIA encourages development of a well-supported and researched PV Demand Credit that meets commercial and industrial sector, and customer needs. Today, MnSEIA aligns with the Commercial Cohort in their comments and their recommended courses of action in light of the Department’s supplemental comments.

Specifically, we echo the comments made by the Commercial Cohort and recommend: (i) including the PV Demand Credit Rider in Xcel Energy’s next rate case to encourage more comprehensive analysis; (ii) directing Xcel Energy to convene a stakeholder process with commercial customers; (iii) maintaining the existing PV Demand Credit Rider through April 20, 2027; (iv) resolving implementation issues, such as defining and interpreting the term

---

<sup>1</sup> Docket No. E999/CI-15-115. Department of Commerce [Supplemental Comments in the Matter of a Commission Inquiry into Standby Service Tariffs, PV Demand Credit Rider Methodology](#), August 16, 2019.

“enrollment” as the date a complete interconnection application is submitted to Xcel, to provide certainty to commercial and industrial solar companies that their project will be credited at the current Rider rate and terms; and (v) including energy storage in the PV Demand Credit Rider.

### III. MnSEIA Recommendations

In conclusion, MnSEIA supports the Commercial Cohort and the Department’s recommendation to include the PV Demand Credit Rider in Xcel Energy’s next rate case.

In unity with the Commercial Cohort, we similarly recommend that the Commission also:

- Direct Xcel to convene a stakeholder process with commercial customers and that the stakeholder meetings are led as follows:
  - Work with historically engaged commercial customers involved in PV Demand Credit rate design discussions to schedule multiple meetings with notice
  - Facilitate the exchange of stakeholder materials in advance of meetings to allow for review time and maximize meeting productivity
  - Offer access to the Company’s underlying calculation data for stakeholder review
- Adopt the Department’s option in section IV. D. 1.b. *Potential Commission Options*:

Until the Pilot project is approved, maintain Xcel’s current PV Demand Credit Rider of \$0.07139 per kWh of peak period solar PV generation [from 1:00 p.m. to 7:00 p.m.] but for the closed rate, A85, extend the expiration date from April 20, 2024 to April 20, 2027.<sup>2</sup>

- For the existing Rider, clarify the fulfillment of “enrollment” as being when a complete interconnection application is submitted for a planned project.
- Direct Xcel to propose a pilot that allows customers with energy storage to participate under the Rider.

MnSEIA appreciates the Commission’s attention to this important matter and we thank you for the opportunity to share our perspective as representatives of the Minnesota solar industry.

Respectfully submitted,

David Shaffer, Esq.  
MnSEIA Executive Director  
[dshaffer@mnseia.org](mailto:dshaffer@mnseia.org)

Liz Lucente, Esq.  
MnSEIA Program Director  
[llucente@mnseia.org](mailto:llucente@mnseia.org)

---

<sup>2</sup> See Department’s [Supplemental Comments](#) at p.19.