

KEYES & FOX^{LLP}

October 17, 2016

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

VIA ELECTRONIC SERVICE

Re: ***In the Matter of the Commission's Inquiry into Fees Charged on Qualifying Facilities***

PUC Docket No.: E-999/CI-15-755

Dear Mr. Wolf,

The Energy Freedom Coalition of America ("EFCA") hereby submits the **SUPPLEMENTAL REPLY COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA** to the above-entitled matter.

EFCA has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at (720) 639-2190 or at jschlesinger@kfwlaw.com.

Sincerely,

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Enclosure

Cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S INQUIRY
INTO FEES CHARGED ON QUALIFYING FACILITIES

DOCKET No. E999/CI-15-755

**SUPPLEMENTAL REPLY
COMMENTS OF THE
ENERGY FREEDOM
COALITION OF
AMERICA**

The Energy Freedom Coalition of America ("EFCA") hereby submits its Supplemental Reply Comments pursuant to the State of Minnesota Public Utilities Commission's ("Commission") Notice of Comment Period ("Notice"), issued June 22, 2016 requesting Supplemental Comments "limited to issues raised by a party in its reply comments that were not included in its initial comments." In Reply Comments, EFCA argued that it would not be fair to allow utilities to present their case-in-chief through reply comments and deny other stakeholders an opportunity to respond. EFCA appreciates the Commission's recognition of this fairness issue and provides the following supplemental response.

1. Introduction

Connexus Energy ("Connexus"), Minnesota Power, Northern State's Power doing business as Xcel Energy ("NSP" or "Xcel") and the Minnesota Rural Electric Association ("MREA") (specifically on behalf of Mille Lacs Energy Cooperative (Mille Lacs) and Goodhue Electric Cooperative (Goodhue)) each filed Reply Comments in this docket that included their primary justification and arguments in favor of fees utilities have been

charging to distributed generation (“DG”) customers.¹ Many of these Reply Comments argue 1) similar to past utility arguments, that the fees are reasonable mechanism to recover interconnection costs² and 2) that the fees were either explicitly or implicitly approved by the Commission in the past.³

First, a re-occurring fee is not the appropriate mechanism to recover one-time interconnection costs. Those costs should be made explicit and be charged by utilities up front. If a customer feels that any interconnection costs assessed by their utility are unfair or unreasonable, then that customer has the ability to challenge the fee pursuant to Minnesota Statue Section 216B.164, subd. 5.

Second, prior approval of a particular fee (either explicitly or implicitly) has no bearing on the questions at issue in this docket: whether or not the fees at issue are just, reasonable, legal and in the public’s interest. If the Commission finds that they are not, then it can, and must, order that all such fees be abandoned.

Finally, EFCA provides some additional specific replies to individual utility comments below.

2. Utility comments generally rely on legal arguments, which have already been addressed in prior party comments and fail to justify the DG fixed charges at issue.

All four of the above mentioned Reply Comments rely heavily on Minn. Stat. § 216B.164, Subd. 8, which requires a QF to pay “costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load

¹ Otter Tail Power (“Otter Tail”) did file initial comments, but made some new arguments in its Reply Comments, which are also addressed herein.

² Connexus Reply Comments at p. 2, MN Power Reply Comments at p. 3-4, Xcel Reply Comments at p. 2-3; MREA Reply Comments at p. 3.

³ Connexus Reply Comments at p. 1-2, MN Power Reply Comments at p. 4-6, Xcel Reply Comments at p. 4-5; MREA Reply Comments at p. 4-5.

characteristics who are not cogenerators or small power producers, or from any fixed charges normally assessed such nongenerating customers.” As discussed at length in prior comments and incorporated herein, Subdivision 8 concerns interconnection and wheeling costs, not costs for electricity service like the fixed monthly charges at issue here. As noted by the Department of Commerce (“DOC”) in its Initial Comments, “to the extent the fees in question are found to be interconnection costs, recovery of a one-time cost on a monthly basis in perpetuity is not reasonable.”⁴

From a developer’s perspective, interconnection fees should be paid up front. Collecting them monthly and in perpetuity allows the utility to charge a carrying fee and is likely to result in over-collection. Interconnection fees, like other utility costs, should reflect cost causation principles and should be supported with clear and consistent data demonstrating the incremental costs of interconnection for each customer. To the extent an upfront interconnection fee seems unreasonable, a QF customer has the right to challenge such fees pursuant to Minn. Stat. § 216B.164, Subd. 5.

3. Utility claims that prior decisions explicitly or implicitly approved their fees are not a basis to find them to be just, reasonable, legal or in the public’s interest.

All of the above mentioned Reply Comments also rely heavily on the fact that their fees were either implicitly or explicitly approved through various earlier rate cases, rulemakings, or annual tariff filings.⁵ EFCA does not opine as to the accuracy of these assertions. However, as stated in EFCA’s Reply Comments with regard to Otter Tail Power’s similar arguments, prior approval (even if explicit) of any DG specific fees does

⁴ DOC Comments at p. 5.

⁵ Connexus Reply Comments at p. 1-2, MN Power Reply Comments at p. 3-4, Xcel Reply Comments at p. 2-3; MREA Reply Comments at p. 3-4.

not justify their continued application if the Commission now finds such fees to be unreasonable per Section 216B.03.

Minnesota Statute, Section 216B.03 is unambiguous and states,

Every rate made, demanded, or received by any public utility, or by any two or more public utilities jointly, shall be just and reasonable. Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers. To the maximum reasonable extent, the commission shall set rates to encourage energy conservation and renewable energy use and to further the goals of sections 216B.164, 216B.241, and 216C.05. Any doubt as to reasonableness should be resolved in favor of the consumer.

Thus, if the Commission at any time finds that a rate violates the above statute that rate must cease.

Further, the Commission has explicit authority pursuant to Section 216B.25 to “rescind, alter, or amend any order fixing rates, tolls, charges, or schedules, or any other order made by the commission ...” Thus, there is absolutely no reason why any purported prior approval would justify the continuation of any illegal or unreasonable fee.

4. EFCA provides specific replies to certain utility comments made for the first time in Reply Comments regarding reasonableness.

As detailed in earlier comments, all of the fees at issue in this proceeding are illegal. However to the extent that the Commission finds that any such fees could be legal, it should still find that the specific fees at issue are unreasonable and not cost based. Below, EFCA offers specific responses to new utility claims that their individual fees are justified.

a. Minnesota Power

In their Reply Comments, Minnesota Power claims that in 1984 the Commission approved a monthly service charge of \$1.30, which was calculated by dividing the total customer service expenses by the number of Residential and General Service customers.⁶ It then goes on to say that the service charge calculation was refined, presumably to derive the monthly fee to DG customers, but Minnesota Power provides no additional information about how the calculation was refined and or evidence about why the changes were appropriate. Instead the company bases its reasonableness argument on its finding that the 1984 fee is roughly equivalent to the current 2016 DG service fee when accounting for inflation.⁷

EFCA raised several concerns in its initial comments regarding Minnesota Power's monthly fees,⁸ but the company failed to provide any response or evidence to support its assumptions used to calculate the fee. These concerns include whether there is evidence that DG systems required additional distribution and general engineering cost; whether 12% of the meter cost is a reasonable approximation of the engineering costs; and whether 0.17% of the meter costs sufficiently represent the associated Administration and General Service costs. Without justification for use of these figures, it is not possible to determine the reasonableness of the fees. Thus, Minnesota Power has failed to meet its burden to demonstrate that the fees are just and reasonable.

⁶ Minnesota Power Reply comments at p. 5.

⁷ *Id.*

⁸ EFCA Initial Comments at p. 11.

b. Connexus

In its initial comments, EFCA laid out several concerns with Connexus' assumptions for its monthly fees,⁹ but the company did not address any of the specific concerns. Connexus did not provide any data or evidence in its Reply Comments to support its claims that its \$2.65 monthly fee reflects the incremental expenses (i.e., O&M and customer service). In fact, its initial responses to Staff's information requests clearly show that Connexus does not collect data to support those claims, and it even says that O&M costs are the same for bi-directional meters and standard meters.¹⁰ Without such data, it is not possible to determine the reasonableness of the fees. Thus, Connexus has failed to meet its burden to demonstrate that the fees are just and reasonable.

It is also worth noting that Connexus states that a bi-directional meter is clearly an interconnection expense, which highlights the inconsistent treatment of these expenses across Minnesota since other utilities claim their monthly fees cover meter costs.

c. Xcel

Xcel claims in its Reply Comments that its current metering fees are reasonable based on the calculations it provided in MPUC-003.¹¹ EFCA raised several concerns with Xcel's fees in its Initial Comments, and issued several information requests in order to better assess whether the fees were in fact reasonable and cost-based. Xcel responded to EFCA's requests in part, and provided an updated version of MPUC-003 in its Reply Comments upon EFCA noting that it is not appropriate for meter installation costs to be

⁹ *Id.* at p. 8.

¹⁰ Connexus response to IR PUC #3.

¹¹ Xcel Reply Comments at p. 6.

assessed a carrying charge.¹² However, even with this correction Xcel's calculations in MPUC-003 fail to prove the fees are reasonable or cost-based.

First, the company stated in response to EFCA-IR-1 that it does not separately account for DG customer account expenses, meter reading, or customer account revenue requirements separately from other customers.

Second, Xcel includes annual incremental costs for meter reading FERC 902,¹³ yet their response to EFCA-IR-7, the company says “[n]o additional charges are incurred by a DG customer for reading their meters.”

Third, in response to EFCA-IR-8, EFCA-IR-9 and EFCA-IR-10 Xcel noted that it does not maintain multiple customer records under FERC accounts for individual DG customers. In its initial response to MPUC-003, Xcel says these accounts are divided by the number of customers. However the calculations in MPUC-003 (original and corrected) clearly show DG customers are being charged twice for these accounts.¹⁴

Finally, Xcel stated in response to EFCA-IR-3 and EFCA-IR-4 that it would provide supporting data for MPUC-003 in its Reply Comments regarding meter programming costs and installation costs, yet the Company failed to do so. It is therefore unclear whether the costs associated with these categories in MPC-003 are reasonable.

Based on Xcel's filings and responses to IRs, it is not possible to determine the reasonableness of its DG fees. Thus, Xcel has failed to meet its burden to demonstrate that the fees are just and reasonable.

¹² *Id.* at FN 6.

¹³ Xcel's Reply Comments at Attachment B, p. 1, line 12.

¹⁴ Xcel Reply Comments, at Attachment B, p. 1, lines 11-14; and Attachment B p. 2, lines 6-8 and line 10.

d. MREA (specifically on behalf of Mille Lacs and Goodhue)

MREA argues that Mille Lacs and Goodhue's charges are "the reasonable costs of connection, switching, metering, transmission, distribution, safety provisions and administrative costs of providing service to a qualifying facility...."¹⁵ But this statement is inconsistent with the other assertions made in this docket.

With regard to Mille Lacs, MREA states that the coop charges \$300 up front for engineering work and inspection, but collects nothing for the cost of the meter or the ongoing metering costs.¹⁶ However, this assertion contradicts the Cooperative's initial response to MPUC IRs that the monthly fee covers the installation of the meter¹⁷ and its claim that it doesn't charge DG customers any meter-related costs at the time of interconnection. The assertion also contradicts MREA's statement quoted above that the fees include the reasonable cost of metering.¹⁸ Mille Lacs provides no data or evidence that meter costs are excluded in its interconnection fee or that they are cost based. Moreover, Mille Lacs does not reconcile why it has two meter costs, one that is \$130 and another that is \$285, yet charges all DG customers \$4.50/month.¹⁹ Based on Mille Lacs and MREA's filings and Mille Lacs' responses to IRs, it is not possible to determine the reasonableness of its DG fees. Thus, Mille Lacs has failed to meet its burden to demonstrate that the fees are just and reasonable.

With regard to Goodhue, neither MREA, nor Goodhue itself has provided any data or evidence that the \$3/month DG fee is appropriate or cost-based. Thus, it is not

¹⁵ MREA Reply Comments at p. 2.

¹⁶ *Id.* at p. 3.

¹⁷ MLEC Response to IR PUC #3.

¹⁸ MREA Reply Comments at p. 2.

¹⁹ EFCA Reply Comments at p. 10.

possible to determine the reasonableness of its DG fees. Goodhue has therefore failed to meet its burden to demonstrate that its fees are just and reasonable.

e. Otter Tail

Otter Tail did file Initial Comments, however the company made an additional argument in its reply comments that was not stated in its initial comments. Otter Tail states it “would urge that the level of analysis applied to validating the reasonableness of customer charges have some level of proportionality with the magnitude of the charges.”²⁰ They go on to assert, “some commenters demand a level of analysis that will cause utilities to question whether the administrative burden of determining charges is worth the small amount of expense recovered.”²¹

This statement indicates that Otter Tail believes that the costs of interconnection are so *diminimus* that the effort to precisely quantify them would outweigh the benefit to it or its non-DG customers of collecting them. Assuming this is true, such an admission would prove that the fees it is collecting are not reasonable or cost based. It appears Otter Tail is just making its best guess, without putting in the time or effort to ensure that its DG specific fees are cost based and therefore just and reasonable.

5. Conclusion

EFCA appreciates this opportunity to offer Supplemental Reply Comments. For all of the reasons stated herein and in EFCA’s earlier comments, all of the fees at issue in this proceeding are illegal under Minnesota and federal law. However, if the Commission nevertheless finds that any such fees *may* be legal, it should still find that all

²⁰ Ottertail Power Reply Comments at p. 8-9.

²¹ *Id.* at p. 9.

of the fees at issue in this docket are unreasonable and therefore unjust. None of the six utilities named in this proceeding have met their burden to show that the fees are reasonable or cost based.

Respectfully submitted this 17th day of October 2016.

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CERTIFICATE OF SERVICE

RE: Docket No. E999/CI-15-755 - In the Matter of the Commission's Inquiry into Fees Charged on Qualifying Facilities

I, Blake Elder, hereby certify that I have this day served a true and correct copy of the "*Supplemental Reply Comments of the Energy Freedom Coalition of America*" to all persons on the attached service list by electronic filing, electronic mail, or by U.S. mail, postage prepaid and properly addressed at Cary, North Carolina.

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Dated this 17th day of October, 2016.

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