



414 Nicollet Mall
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February 23, 2018

—Via Electronic Filing—

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

RE: VALUE OF SOLAR ADDERS ANALYSES – CORRECTED
COMMUNITY SOLAR GARDENS PROGRAM
DOCKET NO. E002/M-13-867

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), files the following correction to our Analyses submitted February 1, 2018 in response to the Commission's December 1, 2017 Notice of Required Filing.

Upon review of the filing, we discovered an error located on page 6 of our analyses. The data located in Table 6 was inadvertently a copy of the data included in Table 5. We have corrected the error and provide the enclosed corrected filing.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or 612-337-2268, or me at lisa.r.peterson@xcelenergy.com or 612-330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON
MANAGER, REGULATORY ANALYSIS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ITS PROPOSED
COMMUNITY SOLAR GARDENS PROGRAM

DOCKET No. E002/M-13-867

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), files the following analyses in response to the Commission’s December 1, 2017 Notice of Required Filing.

As requested by the Notice, we submit an analysis of the potential incremental bill impact of the Department’s recommended residential “adder” framework at different residential class subscription levels of community solar gardens under the Value of Solar (VOS). We provide a view of the potential impact of the adder framework on fuel clause costs for all customers, as well as the value of the compensation provided to an individual subscriber under the adder framework. We illustrate the costs of the incentive under different levels of residential participation in a single garden, as well as the cost of different penetration levels of new gardens coming online under a five percent residential capacity carve-out.

As shown here, should 60 MWs of new community solar gardens come online with a five percent residential participation rate, the Company would expect \$112,000 in annual incremental payment to residential subscribers flowing through the fuel clause, assuming a 2.5 cent residential adder rate. In today’s value, the sum of the annual payment over the 25-year period is approximately \$1.4 million. The adder would push the annual cost of the residential payment to over \$500,000 and the present value of the cost over the life of the community solar garden to over \$7 million. However, it is possible that with such an adder, residential subscriptions could exceed five percent or

more MWs of residential gardens could come online, leading to a higher and unknown cost impact absent some type of carve-out capacity limit.

Additionally, we provide a discussion of implications for a residential customer capacity carve-out, should one be imposed in the program rules of Solar*Rewards Community. We highlight possible methods for implementing a carve-out including systematic changes and business rules, and we review the means through which the Company would monitor compliance.

Should the Commission decide to take action to boost residential class participation in the program, the Company believes the Commission should focus on non-incentive mechanisms. The Company continues to believe the record does not support the use of further incentives in this program. Notwithstanding the Community Solar Garden statute, which states, “[t]he purchase *shall be at the rate calculated* under section 216B.164, subdivision 10[...].” (emphasis added), the Company continues to have concerns about any consideration of increased cost impacts due to the imposition of incentive payments. As the Company raised in Comments dated January 13, 2017, April 18, 2017, and May 17, 2017, we do not believe the timing is right to apply incentives in the absence of more understanding about the VOS.

I. INCREMENTAL BILL IMPACT OF A RESIDENTIAL ADDER

A. Background

On March 1, 2017, the Department of Commerce (DOC) recommended adopting a residential adder over and above the current Value of Solar (VOS) rate of “\$0.025 per kWh for residential subscribers to CSGs for 2017 with the rate decreasing to \$0.015 in 2019 and \$0.005 in 2020 and thereafter or until further modified by the Commission”.

On October 24, 2017, the Commission postponed its decision on the DOC recommendation so that the Company can provide an analysis of the incremental bill impact of the suggested adder to residential subscribers. We further note that in our January Monthly Compliance filing, submitted on January 16, 2017, we report that a few developers have opted to serve residential customers under current program rules and ARR compensation levels. The Compliance Filing shows over 2,200 residential customers subscribed to gardens in the Solar*Rewards Community program, making up 87 percent of the subscription base for 7 percent of the total enrolled capacity. There is no subscriber class data available for in-progress gardens that will be under the VOS.

B. Residential Adder

The Commission requested Xcel Energy to provide two separate analyses. These include: (1) an analysis of the potential incremental bill impact of various levels of residential solar garden penetration under the Department’s residential adder proposal; due to the many unknowns, the Commission asked Xcel Energy to apply a “scenario analysis approach” in its analysis of the incremental bill impact, and (2) an analysis of how a solar residential carve-out concept might be implemented and monitored.

The following analyses show the impact of the Department’s residential adder proposal to subscribers, Garden Operators and non-participating customers under various scenarios.

1. Incremental Residential Adder Costs per Adder Rate Level – Project Level Carve-out of 5% residential per garden

Tables 1 and 2 illustrate the incremental cost of the residential adder relative to the vintage adder levels proposed by the Department for the Solar*Rewards Community program. Tables 1 and 2 assume five percent of subscribed capacity receives the residential adder. Given the passage of time, we moved the adder levels forward a year beginning in 2018 (rather than beginning in 2017 as proposed by the Department). Table 1 shows the annual incremental cost for a range of garden sizes at the various adder amounts proposed by the Department. In Table 2, we illustrate the incremental cost of the adder over the life of the solar garden, for the same range of garden sizes and adders as in Table 1.

For example, if 60 MWs of solar garden come online at the 2.5 cent adder level (2018 vintage), and five percent of subscribed capacity receives the residential adder, the fuel clause would increase by \$111,916 each year for the life of the program. Should residential participation increase above the five percent, the cost would increase linearly. Table 2 highlights the incremental cost of the adder at the same MW levels as in the Table 1 but the values are stated in present value which recognizes adder payment over the life of the solar garden in today’s value. The same 60 MWs from the previous example results in a present value roughly \$1.4 million of incremental cost to be recovered through the fuel clause over the life of the garden. In addition, should 30MWs of solar garden come on line from the 2019 vintage at the 1.5 adder level and another 30MWs solar garden come online in the 2020 and 2021 vintages at an residential adder rate of 0.5 cents, the present value of the adder associated with these garden would be approx.\$2.1 million as the present value dollars from each vintage would be additive.

**Table 1: 5% Residential Participation
Annual Cost by Proposed Residential Adder Rate**

			MWs of Community Solar Gardens Added					
Res.			1	30	60	90	120	150
Adder	2018	2.5	\$1,865	\$55,958	\$111,916	\$167,874	\$223,832	\$279,790
Cents	2019	1.5	\$1,119	\$33,575	\$67,150	\$100,724	\$134,299	\$167,874
/ kWh	2020+	0.5	\$373	\$11,192	\$22,383	\$33,575	\$44,766	\$55,958

*Assumes an 18% capacity factor

**Table 2: 5% Residential Participation
Present Value of Cost by Proposed Residential Adder Rate**

			MWs of Community Solar Gardens Added					
Res.			1	30	60	90	120	150
Adder	2018	2.5	\$23,693	\$710,782	\$1,421,564	\$2,132,346	\$2,843,128	\$3,553,910
Cents	2019	1.5	\$14,216	\$426,469	\$852,938	\$1,279,408	\$1,705,877	\$2,132,346
/ kWh	2020+	0.5	\$4,739	\$142,156	\$284,313	\$426,469	\$568,626	\$710,782

*Assumes an 18% capacity factor and an after-tax discount rate of 6.18%

*2. Incremental Residential Adder Costs per Adder Rate Level – Program Level Carve-out
100% Residential gardens*

Tables 3 and 4 are provided to highlight the incremental cost of the residential adder at the program level for a solar garden. For the sake of simplicity in illustrating the impact, we assume these gardens are comprised entirely with residential customers to meet a program level requirement. In Table 3, the Company shows that 20 MWs results in roughly \$746,000 of recovery via the fuel clause per year for the 25-year life of the solar garden. In Table 4, the Company illustrates the incremental annual cost of 100 percent residential gardens in today’s value (i.e., present value).

For example, for the same 20 MWs of solar garden from the previous example (Table 3) that come online at the 2.5 cent level, the Company would expect to have to recover the equivalent of \$9.5 million in today’s value through the fuel clause over the life of the solar garden (Table 4). As outlined in the tables, the cost estimates are for each vintage year beginning in 2018, rather than 2017, given the passage of time since the initial Department recommendation. The values in the tables are additive for each

year at the appropriate MW level for each year until the residential adder is removed for new vintages.

Table 3: 100% Residential Participation – Annual Cost by Proposed Residential Adder Rates

			MWs of Community Solar Gardens Added				
Res.			1	5	20	50	100
Adder	2018	2.5	\$37,305	\$186,526	\$746,106	\$1,865,265	\$3,730,530
Cents	2019	1.5	\$22,383	\$111,916	\$447,664	\$1,119,159	\$2,238,318
/ kWh	2020+	0.5	\$7,461	\$37,305	\$149,221	\$373,053	\$746,106

*Assumes an 18% capacity factor

Table 4: 100% Residential Participation – Present Value of Cost by Proposed Residential Adder Rate

			MWs of Community Solar Gardens Added				
Res.			1	5	20	50	100
Adder	2018	2.5	\$473,855	\$2,369,274	\$9,477,094	\$23,692,736	\$47,385,472
Cents	2019	1.5	\$284,313	\$1,421,564	\$5,686,257	\$14,215,642	\$28,431,283
/ kWh	2020+	0.5	\$94,771	\$473,855	\$1,895,419	\$4,738,547	\$9,477,094

*Assumes an 18% capacity factor and an after-tax discount rate of 6.18%

3. Residential Adder Compensation per Residential Subscriber

In addition to the compliance analysis provided in Table 1-4, the Company also provides an alternative view of the subscriber impact of the residential adder based on energy usage of the residential subscriber.

Tables 5 and 6 show an estimate of the adder compensation per residential subscriber for each adder level associated with various levels of average monthly customer usage. In Table 5, for example, the 2.5 cent adder, for a customer with 650 kWh of annual monthly usage results in \$195 of annual compensation for the 25-year life of the solar garden. In table 6, we illustrate the value of the annual \$195 in today's terms. For example, the same subscriber with average monthly usage of 650 kWh that has a 2.5 rate adder would receive an estimated \$2,346 in today's value.

Table 5: Annual Residential Adder Compensation per Subscriber

			Residential Garden Subscriber's Average Monthly Usage (kWh)				
Res.			350	500	650	800	1100
Adder	2018	2.5	\$105	\$150	\$195	\$240	\$330
Cents	2019	1.5	\$63	\$90	\$117	\$144	\$198
/ kWh	2020+	0.5	\$21	\$30	\$39	\$48	\$66

*Assumes an 18% capacity factor

Table 6: Present Value of Residential Adder Compensation per Subscriber

			Residential Garden Participant's Average Monthly Usage				
Res.			350	500	650	800	1100
Adder	2018	2.5	\$1,262	\$1,803	\$2,344	\$2,885	\$3,967
Cents	2019	1.5	\$757	\$1,082	\$1,406	\$1,731	\$2,380
/ kWh	2020+	0.5	\$252	\$361	\$469	\$577	\$793

*Assumes an 18% capacity factor and an after-tax discount rate of 6.18%

II. SOLAR GARDEN RESIDENTIAL CARVE-OUT CONCEPT

In compliance with the Commission's Notice, we provide an analysis of how a capacity carve-out for residential customers would be implemented and monitored if the Commission ordered a carve-out approach to boost residential subscriptions. Should the Commission take action to create a residential carve-out, we continue to support a non-incentive approach.

A carve-out implemented on a "per project" basis would ensure a minimum amount of residential subscribers in the program. This concept would require a Garden Operator to reserve a minimum amount of the garden capacity for the exclusive subscription of residential customers. For example, at a five percent capacity carve-out under our current trend of seven kW per residential subscription, this would be approximately seven customers for a 1 MW garden.

Subject to further development, the Company would implement this scenario as follows:

- Garden Operators enter subscriber and subscription information into the Company's subscription management system throughout the interconnection process;

- Our subscription management system verifies customer class as subscribers are validated, tracks compliance, and alerts Garden Operators when there is risk of non-compliance;
- The Company reviews carve-out compliance prior to garden completion or granting permission to operate;
- Compliance monitoring is conducted through the subscription management system and enforcement actions are taken as necessary; and
- In cases of non-compliance, Garden Operators would receive notice and be required to come into compliance with 30 days or be subject to the remedies for breach of the Standard Contract for Solar*Reward Community as defined in our electric rate book at Section 9, beginning on Original Sheet No. 81, which includes possible disconnection until the breach is cured.

This process would require modifications to the existing subscription management system and the tariffs governing the program. In addition, business rules and tariff adjustments would be required to create remedies for breach that include disconnection of the community solar garden. Disconnection or interruption of bill credits could result in harm to subscribers, and the Company does not have knowledge of whether the terms of garden operators' private contracts with subscribers protect the subscribers in instances where the garden operator breaches its duties under the tariff.

We note that this process is established for our Colorado Solar*Rewards Community program today addressing a state mandated five percent carve-out for low-income customers. There has been an increase in resources managing subscriptions and compliance for this requirement. To-date, we have had no issues of non-compliance.

If the Commission chooses to include an adder as part of a capacity carve-out, we believe an established maximum incentive budget should be identified to achieve a participation goal while limiting the further exposure of non-participating customers to increases in their fuel cost.

CONCLUSION

We appreciate the opportunity to provide these analyses regarding the Department's proposal for a declining VOS Adder for residential subscribers and a potential residential capacity carve-out. We do not believe the costs to implement an incentive framework are supported by this record.

Should the Commission believe action is necessary to boost residential participation in the program, the Company supports non-incentive tools to achieve the Commission's goals.

Dated: February 1, 2018

Northern States Power Company

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-13-867

Dated this 23rd day of February 2018

/s/

Jim Erickson
Regulatory Administrator

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