

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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**In the Matter of an Inquiry into
Utility Investments that May Assist in
Minnesota’s Economic Recovery from
the COVID-19 Pandemic**

**COMMENTS of the MINNESOTA
SOLAR ENERGY INDUSTRIES
ASSOCIATION’S (MnSEIA)**

September 30, 2020

Docket No. E,G-999/CI-20-492

Introduction

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 4,000 Minnesotans.

Comments

MnSEIA is supportive of the Reports put forward from the various electrical utilities that have filed in this docket. Of particular note are the filings of Xcel Energy and Minnesota Power. We also want to acknowledge the work of Otter Tail Power for two solar items that are outside of their report; namely, their recent announcements that they are replacing their Hoot Lake coal plant with 50 MW of solar, and the news that the Red Lake Falls wind/solar hybrid facility from PUC Docket 16-1021 should be built this year. These proposals, if approved, will put solar installers to work and create thousands of new jobs for Minnesotans. The proposals from the utilities describe dynamic, game-changing projects that will help them meet Minnesota’s 10% by 2030 solar energy goal.

The 15-year long pipeline of utility-scale solar work that appears to begin with these proposals and projects, and continues with projects described in utility filings in other dockets, like filed Integrated Resource Plans, is exciting. From what we know today, and assuming no delays, the pipeline will start in 2021 with Hoot Lake and Elk Creek combining for 130MW of generation, and will conclude in 2034 with a total of more than 4 GW of solar capacity. Long pipelines of work ensure that utility-scale projects are not gig-like in nature. There will be fewer boom bust cycles of development like Minnesota saw with the initial grouping of utility-scale projects that were built largely in 2016-2017 to meet the 2020 solar energy standard.

What we are seeing now are proposals that will create careers. They are projects so substantial that they will encourage people to enter the trades and learn how to become solar installers. Minnesotans will know that there will be work for them when they finish their solar training, and that there will be work for them for years to come. Many of these jobs will be great paying union positions as well. This is an impressive proposition.

What these utilities propose to begin next year is something the solar industry expected to start in 2025. We are thrilled that these utility proposals and projects will both help initiate a more rapid buildout, and help bridge the project gap we had been expecting. These soon-to-be-ready projects will help get Minnesota's economy back on track with socially distanced, outdoor work that is relatively safe from COVID-19, and create careers available to all Minnesotans. It does not get much better than that from the solar industry's perspective.

We do, however, feel inclined to address an issue that is now spanning many dockets, because at the crux of this docket is a need for rapid job growth and project deployment to combat the economic downturn from a global pandemic. That issue is the interconnection of smaller solar projects. Interconnecting with Xcel Energy's electric system has been challenging for distributed generation ("DG") projects, and the timelines for many systems are now measured in months and years when many of them could be measured in days and weeks. If the Commission is interested in job creation, then the easiest and fastest way to spur renewable energy jobs is to get projects moving faster through Xcel's queue.

Currently, we estimate that there are about 400 MW of DG solar projects in Xcel Energy's queue, ranging from very small rooftop projects to 1 MW community solar gardens. They are just waiting to get built. However, it is unclear when that might happen. Due to the depths of the queue in some locations, there will be 1 MW projects currently on hold that will, undoubtedly, have to wait longer than Xcel will have to wait on their 460 MW Sherco project, if it is approved. There has got to be a way to simultaneously ensure the timely processing of DG project applications and to jumpstart a utility-scale solar pipeline.

It is important that the Commission consider and recognize the fact that while 460 MW of new utility-scale solar generation is amazing, Xcel is also sitting on nearly the same amount of MW of shovel-ready DG projects. And instead of moving those projects forward, Xcel engineers are routinely missing timelines. While simultaneously getting applauded for their 100% carbon free objectives and now their COVID-19 response, Xcel is slowing the onset of clean energy jobs every single day.

However, on this topic, we have no action items or model decision options for the Commission here. The challenges of interconnection just need to be said over and over again until the problem is fixed and applications are processed on time. Instead, we would prefer to leave that matter to one of the other dockets pertaining more specifically to interconnection, and to have MnSEIA on the record as supportive of the utility proposals as submitted and any rate recovery required to ensure the projects advance.

Lastly, we would like to mention that we are generally supportive of the comments filed by Native Sun Community Power Development, MN350, St. Paul 350, Sierra Club, CMEJ, Community Power, MN Renewable Now, Alliance for Metropolitan Stability, COPAL, MEP, NAMC, UCS, Take Action MN, and others (hereinafter the “Joint Commenters”), so long as they can be administered in a timely manner to ensure the utility project timelines do not fall too far afield.

We hope the utilities proactively adopt those provisions that are immediately actionable without need for protracted negotiations or unnecessary dialogue, which would allow for important and more challenging requests to take center stage. Similarly, we hope the Commission considers what bullet points from the Joint Commenters are easier to adopt, and to make sure those items are required parts of utility plans at the outset, while affording more difficult conversations the time to take place and for a subsequent proceeding to be possible if and when agreements are reached or important issues become impasses.

So in conclusion, Minnesota’s solar industry is very supportive of the utility projects and proposals filed in this docket. We hope the Commission will approve them quickly while also being consistent with the recommendations of the Joint Commenters. Lastly, we hope the Commission recognizes that resolving the pain of Xcel’s sluggish interconnection queue would also be consistent with the goals laid out in this Docket in spurring clean energy job growth.

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