

April 15, 2016



The Honorable Jeffrey Oxley
Administrative Law Judge
600 North Robert Street
PO Box 64620
St. Paul, MN 55164-0620

VIA ELECTRONIC SERVICE

*Re: In the Matter of the Application of Northern States Power for Authority to Increase Rates
for Electric Service in the State of Minnesota
PUC Docket No. E-002/GR-15-826*

Dear Judge Oxley,

In regards to the above-mentioned docket, please find enclosed a Notice of Appearance and Motion to Intervene, filed on behalf of SunShare, LLC. Also attached is a certificate of service.

Sincerely,

s/ Ross Abbey
Ross Abbey
Regulatory Counsel

ross@mysunshare.com
612-345-8331
609 South 10th Street, Suite 210
Minneapolis, MN 55404

On behalf of SunShare, LLC

cc: Service List

STATE OF MINNESOTA

BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS

600 North Robert Street
St. Paul, MN 55101

FOR THE PUBLIC UTILITIES COMMISSION

121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

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

OAH Docket No. 19-2500-33074
PUC Docket No. E-002/GR-15-826

PETITION TO INTERVENE BY SUNSHARE, LLC

Pursuant to Minn. R. 1400.6200, SunShare, LLC petitions to intervene in the above-captioned matter.

SunShare is a community solar garden developer with a headquarters in Denver, Colorado and an office in Minneapolis, Minnesota. 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. To date, we have subscribed more than 20 commercial/industrial "anchor tenant" customers and 2500 residential customers across Xcel's Minnesota service territory.

Petitioner is directly affected by and has an interest in addressing NSP's rates and rate designs. NSP's retail rates dictate the bill credit our community solar customers receive on their energy bills as CSG subscribers. Because we offer a savings product to our subscribers, the subscription rates we can charge our customers are directly tied to NSP's retail rates. The outcome of this proceeding thus directly affects the financial viability of our company. As no other CSG developers are participating in this docket, our interests will not be adequately represented by other parties to this proceeding.

In NSP's 2016-2030 Integrated Resource Plan, NSP outlined a pilot project that will directly impact our business. NSP is working with the Electric Power Research Institute (EPRI) to test the capacity for smart inverters to facilitate greater solar photovoltaic (PV) penetration in

Minnesota. NSP has attempted to curtail the size of at least 5 of our projects based on “voltage flicker,” a phenomenon that can be mitigated through the use of smart inverter functionality, only allowing approximately 27% of the total capacity applied for across those sites. Because this curtailment harms SunShare financially by reducing our total CSG capacity, we are directly affected by the result of NSP’s request to recover the costs of its proposed smart inverter pilot in this rate case.

Dated April 15, 2016.

Respectfully submitted,

s/ Ross Abbey

Ross Abbey
SunShare, LLC
609 South 10th Street, Suite 210
Minneapolis, MN 55404
612-345-8331
ross@mysunshare.com

On behalf of SunShare, LLC

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

In the Matter of the Application of Northern
States Power Company, dba Xcel Energy,
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Service in the State of Minnesota

**OAH Docket No. 19-2500-33074
PUC Docket No. E-002/GR-15-826**

NOTICE OF APPEARANCE

Name, Address, and Telephone Number of Administrative Law Judge:

The Honorable Jeffery Oxley
Office of Administrative Hearings
600 N. Robert Street
PO Box 64620
St. Paul, MN 55164-0620
651-361-7835

To the Administrative Law Judge:

You are advised that the party named below will appear at the above hearing.

Name and Address of Party:

Ross Abbey
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ross@mysunshare.com

Party's Attorney or Other Representative:

Ross Abbey
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612-345-8331
ross@mysunshare.com

Dated April 15, 2016.

Respectfully submitted,

s/ Ross Abbey

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612-345-8331
ross@mysunshare.com

On behalf of SunShare, LLC

CERTIFICATE OF SERVICE

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

OAH Docket No. 19-2500-33074
PUC Docket No. E-002/GR-15-826

I, Ross Abbey, certify that I served copies of this notice of appearance and petition to intervene by electronic filing service or by U.S. Mail on the attached service list.

Dated April 15, 2016.

Respectfully submitted,

s/ Ross Abbey

Ross Abbey
SunShare, LLC
609 South 10th Street, Suite 210
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On behalf of SunShare, LLC

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