

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF  
COLORADO**

**IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE  
COMPANY OF COLORADO FOR APPROVAL OF ITS 2010  
RENEWABLE ENERGY STANDARD COMPLIANCE PLAN**

**DOCKET NO. 09A-772E**

**ANSWER TESTIMONY AND EXHIBITS OF ERIKS BROLIS**

**ON BEHALF OF**

**COLORADO SOLAR ENERGY INDUSTRIES ASSOCIATION**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

**DOCKET NO. 09A-772E**

---

**IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY FOR  
APPROVAL OF ITS 2010 RENEWABLE ENERGY STANDARD COMPLIANCE PLAN**

---

**ANSWER TESTIMONY AND EXHIBITS**

**OF**

**ERIKS BROLIS**

---

1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

2

3   **Q: Please state for the record your name, position and business address.**

4   A: My name is Eriks Brolis. I am the Director of External Affairs for Namaste Solar. My  
5   business address is 4571 Broadway Street, Boulder, Colorado, 80304. Namaste Solar is the  
6   leading solar photovoltaic (“PV”) installer in Colorado’s residential and small commercial grid-  
7   tied markets.

8

9   I also serve as the Vice President of the Board of Directors of the Colorado Solar Energy  
10  Industries Association (“CoSEIA”), and as the Chair of the CoSEIA PV Policy Subcommittee.

11

12 **Q: Please describe your experience and qualifications.**

13 A: My experience and qualifications are described in the attached *curriculum vitae*, which is  
14 **Exhibit EB-1** to this testimony.

15

16 **Q: On whose behalf are you testifying today?**

17 A: I am appearing on behalf of CoSEIA. CoSEIA represents and serves energy professionals  
18 and renewable energy users, promoting the use of solar energy and conservation to improve the  
19 environment and create a sustainable future. CoSEIA represents the solar industry in Colorado.  
20 With more than 200 members representing at least 1,200 full-time equivalent employees directly  
21 involved in the solar industry, the members of CoSEIA provide both residential, commercial and  
22 utility-scale solar system products and services to consumers and businesses. CoSEIA members  
23 include solar installers, manufacturers, distributors, utilities, educational and informational

1 organizations, and concerned individuals and companies. CoSEIA is the Colorado state chapter  
2 of the national Solar Energy Industries Association (SEIA), and was organized in 1989.

3

4

## II. PURPOSE AND SUMMARY OF TESTIMONY

5

6 **Q: What is the purpose of your testimony?**

7 A: My testimony addresses several of the changes to the Solar\*Rewards program presented by

8 Public Service Company of Colorado (“Public Service” or “the Company”) in its testimony in

9 the Company’s 2010 Renewable Energy Standard Compliance Plan (the “Plan”). The Company

10 has made important changes that will have a significant impact on Colorado consumers who

11 install solar PV systems to serve all or a portion of their electricity needs. These include:

12 • Creating a declining REC payment structure based upon narrow 1 MW tiers in the  
13 earlier years followed by wider 5 MW tiers in the later years.

14

15 • Changing the Solar\*Rewards application process to require a reservation payment.

16

17 My testimony addresses several key issues:

18 • Fiscal responsibility to ratepayers.

19 • Programmatic efficiencies and administrative due process.

20 • Viability of the solar market through improved design of standard REC offer.

21 • Communication among stakeholders.

22

23 As a whole, my testimony addresses issues that affect the long-term viability of all segments of

24 the on-site solar market in Colorado, while ensuring fiscal responsibility to the ratepayers by

25 leveraging the Renewable Energy Standard Adjustment (“RESA”) to fulfill “the best interests of

1 the citizens of Colorado to develop and utilize renewable energy resources to the maximum  
2 practicable extent” Colo. Amend. 37 § 1 (2004). [Emphasis added]

3  
4 CoSEIA applauds the Company for increasing acquisition targets of on-site solar resources in the  
5 Plan above the minimums outlined in HB07-1281 and for providing some visibility of the  
6 declining schedule for the standard Renewable Energy Credit (“REC”) offers.

7  
8 **Q: Please summarize the recommendations that you present in this testimony.**

9 A: My testimony recommends:

- 10 • Modifications to the Solar\*Rewards application process that could prevent further  
11 market disruptions which may lead to significant loss of jobs, businesses, and  
12 economic opportunities throughout the state of Colorado.
- 13  
14 • Suggestions on how to improve the process between the Company and key  
15 stakeholders in order to resolve problems arising from the Company’s administration  
16 of the Solar\*Rewards program.
- 17  
18 • A recommendation that the Commission consider the appointment of a third party  
19 administrator for the Solar\*Rewards program if the current problems remain  
20 unresolved and pose a threat to the continued viability of the solar industry in  
21 Colorado.
- 22

### 23 **III. POLICY BACKGROUND**

24  
25 **Q: Please describe the policy direction provided by the state legislature and the**  
26 **Commission relative to the deployment of solar generation in Colorado.**

27 A: In November 2004, Colorado voters passed Amendment 37 that established a Renewable  
28 Energy Standard (“RES”) for certain Colorado electric utilities deemed Qualifying Retail  
29 Utilities. The Colorado General Assembly in the 2007 session increased the RES by the passage

1 of HB07-1281 which increased the amount of renewable energy a QRU must acquire to 20% by  
2 the year 2020.

3

4 In 2009 the Colorado General Assembly passed SB09-051 which made significant changes to  
5 HB07-1281, including enabling third parties to sell electricity from on-site solar facilities to the  
6 on-site customer, expanding the size of customer sited solar systems to 500 kW, eliminating the  
7 2 MW net meter limitation, and imposing a customer sited system size limit of 120% of the  
8 customer's average annual consumption at the site.

9

10 The changes proposed by the Company in the Plan largely result from the desire of the Colorado  
11 General Assembly and, more importantly, the people of Colorado to encourage the rapid and  
12 widespread deployment of solar energy systems in Colorado and the need for the Company to  
13 manage its RESA balance associated with financial incentives for on-site solar systems. My  
14 testimony is directed at harmonizing the Solar\*Rewards process so that the Company and the  
15 solar industry may minimize their transaction costs and so that consumers are assured of their  
16 ability to make economic decisions based upon guaranteed REC pricing.

17

18 **Q: In the Executive Summary of the Plan, the company states: "Public Service aims to**  
19 **exceed the minimum levels required by HB07-1281 and is expressly allowed to exceed these**  
20 **minimum levels so long as the retail rate impact does not exceed two percent on the annual**  
21 **bills of our customers." Do you agree with this statement?**

1 A: Yes. I support the Company’s goal to exceed the minimum compliance levels required by  
2 HB07-1281. I believe that it is important to the solar industry in Colorado to utilize all available  
3 means to exceed these limits consistent with compliance with the annual 2% retail rate cap.

4  
5  
6 CoSEIA applauds the Company’s increase to the acquisition levels of on-site solar to exceed the  
7 minimum levels required by HB07-1281. CoSEIA believes this increase is fully justified in  
8 order to fulfill “the best interests of the citizens of Colorado to develop and utilize renewable  
9 energy resources to the maximum practicable extent” Colo. Amend. 37 § 1 (2004).

10

11 **IV. DISCUSSION OF ISSUES REGARDING SOLAR\*REWARDS PROGRAM**  
12 **IMPLEMENTATION**

13 **Q: Do you agree with the Company’s assertion that applications under the Solar\*Rewards**  
14 **program for projects that ultimately are not completed adversely impact the solar**  
15 **installers and customers who wish to participate in the program?**

16 A: Yes. This is why CoSEIA proactively requested that the Company implement an application  
17 deposit in order to minimize the number of “placeholder” applications.

18

19 **Q: Do you agree with the current implementation of the application deposit by the**  
20 **Company?**

21 A: No, I disagree with the current implementation of the application deposit by the Company for  
22 several reasons. First, the application deposit as currently implemented by the Company may be  
23 adding additional administrative costs which will reduce the amount of available RESA funds.

1 Next, it appears that the Company is using the application deposit process in a manner which is  
2 punitive to the applicant. I base this statement on my direct experience with the Company  
3 rejecting applications and requiring resubmittal for reasons that are *de minimus*. By the time the  
4 application is resubmitted along with a new deposit, the application may only be eligible for a  
5 lower standard REC offer. Thus, the resubmission process slows down the application and adds  
6 additional uncertainty to the REC offer. This cumbersome and uncertain process causes  
7 potential solar customers to experience frustration with the Solar\*Rewards program. Without  
8 fixed REC price certainty, many customers fail to move forward with a solar system, resulting in  
9 significant transactional costs for solar installers.

10

11 **Q: Please provide an estimate of the transactional costs that are incurred by installers**  
12 **while navigating the current application process under the Solar\*Rewards program.**

13 A: The transactional costs incurred by installers to submit the first stage application are  
14 significant. The following is an example of the time that is generally incurred to submit the first-  
15 stage application, for a straightforward, customer-owned, residential, small category PV system:

- 16 ○ Cost to service lead
  - 17 ■ Site visit (2+ hours)
    - 18 ● Travel time and expense
    - 19 ● Roof measurement
    - 20 ● Electrical analysis
    - 21 ● Shading determination
    - 22 ● Answer general customer questions
  - 23 ■ Electrical and structural design work (6+ hours)

- 1                           • One-line diagram
- 2                           • System layout
- 3           ○ Enter into contract and process down-payment (1+ hour)
- 4           ○ Explain Solar\*Rewards process to customer (1+ hours)
- 5                         ▪ Execute and/or track down customer documents (2 + hours)
- 6                           ○ Utility bill (to verify customer account information)
- 7                           ○ Proof of Homeowner’s Insurance coverage
- 8                           ○ Reservation deposit form
- 9   ▪ Download
- 10                                        ▪ Send to customer
- 11                                        ▪ Verify submission
- 12           ○ Cost to submit application
- 13                         ▪ Time to process application (2 + hours)
- 14                           • Online application
- 15                           • Email/fax documents
- 16                           • Send via mail, hard-copy of application deposit form and deposit
- 17           ○ Cost of providing refund to customer if they choose not to move ahead (2+ hours)
- 18                         ▪ Legal cost of cancelling contract
- 19                         ▪ Processing return of down payment

21 This example shows that it can take an installer submitting an application on a customer’s behalf,  
 22 upwards of 16 to 20 person-hours, and a \$250 non-refundable application deposit, to submit an  
 23 application that yields no sale.

24

1 **Q: Can a customer reasonably be expected to move ahead on a solar PV installation if**  
2 **there is no guaranteed REC payment and total project cost?**

3 A: A customer cannot be reasonably expected to move ahead with contracting a PV installation  
4 unless there is a guaranteed REC payment and total project cost. This is in part because many  
5 customers depend on the REC payment to procure financing of a PV system that can cost  
6 upwards of \$50,000 for a residential system and \$2.5 million for a 500kW commercial system.  
7 In some instances, especially lower income customers and commercial entities, it is nearly  
8 impossible to move forward without first securing financing from a private source, or public  
9 sources such as Boulder’s ClimateSmart-type property assessed clean energy (“PACE”)  
10 program. Certainty, or at least clarity, in what the REC offer will be is integral to the customers’  
11 ability to procure financing to move forward with the installation of a PV unit with a fixed  
12 contract price. As the process currently stands, if an application is submitted and the customer’s  
13 expected REC price is not secured, placeholder applications that will never yield installed solar  
14 PV systems will continue to clog up the Solar\*Rewards program and unnecessarily tie up RESA  
15 funds.

16  
17 **Q: What type of discrepancies are you seeing with the application process?**

18 A: Since adoption of the application deposit and accompanying rules, applications have been  
19 increasingly denied on very broad and sometimes arbitrary grounds leading to removal from the  
20 queue for minor adjustments in the application. In extreme circumstances, this is happening  
21 outside of the control of applicants, such as discrepancies between a customer’s electric bill and  
22 the information in the Company’s database. Paying additional deposit fees to correct minor

1 errors, omissions, and discrepancies is not what the application deposit was intended to achieve.  
2 The application deposit was not meant to punish typographical errors in the application process.  
3 The application deposit was intended to deter “placeholder” applications from clogging the  
4 queue. This mis-application of the application deposit process undermines the consistency and  
5 fairness of the Solar\*Rewards program.

6

7 **Q: In addition to the REC certainty issues already discussed, do you have other concerns**  
8 **about the implementation of the application process?**

9 A: Yes. While I realize that some applications will be rejected on justifiable grounds, it is  
10 important for customers and the solar industry that the Company be required to respond to all  
11 applications that cannot be reasonably approved on a timely basis, not to exceed a turn around of  
12 15 business days. For many applications which were submitted after the Solar\*Rewards rule  
13 changes in September 2009, a lapse of over 50 days occurred before the Company notified the  
14 customer of the denial of their application based upon the failure to receive the application  
15 deposit within five days after application submission.

16

17 **Q: The Company has indicated that it will post on its web-site the total number of**  
18 **confirmed applications so all customers will have information as to when the offered SO-**  
19 **REC price is likely to decline. In your experience, is this what is happening?**

20 A: No, it is not.

21

1 **Q: What would you recommend the Company do to improve the overall application**  
2 **process so as to remove current concerns?**

3 A: I recommend that the Company make several changes which will create fairness,  
4 transparency, and due process notice for upcoming REC pricing changes. The first is creating an  
5 advance trigger for REC pricing changes. Currently, these triggers are recognizable only to the  
6 Company and do not produce any change in REC pricing that is recognizable to applicants until  
7 well after the fact. To correct this deficiency, advance notice must be given by posting  
8 additional timely information on the Company's web site and sending an email to the potential  
9 applicant market and installers which alerts them to REC pricing changes well in advance of the  
10 actual change. CoSEIA recommends that when 90% of a step level is filled, then public  
11 notification be provided that applications must be submitted within five business days to qualify  
12 for the current REC payment amount. This timeframe should be long enough to submit an  
13 application in progress, but not so long as to generate significant numbers of new applications.

14

15 **Q: What other recommendations would you make?**

16 A: I recommend eliminating the subjectivity in the application process by offering more  
17 objective information in a transparent format. These could include the following:

- 18
- 19 • Publishing additional Frequently Asked Questions ("FAQs").
  - 20 • Clearly defining a kWh/square foot multiplier that can be used as a guide to determine a  
21 maximum allowable system size according to the requirement that a system be sized not  
22 to exceed 120% of annual load.
  - 23
  - 24 • Clearly defining the term "customer site" and the maximum allowable rebate per site.
  - 25

- 1 • Implementing only prospective REC offer reductions, not retroactive REC offer  
2 reductions which result in cancelled contracts and lost revenue. Notification of a drop in  
3 REC tiers should occur with sufficient notice to submit an application at the then-current  
4 step.  
5
- 6 • Display on Company website the number of applications and total MW submitted and  
7 confirmed. The list should be updated in real-time, or twice daily at a minimum.  
8
- 9 • Technical upgrades that give additional transparency and information are well worth the  
10 RESA investment to create a more stable and predictable marketplace with lower  
11 transactional costs for customers, installers, and the Company.  
12
- 13 • Due process should call for advance notification of a drop in a REC offer with sufficient  
14 notice to submit an application at the then-current step.  
15
- 16 • Application process that is realistic. The Plan was filed 10/27/09, but Company witness  
17 Newell states “[t]he queues for the first tier step for all programs will begin with  
18 applications submitted on or after September 21, 2009.” In short, the filing of the Plan  
19 served as notification for REC price declines on applications that had possibly been  
20 submitted over one month prior. It is unrealistic to implement a retroactive REC offer  
21 reduction – many of these applications resulted in cancelled contracts and lost revenue.  
22 While there is no remedy for these lost PV installations resulting from this particular  
23 action at this point, the process can and should be improved going forward.  
24  
25  
26  
27

28 **Q: Can the process be simplified and cost-effectively improved to reduce the adverse**  
29 **effects and minimize the misallocation of RESA dollars?**

30 A: Yes. CoSEIA installers, who in the course of attempting to do day-to-day business navigate  
31 the Company’s Solar\*Rewards process on behalf of their customers, have collectively drafted  
32 relatively minor changes to administration of the program that would greatly improve the process  
33 for ratepayers, customers, installers, and the Company. I would like to offer these process  
34 suggestions as **Exhibit EB-2**.

35  
36 **Q: What are the key elements of your process improvements?**

1 A: Key elements of the suggested changes include:

- 2 • Company’s confirmation of receipt of documents.
- 3
- 4 • Written confirmation of the amount of the REC lock at the time the application is
- 5 submitted, pending submission of remaining documentation and deposit.\
- 6
- 7 • No refusal of application based upon errors or omissions of customer’s account
- 8 information so long as the on-line application has been submitted as per the information
- 9 found on a customer’s electric bill.
- 10
- 11 • “Three strikes and you’re out.” In other words, allowing two attempts to correct errors
- 12 and omissions of the initial submission after the Company provides a complete list of
- 13 reasons for application denial.
- 14
- 15 • Regular updates posted on the Company’s website regarding allocation of RESA dollars
- 16 and the proximity to a reduction of the standard REC offer.
- 17

18 **Q: Are you recommending that the Commission require the Company to implement the**  
19 **changes outlined in Exhibit EB-2?**

20 A: Yes. If the Company is unable or unwilling to implement similar changes in an acceptable  
21 fashion, CoSEIA would recommend that the Commission consider ordering competitive  
22 procurement of a third party administrator to administer the Solar\*Rewards program to  
23 maximize ratepayer contributions.

24

25 **Q: Does CoSEIA have any other suggestions as to how else the process could be improved?**

26 A: Yes. Reducing the total number of steps and expanding the number of MWs in each step  
27 would reduce the absolute number of REC drops, which would then result in increased certainty  
28 as to which standard REC offer step/amount a customer will receive. Expanding the number of  
29 MWs in each step will decrease the number of step changes and thus reduce the customer’s need

1 to have real-time information about when the next step decrease may occur relative to the  
2 installation of their solar PV system. For example, in the small customer owned category,  
3 CoSEIA suggests steps consisting of a minimum of 5 MWs per step.

4  
5 **Q: Company witness Newell states “[w]hen the rules were originally crafted, there were**  
6 **fewer installers, material shortages were common, and customers were less informed about**  
7 **solar. A year was a reasonable amount of time, under those circumstances, for a customer**  
8 **to comfortably go from start to finish on a project. Due to increased efficiencies in the**  
9 **marketplace, the turnaround time is now shorter than when the rules were originally**  
10 **adopted.” Do you agree with this statement?**

11 A: No. Although the rationale cited is correct, it is an incomplete portrayal of the evolving  
12 marketplace. Thus, the rationale is not a sufficient justification to reduce the installation  
13 timeframe from 12 months to 9 months. The current market continues to justify maintaining the  
14 statutory 12-month timeframe to complete a PV project installation, contrary to Newell’s  
15 position. The reduction in the installation timeframe from 12 months to 9 months had and  
16 continues to have significant negative impacts on the viability of installing solar where there are  
17 generally longer development schedules such as on commercial projects, new construction,  
18 remodels, low-income customers requiring financing, and many other projects beyond a  
19 straightforward residential retrofit.

20  
21 **Q: Do you have any recommendations for changing the applicable installation**  
22 **timeframes?**

1 A: Yes, the parameters around when the 12-month timeframe begins and ends must be revised.  
2 Currently, significant time is lost waiting for the Company to process an application. Newell  
3 states “[a]n application is confirmed once the application has been reviewed, the deposit  
4 received, and the line diagram received and approved. This Stage 1 approval releases the  
5 Reservation Letter, along with the Interconnection Application, to the customer and installer. At  
6 the Stage 1 Approval point, the kW value of the project is added to the ‘confirmed’ queue and  
7 counts as progress toward the next step.” The 12-month timeline should begin upon  
8 confirmation and notification as per above, and end upon submission of proof of inspection and  
9 approval of the solar installation by the local or state authority having jurisdiction. CoSEIA  
10 requests the Commission order the Company to reinstate a 12-month REC lock per the  
11 parameters in the previous sentence and apply a 12-month REC lock retroactively for all current  
12 applications.

13

14 **Q: Is it true that the Company collaborated with CoSEIA and the Governor's Energy**  
15 **Office in preparing the Company's forecast of solar PV installations?**

16 A: Yes. While there has been some productive communication it has unfortunately fallen short  
17 of arriving at a mutually acceptable conclusion regarding the parameters of the forecast. For  
18 example, all parties agreed to reinstate a 12-month installation timeframe in late 2009, but, after  
19 numerous attempts by CoSEIA to verify this reinstatement, it appears that the Company has not  
20 taken action to reinstate this policy.

21

1 **Q: How would you suggest that the Company could improve collaboration with CoSEIA,**  
2 **the Governor’s Energy Office, and – most importantly – solar customers?**

3 A: It must be first noted that in part because of the design and complexity of the Solar\*Rewards  
4 process, solar installers are generally submitting applications on a customer’s behalf. As such, in  
5 order to reduce RESA expenditures related to familiarizing new customer-applicants on the  
6 Solar\*Rewards application process, it is in the best interest of the Company, ratepayers, the  
7 Commission, and installers to facilitate a process that solicits feedback from CoSEIA as well as  
8 directly from the installers who must navigate this unwieldy process day to day. It is important  
9 for the Company to garner multiple perspectives from installers of varying size, geographic  
10 locations, customer profile, and permitting jurisdictions. I recommend that the Company hold at  
11 least monthly installer meetings and more frequently if required (in person and by conference  
12 call) in order to solicit and implement changes to the Solar\*Rewards program. I also recommend  
13 that the Company guarantee a two business day response time to any customer or installer  
14 inquiry.

15

16 **Q: What if the Company is unwilling or does not make reasonable efforts to implement the**  
17 **process suggestions in Exhibit EB-2 and this testimony while improving collaboration with**  
18 **CoSEIA, the Governor’s Energy Office, solar customers, and other stakeholders?**

19 A: CoSEIA believes the Commission should consider ordering competitive procurement of a  
20 not-for-profit third party administrator to administer the Solar\*Rewards program to maximize  
21 ratepayer contributions. It is CoSEIA’s belief that deploying such a third party administrator  
22 could result in (i) lower costs, (ii) greater efficiencies, (iii) increased customer satisfaction, and

1 (iv) reduced conflict of interest. A number of other states, with similar on-site solar incentive  
2 programs rely on third parties, rather than the investor owned utility, to manage such initiatives.

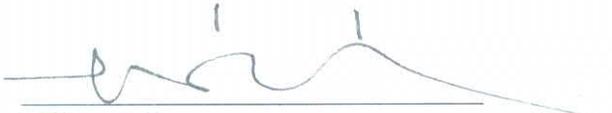
3

4 **Q: Does this conclude your testimony?**

5 A: Yes it does.

Respectfully submitted this 4<sup>th</sup> day of February, 2010.

FURTHER AFFIANT SAYETH NAUGHT.

  
Eriks Brolis

STATE OF COLORADO )

)

COUNTY OF BOULDER )

The foregoing **ANSWER TESTIMONY AND EXHIBITS OF ERIKS BROLIS ON BEHALF OF COLORADO SOLAR ENERGY INDUSTRIES ASSOCIATION** was acknowledged before me this 4<sup>th</sup> day of February, 2010, by Eriks Brolis.

Witness my hand and official seal.



My Commission Expires 03/06/2012

My commission expires: 3/6/2012

Theresa A. Lema

Colorado, Notary Public

Address: 4571 Broadway  
Boulder CO 80304

**EXHIBIT EB-1**  
**TO THE ANSWER TESTIMONY OF ERIKS BROLIS**

**ERIKS BROLIS**

4571 Broadway • Boulder, CO 80304  
303.447.0300 • Eriks@NamasteSolar.com

---

**PROFESSIONAL EXPERIENCE**

---

**Colorado Solar Energy Industries Association** Denver, CO • 2008 - Present

*Vice President, Board of Directors*

- Elected representative of 200+ member companies
- Founding member and Chair of PV Policy Subcommittee (since 2006)
- Testify in state legislative and regulatory bodies on renewable energy matters
- Advocate and build consensus for successful legislation, regulation, ballot measures
- Coordinate fundraising efforts

**Namasté Solar** Boulder, CO • 2006 - Present

*Co-Owner, Director of External Affairs*

- Manage solar electric startup from initial growth phase to 60+ employees in 2 offices
- Collaborated with Xcel staff to develop and troubleshoot Solar\*Rewards program from kick-off off in March 2006
- Facilitated construction of custom corporate infrastructure and consult on our employee-owned, democratic business model
- Coordinate outside general counsel and consultants
- Represent company in legislative and regulatory matters
- Member of Strategy (Executive) Team

**Patriot Wind / Clean and Green** Boulder, CO • 2005 - 2006

*Outreach Manager*

- Managed client outreach, industry contacts, public relations, research, and procurement for industrial wind-power development group
- Represented our development team at the New Mexico Wind Working Group under the state Energy Office
- Independently developed proposal template short-listed for \$300M windpower facility
- Coordinated with attorneys to draft, review and negotiate contracts

**King & Spalding, LLP** Washington, DC • 2004 - 2005

*Litigation & Anti-Trust Project Assistant*

- Supported senior partners and associates in large-scale, multidistrict litigation
- Interfaced with a lateral paralegal to manage a staff of seven
- Liaison and repository for co-counsel evidence transmittal requests

---

## EDUCATION & PROFICIENCY

---

**The College of William and Mary**

Williamsburg, VA • 2002

- Bachelor of Arts in European Studies, Focus: Government

**Languages**

- Fluency in English, Latvian, Spanish; beginner level Russian

---

## AWARDS

---

**Volunteer of the Year Award**

2007

*Colorado Solar Energy Industries Association*

**EXHIBIT EB-2  
TO THE ANSWER TESTIMONY OF ERIKS BROLIS**

**EXHIBIT EB-2 NOTE:** The comments on these contracts contain the recommendations of CoSEIA.  
[http://www.xcelenergy.com/Colorado/Residential/RenewableEnergy/Solar\\_Rewards/Pages/SmallProgramDetails.aspx](http://www.xcelenergy.com/Colorado/Residential/RenewableEnergy/Solar_Rewards/Pages/SmallProgramDetails.aspx)

**Solar\*Rewards Small Program (0.5 kW to 10.0 kW)**

**Small program customer owned details**

System Size:	.5 kW to 10 kW
Program Type:	Standard Offer
Contract Term:	20 years
Rebate payment:	\$2.00 per watt DC capacity
REC payment:	Check pricing levels

**Small program application process**

1. Start the online application

Apply for a solar rebate at [www.xcelenergysolarrewards.com](http://www.xcelenergysolarrewards.com). You will need to create a user ID and password. Simply follow the [instructions on the website and enter in your information](#).

**Comment [eB1]:**  
To reduce Xcel admin burden, publish more FAQ, sq ft/kW multiplier for 120% rule, etc

2. Complete project details

If you select a professional installer during Step 1, that installer will be able to log in to your application with an installer ID. Installers can then submit any remaining information about the proposed project. Self-installers must complete this information on their own applications.

**Comment [eB2]:** As per info on Xcel bill

The following is required at this step:

- o PV module/panel manufacturer and model
- o kW size (nameplate capacity)
- o Azimuth/Orientation
- o Tilt angle
- o Fixed, 1-axis tracking or 2-axis tracking system
- o Single or three phase electrical service
- o Inverter manufacturer and model (For multiple inverters, use one inverter and add the panels together. Record the remaining inverters in the comments field)

**Comment [eB3]:**  
After initial submission, cannot change kW by more than 20%. Other information may be changed by applicant until post-install doc submission.

3. Send in Reservation Deposit Form and deposit check to:

Xcel Energy  
 Attn: Solar\*Rewards Program Manager  
 414 Nicollet Mall- 6<sup>th</sup> floor  
 Minneapolis, MN 55401

**Comment [eB4]:**  
Submit via Paypal , Credit Card, wire transfer, and/or on-bill payment

**Comment [eB5]:**  
Either (i) No form OR (ii) generic form available for download pre-application. Confirmation of receipt.

Reservation Deposit is due at time of submission and must be postmarked within 5 business days of application submission.

For more information on reservation deposits, please click [here](#).

**Comment [eB6]:**  
Xcel price tracker automatically updated to show aggregate number of applications/kW in queue, e.g. "application received."

#### 4. Submit line diagram

Once you complete the application, you will receive an e-mail message from Xcel Energy that explains the next step. At this time, you or the installer must submit an installation line diagram that shows the layout of your system. For an example of a line diagram, see the [document downloads page](#).

**Comment [eB7]:** Email message reads "REC payment locked at \$X.XX/kW pending approval of application and line diagram"

#### 5. Application review and pre-approval

When the solar application is submitted and we have received the Reservation Deposit and line diagram, we will evaluate the proposed PV installation. Once reviewed by Xcel Energy, the status of your application will change online and you will be notified by e-mail of project pre-approval.

**Comment [eB8]:** Confirmation of receipt

#### 6. Complete Acknowledgment Letter and Interconnection Agreement

You will receive an e-mail notice that your application and line diagram have been pre-approved. You will need to print, sign and send back the [Interconnection Agreement](#). Once you have accepted the terms of the Solar\*Rewards program, you may authorize your installer to move forward with obtaining the necessary permits for the project.

**Comment [eB9]:**  
3 strikes and you're out. In other words, after Xcel offers [complete list](#) of corrections applicant has 2 opportunities to remedy without application removal from queue and repayment of deposit.

If application cannot be reasonably remedied by applicant within 2 attempts, denial must be received in timely fashion.

#### 7. Complete installation and supply documentation

After we review and approve your documents, you will receive an e-mail message from us. You or the installer can then submit the final application. You will be instructed to send a number of documents to complete the rebate application.

**Comment [eB10]:**  
Upon written notification to applicant of approval and definitive REC lock 12-month installation deadline begins.

Xcel price tracker updated to show "applications confirmed."

The following is required at this step:

- o Invoice with actual installation costs
- o Documentation of all necessary town / municipal / county inspections
- o Proof of \$300,000 minimum liability homeowner's insurance
- o Serial numbers of the PV panels and inverters

**Comment [eB11]:** Confirmation of receipt.

**Deleted: .**

#### 8. Documentation review

Xcel Energy will review the project documentation and notify you by e-mail whether the installation has been approved.

**Comment [eB12]:**  
Submission deadline must occur within 12months of initial approval notification. Confirmation of receipt.

**Comment [eB13]:** Confirmation of receipt.

#### 9. Submit Final Contract

Your [Final Contract](#) will be available through this site. You must sign and return the contract to us.

#### 10. Net meter installation

Once we receive the signed [Final Contract](#), we order a net meter and schedule its installation. After the net meter is installed, you are placed on the PV rate and notified of completion by e-mail.

**Comment [eB14]:** Confirmation of receipt.

#### 11. Process and mail Solar\*Rewards rebate

After the new meter has been set and the account is being billed on the photovoltaic rate, we will process and mail your rebate within 30 business days. You will receive two checks: one for the rebate and one for

the REC payment. Checks are made out to the name on the Xcel Energy account. If you would like your check to go elsewhere, please see the FAQ on alternate payment recipients.

Send all documentation to Solar\*Rewards

Mail:

Xcel Energy  
Solar\*Rewards Program Manager  
414 Nicollet Mall - 6th Floor  
Minneapolis, MN 55401

Fax: 800-252-4371, Attn: Solar\*Rewards

Scan and e-mail: [solarprogram@xcelenergy.com](mailto:solarprogram@xcelenergy.com)