

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

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

ISSUE DATE: October 7, 2021

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

ORDER EXTENDING THE RESIDENTIAL ADDER AND REQUIRING ADDITIONAL FILINGS

**PROCEDURAL HISTORY**

On November 16, 2018, the Commission issued an order adopting a \$0.015/kilowatt-hour (kWh) residential adder for the community solar garden (CSG) program for Northern States Power Company d/b/a Xcel Energy (Xcel Energy).<sup>1</sup> The residential adder for the value of solar bill credit rate was adopted for a two-year term spanning the 2019 and 2020 vintage years.

On March 9, 2021, the Commission directed Xcel Energy to file a report addressing the performance of the residential adder and forward-looking options for increasing residential participation in CSGs.<sup>2</sup>

On March 26, 2021, Xcel Energy filed the Residential Adder Evaluation. The report addressed the issues required by the Commission in its March 9, 2021, Order.

On April 19, 2021, the Commission issued a notice requesting comments on extending the residential adder for Xcel Energy's CSG program.

By June 22, 2021, comments were received from the following:

- Nexamp;
- Minneapolis Climate Action;
- Department of Commerce, Division of Energy Resources (the Department);
- Minnesota Solar Energy Industries Association (MnSEIA);
- Cooperative Energy Futures;
- United States Solar Corporation;

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<sup>1</sup> Order Adopting Adder and Setting Reporting Requirements (Nov. 16, 2018).

<sup>2</sup> Order Approving Xcel's 2021 Value-of-Solar Rate (Mar. 9, 2021).

- Just Solar Coalition;
- The Institute for Local Self-Reliance (ILSR); and
- Dr. Gabriel Chan, Matthew Grimley, Katrina Little, and Dillon Cummins (Dr. Chan et al.).<sup>3</sup>

By July 6, 2021, reply comments were received from the following:

- Xcel Energy and
- MnSEIA.

On August 12, 2021, this matter came before the Commission.

## **FINDINGS AND CONCLUSIONS**

### **I. Summary**

In this order, the Commission extends the residential adder an additional two years through vintage years 2021 and 2022. In addition, Xcel Energy is required to provide additional filings and take steps intended to increase residential participation in the CSG program.

### **II. Residential Adder**

The current value of solar rate, previously approved by the Commission, compensates CSG subscribers for the electrical generation they bring to Xcel Energy's system and reflects the value of solar photovoltaic resources to a utility, its customers, and society. The residential adder is an additional amount of credit that is applied to residential subscribers' bills in addition to the value of solar rate and is currently set at \$0.015/kWh.

The residential adder was initially approved for a two-year pilot period, and Xcel Energy was required to (1) report on the performance of the residential adder and (2) provide forward-looking options for increasing participation in the CSG program, as required by statute.<sup>4</sup>

#### **A. Position of the Parties**

##### **1. Xcel Energy**

At the time of the filing, only six CSGs were online and eligible for the residential adder. Xcel Energy initially concluded there was no current justification for extending the pilot program because the limited data did not demonstrate the residential adder increased the number of residential subscriptions in CSGs and the costs of the CSG program overall, which includes the residential adder, rose annually. In its reply comment, Xcel Energy subsequently agreed to

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<sup>3</sup> Dr. Chan is an Assistant Professor with the Center for Science, Technology, and Environmental Policy in the University of Minnesota's Humphrey School of Public Affairs. Mr. Grimley, Ms. Little, and Mr. Cummins were researchers in the same center as Dr. Chan at the University of Minnesota. Each of them joined in the same filing submitted to the Commission on their own behalf.

<sup>4</sup> See Minn. Stat. § 216B.1641(e).

extend the residential adder for an additional year, through the 2021 vintage year, and file additional reporting by May 1, 2022, regarding the effectiveness of the program.

## **2. The Department**

The Department noted there was currently insufficient data to determine the effectiveness of the residential adder and supported extending the program an additional year through the 2021 vintage year. A gap, over a year at times, between the start of the vintage year and when residential subscribers receive CSG bill credits affected the data. Extending the program by a year would account for this lag, generate additional useful information, and allow for a better assessment of the effects of the pandemic on enrolling residential subscribers.

## **3. MnSEIA**

MnSEIA supported continuing the residential adder for at least another year or making the residential adder continuous and permanent. It argued the available data supported finding either (1) the adder was too low and did not encourage residential participation or (2) the adder was working as intended and not significantly impacting other Xcel Energy ratepayers. MnSEIA leaned toward the second conclusion since residential participation in the CSG program increased after the implementation of the residential adder. Specifically, residential subscriptions grew as a proportion of CSG capacity.

If additional data is necessary for the Commission, MnSEIA argued the residential adder should be extended in the interim. MnSEIA noted cancelling a potentially successful program would be self-defeating, especially in light of the strong public interest in increasing the number of residential subscribers in the CSG program.

## **4. ILSR**

ILSR contended the residential adder increased the number of residential subscribers, and it argued the program should be extended. It explained how one of the goals of the CSG program was to help residential customers who could not exercise solar rights because they lacked a sunny rooftop to benefit from solar. The residential adder allowed developers to design projects for this group by defraying the higher costs to acquire, serve, and retain households, which have smaller energy needs, in relation to commercial businesses, which have larger energy needs.

## **5. CSG Developers**

The following CSG developers and groups advocating on behalf of CSG developers supported extending the residential adder as a means of increasing participation and accessibility:

- Nexamp;
- Minneapolis Climate Action;
- Cooperative Energy Futures;
- United States Solar Corporation; and
- Just Solar Coalition.

The residential adder was important to CSG developers. Several stated the adder defrayed the higher costs associated with engaging potential residential subscribers, specifically outreach and administrative expenses to connect with low- to moderate-income and historically disadvantaged communities—this outreach often requires additional time and face-to-face interaction.

Both the Just Solar Coalition and Minneapolis Climate Action argued the residential adder should be increased. The Just Solar Coalition stated an increase would allow for sustained and substantial residential subscribership. Minneapolis Climate Action stated an increase provided room for smaller projects tailored to local communities.

## **6. Dr. Chan et al.**

Dr. Chan et al. concluded the residential adder is necessary. In their review of CSG subscription contracts, they concluded the residential adder provided a meaningful increase in the net benefit to low-income subscribers and was necessary to provide these savings.

Further, Dr. Chan et al. explained the cost of the residential adder had a minimal impact on Xcel Energy's other customers. Based on their analysis, for every 10,000 residential customers subscribed to a CSG and receiving the residential adder, non-participants' bills increased by \$0.03 per month.

## **B. Commission Action**

The Commission will extend the residential adder of \$0.015/kWh for an additional two years, extending to all projects in vintage years 2021 and 2022. At this time, it is clear that there is insufficient data to evaluate the effectiveness of the residential adder in increasing residential subscriptions to CSGs. Part of the issue is the lag between when a year begins and when residential customers receive bill credits from their CSG subscription. This gap can extend beyond a calendar year. Another part is the COVID-19 pandemic. Social distancing and other health protocols have limited face-to-face interaction, and multiple CSG developers emphasized the importance of in-person communication on increasing residential subscriptions, especially among historically disadvantaged communities and low- to moderate-income households.

As a result, any data from the initial two-year pilot comes with conditions. Instead of dedicating more time to parsing the current data, the Commission believes extending the residential adder for an additional two years will allow for a useful comparison of the time before and after implementation of the residential adder. The Commission recognizes Xcel Energy's concerns about the escalating costs of the CSG program, of which the residential adder is a part. At this time, however, the Commission concurs with Dr. Chan et al.'s analysis that the costs from residential subscriptions to CSGs will have a limited impact to non-participants in the CSG program.

The Commission is further satisfied that if these costs do blossom into an unsustainable burden, Xcel Energy will use one of the opportunities, as outlined in the ordering paragraphs below, to timely alert the Commission and its staff.

In the order issued on November 16, 2018, the Commission stated the following:

While it is impossible to predict with certainty the impact of an adder, the record supports exploring whether an adder would be an effective tool in promoting residential subscribership, particularly in light of the Commission's recent decision approving a value of solar rate.<sup>5</sup>

At this time, the record still supports exploring whether the adder can be an effective tool in promoting residential subscribership. As a result, the Commission will extend the residential adder for two years.

### **III. Improving Residential Subscriber Participation**

#### **A. Position of the Parties**

##### **1. Xcel Energy**

Xcel Energy proposed two alternatives to the current residential adder to improve residential participation: (1) a mixed adder and (2) a carveout.<sup>6</sup> Under the first, a mixed adder, business subscribers would receive a negative adder while residential subscribers would receive a positive adder. This would reduce the cost of the CSG program by offsetting residential rates with business rates. Under the second, the carveout, CSG developers would be mandated to include a certain amount of residential or income-qualified subscribers. Xcel Energy believed such a carveout would allow for additional CSG opportunities and limit costs to ratepayers.

Xcel Energy also developed a survey and twice invited operators of CSGs and other stakeholders to provide feedback for the CSG program, including the residential adder. In the most recent set of responses, the stakeholder suggestions included (1) consolidating CSG and Xcel Energy billing and (2) minimizing the time to transfer bill credits after a subscriber moves.

In its reply comments, Xcel Energy opposed these two suggestions from stakeholders. First, Xcel Energy noted the CSG statute did not require it to dedicate resources to address the customer service obligations of CSG developers. Second, Xcel Energy argued it was limited by statute in how far it could condense the bill credits transfer process, and garden operators are responsible for updating subscription changes.<sup>7</sup> It was open, however, to working with customers and stakeholders to improve the process moving forward.

##### **2. The Department**

The Department recommended the Commission require Xcel Energy to develop and file proposals regarding the mixed adder and carveout if the Commission wanted to further explore these options.

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<sup>5</sup> Order Adopting Adder and Setting Reporting Requirements (Nov. 16, 2018).

<sup>6</sup> In its reply comments, Xcel Energy did not oppose filing proposals regarding a mixed adder or residential carveout.

<sup>7</sup> See Minn. Stat. § 216B.1641.

### **3. MnSEIA**

MnSEIA raised several issues with Xcel Energy's suggestions. It argued the mixed adder would add additional layers to the program, which is already complicated, and the carveout would burden developers, potentially stifling future CSG development.

MnSEIA instead supported the suggestion of several stakeholders to consolidate billing for CSG residential subscribers. This would simplify the experience and eliminate credit-worthiness barriers to participation. MnSEIA also advocated in favor of increasing coordination with existing energy assistance programs and decreasing the time for interconnecting CSGs.

### **4. Cooperative Energy Futures**

Cooperative Energy Futures opposed Xcel Energy's proposals. It highlighted how the proposed mixed adder was likely too low to promote meaningful residential participation. Further, without mechanisms to ensure residential participation, it contended that carveouts can often become an artificial ceiling and not a floor to the subscriber mix of a CSG.

### **5. ILSR**

ILSR reviewed strategies from other states designed to incentivize residential and low- to moderate-income subscriptions in CSGs. ILSR noted carveouts put the onus on CSG developers without providing either incentives or resources.

### **6. Dr. Chan et al.**

Dr. Chan et al. considered ways to increase participation among low-income customers. They proposed implementing a pathway to automatically qualify low-income customers for incentives based on participation in other energy programs, such as the Low Income Home Energy Assistance Program (LIHEAP). Dr. Chan et al. also proposed tying an adder to how much of a CSG's output was dedicated to low-income subscribers.

## **B. Commission Action**

The Commission appreciates the parties' thoughtful proposals to improve and promote residential subscriber participation in the CSG program.<sup>8</sup> At this time, the Commission believes it is worth exploring how residential participation can be increased by (1) consolidating the CSG bill with the customer's utility electricity bill and (2) reducing the amount of time it takes for a CSG residential subscriber to receive bill credits after changing addresses. These options were raised and supported by several CSG developers and multiple stakeholders who provided feedback to Xcel Energy. The Commission believes both could assist customers who currently have to navigate multiple statements and potentially wait several months to receive bill credits. Opportunities to simplify the process for residential customers deserve to be explored.

While the Commission appreciates Xcel Energy's proposals, it is premature to address the proposed mixed adder and carveout. At this time, the Commission does not have sufficient data

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<sup>8</sup> See Minn. Stat. § 216B.1641.

to determine the effectiveness and cost of the residential adder. The Commission believes more information would help evaluate all proposals and will instead direct Xcel Energy to collect and regularly report on a number of areas, including data about the number of LIHEAP recipients who are participating in the CSG program and receiving bill credits. These requirements are outlined in the ordering paragraphs below.

## **ORDER**

1. The Commission extends the residential adder for Xcel Energy's community solar garden (CSG) program for an additional two years for all projects in value of solar (VOS) vintage years 2021 and 2022 at the current rate \$0.015/kilowatt-hour.
2. Xcel Energy shall file an initial residential adder evaluation report by May 1, 2022, documenting CSG project and subscription data for VOS vintage years 2017-2021, and a final evaluation report by May 1, 2023, documenting CSG project and subscription data for vintage years 2017-2022.
3. Xcel Energy shall include the following information as part of the evaluation reports on an ongoing basis:
  - a. Document CSG project and subscription data by VOS vintage year, including a breakdown by subscriber class of the number of active subscriptions and the capacity associated with these subscriptions.
  - b. The current number of residential subscribers uploaded to the Salesforce portal for each VOS vintage year reported on.
  - c. The most currently available metrics for one month as reported in Table 3 of Xcel Energy's quarterly CSG update report. These metrics include: the number of active subscriptions, the number of active subscribers, DC capacity allocation, AC monthly production allocation (kilowatt-hours), and incremental bill credits. Xcel Energy should report these metrics for a snapshot month as close to the date of the evaluation report as possible.
  - d. The total number of Low Income Home Energy Assistance Program (LIHEAP) recipients, who are participating in the CSG program and receiving bill credits, for each of the VOS vintage years for which Xcel Energy reports.
4. Xcel Energy shall file a CSG on bill payment proposal for only vetted community solar developers that considers and incorporates vetting criteria that will ensure greater local benefits, low-income participation, consumer protection contracts, and co-ownership and/or profit sharing with subscribers or local nonprofits. This proposal should be based on stakeholder input and filed by May 1, 2022.

5. Xcel Energy shall work with stakeholders to update its process for subscriber address transfers to avoid or reduce subscription period gaps created by Xcel Energy's validation requirements at new addresses.
6. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



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## **CERTIFICATE OF SERVICE**

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission**  
**Order Extending the Residential Adder and Requiring Additional Filings**

Docket Number **E-002/M-13-867**

Dated this 7th day of October, 2021

/s/ Chrishna Beard

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