414 Nicollet Mall
Minneapolis, MN 55401

**PUBLIC DOCUMENT –
NOT PUBLIC DATA HAS BEEN EXCISED**

November 28, 2022

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
BORDER WINDS & PLEASANT VALLEY WIND REPOWERING PROJECTS
DOCKET NO. E002/M-20-620

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply Comments regarding the updated pricing for the Border Winds and Pleasant Valley Wind Repowering Projects in response to Comments received from the Department of Commerce.

We appreciate the Commission's time and consideration with this matter. Portions of the enclosed Reply Comments and Attachments are marked "NOT PUBLIC" as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential pricing forecasts and assumptions as well as contract terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. We have marked additional information as "NOT PUBLIC" because the knowledge of such information in conjunction with public information in our Petition could also adversely impact future contract negotiations, potentially increasing costs for our customers. Thus, the Company maintains this information as a trade secret.

Please note, Attachments A through N to this filing contain information classified as trade secret pursuant to Minn. Stat. § 13.37 for the above-noted reasons and are marked as "Not-Public" in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

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Attachment A:

1. **Nature of the Material:** A live, Microsoft Excel file that provides a summary of annual revenue requirements, PVRR, and LCOE for both projects as filed in the original September 29, 2020 petition compared to the October 14, 2022 petition
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information.
4. **Date the Information was Prepared:** Fall 2022

Attachments B through I:

1. **Nature of the Material:** The attachments are supporting revenue requirements models provided in live Excel spreadsheet format.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information, and the Company considers the models as proprietary in their design.
4. **Date the Information was Prepared:** Fall 2022

Attachment J:

1. **Nature of the Material:** A live, Microsoft Excel file providing a breakdown of the capital cost increases.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information.
4. **Date the Information was Prepared:** Fall 2022

Attachment K:

1. **Nature of the Material:** A live, Microsoft Excel file detailing production tax credits information.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential production and PTC information.
4. **Date the Information was Prepared:** Fall 2022

Attachment L:

1. **Nature of the Material:** A live, Microsoft Excel file providing a summary of the benefits due to the IRA.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information.
4. **Date the Information was Prepared:** Fall 2022

Attachments M and N:

1. **Nature of the Material:** The attachments are supporting revenue requirements models provided in a live Excel spreadsheet format.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information, and the Company considers the models as proprietary in their design.
4. **Date the Information was Prepared:** Fall 2022

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact Madeline Lydon at madeline.k.lydon@xcelenergy.com or me at monsherra.s.blank@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

MONSHERRA S. BLANK
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
cc: Service List

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NOT PUBLIC DATA HAS BEEN EXCISED

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF XCEL ENERGY FOR APPROVAL OF THE ACQUISITION OF REPOWERED WIND GENERATION TO SUPPORT ECONOMIC RELIEF AND RECOVERY

DOCKET NO. E002/M-20-620

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments regarding the updated pricing for the Border Winds and Pleasant Valley Wind Repowering Projects (the Projects) in response to Comments received from the Department of Commerce.

We appreciate the Minnesota Department of Commerce's (the Department) thorough review of the Company's Petition and have provided answers to their questions below. While there have been challenges that have put upward pressures on costs for the Projects, the benefits of the Inflation Reduction Act (IRA), combined with the Company's work to maximize production tax credit (PTC) benefits for our customers, will more than offset these cost increases and result in significant additional customer savings compared to the initial filing. The Company believes there is still great value in these Projects for our customers. To keep the Projects on track, we hope the Commission can reach a decision by March 2023.

REPLY COMMENTS

I. SUPPLEMENTAL INFORMATION REQUESTED

A. Provide workpapers (in both PDF and spreadsheet form) detailing the forecasted and historical annual costs, benefits, and production levels of

the project, as newly forecasted and as forecasted in the original September 29, 2020 petition,

Attachment A provides a summary of annual revenue requirements, PVRR, and LCOE for both projects as filed in the original September 29, 2020 petition compared to the October 14, 2022 petition. Attachment A includes labels referencing the detailed supporting revenue requirement models, provided as Attachments B through I. The updated models reflect higher capital costs, COD deferral to 2025, and the impact of IRA as described in the October 14, 2022 petition.

B. Tie the workpapers to all cost and benefit numbers cited in the October 14, 2022 petition,

Attachments A through I, as noted above, support the LCOEs in the October 14, 2022 petition.

The following additional attachments are provided in support of other cost and benefit numbers cited in the October 14, 2022 petition:

- Attachment J contains a breakdown of the $89 million in capital cost increases with links to the supporting models,
- Attachment K details the **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** in PVRR benefits from PTCs preserved on the original projects by deferring the repower CODs to 2025,
- Attachment L is a summary of the **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** in PVRR benefits due to the IRA, and includes labels referencing the detailed supporting revenue requirement models (Attachments E, I, M, and N).

C. Provide updated Encompass modeling and present value of revenue requirements (PVRR) and present value of societal costs (PVSC) calculations, both on an individual basis and as a total portfolio, as required by the January 22, 2021 order,

The Department interpreted the Commission's January 22, 2021 Order as requiring updated Encompass modeling on both an individual basis and total portfolio basis. The Commission's Order states:

> *For future repowering petitions that include more than one project, Xcel shall evaluate the proposed wind projects both on an individual basis and as a total portfolio.*

In this case, the Company is not proposing new repowering projects, but providing an update to the costs of two previously-approved repowering projects. The Company disagrees that the Commission Order was intended to require additional Encompass modeling in this circumstance.

Further, while the Department does not indicate another basis for its recommendation beyond the Commission's Order, the Company notes that additional Encompass analysis would provide little value to this proceeding, while creating further demands on limited resources and potentially resulting in delay. The increased capital costs and offsetting benefits of the IRA significantly reduce the annual revenue requirements of Border Winds and Pleasant Valley. The annual revenue requirements are used as inputs to the Encompass model, but do not impact the optimization or dispatch of Encompass. Therefore, a change in revenue requirements does not require re-modeling to assess the impact. A change in the present value of revenue requirements has the same impact on the modeling results.[1]

The Encompass modeling conducted as part of our September 29, 2020 petition for approval of the repower portfolio resulted in estimated net benefits of $260 million in customer savings on a present value of societal cost (PVSC) basis, and $163 million on a present value of revenue requirement (PVRR) basis. Our October 14, 2022 pricing update discussed changes to the costs of Border Winds and Pleasant Valley, which are further supported in the response to part A and B, above. The net impact, as shown in Attachment A, is a further reduction in the Company's revenue requirement of approximately $200 million on a present value basis for Border Winds and Pleasant Valley, compared to what the Commission previously approved.[2] As noted above, such a change in revenue requirements would not impact the dispatch or optimization of the Encompass model.

D. Explain how any new types of transfer of credits to third parties would affect revenue requirements offsets for PTCs relative to pre-IRA,

The cost associated with transferring credits to third parties will be netted against the PTC benefit that is passed on to customers. The Company modeled the cost at **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** of the

[1] This assumes the same discount period and rate are used.
[2] The total benefits of the repower portfolio will increase further as the IRA will also reduce the revenue requirement for Nobles and Grand Meadow.

PTC, which we believe is reasonable. However, we will learn more about the cost to transact as the market for selling credits develops. Prior to the IRA, there was no ability to transfer credits. Instead, customers would receive the PTC benefit net of the cost to carry the PTC in rate base until the Company could utilize the credits to offset taxable income.

E. Explain how ratepayers would benefit from any new types of transfers of credits to third parties,

The transfer of credits to third parties will replace the need to carry unused credits in rate base due to the Company's current inability to utilize credits to offset taxable income. Having the Company carry unused PTCs is expected to have a significantly higher cost to customers than the cost to transfer the credits.

F. Precisely explain under what section (45 or 45Y) the new projects would receive PTCs, what PTC levels are expected, and the uncertainty regarding the level of PTCs,

Both projects would receive PTCs under Sec 45 at the full PTC rate, which is currently 2.75 cents per kilowatt hour. If the projects are placed in service by the end of 2025, the only remaining uncertainty is with respect to potential bonus PTCs for domestic content and the resources being in an energy community. We are awaiting US Department of Treasury/Internal Revenue Service (IRS) guidance and working with our suppliers to determine the projects' applicable domestic content. We are also awaiting IRS guidance regarding energy community qualification requirements; however, at this time, it does not appear that the Border Winds and Pleasant Valley repowers are in energy communities.

G. Explain and quantify to what extent the value of PTCs underlying benefit estimates depends on the prevailing wage and apprenticeship provisions or bonus credit provisions related to energy communities or domestic content,

Both projects began construction in 2021, before the passage of the IRA. Under the applicable IRS continuous construction safe harbor, if the Projects are placed in service by the end of 2025, they are not subject to the prevailing wage and apprenticeship provisions. We are awaiting further guidance from the IRS regarding energy community qualification requirements; however, it appears that neither of these projects are in energy communities. We also do not yet know if the projects will qualify for the domestic content bonus PTC, as the IRS has not yet defined the qualifications for domestic content bonus. We are awaiting guidance from the IRS and are working with our suppliers to determine domestic content. Currently, our estimates only include the full PTC benefit (currently $27.50/MWh) and assume that the projects do not qualify for bonus credits.

H. (1) Explain and quantify the uncertainty in PTC estimates related to the inflation adjustment factor, and (2) Explain the "uncertainty in the language surrounding the inflation adjustment factor and the resulting PTC value for credits beginning in 2022,"

There is no longer uncertainty as to the inflation adjustment factor methodology applicable to these projects. The IRS issued Announcement 2022-23 on November 10, 2022, in which it affirmed the applicability of the new inflation adjustment rounding mechanism to projects that are placed in service after 2021.[3] The 2022 PTC rate for these newer projects, which would apply to Border Winds and Pleasant Valley with an adjustment for inflation, is 2.75 cents per kilowatt hour, while the 2022 PTC rate for projects placed in service before 2022 remains at 2.6 cents per kilowatt hour.

I. Explain how delaying construction to 2025 or 2026 generates additional PTCs,

The 10 years of PTC eligibility for the existing facilities expires in November 2025 for Pleasant Valley and December 2025 for Border Winds. The Company's initial planned repower COD of December 2024 would result in foregoing the final year of PTCs currently in place for both projects. Delaying construction and COD to 2025 would allow the Company to preserve a significant portion of the final year's PTCs, with some PTCs forfeited during the construction period as wind turbines are taken offline to be repowered. Delaying further into 2026 would allow the Company to preserve 100 percent of the final year's PTCs. However, the Company needs further IRS guidance to determine if a delay into 2026 would qualify the projects for the full PTC under the IRA, as described in the response to question J below.

J. Explain why the projects need to be placed in service by the end of 2025 to satisfy certain PTC requirements and explain which requirements Xcel is referring to and whether these are the safe harbor requirements,

[3] https://www.irs.gov/pub/irs-drop/a-22-23.pdf

The projects began construction pre-IRA in 2021 when prevailing wage and apprenticeship requirements were not applicable. Once a project begins construction, it also must continue construction activities. If a project is placed in service within a certain number of years (usually four years), the IRS presumes that continuous construction has occurred. This is the continuous construction safe harbor. For projects that began construction in 2021, the continues construction deadline is the end of 2025. Since these two repower projects began before the passing of the IRA and are planned to be placed in service prior to the expiration of the continuity safe harbor in 2025, the new prevailing wage/apprenticeship requirements remain inapplicable.

If, instead, the projects are placed in service after 2025, whether they qualify for the full PTC (currently at 2.75 cents per kilowatt hour) [4] might depend on if all our contractors will adhere to the prevailing wage/apprenticeship requirements of the IRA throughout the construction period and during the 10-year PTC period. We are expecting guidance from the Treasury/IRS to address situations where a project began construction pre-IRA but was not placed in service prior to the expiration of the current continuous construction safe harbor. The question is whether a project with this construction timeline would be subject to the prevailing wage/apprenticeship provisions to qualify for the full PTC rate. If the IRS provides favorable guidance, we might be able to delay these projects into 2026, if beneficial, without risking loss of the full PTC rate.

K. Provide updated information on when precisely the repowering is expected to occur, how long it will take, and the expected production cuts during construction,

The timelines of the Border Winds and Pleasant Valley repowers have been aligned to maximize the PTCs at each site. The Site Permit Amendment for each project was verbally approved by the respective commissions in Minnesota and North Dakota on October 27, 2022. Both projects are currently scheduled to begin repowering in Q2 2025. If favorable, we may start civil activities, such as the laydown yard or road improvements, in the year prior to repowering, provided further unanticipated federal tax law changes do not affect the schedule. Xcel Energy has not selected a contractor

[4] Note that the IRA establishes a new, lower "base rate" ($0.003/kWh in 1992 dollars) and provides a 5x multiplier for projects that satisfy the prevailing wage and apprenticeship requirements. Therefore, the full value of the PTC referenced above is based on the base rate times the 5x multiplier – $0.015/kWh – which equates to $0.0275 when adjusted for inflation. *See: https://www.mcguirewoods.com/client-resources/Alerts/2022/8/inflation-reduction-act-tax-credits-for-wind-projects*

for either project, and as such, a finalized sequence is not likely to be known until 2024. However, for comparison, we utilized the information from our most recent repowering project at Nobles. The Nobles project required a downtime of 21 days per turbine - plus an allowance for wind/weather days if applicable.

L. Provide an update on the current production of the facilities and any current construction or repowering activities,

Currently, there are no repowering construction activities at either site. As previously mentioned, we may start civil activities, such as the laydown yard or road improvements, in 2024; however, Xcel Energy has not selected a contractor for either project, and as such, a finalized sequence is not likely to be known until 2024. Construction and repowering activities are currently scheduled to begin in Q2 2025.

M. Explain the open builder's insurance claims cited on page 6 and why builder's insurance has increased by over 20 times from what the Company originally forecasted,

Over the past four to five years, property insurance markets have experienced numerous claims, which have impacted the premiums for current and future projects. The Company has not escaped the impacts of rising premiums, and has additionally filed insurance claims on our wind farms, making the original insurance estimate of **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** for both Projects is no longer attainable. The **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** estimated premium we reported in our October 14, 2022 supplemental filing in this docket was based on past insurance placements. Since that placement, the Company changed insurance brokers and utilized them on an early October insurance placement. Based on that result, we are now estimating the insurance cost for both projects to be **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]**. This changes the cost increase of Border Winds and Pleasant Valley from **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS] to [PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]**.

N. Explain whether Xcel included any forecasted Border Winds and Pleasant Valley revenue requirements in its recovery request in Docket No. E002/GR-21-630 and explain how this updated petition affects that docket,

The Company is not seeking to recover any costs associated with the repowering of Border Winds or Pleasant Valley in its pending electric rate case in Docket No. E002/GR-21-630. Specifically, although the Company included forecasted Border Winds and Pleasant Valley revenue requirements in our MYRP forecast, all those costs were removed through our RES Rider removal and are not being requested as part of MYRP costs of service. Therefore, any changes that have occurred since filing will have no impacts on our rate case.[5,6]

O. Provide a narrative explaining the annual difference in expected PTCs and an explanation of whether the new credits include any changes for the sale or transfer to third parties,

The Company's initial filing included PTCs for both projects at an expected 60 percent qualification level (2020 rate of $15.00/MWh adjusted for inflation thereafter), and costs for carrying unused PTCs in the rate base. With the passage of the IRA, we currently anticipate that the projects will qualify for the full credit (2022 rate of $27.50/MWh adjusted for inflation thereafter). Additionally, we assume the benefit of avoiding the cost to carry PTCs by transferring the credits, net of an estimated **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]** cost to transfer credits.

P. Explain any anticipated risks (with additional inflation, supply chain issues, workforce issues, land issues, etc.) with delaying construction from 2024 to 2025,

As with any project, we see several risks, including inflation and workforce, land, environmental, and interconnection issues. Our current assessment is that these risks are not sufficiently material to warrant starting the repowering before 2025, as they are difficult to quantify, and they do not outweigh the benefits of prolonging the PTCs.

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5 2022-2024 MYRP Workpapers (Docket No. E002/GR-21-630), Volume 4, Section VIII: Adjustments, Tab A44, October 25, 2021.

6 In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota, Direct Testimony and Schedules, Benjamin C. Halama (Docket No. E002/GR-21-630), Section VII, subpart D, item 25 and Section VIII, subpart A, item 1, October 25, 2021.

Securing an agreement with Vestas early in the project (by 1Q 2023) mitigates the supply chain risks.[7]

Q. Provide detail on cost changes as a result of contractor changes, including any changes to any costs paid to Vestas,

Xcel Energy signed a safe harbor agreement with Vestas in 2021. The Turbine Supply Agreement for the remainder of the wind turbine components has not yet been executed. We anticipate that execution of the Turbine Supply Agreement will occur after approval of this petition.

Xcel Energy has not yet signed an agreement with any contractor. The procurement process for this will begin after the Turbine Supply Agreement is executed.

R. Explain whether the Company anticipates any effects on transmission issues resulting from anticipated project changes.

We do not foresee any adverse effects due to impacts on the transmission system, as wind repowerings have a very low probability of requiring mitigation. To comply with MISO Tariff and Business Practice Manual provision, replacement of an existing facility is required to have de minimis impact on the grid. When grid changes are submitted to MISO, a reliability assessment is performed to determine impact. Unless there is a significant change (like switching fuel type or decreased output) these are generally found to have insignificant impacts. If MISO determines a change to the grid represents a material modification, that change would be required to enter the MISO Generator Interconnection Queue to address those changes[8]. Beyond this requirement, mitigation of impacts from transmission limitations leading to congestion are actively being developed and implemented by the Company. As discussed in our Informational Filing on November 10, 2022 in Docket No. E002/M-20-620, the Company has recently completed several near-term congestion and curtailment mitigation efforts, which increased overall system capability and decreased curtailments. The Company also has several ongoing efforts to mitigate and reduce curtailments in the near-term (such as Grid Enhancing Technologies), the mid-term

[7] The Vestas contract timeline and risk mitigation is the reason we have asked for a decision by March 2023.
[8] MISO Business Practice Manual 015: https://cdn.misoenergy.org/BPM%20015%20-%20Generation%20Interconnection49574.zip

(low cost, high impact system upgrades), and the long-term (MISO Long Range Transmission Planning projects).

CONCLUSION

The Company has worked diligently to keep the Border Winds and Pleasant Valley Projects moving forward amid cost, technical, and logistical challenges, which are occurring in an inflationary environment, and to maximize PTCs and IRA benefits to combat these pressures. These Projects have value for our customers, and it is critical to keep our entire portfolio of wind repowering projects on track to meet approved resource needs. Additionally, the Projects will generate approximately 250 well-paying union construction jobs, maintain existing permanent jobs, and meet the requirements outlined in the economic relief and recovery docket. For these reasons, and the merits previously discussed in the record, the Projects are in the public interest, and the Company respectfully requests that the Commission:

- Approve the updated pricing for the Projects discussed in this Petition, as reasonable and in the public interest; and,
- Continue to allow the Company to pursue cost recovery for our Wind Repowering Portfolio, including the Border Winds and Pleasant Valley Projects, in a future Renewable Energy Standard (RES) Rider filing.

Dated: November 28, 2022

Northern States Power Company

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Attachments B through I:
1. **Nature of the Material:** The attachments are supporting revenue requirements models provided in live Excel spreadsheet format.
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3. **Importance:** This data includes confidential cost information.
4. **Date the Information was Prepared:** Fall 2022

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3. **Importance:** This data includes confidential production and PTC information.
4. **Date the Information was Prepared:** Fall 2022

Attachment L:

1. **Nature of the Material:** A live, Microsoft Excel file providing a summary of the benefits due to the IRA.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information.
4. **Date the Information was Prepared:** Fall 2022

Attachments M and N:

1. **Nature of the Material:** The attachments are supporting revenue requirements models provided in a live Excel spreadsheet format.
2. **Authors:** The attachments were prepared by the Company's Corporate Development personnel.
3. **Importance:** This data includes confidential cost information, and the Company considers the models as proprietary in their design.
4. **Date the Information was Prepared:** Fall 2022

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-20-620

Dated this 28th day of November 2022

/s/

____

Joshua DePauw

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-620_E002-M-20-620

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