

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of  
Northern States Power Company, d/b/a  
Xcel Energy, for Authority to Increase  
Rates for Electric Service in the State  
of Minnesota

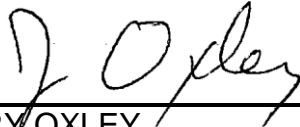
**ORDER DENYING INTERVENTION  
TO SUNSHARE, LLC AND THE INSTITUTE  
FOR LOCAL SELF RELIANCE**

On April 15, 2016, SunShare, LLC (SunShare) filed a petition to intervene in this matter.<sup>1</sup> On this same date, the Institute for Local Self-Reliance (ILSR) also filed a petition to intervene.<sup>2</sup> On April 22, 2016, Northern States Power Company d/b/a Xcel Energy (Xcel) timely filed its objection to SunShare's and ILSR's petitions.<sup>3</sup> The record on these petitions closed on April 22, 2016.

**ORDER**

1. SunShare's petition to intervene is **DENIED** with prejudice to refiling.
2. ILSR's petition to intervene is **DENIED** with prejudice to refiling.

Dated: May 3, 2016

  
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JEFFERY OXLEY  
Administrative Law Judge

**MEMORANDUM**

Minnesota Rules part 1400.6200 (2015) provides that a petition to intervene must show how the petitioner's legal rights, duties, or privileges may be determined or directly

<sup>1</sup> PETITION TO INTERVENE BY SUNSHARE, LLC (April 15, 2016) (SUNSHARE PETITION).

<sup>2</sup> PETITION TO INTERVENE OF THE INSTITUTE FOR LOCAL SELF-RELIANCE (April 15, 2016) (ILSR PETITION).

<sup>3</sup> NORTHERN STATES POWER COMPANY'S OBJECTION TO SUNSHARE'S AND THE INSTITUTE FOR LOCAL SELF-RELIANCE'S PETITIONS TO INTERVENE (April 22, 2016) (XCEL'S OBJECTION).

affected by the proceedings; shall set forth the grounds and purposes for which intervention is sought; and shall indicate the petitioner's statutory or legal right to intervene, if one should exist.<sup>4</sup> Upon making a proper showing, the administrative law judge shall allow intervention unless the administrative law judge finds that the petitioner's interests are adequately represented by one or more parties participating in the case.<sup>5</sup>

SunShare is a community solar garden developer headquartered in Denver, Colorado, with an office in Minneapolis, Minnesota.<sup>6</sup> SunShare "is currently developing more than 15 co-located community solar garden (CSG) sites in NSP's service territory in Minnesota under NSP's Solar\*Rewards Community program." SunShare states that its Minnesota subscribers include "more than 20 commercial/industrial 'anchor tenant' customers and 2500 residential customers . . . ."

SunShare explains its interest in this case is that Xcel's retail rates determine the size of the bill credit its customers receive. SunShare is also interested in Xcel's "request to recover the costs of its proposed smart inverter pilot in this rate case" because "smart inverters" can mitigate the "voltage flicker" that limits the capacity of certain of SunShare's projects.<sup>7</sup> SunShare asserts that its interests will not be represented by other parties because "no other CSG developers are participating in this docket . . . ."<sup>8</sup>

The ILSR is "a non-profit organization that provides innovative strategies, working models and timely information to support environmentally sound and equitable community development."<sup>9</sup> ILSR seeks to intervene for a number of reasons. First, "because of the strong relationship between rates and rate design and the incentives for customers to invest in energy efficiency, distributed energy such as rooftop solar, and flexible demand."<sup>10</sup> The benefits of "clean energy and energy efficiency . . . are too frequently not available to ratepayers with low or fixed incomes."<sup>11</sup> Second, because "the potential use of revenue from proposed rates will have long-term implications for grid design . . . ."<sup>12</sup> And third, because ILSR "seeks to facilitate community input into the docket."<sup>13</sup>

ILSR explains that its interests will not be represented by other parties because of its "unique perspectives." In this regard, ILSR refers to its work with the city of Minneapolis Partnership to promote participation in an energy retrofit program and to increase energy affordability "by lowering energy costs through conservation, efficiency, and distributed generation, and not simply lowering rates."<sup>14</sup> In addition, ILSR offers its

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<sup>4</sup> Minn. R. 1400.6200, subp. 1.

<sup>5</sup> Minn. R. 1400.6200, subp. 3.

<sup>6</sup> SUNSHARE PETITION at 1.

<sup>7</sup> *Id.* at 1-2.

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

<sup>9</sup> ILSR PETITION at 1.

<sup>10</sup> *Id.* at 2.

<sup>11</sup> *Id.*

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

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

<sup>14</sup> *Id.*

own perspective for developing an “electricity system that is designed to maximize the public benefit of energy infrastructure for its customer, including their ability to have choices and ownership over their energy use.”<sup>15</sup>

Xcel objects to both SunShare’s and ILSR’s petitions because neither has met the standard for intervention set forth in Minn. R. 1400.6200. Neither Petitioner claims their participation in this proceeding is authorized by statute, rule or court decision; neither shows that their “legal rights, duties, or privileges may be directly affected’ by this rate case” and neither succeeds in demonstrating that their interests will not be adequately represented by other parties to this proceeding.<sup>16</sup>

Xcel observes that SunShare’s concerns relating to the CSG program are being addressed in two other dockets.<sup>17</sup> Xcel observes that SunShare is not seeking to represent its subscribers’ interests as ratepayers and to the extent that SunShare is affected by this proceeding, any effects are indirect as they result from ratepayers’ responses to rate changes resulting from this proceeding.<sup>18</sup> Finally, SunShare has not shown that its interests, and those of its subscribers, will not be adequately represented by other parties.

With respect to ILSR, Xcel argues that ILSR’s interests as stated are “broad statements of interest in wide-ranging energy policy and issues” and that ILSR has failed to establish that such general policy interests will not be adequately represented by other parties. Further, the organization has not said that it seeks to represent the interests of ratepayers.<sup>19</sup>

In considering earlier filed petitions for intervention, the Administrative Law Judge has applied Minn. R. 1400.6200 and attended to the Minnesota Public Utilities Commission’s (Commission) intention in this docket to review Xcel’s:

[p]erformance-based metrics and incentives to be implemented throughout the multiyear plan that begin shifting away from a regulatory system that rewards the sale of electricity and building large, capital-intensive power plants toward one that rewards Xcel for achieving a set of clearly defined performance outcomes, such as energy efficiency, reliability, community-owned distributed generation, affordability, emissions reductions, predictable rates, etc.<sup>20</sup>

The Administrative Law Judge has also considered petitions to intervene in light of the Minnesota Legislature’s direction to the Commission to “encourage energy conservation and renewable energy use and to further the goals of sections 216B.164, 216B.241, and

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<sup>15</sup> *Id.*

<sup>16</sup> XCEL OBJECTION at 1-2.

<sup>17</sup> *Id.* at 3 (citing the CSG Docket No. E-002/M-13-867 and SunShare’s complaint regarding the CSG program, Docket No. E-002/M-15-786).

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* at 4.

<sup>20</sup> NOTICE OF AND ORDER FOR HEARING (Dec. 22, 2015) at 3.

216C.05” in setting rates.<sup>21</sup> Lastly, the Administrative Law Judge has found that this docket is not an appropriate proceeding in which to litigate issues already undergoing review in other dockets.<sup>22</sup> The Administrative Law Judge agrees with Xcel that SunShare’s concerns with the deployment of smart inverters are better dealt with in other existing dockets.

In addition, while the petitions of SunShare and ILSR demonstrate that their interests relate to the Commission’s and the legislature’s directives regarding energy efficiency and renewable energy sources, the Administrative Law Judge finds that these interests are already adequately represented by other parties. As Xcel observes, the Energy Freedom Coalition of America (EFCA) shares SunShare’s interest in rates and rate design from the perspective of distributed energy providers. EFCA’s members include solar panel manufacturers and installers SolarCity Corporation, Silevo, LLC, and NRG Energy, Inc.<sup>23</sup> EFCA can be expected to be well-acquainted with and sympathetic to SunShare’s interests as NRG Energy, Inc. is partnering with SunShare in a large solar energy project in Colorado.<sup>24</sup>

Xcel is correct in stating that the Department of Commerce (DOC) represents the general interests of ratepayers and those interests include energy conservation and efficiency, both of which require the DOC to consider how rates established in this proceeding will affect these goals which are shared by ILSR. The Office of the Attorney General – Antitrust and Utilities Division (OAG) also analyzes these issues and is particularly concerned with the effects of this proceeding on residential and small business consumers. These parties together with the Energy Cents Coalition (EEC), and AARP have concerns with issues of affordability for low and fixed income ratepayers, just as ILSR does.

The Clean Energy Organizations (CEOs) whose members include Fresh Energy, Sierra Club, Wind on the Wires, National Resources Defense Council and Minnesota Center for Environmental Advocacy, share ILSR’s interests in energy conservation and energy efficiency as well as in “supporting renewable energy expansion from sources of all scales, including transmission infrastructure to support such projects.”<sup>25</sup> The CEOs are concerned with the impact of rate design on these interests, just as SunShare and ILSR are.

ILSR grounds its claim that its interests will not be adequately represented by other parties in large part by referring to its work with the City of Minneapolis Partnership. But the city of Minneapolis is a party to this proceeding and will certainly represent the interests of its ratepayers.

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<sup>21</sup> See AMENDED ORDER GRANTING PETITIONS TO INTERVENE OF ICI GROUP, THE ENERGY CENTS COALITION, AND THE ENERGY FREEDOM COALITION OF AMERICA (MARCH 23, 2016).

<sup>22</sup> *Id.* at 5.

<sup>23</sup> PETITION TO INTERVENE OF THE ENERGY FREEDOM COALITION OF AMERICA (Feb. 17, 2015).

<sup>24</sup> <http://www.nrg.com/renewables/projects/community/colorado-sunshare/>.

<sup>25</sup> PETITION TO INTERVENE OF FRESH ENERGY, SIERRA CLUB, WIND ON THE WIRES, NATURAL RESOURCES DEFENSE COUNCIL, AND MINNESOTA CENTER FOR ENVIRONMENTAL ADVOCACY (Jan. 25, 2016) at 2-3.

There are numerous parties to this proceeding. In addition to Xcel, the DOC, the OAG, the EEC, AARP, the CEOs, the EFCA, and the city of Minneapolis, other parties include the Xcel Large Industrials, the Commercial Group, the Suburban Rate Authority, the Minnesota Chamber of Commerce, and U.S. Energy Services. Allowing additional parties to intervene when their interests are already adequately represented will only make the proceeding more difficult to manage fairly and efficiently, and will add to the costs the proceeding will exact from parties and ratepayers.

For the foregoing reasons, the petitions of SunShare and ILSR are denied with prejudice.

**J. J. O.**

May 3, 2016

See Attached Service List

**Re: In the Matter of the Application of Northern States Power Company  
for Authority to Increase Rate for Electric Service in the State of MN  
(GR-15-826)**

**OAH 19-2500-33074  
MPUC E-002/GR-15-826**

To All Persons on the Attached Service List:

Enclosed and served upon you is the Administrative Law Judge's **ORDER  
DENYING INTERVENTION TO SUNSHARE, LLC AND THE INSTITUTE FOR LOCAL  
SELF RELIANCE** in the above-entitled matter.

If you have any questions, please contact my legal assistant Denyse Johnson at  
(651) 361-7888 or [denyse.johnson@state.mn.us](mailto:denyse.johnson@state.mn.us), or facsimile at (651) 539-0310.

Sincerely,



JEFFERY OXLEY  
Administrative Law Judge

JO:dj  
Enclosure  
cc: Docket Coordinator

STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS  
PO BOX 64620  
600 NORTH ROBERT STREET  
ST. PAUL, MINNESOTA 55164

**CERTIFICATE OF SERVICE**

|  |                                  |
|--|----------------------------------|
| In the Matter of the Application of Northern States Power Company for Authority to Increase Rate for Electric Service in the State of MN (GR-15-826) | OAH Docket No.:<br>19-2500-33074 |
|--|----------------------------------|

Denyse Johnson, certifies that on May 3, 2016 she served the true and correct **ORDER DENYING INTERVENTION TO SUNSHARE, LLC AND THE INSTITUTE FOR LOCAL SELF RELIANCE** by eService, and U.S. Mail, (in the manner indicated below) to the following individuals:

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| David       | Aafedt    | daafedt@winthrop.com          | Winthrop & Weinstine, P.A.         | Suite 3500, 225 South Sixth Street<br>Minneapolis, MN 554024629                  | Electronic Service | No                |
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| Adam       | Wattenbarger | awattenbarger@kennedy-graven.com  | Kennedy &<br>Graven,<br>Chartered                           | 470 U.S. Bank<br>Plaza<br>200 South Sixth<br>Street<br>Minneapolis,<br>MN 55402      | Electronic<br>Service | No                |
| Scott M.   | Wilensky     | scott.wilensky@xcelenergy.com     | Xcel Energy   | 7th Floor<br>414 Nicollet Mall<br>Minneapolis,<br>MN 554011993                       | Electronic<br>Service | No                |
| Samantha   | Williams     | swilliams@nrdc.org                | Natural<br>Resources<br>Defense Council                     | 20 N. Wacker<br>Drive<br>Ste 1600<br>Chicago,<br>IL 60606                            | Electronic<br>Service | Yes               |
| Joseph     | Windler      | jwindler@winthrop.com             | Winthrop &<br>Weinstine                                     | 225 South Sixth<br>Street, Suite<br>3500<br>Minneapolis,<br>MN 55402                 | Electronic<br>Service | No                |
| Cam        | Winton       | cwinton@mnchamber.com             | Minnesota<br>Chamber of<br>Commerce                         | 400 Robert Street<br>North<br>Suite 1500<br>St. Paul,<br>Minnesota 5510              | Electronic<br>Service | Yes               |

| First Name | Last Name | Email                     | Company Name                                    | Address   | Delivery Method    | View Trade Secret |
|------------|-----------|---------------------------|---|---|--------------------|-------------------|
|            |           |                           |   | 1   |                    |                   |
| Daniel P   | Wolf      | dan.wolf@state.mn.us      | Public Utilities Commission                     | 121 7th Place<br>East<br>Suite 350<br>St. Paul,<br>MN 551012147 | Electronic Service | Yes               |
| Patrick    | Zomer     | Patrick.Zomer@lawmoss.com | Moss & Barnett<br>a Professional<br>Association | 150 S. 5th Street,<br>#1200<br>Minneapolis,<br>MN 55402         | Electronic Service | No                |