



414 Nicollet Mall
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May 8, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: COMMENTS
UTILITY RENEWABLE ENERGY COST IMPACT REPORTS
DOCKET NO. E999/CI-11-852

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Commission's April 18, 2014 NOTICE OF SUPPLEMENTAL COMMENT PERIOD ON COST IMPACT REPORTS.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at james.r.alders@xcelenergy.com or (612) 330-6732 if you have any questions regarding this filing.

Sincerely,

/s/

JAMES R. ALDERS
STRATEGY CONSULTANT
RATES AND REGULATORY AFFAIRS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF UTILITY RENEWABLE
ENERGY COST IMPACT REPORTS
REQUIRED BY MINNESOTA STATUTES
SECTION 216B.1691, SUBD. 2E

DOCKET NO. E,G999/CI-11-852

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's April 18, 2014 NOTICE OF SUPPLEMENTAL COMMENT PERIOD ON COST IMPACT REPORTS. The Notice solicits further comments on alternative proposals presented by Xcel Energy and the Department of Commerce – Division of Energy Resources (Templates 1 and 2, respectively).

We continue to support the template that we proposed in our December 20, 2013 Comments. In these Comments, we discuss the reasons we believe our Template best facilitates reporting of renewable energy cost impacts consistent with both the statutory reporting requirements and the four guiding principals outlined by Staff in the Commission's November 6, 2013 NOTICE OF COMMENT PERIOD ON COST IMPACT REPORTS.

However, we note that just as we were finishing these Comments, we saw that the Department suggested that additional detail regarding some of the elements of our proposal, such as how the avoided energy benefit would be calculated based on historical location marginal prices (LMP's), may be helpful to the Commission assess whether all utilities subject to the RES would reasonably be able to develop the estimates under our proposed methodology. We will supplement these Comments with this additional detail as soon as possible. We are additionally open to providing other information regarding our proposal, should parties have additional questions as part of this comment process.

Minn. Stat. § 216B.1691, Subd. 2(e) requires the Commission to:
...determine a uniform reporting system to ensure that individual utility reports are consistent and comparable, and shall, by order, require each electric utility subject to this section to use that reporting system. The rate impact estimate must be for wholesale rates and, if the electric utility makes retail sales, the estimate shall also be for the impact on the electric utility's retail rates. Those activities include, without limitation, energy purchases, generation facility acquisition and construction, and transmission improvements.

Similarly, the guiding principals outlined by Staff in the November 2013 Notice require the reporting template to:

- 1) Foster transparency;
- 2) Support consistency, coordination and non-burdensome administration;
- 3) Provide realistic representation of baseline, actual (to-date) and future expected costs for achieving and maintaining compliance; and
- 4) Enable comparison across utilities.

In summary, we believe that our proposed Template provides the necessary information regarding the costs and benefits of utility compliance with Minnesota's Renewable Energy Standard (RES) and the Solar Energy Standard (SES) as contemplated in the statute, and the level of detail and type of information that is consistent with the guiding principles. For example, the Template we propose:

- Contains a greater level of detail for each category, such as capacity and generation, expenses, benefits, and net impacts and costs; it also contains specific items such as transmission costs and indirect items, such as wind integration. We believe this richer level of information will foster greater transparency and more meaningful comparison across utilities;
- Expense and benefit calculations based on historic actual and forecasted annual costs that represent the actual impacts to customers in the year in which the costs or benefits are realized, which we believe is the intent of the statute. Our proposed final summation of costs and comparison to total Company costs provides an accurate estimate of percentage impact on Company rates. In comparison, levelized estimates provide a view of the overall Net Present Value of projects, but these average or levelized estimates over time can skew or mask the annual rate impact estimates; and
- Relying on generic Combustion Turbine or Combined Cycle estimates from the Energy Information Administration or those projects added within the last year

would not likely capture the true avoided cost of renewables, as we discussed in our previous Comments. Rather, it relies on information maintained by each specific utility, or that is created as part of the utility's resource planning process, which is the context within which this reporting will occur. Therefore, our proposed Template would not create an administratively-burdensome process.

We provide further discussion below regarding avoided cost calculations and the overall presentation of renewable compliance costs.

Avoided Cost Calculations

As we noted previously, the use of EIA levelized costs for either a Combustion Turbine or Combined Cycle is not likely to capture the true avoided cost of renewables. We have previously discussed how the use of levelized prices may skew the rate impact results. However, more importantly, the use of a natural gas plant as a proxy is not likely appropriate for all types of renewable energy.

For example, our portfolio of renewables includes biomass and hydro power that operate around the clock and are much more similar to a baseload plant than either an intermediate CC or peaking CT. Also our simulations have shown that approximately 40 percent of the fossil fuel displaced by wind generation comes from coal plants or market purchases, which we demonstrated in our most recent proposal to add significant wind resources to our system.¹ As such, the use of a natural gas plant in comparison to wind is not likely accurate.

Finally the EIA's generic cost estimate is not necessarily a good proxy for each utility's cost of generation. As we noted above, because the renewables cost impact reporting will be performed in the context of each utility's resource plan, each plan will necessarily include updated cost estimates for CTs and CCs. Introducing a different and generic cost estimate for natural gas plants is unnecessary, and would not be representative of the utility's actual or expected costs.

Presentation of Renewables Compliance Costs

We believe compliance costs should be provided for two categories: (1) the Renewable Energy Standard; and (2) the Solar Energy Standard. While we can appreciate the Department's suggestion that each type of renewable resource be listed separately, we believe providing an overall cost of compliance is the intent of the statute – rather than a comparison of the costs associated with different renewable

¹ See IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF THE ACQUISITION OF 600 MW OF WIND GENERATION, July 16, 2013, page 29 (Docket No. E002/M-13-0603).

energy technologies. We have developed a diverse portfolio of resources to meet the RES, and believe that cost impact of our portfolio should be considered as a whole.

Finally, the Department's proposal has a focus on renewable energy projects added within the last year. As also noted by the Department, disclosing the costs of such a small subset of renewable projects creates confidentiality issues that would undermine the goal of transparency. Further, all of our large renewable energy projects go through an extensive regulatory review process, such that the cost and benefits of individual projects have already been reviewed, which we believe further minimizes the importance of isolating these most recent additions. Therefore, we believe our proposal that focuses on the overall compliance cost of the portfolio, and provides a realistic representation of baseline, actual and future expected costs for achieving and maintaining compliance is both consistent with the intent of the statute and with the guiding principles outlined in the Commission's November Notice.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these Comments, and continues to support the template that we proposed. We note that we will supplement these Comments with the additional detail that the Department notes would be helpful, as soon as possible. We are additionally open to providing other information regarding our proposal, should parties have additional questions as part of this comment process.

Dated: May 8, 2014

Northern States Power Company

Respectfully submitted,

/s/

JAMES R. ALDERS
STRATEGY CONSULTANT
RATES AND REGULATORY AFFAIRS

CERTIFICATE OF SERVICE

I, Theresa Sarafolean, 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 by email; or

xx by electronic filing.

Docket No. E999/CI-11-852 RES Energy Cost Impact Reports

Dated this 8th day of May 2014

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