

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

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Camp Ripley Solar Project for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645 and Related Tariff Modifications

DOCKET NO. E015/M-15-773

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL ON
MINNESOTA POWER'S APRIL 25, 2016
COMPLIANCE FILING**

I. INTRODUCTION

The Office of Attorney General – Residential Utilities and Antitrust Division (“OAG”) submits the following comments on Minnesota Power’s April 25, 2016 compliance filing on its Petition for Approval of Investments and Expenditures in the Camp Ripley Solar Project for Recovery through Minnesota Power’s Renewable Resources Rider under Minnesota Statutes section 216B.1645 and Related Tariff Modifications.

Minnesota Power acknowledges that the Camp Ripley solar facility will provide non-solar-paying customers (“exempt customers”) with at least some of the benefits that the Commission recognized in its Value-of-Solar (“VOS”) rate. The company, however, has not quantified the value of these benefits, and also notes that these values cannot be included as adjustments to the company’s fuel-clause rider. For the reasons set forth below, the Commission should require Minnesota Power to calculate the impact of all VOS components for the Camp Ripley facility in its next rate case, and incorporate the components that the company believes are appropriate in its class cost of service study (“CCOSS”).

II. BACKGROUND

Minnesota Power plans to construct a 10MW solar generating facility at the Camp Ripley Minnesota Army National Guard base and training facility near Little Falls, Minnesota.¹ The facility will cost approximately \$30 million to build.² Minnesota Power requested recovery for expenditures of the Camp Ripley project in order to meet its solar energy standard (“SES”) to generate at least 1.5 percent of its total retail electric sales from solar energy by 2020.³ The SES statute requires that certain customers not pay “any costs of satisfying the [SES].”⁴ Therefore, Minnesota Power developed a Solar Renewable Factor for non-exempt customers to ensure that project costs are paid only by those customers.⁵ Minnesota Power then proposed to credit these non-exempt customers in its fuel clause for the energy generated by the Camp Ripley facility at the company’s average cost of energy.⁶

The Department of Commerce (“DOC”) and the OAG each objected to Minnesota Power’s proposed credit for non-exempt customers. The DOC stated that the fuel-clause credit for non-exempt customers should consist of the peak cost of energy, and that the company should credit the generation capacity additions to non-exempt customers in its next rate case.⁷ The OAG recommended crediting non-exempt customers at the VOS rate as a proxy for the benefits that the Camp Ripley facility will produce.⁸ On February 24, 2016, the Commission ordered the company to develop a new credit for non-exempt customers that shall include, at a minimum: (1) an on-peak energy offset, and (2) an analysis of the applicability of the VOS

¹ Petition at 2.

² Petition at 2, 9.

³ See Minn. Stat. § 216B.1691, subd. 2f(d) (2015)

⁴ *Id.* at subd. 2f(d)(2) (stating that exempt customers “may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified in this subdivision.”)

⁵ See Petition at 2.

⁶ See Petition at 24-25.

⁷ See DOC Initial Comments at 9.

⁸ See OAG’s Reply Comments at 4.

Methodology components.⁹ The company included this credit in its April 25, 2016 compliance filing.

III. THE COMMISSION SHOULD REQUIRE MINNESOTA POWER TO QUANTIFY ALL VOS COMPONENTS FOR THE CAMP RIPLEY FACILITY IN ITS NEXT RATE CASE, AND INCLUDE APPROPRIATE ADJUSTMENTS TO ITS CCOSS.

Minnesota Power's compliance filing demonstrates that the Camp Ripley facility will provide several of the VOS benefits to exempt customers at no cost. Specifically, the company explains that the facility will reduce the company's fixed plant operation and maintenance ("O&M") costs, its variable plant O&M costs, and its generation capacity costs.¹⁰ It argues, however, that the value of these benefits should not be credited to non-exempt customers now. Minnesota Power provides two reasons for this position: (1) it claims that the financial impact of these benefits is likely to be small, or not realized immediately; and (2) it suggests that the value of these benefits cannot be included in its fuel clause adjustment under the Energy Cost Adjustment Statute.¹¹ Despite these concerns, the company's filing demonstrates that, for two reasons, it is necessary to further evaluate the impact of the Camp Ripley facility in the company's next CCOSS.

First, the company admits that, after reviewing components of the VOS methodology, it concluded that the Camp Ripley facility will provide several financial benefits to the company's system. At least two of these benefits—fixed and variable avoided plant O&M costs—had not been considered when the company's initial request was reviewed. These benefits will flow to all customers, regardless of whether particular customers contribute to the Camp Ripley facility

⁹ Order Granting Petition in Part and Requiring Reevaluation of Solar Energy Adjustment Rider, at 8.

¹⁰ Minnesota Power's compliance filing at 11-12 (Apr. 25, 2016).

¹¹ *Id.*; See also Minn. Stat. § 216B.16, subd. 7 (2016).

or not. Therefore, it is important that the customers paying for the added solar generation receive the full impact of these benefits in their utility rates.

Second, Minnesota Power's arguments that several of the VOS benefits do not apply to the Camp Ripley facility are questionable and additional analysis is needed in the company's next rate case. For most components, the company's analysis consists of a single paragraph. Much more analysis is needed to allow the Commission to determine whether these values should apply to Camp Ripley. For example, the company argues that the Camp Ripley facility will not lead to avoided transmission and distribution capacity costs, which are both components of the VOS methodology.¹² Specifically, the company states that the Peak Load Reduction from Camp Ripley is expected to be at or near zero because Minnesota Power's peak is in the winter, during the evening.¹³ The Commission, however, has recently questioned whether cost allocators in the CCOSS should rely on the utility's peak, as Minnesota Power suggests, or on MISO's peak. In Xcel's last rate case, the Commission indicated that it may be necessary to adjust the company's allocator for production plant costs to account for MISO's peak:

. . . the Commission also agrees that the OAG has raised an important issue. Calculating a capacity allocator based on each customer class's contribution to Xcel's system load coincident with MISO's system peak would better reflect each class's share of the costs of meeting MISO's planning reserve margin. For the Company's next rate case, the Commission encourages Xcel to work with MISO and other parties to recalculate the D10S Capacity Allocator on the basis of MISO's peak for purposes of comparison with Xcel's peak.¹⁴

Until the Commission evaluates Minnesota Power's CCOSS, it is unclear whether this same reasoning should apply to the company's transmission and distribution costs.

¹² Minnesota Power's compliance filing at 12-13 (Apr. 25, 2016).

¹³ *Id.*

¹⁴ Findings of Fact, Conclusions, and Order, *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Dkt. No. E-002/GR-13-868 at 67 (May 8, 2015).

Moreover, Minnesota Power’s conclusion that its avoided capacity and transmission costs are expected to be “at or near zero” is unsupported speculation, because the company did not perform the applicable calculations. These calculations can differ for transmission and distribution facilities. The VOS methodology provides one methodology for calculating the avoided capacity for transmission projects: “avoided transmission capacity costs are calculated based on the utility 5-year average MISO OATT Schedule 9 charge”¹⁵ Avoided distribution capacity costs, however, may be calculated in two ways. The utility may consider system-wide avoided costs, which use “actual data from each of the last 10 years and peak growth rates based on the utility’s estimate future growth rate over the next 15 years.”¹⁶ In addition, the utility may consider location-specific avoided costs, which allows the utility to target areas where capacity is most needed.¹⁷ It is possible that Camp Ripley’s peak is not in the winter, during the eventing. In that case, it may be appropriate to consider the location-specific avoided costs, rather than the system-wide savings. In any event, Minnesota Power did not submit any of these calculations to support its conclusion that the capacity benefit from the Camp Ripley facility will be at or near zero. Therefore, Minnesota Power’s argument that Camp Ripley will not impact its capacity costs for transmission and distribution facilities is questionable.

Similarly, other VOS components that Minnesota Power claims should not apply to Camp Ripley will need further analysis during the company’s next rate case. While the company has clearly articulated its position, its brief comments do not demonstrate that these components should be ignored. Therefore, the Commission should require that Minnesota Power quantify all VOS components, and include those components that it believes are appropriate in its next

¹⁵ Minnesota Value of Solar Methodology: Minnesota Department of Commerce, at 31 (April 1, 2014).

¹⁶ *Id.* at 34.

¹⁷ *Id.*

CCOSS. This will allow other parties to evaluate both Minnesota Power's calculation of the VOS components, and its decisions on which components to include in its CCOSS.

IV. CONCLUSION

For the reasons set forth above, the Commission should require Minnesota Power to calculate the impact of all VOS components for the Camp Ripley facility in its next rate case, and to incorporate the components that the company believes are appropriate in its class cost of service study ("CCOSS").

Dated: July 7, 2016

Respectfully submitted,

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s/ Ian M. Dobson

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July 7, 2016

Mr. Daniel Wolf, Executive Secretary
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121 Seventh Place East, Suite 350
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RE: *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Camp Ripley Solar Project for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645 and Related Tariff Modifications Docket No. E015/M-15-773*

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find *Comments of the Office of the Attorney General—Residential Utilities and Antitrust Division*.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ Ian Dobson

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Enclosure

AFFIDAVIT OF SERVICE

RE: *In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Camp Ripley Solar Project for Recovery through Minnesota Power’s Renewable Resources Rider under Minn. Stat. § 216B.1645 and Related Tariff Modifications Docket No. E015/M-15-773*

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I hereby state that on July 7, 2016, I filed with eDockets *Comments of the Office of the Attorney General–Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

 s/ Judy Sigal
Judy Sigal

Subscribed and sworn to before me
this 7th day of July, 2016.

 s/ Ruth M. Busch
Notary Public

My Commission expires: January 31, 2020

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