

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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April 12, 2019

**In the Matter of Xcel Energy’s Motion Requesting
Changes to Program Reporting Requirements for
Community Solar Gardens**

Docket No. E002/M-13-867

COMMENTS OF ELPC, FRESH ENERGY, ILSR, AND MNSEIA

The Environmental Law and Policy Center (“ELPC”), Fresh Energy, Institute for Local Self-Reliance (“ILSR”), and Minnesota Solar Energy Industries Association (“MnSEIA”) submit these comments to the Minnesota Public Utilities Commission (the “Commission”) in response to Xcel Energy’s (“Xcel”) April 1, 2019 [Motion Requesting Changes to Program Reporting](#) for the community solar garden program.

Introduction

The monthly community solar program reporting provides significant value to our organizations. We appreciate the consistent transparency, the detailed appendixes, and the timely program data that Xcel has provided stakeholders over the last four years as the program has evolved. This reporting has enabled us to advocate for the ongoing success of Xcel’s program and work to shape strong community solar programs and policies with other utilities and states.

Xcel suggests in their motion that the reporting goals have been met now that the challenges of the program launch have been addressed. Xcel states the following:

When the Solar*Rewards Community program began, there were challenges to deal with new processes and a larger than anticipated number of applications. However, the program has evolved and matured since its inception when the initial monthly reporting was established, and we believe that in the program’s current state annual reporting and website updates would provide sufficient transparency and information

to interested stakeholders and the public.¹

We agree that the program has matured since the first reporting Order in 2014, but some of these reporting requests were issued by the Commission as recently as November 2018. There continue to be interconnection challenges to address and ongoing program changes to evaluate and monitor. Reporting and transparency is as valuable to stakeholders as ever. As non-developer stakeholders participating in ongoing conversations on the appropriate Value of Solar (VOS) inputs, for example, we are anxious to see Xcel's reporting on the number of new solar garden applications deemed complete under the 2019 VOS. We will also be closely tracking the effect of the VOS adder for residential participants – it is important to be able to regularly monitor residential participation and ensure these customers are not left behind as Xcel's community solar program grows. And as we work on new state interconnection standards, we share the developers' frustration with worsening delays in interconnection study delivery, despite predictable and relatively low volumes of applications. All this to say, the program continues to be dynamic and we continue to find value in Xcel's detailed reporting.

We do recognize the effort that reporting requires, and appreciate Xcel's ideas to make the data more accessible and reporting more efficient. However, annual reporting is too infrequent for stakeholders to correctly evaluate and effectively participate in this ever-changing program.

We recommend the Commission take the following actions:

- Support Xcel's proposal to create a dashboard for high-level program reporting, updated at least monthly.
- Support Xcel's proposal to merge the community solar interconnection queue into a single application queue per the Minnesota Distributed Energy Resources Interconnection Process (MN DIP).
- Continue to require monthly reporting with a focus on interconnection tariff compliance for both the old and new interconnection standards.
- Require all remaining program components be reported quarterly.

We conclude our comments by replicating the summary table² provided in Xcel's

¹ Xcel Energy's Motion Requesting Changes to Program Reporting Requirements for Community Solar Gardens, p. 2

² *Id.*, Table 1: Summary of Current Reporting Requirements and Proposed Changes

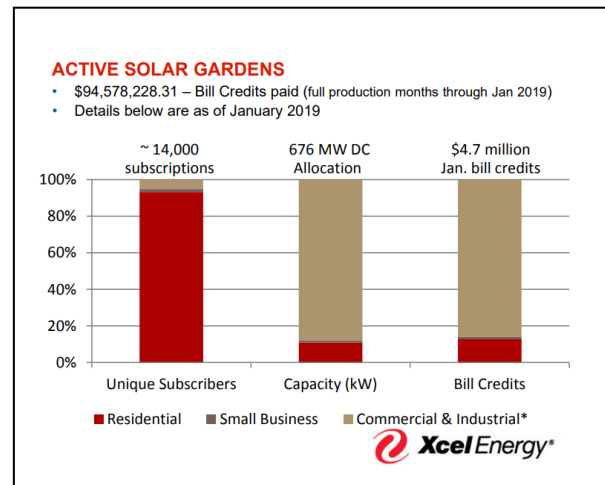
motion and inserting a fourth column detailing our recommendations.

Support for a Program Dashboard, Updated Monthly (at a minimum)

We support Xcel’s proposal to migrate high-level program reporting to a dashboard format hosted on Xcel’s community solar webpage. Having this information available on their website will provide simpler access to a wider range of stakeholders.

We recommend improving the “Active Solar Gardens” chart proposed on the bottom-right of the dashboard³ by including the actual subscriber data points (e.g. number of customers subscribed) that make up the bar graphs.

We also expect that Xcel would be amenable to feedback from the CSG Workgroup and other stakeholders on how the dashboard can be improved as the program continues to evolve.⁴



Ongoing Monthly Reporting Focused on Tariff Compliance

Developer stakeholders have succeeded in bringing the Commission’s attention to three interconnection challenges that add expense and instability to the program; namely, 1) application rejections prior to being deemed complete, 2) study timeline delays, and 3) inaccurate interconnection cost estimates. Despite the learnings of over 500MW of community solar gardens, the monthly reporting reveals that these issues continue to plague the program. Despite low and predictable volumes of applications, Xcel is still not providing a streamlined, accurate, predictable interconnection service to community solar developers and their subscribers.

The most alarming interconnection issue today, as reported over the last four months, is the delayed delivery of interconnection study results. Per Xcel’s March 14, 2019 compliance report, of the 16 projects with interconnection study results due in February, 0 (zero) were

³ *Id.*, Attachment A

⁴ As a comparable illustrative example, the Illinois Power Agency’s program dashboard is updated daily. Hosted on their website here: <http://illinoisabp.com/dashboard-status/>.

delivered within the timeline required by the tariff. One study that was delivered February 18, 2019 had been due September 5, 2018 and no explanation was provided for the five-month delay.⁵ Xcel’s explanation for this troublesome trend of study delays in their monthly reporting has been vague and confusing. Further, their ongoing failure to meet tariff study timelines is not even mentioned in their annual compliance report.⁶

We recommend that the Commission continue to require monthly reporting on inefficiencies with the interconnection process, most importantly tariff timeline compliance. We recommend that Xcel be required to provide a clear explanation for the inefficiencies and to outline internal steps being taken to improve their performance. Xcel should not be permitted to report this data less frequently until these ongoing issues have been addressed.

Reporting on Old and New Interconnection Tariffs

Community solar projects with applications underway prior to the June implementation date of the MN DIP will be grandfathered under Xcel’s current Section 9 and Section 10 tariffs. We recommend that Commission make clear to Xcel that ongoing reporting on grandfathered applications is required where tariffs differ (e.g. timelines associated with process steps) until the batch of grandfathered applications are complete. Over time, the reporting will become fully consolidated once all applications are being administered under the MN DIP.

Summary Table

	Commission Order	Current Reporting Requirement	Proposed Reporting Requirement	ELPC, Fresh Energy, ILSR, MnSEIA Recommendation
1	April 7, 2014 Order, Order Point 3.c	Xcel shall make information on the total number of pending and approved applications and their size available on its website.	Continue to provide information on program website.	[Support Xcel’s proposal of a website dashboard, updated at least monthly .
2	September 17, 2014 Order, Order Point 9	Xcel shall, in reporting on the application process, include information on what percentage of projects were finished within the 24-month deadline for project completion.	Continue to provide information annually .	Continue to provide information quarterly .

⁵ Monthly Update, Community Solar Garden Program, filed March 14, 2019, Attachment E [\[Link\]](#).

⁶ 2018 Annual Report, Community Solar Garden Program, filed April 1, 2019. [\[Link\]](#)

3	February 13, 2015 Order, 7 Order Point 3	Xcel shall file monthly updates on the status of the initial cohort of 427 solar-garden applications, reflecting the following information: the number of initial solar garden applications commissioned and/or still active and related MW capacity, categorized by county.	Initial cohort completed. Provide information annually , and monthly on program website.	[Support Xcel's proposal of a website dashboard, updated monthly .]
4	August 6, 2015 Order, Order Point 1 (2.2.a.ii)	The Company shall post on the S*RC page of its website the size, county, substation, and queue position of each Community Solar Garden application on a monthly basis.	Eliminate separate reporting under the Solar*Rewards Community program because corresponding information is reported in the annual DER interconnection report and the DER queue is updated monthly on our website.	[Support single DER queue updated monthly on Xcel's website that includes all interconnection requests, not only Solar*Rewards Community projects, per MN DIP]
5	August 6, 2015 Order, Order Point 2	Xcel shall, as part of its monthly updates to the Commission in this docket, a. identify each instance in which an application was deemed incomplete or otherwise returned to the applicant for additional information, the additional information being sought from the applicant, and the amount of additional time taken for processing the application; and b. identify each instance in which the Company has not met a Section 10 tariff interconnection process timeline, or has otherwise restarted the timeline, and the reason for not meeting or restarting the timeline.	Provide information annually for those applications that are not subject to MN DIP. For applications subject to MN DIP, eliminate separate reporting under the Solar*Rewards Community program because corresponding information is reported in the annual DER interconnection report.	Continue to provide information monthly without modification for all applications until timelines are being consistently met.
6	August 6, 2015 Order, Order Point 7	Xcel shall provide a breakdown by customer class of solar-garden subscribers and update this breakdown quarterly .	Provide information annually .	Provide information quarterly .
7	November 1, 2016 Order, Order Point 5	Xcel shall report cost variances between the indicative cost estimate and the actual costs for the total project, the substation costs, and the distribution costs. For each of these costs that fall outside a +/-20% range, Xcel shall provide a detailed explanation for the variance. Xcel shall report this information to the Commission within 30 days of the actual cost being provided to the developer in its next monthly community-solar-garden update report	Provide information annually .	Continue to provide information monthly until accurate cost estimates are being consistently provided.
8	November 16, 2018 Order, Order Point 5	Xcel must report separately on value of solar garden project subscription metrics, in addition to the program-	Provide information annually .	Provide information quarterly .

		wide metrics currently reported, as part of its Community Solar Garden monthly updates and annual reports.		
9	November 16, 2018 Order, Order Point 6	Xcel must report monthly in its Community Solar Garden updates on the total number of projects receiving unsubscribed energy payments, the total amount of unsubscribed energy, and the total amount paid for that energy in the reporting month.	Provide information annually .	Provide information quarterly .
10	November 16, 2018 Order, Order Point 7	Xcel must report monthly on the total incremental bill credit payments for any residential adder adopted by the Commission.	Provide information annually .	Provide information quarterly .

Conclusion

We appreciate the opportunity to emphasize the value of transparency and timely reporting to Xcel’s community solar stakeholders working to address challenges and find opportunities. We look forward to continuing to support Xcel’s nation-leading community solar program.

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