Xcel Energy®

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November 13, 2019

–Via Electronic Filing–

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: PETITION SUPPLEMENT
APPROVAL OF THE ACQUISITION OF THE MOWER COUNTY WIND FACILITY
DOCKET NO. E002/PA-19-553

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed information supplementing our August 30, 2019 Petition for approval of the Company's agreement to acquire, own, and operate the 98.9 megawatts Mower County Wind Facility. The supplemental information provides additional analysis to incorporate the Commission's recent decision in the Mankato Energy Center proceeding, and other updates to the Strategist modeling.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6064 or bria.e.shea@xcelenergy.com or Farah Mandich at (612) 330-5918 or farah.l.mandich@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Encls
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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Dan Lipschultz	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF THE ACQUISITION OF THE MOWER COUNTY WIND FACILITY

DOCKET NO. E002/PA-19-553

PETITION SUPPLEMENT

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission information supplementing our August 30, 2019 Petition for approval of the Company's agreement to acquire, own, and operate the repowered 98.9 megawatts (MW) Mower County Wind Facility (Project). The supplemental information provides additional analysis to incorporate the Commission's recent decision in the Mankato Energy Center (MEC) proceeding, and other updates to the Strategist modeling.

The supplemental analysis provided in this filing continues to support the proposed purchase of the repowered Mower County Wind Project. It shows that, even under the modified assumptions, the acquisition provides immediate cost savings for customers using both present value of societal costs (PVSC) and present value of revenue requirement (PVRR) views. Our initial filing also provided an alternative way to evaluate the proposal separate from the Strategist model—a pro forma analysis. The updated assumptions used in the supplemental analysis here do not affect the pro forma analysis results; however, we remind stakeholders that the pro forma analysis also indicated that the proposed repowering and purchase results in significant benefits for customers throughout the Project's life.

We believe that the analysis we have presented – both in this supplement and the initial Petition – provides the Commission with the information necessary in order to find the Company's proposed acquisition to be in the public interest.

SUPPLEMENTAL COMMENTS

A. Supplemental Strategist Modeling Continues to Show Substantial Benefits from the Company's Proposed Mower County Project Acquisition

The Company's initial Petition included both Strategist and pro forma modeling to show that the proposed Mower County Project acquisition presented an opportunity to achieve substantial customer benefits, which begin accruing immediately. We showed analysis supporting this conclusion under two approaches: first, a "partial fulfillment" approach, in which the repowered Project would fulfill some of the need identified in our Resource Plan's Preferred Plan; and second, an "incremental" approach in which the Project would be considered incremental to the wind additions included in our Resource Plan. Under this "partial fulfillment" approach, the acquisition results in approximately $49 million in PVRR benefits to customers. Even in the incremental analysis approach, PVRR benefits exceed $10 million. In both cases, the present value societal cost benefits amount to around $50 million. In short, this modeling showed that the proposed acquisition ensures the Company's customers benefit from efficient, cost-effective renewable energy from the Mower County Project into the future.

The Company's initial analysis used assumptions consistent with our most recent Integrated Resource Plan (Docket No. E002/RP-19-368), including an assumption that the Company would acquire the MEC as a regulated asset. In order to incorporate the Commission's decision on MEC into our analysis as well as other updated information, and to provide assurances to the Commission that the acquisition continues to be a cost-effective resource under updated assumptions, we herein provide supplemental Strategist modeling that addresses the changes discussed below.

The supplemental Strategist modeling shows similar customer benefits under all scenarios analyzed. The updated assumptions include:

- The existing PPAs for MEC are included in the modeling consistent with the Commission's determination in Docket No. IP6949, E002/PA-18-702.
- The size of the Crowned Ridge wind project was reduced by 200 MW to reflect the updated size of 400 MW. As noted in the initial Petition, the final 200 MW phase of the Crowned Ridge project withdrew from the Midcontinent Independent System Operator (MISO) queue as a result of the high transmission interconnection upgrade costs MISO identified in its recent study.

- Hourly market price shapes are now based on load instead of net thermal load. Previous analysis used an hourly shape for each month that was based on the amount of thermal generation dispatched on our system.[1] We modified the hourly market shapes in response to concerns raised by the Department of Commerce in the MEC acquisition proceeding. We note that a view of the Mower County Project's acquisition benefits using this modified market shape was presented in our initial Petition, but the assumption change is further incorporated in the updated analysis here.
- The model was updated to improve run times and limit new resource options. These updates include limiting the number of superfluous units available to add each year.
- Several minor updates and corrections to the model were made including: removing renewable energy credits from Manitoba Hydro; revising Manitoba Hydro pricing; adjusting the solar profile used in Strategist, adjusting inputs related to the Cannon Falls and Lake Benton 1 and 2 PPAs; and corrections to the heat rates for the proposed Sherco Combined Cycle unit and generic combined cycle resources.

Additional detail regarding the key assumptions in the supplemental modeling are included in Attachment A.

Table 1 below shows both the PVSC and PVRR savings of the proposed repowering and acquisition from our Strategist analyses that examine system costs through 2045, compared to the existing PPA. As in the original analysis, the proposed repowering and acquisition option results in customer benefits in every scenario tested. In the incremental analysis, however, we note that the PVRR and PVSC results diverge because adding incremental wind to the amount of wind already included in the Preferred Plan results in further carbon emissions reductions.

[1] The methodology results in lower hourly locational marginal prices (LMPs) during times when significant amounts of renewable energy are on the system and higher hourly LMPs when lower amounts of renewable energy are available on our system. While we continue to believe that this methodology is reasonable and provides a conservative estimate of the cost efficiencies to be gained through MISO market interaction, we acknowledge that it may not always correspond well with the timing of observed high and low LMPs in the MISO market.

Table 1
Mower County Repower and PSA Incremental PVSC and PVRR Savings from Preferred Plan (Base Case) ($2019 millions)

	Present Value Measure Cost/(Savings) ($2019 millions)	Partial Fulfillment Analysis[2]	Incremental Analysis
Original analysis	PVSC (High Ext Costs thru 2024, High Reg Costs)	(50.5)	(49.1)
	PVRR (No CO_2 Costs)	(48.8)	(10.7)
Updated analysis	PVSC (High Ext Costs thru 2024, High Reg Costs)	(43.5)	(69.4)
	PVRR (No CO_2 Costs)	(48.9)	(15.2)

As noted in Table 1 above, the base PVSC assumptions include high externality costs through 2024 and high regulatory costs in 2025 and beyond, as approved by the Commission in its June 11, 2018 Order.[3] The Commission's Order also required that:

> In all electricity generation resource acquisition proceedings during 2018 and 2019, utilities shall analyze potential resources under a range of assumptions about environmental values, including scenarios that—
>
> A. Incorporate, for all years, the low end of the range of environmental costs for carbon dioxide as approved by the Commission in its January 3, 2018 Order Updating Environmental Costs in Docket No. E-999/CI-14-643, *In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3*.
>
> B. Incorporate, for all years, the high end of the range of environmental costs for CO_2 as approved by the Commission in its January 3, 2018 Order.
>
> C. Incorporate the low end of the range of environmental costs for CO_2 but substituting, for planning years after 2024, the low end of the range of regulatory costs for CO_2 regulations, in lieu of environmental costs.

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[2] Original analysis results in this table reflect a market price shape in Strategist that is based on net thermal load. In the original analysis that used a market price shape based on net load, the PVSC benefits amounted to $45.1 million and PVRR benefits were $42.1 million.
[3] ORDER ESTABLISHING 2018 AND 2019 ESTIMATE OF FUTURE CARBON DIOXIDE REGULATION COSTS, Docket Nos. E999/CI-07-1199 and E999/DI-17-53.

D. Incorporate the high end of the range of environmental costs for CO_2 but substituting, for planning years after 2024, the high end of the range of regulatory costs for CO_2 regulations, in lieu of environmental costs.

We have included these sensitivities, for compliance with the Commission's Order, in Table 2 below. We note here that all sensitivity analyses associated with both the partial fulfillment and incremental resource approaches show that the Mower County Project's proposed PSA is expected to yield customer benefits.

Table 2
Mower County Repower and PSA Customer Costs/(Savings) Under Environmental Cost Sensitivities ($2019 millions)

	Cost Sensitivity **Cost/(Savings) ($2019 millions)**	**Partial Fulfillment Analysis**	**Incremental Analysis**
Original analysis	PVRR (Base) – No Externalities or Regulatory Costs	(48.8)	(10.7)
	PVSC (Base)	(50.5)	(49.1)
	Low Externality	(49.6)	(14.1)
	Low Externality, Low Regulatory Cost of CO_2	(48.8)	(21.9)
	Mid Externality, Mid Regulatory Cost of CO_2	(49.7)	(34.0)
	High Externality	(52.2)	(25.8)
Updated analysis	PVRR (Base) – No Externalities or Regulatory Costs	(48.9)	(15.2)
	PVSC (Base)	(43.5)	(69.4)
	Low Externality	(49.7)	(25.8)
	Low Externality, Low Regulatory Cost of CO_2	(48.9)	(32.5)
	Mid Externality, Mid Regulatory Cost of CO_2	(50.3)	(44.3)
	High Externality	(53.0)	(36.9)

B. Pro Forma Model Approach and Results

Our initial Petition also provided a pro forma analysis to evaluate the present value and annual cost implications of the Mower County PSA. The pro forma model provides a simpler view of the economic costs or benefits of the project than does the Strategist modeling. We note that the updated assumptions used in the supplemental Strategist modeling do not affect the pro forma analysis results.

In our initial Petition, we noted that the pro forma analysis indicated that the proposed repowering and purchase result in PVRR benefits of approximately $48 million over the life of the Project. On a levelized cost basis, our analysis estimates that the proposed acquisition would result in savings to customers of nearly $11/MWh. This analysis further shows, consistent with Strategist modeling, that the acquisition of a repowered Mower County Project results in savings in nearly every year, primarily because our ownership and operation will result in lower costs to customers than the existing PPA and our expected costs for generic wind in the future.

CONCLUSION

The supplemental analysis provided in this filing continues to support the proposed purchase of the repowered Mower County Wind Project. It shows that, even under several modified assumptions, the acquisition provides customers with substantial value because it will result in cost savings for customers from efficient, refurbished renewable energy sources. We believe that the analysis we have presented – both in this supplement and the initial Petition – provides the Commission with the information necessary in order to find the Company's proposed acquisition to be in the public interest. Xcel Energy respectfully requests the Commission approve the Company's acquisition, ownership, and operation of the repowered Project pursuant to the terms of the executed Purchase and Sale Agreement. In the alternative, if not approving the proposed acquisition, Xcel Energy continues to respectfully request the Commission approve the First Amendment to the Renewable Energy Purchase Agreement, as discussed in our initial Petition.

Dated: November 13, 2019

Northern States Power Company

Supplemental Petition Modeling Adjustments

The modeling for this supplemental filing is based on the Preferred Plan modeling in the current Integrated Resource Plan (IRP) (Docket No. E002/RP-19-368). Adjustments were made to the IRP Preferred Plan modeling in order to incorporate the recent Minnesota Public Utilities Commission decision on the Mankato Energy Center (MEC) acquisition, feedback received informally from the Department of Commerce (DOC), and other data cleanup items. The changes include:

<u>Unit Adjustments</u>

- MEC is reflected as two purchase power agreements (PPAs) instead of an owned asset, consistent with the Commission's decision in Docket No. IP6949, E002/PA-18-702.
- The size of the Crowned Ridge wind facility was reduced by 200 MW – 100 MW each from capacity the Company will own and the capacity for which it has a purchase power agreement – consistent with the project phase withdrawal described in the Mower County Wind Facility initial Petition and Petition Supplement.
- The Sherburne County Combined Cycle heat rate curve was updated, as identified in the IRP DOC Information Request (IR) No. 24.
- The Generic Combined Cycle data was updated, as identified in IRP DOC IR No. 25.

<u>Market Prices</u>

- Hourly prices were shaped to retail load instead of net thermal load, as further described in the Petition Supplement.

<u>Expansion Plan Modeling Parameter Adjustments</u>

- At least one Combustion Turbine is allowed as an available resource option every year.
- Combined Cycle units were occasionally made available as options in the model.
- The blanket superfluous designation for generic wind and solar was removed to reduce the number of states generated and model runtimes.

<u>Additional Model Cleanup Items</u>

- We removed the designation that counted generation from the Manitoba Hydro purchase as producing renewable energy credits (RECs). We note that the Company does not use the REC accounting function in Strategist for formal REC tracking.

- The data entry for the Manitoba Hydro purchase contract was revised from an annual average $/MWh to the actual monthly $/MWh values, in order to enable easier audit and verification against the PPA contract terms.
- The generic solar profile was revised to remove extremely small but non-zero values, which were generated by the statistical "8760-to-typical week" conversion program, for hours past sunset.
- The Canon Falls PPA fixed costs were adjusted to align with the PPA.
- The capacity and weighted average price for wind groups "BUFFR_TR" and "BUFFRTR2" was adjusted to reflect the purchase of the Lake Benton wind project.

CERTIFICATE OF SERVICE

I, Paget Pengelly, 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

or

xx electronic filing

Docket No. E002/PA-19-553

Dated this 13th day of November 2019

/s/

____

Paget Pengelly
Regulatory Administrator

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