

# KEYES & FOX LLP

January 13, 2017

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

VIA ELECTRONIC SERVICE

**Re: DOCKET NO. E002/M-13-867 - IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY, DBA XCEL ENERGY, FOR  
APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDEN  
PROGRAM**

Dear Mr. Wolf,

The Energy Freedom Coalition of America (“EFCA”) hereby submits the **COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA** to the above-entitled matter.

EFCA has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at (720) 639-2190 or at [jschlesinger@kfwlaw.com](mailto:jschlesinger@kfwlaw.com).

Sincerely,

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Enclosure

Cc: Service List

STATE OF MINNESOTA  
BEFORE THE MINNESOTA  
PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER  
COMPANY, DBA XCEL ENERGY, FOR APPROVAL OF ITS PROPOSED  
COMMUNITY SOLAR GARDEN PROGRAM

DOCKET NO. E-002/M-13-867

Date: January 13, 2017

**COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA**

The Energy Freedom Coalition of America (“EFCA”) hereby submits these comments pursuant to the Minnesota Department of Commerce, Division of Energy Resources (“Department”) Letters requesting comments issued December 15 and December 28. EFCA represents a broad range of businesses that are fully integrated providers of distributed energy resources (“DERs”) products and services for residential, commercial, government, community solar, and utility-scale applications, including rooftop solar, distributed generation, thermal and battery energy storage, demand response and load management services, and smart energy services. EFCA’s current members include Silevo, LLC; SolarCity Corporation; ZEP Solar, LLC; Go Solar, LLC; 1 Sun Solar Electric, LLC; and Ecological Energy Systems. EFCA appreciates the opportunity to provide comments regarding potential adders to the Value of Solar (“VOS”) used for the community solar garden (“CSG”) bill credit rate.

**I. Adders for Residential, Low-Income or other Small Subscribers**

Residential and low-income customers will need an adder in addition to the VOS bill credit rate in order to encourage developers to acquire such subscribers, and to encourage more residential and low-income customers to participate in the program.

There are three central reasons for this, summarized briefly below and elaborated on in the following pages:

- Higher customer acquisition costs with no accompanying benefit for developers
- For low-income, higher risk and even higher outreach and marketing costs with no accompanying benefit for developers
- Higher financing costs and increased ongoing expenses related to billing, customer service, and facilitating relocations within residential classes over the life of the CSG.

#### ***A. Customer Acquisition Costs***

Residential and low-income customers, as well as other customers with lower electricity usage are eligible for smaller CSG subscriptions compared to large commercial or industrial customers and are therefore less attractive to developers because of the added customer acquisition costs. There is no incentive for CSG developers to sign up residential customers if all customers receive the same rate. For example, it requires significantly more administrative effort (marketing, sales, etc.) to acquire 100 customers with 5 kW subscriptions, compared to acquiring one large customer with a 500 kW subscription.

This phenomenon of “cherry picking” the most attractive customers is by no means limited to CSG initiatives. It has long been seen in retail choice states, where retail energy suppliers are known to show a preference for larger customers because of their larger load sizes compared to overhead costs.<sup>1</sup> Further, the experiences in retail choice states also demonstrate that commercial and industrial customers make changes to their energy supply more easily than residential customers. Commercial and industrial

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<sup>1</sup> Christensen Associates Energy Consulting, LLC. “Retail Choice in Electricity: What Have We Learned in 20 years? February 11, 2016. p. 50 (*available at*, <https://www.hks.harvard.edu/hepg/Papers/2016/Retail%20Choice%20in%20Electricity%20for%20EMRF%20Final.pdf>).

customers switch to retail suppliers in retail choice states at much higher rates than residential customers, due to economies of scale. The benefits of switching a customer's electricity supply is proportional to the size of the customer, meaning that larger customers can afford to invest the time needed to evaluate different supply options and suppliers because the payoff is greater.<sup>2</sup>

***B. Higher Risks and Costs Associated with Low-Income Customers***

Barriers for low-income consumer participation in CSGs are similar but even more significant than for residential consumers generally. Notably, low-income customers have limited disposable income, making them more risk-averse and less willing or able to make any up-front payments. Additionally, because low-income customers lack collateral and typically have poor credit, their financing options are limited.<sup>3</sup> Regardless, traditional financing options are typically not useful to low income consumers who cannot afford to take on additional debt.<sup>4</sup> Furthermore, for some of these customers, daily economic priorities such as housing, health care, and food can make it impossible for them to prioritize participation in CSGs over other needs.<sup>5</sup>

Beyond financial barriers, low-income customers may live in more remote or under-served areas where outreach and education are often insufficient to reach or persuade consumers. This may be due to language barriers, customer skepticism, or

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<sup>2</sup> *Id.* at p. 6.

<sup>3</sup> Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities, December 2016. at p. 35. (*available at*, [http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214830\\_20161215T184655\\_SB\\_350\\_LowIncome\\_Barriers\\_Study\\_Part\\_A\\_\\_Commission\\_Final\\_Report.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/16-OIR-02/TN214830_20161215T184655_SB_350_LowIncome_Barriers_Study_Part_A__Commission_Final_Report.pdf))

<sup>4</sup> *Id.*

<sup>5</sup> Shared Renewables for Low-to Moderate-Income Consumers: Policy Guidelines and Model Provisions, at p. 20 (*available at*, [https://energy.gov/sites/prod/files/2016/04/f30/IREC-LMI-Guidelines-Model-Provisions\\_FINAL.pdf](https://energy.gov/sites/prod/files/2016/04/f30/IREC-LMI-Guidelines-Model-Provisions_FINAL.pdf)).

ineffective marketing.<sup>6</sup> A need for more targeted outreach and marketing to low-income consumers increases the transaction costs of acquiring such consumers.

The Interstate Renewable Energy Council recommends that in order to effectively serve low-income consumers, shared solar policies should go farther to address the additional financial and market barriers that these customers face.<sup>7</sup> IREC advocates setting strong targets for low-income participation and providing adequate support for achieving those targets through programs including targeted incentives and credit support to facilitate direct low-income participation.<sup>8</sup>

For example, Massachusetts is proposing to accommodate low-income consumers in the next phase of its solar incentive and net metering programs in a number of ways. A straw proposal filed in September 2016 includes the following incentives:<sup>9</sup>

- \$0.35/kWh for low-income systems  $\leq$  25 kW AC (compared to \$0.35/kWh for residential systems of the same size)
- \$0.06/kWh adders for low income community solar subscribers (compared to \$0.04/kWh for non-low-income subscribers)

The actual numbers above are preliminary, but what's important is the fact that the Massachusetts Department of Public Utilities is designing their solar incentive program to achieve broader diversity in customer participation and is looking to give special consideration to enrolling low-income customers. Additionally, the Department of Public

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<sup>6</sup> Low-Income Barriers Study, Part A. at pp. 40-47.

<sup>7</sup> Shared Renewables for Low-to Moderate-Income Consumers at p. 30.

<sup>8</sup> *Id.*

<sup>9</sup> Massachusetts Department of Energy Resources. "Next Generation Solar Incentive Straw Proposal," September 23, 2016 (*available at*, <http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/solar-program-straw-proposal-presentation-092316.pptx>).

Utilities is considering proposals from various parties to exempt low-income customers from a potential Monthly Minimum Reliability Contribution charge.<sup>10</sup>

Additional incentives for acquiring Minnesota's residential and low-income consumers are needed in order to overcome barriers. Providing adders to the VOS rate is the most straightforward mechanism for increasing developers' willingness to invest in the outreach and marketing necessary to reach such customers and make the investment more attractive for consumers. However, other financial or programmatic changes may also be necessary to address the unique issues faced by these customer sectors.

For example, a backstop such as a reserve fund may be needed to protect developers against customer attrition. The Department of Commerce could propose an adder or surcharge to the VOS rate, which would be deposited into an account that could be drawn against if customer attrition occurs. Such a fund could also allow for contracts to be offered on more flexible terms or with lower underwriting criteria because the provider has some protection against potential losses.

In addition to reducing the financial barriers through adders and financing options, the Commission should consider requiring Xcel to educate low-income customers about CSG options that could help them save. Such education could be incorporated into marketing and outreach programs that Xcel already has in place for low-income and residential customers.

***C. Financing and Administrative Costs are Higher for Residential and Low-Income Customers***

Some developers have explained that financiers view CSGs comprised of residential subscribers to be higher risk than those comprised of C&I customers.<sup>11</sup> This is

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<sup>10</sup> See generally, comments filed November 14, 2016 in Massachusetts Department of Public Utilities Docket 16-64 (available at, <http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber>).

typically due, in part, to higher consumer protection standards for residential customers and increased attrition in the residential sector.<sup>12</sup> Therefore, financiers assign a higher cost of capital to these CSGs via the interest rates they charge, which results in higher costs to the developer, and ultimately the residential and low-income subscribers.<sup>13</sup> In sworn testimony before the Colorado Public Utilities Commission, Sunshare LLC explained that the cost of capital for financing a CSG comprised of residential customers is approximately 200 basis points higher than the cost of capital for C&I customers, or roughly 27% more expensive to finance.

Administrative costs for a heavily residential subscribed CSG are also higher than for commercial and industrial subscribed gardens due to higher attrition and turnover. Because residential and low income customers tend to move both within and without of utility service territories there are additional CSG costs associated with transferring subscriptions to different premises or replacing residential and low income customers over the life of the CSG. Additional customers with smaller subscriptions also lead to an increased need for customer service representatives to service the higher number of customers.

## **II. Criteria and Schedule for Updating Adder Amounts**

In order to provide some market certainty for developers, EFCA recommends that the Department and the Commission review any adders to the VOS rate every 5 years.

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<sup>11</sup> Colorado PUC Proceeding No. 16AL-0048E, Confidential Opening Testimony and Attachments of David Amster-Olszewski on Non-Unanimous Comprehensive Settlement Agreement on Behalf of SunShare LLC, filed September 2, 2016, p. 23 (*available at*, [https://www.dora.state.co.us/pls/efi/EFI.Show\\_Docket?p\\_session\\_id=&p\\_docket\\_id=16AL-0048E](https://www.dora.state.co.us/pls/efi/EFI.Show_Docket?p_session_id=&p_docket_id=16AL-0048E)).

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

Market conditions are likely to change during that period of time, but reviewing and revising adders more frequently removes any long-term uncertainty that an adder will be available. Such uncertainty could discourage developers from investing in marketing or outreach strategies to specific customer sectors.<sup>14</sup> As with the VOS rate, any adders should stay in place for individual subscribers for the length of the customer's contract.

### **III. Conclusion**

In conclusion, the VOS should be strengthened with additional adders to attract residential subscribers and low-income consumers, as well as to encourage developers to locate systems near the subscribers they serve and to attract subscribers to those nearby systems. We appreciate the opportunity to weigh in on these matters.

Respectfully submitted this 13th day of January 2017.

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<sup>14</sup> National Renewable Energy Laboratory. Distributed Solar Incentive Programs: Recent Experience and Best Practices for Design and Implementation, December 2012 at p. 26, 31-32 (*available at*, <http://www.nrel.gov/docs/fy13osti/56308.pdf>).



**CERTIFICATE OF SERVICE**

**RE: DOCKET NO. E002/M-13-867 - IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY, DBA XCEL ENERGY, FOR  
APPROVAL OF ITS PROPOSED COMMUNITY SOLAR GARDEN  
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I, Blake Elder, hereby certify that I have this day served a true and correct copy of the “*Comments of The Energy Freedom Coalition of America*” to all persons on the attached service list by electronic filing, electronic mail, or by U.S. mail, postage prepaid and properly addressed at Cary, North Carolina.

*Blake Elder*

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