

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 Xcel Energy’s Petition for Approval of a Power Purchase Agreement with Saint Paul Cogeneration, LLC

ISSUE DATE: January 24, 2022

DOCKET NO. E-002/M-21-590

ORDER APPROVING POWER-PURCHASE AGREEMENT, AUTHORIZING COST RECOVERY, AND SETTING ADDITIONAL REQUIREMENTS

PROCEDURAL HISTORY

On July 30, 2021, Northern States Power Company d/b/a Xcel Energy (Xcel) filed a petition under Minn. Stat. § 216B.2424, subd. 5c, for approval of a two-year power-purchase agreement (PPA) for electricity from St. Paul Cogeneration, LLC’s combined heat and power facility in St. Paul fueled by natural gas and wood.

On September 7, 2021, the Department of Commerce, Division of Energy Resources (the Department) filed comments.

On October 4, 2021, Xcel filed reply comments.

On November 3, 2021, the Department filed supplemental comments.

By November 4, 2021, the Commission received additional comments from the following:

- The Partnership on Waste and Energy,
- St. Paul Cogeneration,
- The Minnesota Inter-County Association,
- The Minnesota Pollution Control Agency (MPCA), and
- Alan Muller.

On December 16, 2021, the Commission met to consider the matter.

FINDINGS AND CONCLUSIONS

I. Background

Minn. Stat. § 216B.2424 (the biomass mandate) required any public utility operating a nuclear-powered electric generating plant in Minnesota to either construct and operate or purchase certain amounts of biomass-generated electricity beginning in 1998.

To partially satisfy its obligations under the biomass mandate, Xcel executed an agreement with St. Paul Cogeneration to purchase 25 megawatts of accredited capacity from a biomass generation facility from December 31, 2002 to December 31, 2022.¹

St. Paul Cogeneration owns and operates the wood- and natural-gas-fired combined heat and power facility that supplies energy under the PPA. The facility provides heat to buildings in downtown Saint Paul and provides power to Xcel partially from the burning of tree waste, which comes from a variety of sources including emerald-ash-borer infestation.

In 2021, the Legislature enacted Minn. Stat. § 216B.2424, subd. 5c, which allowed Xcel to propose for Commission approval a new agreement to purchase power from the cogeneration facility for a term of two years, from the expiration of the current agreement through December 31, 2024, subject to certain conditions discussed below.

II. Legal Standard

Minn. Stat. § 216B.2424, subd. 5c(b) prohibits the Commission from approving the new proposed PPA unless the following conditions are met:

(1) the cogeneration facility agrees that any waste wood from ash trees removed from Minnesota counties that have been designated as quarantined areas for utilization as biomass fuel by the cogeneration facility must be accompanied by evidence:

(i) demonstrating that the transport of biomass fuel from processed waste wood from ash trees to the cogeneration facility complies with the department's regulatory requirements under the Minnesota State Formal Quarantine for Emerald Ash Borer, or

(ii) certifying that the waste wood from ash trees has been chipped to one inch or less in two dimensions, and was chipped within the county from which the ash trees were originally removed;

(2) the price per megawatt hour of electricity paid by the public utility demonstrates significant savings compared to the existing power purchase agreement, with a price that does not exceed \$98 per megawatt hour (MWh);

¹ The Commission approved that power-purchase agreement on January 11, 2000. *In the Matter of Northern States Power Company's Petition for a Variance from Competitive Bidding for Biomass Phase II Resources*, Docket No. E-002/M-96-1405, Order Approving Power Purchase Agreement with St. Paul Cogeneration Project, LLC, Authorizing Comments, and Requiring Annual Report (January 11, 2000).

(3) the proposal includes a proposal to the commission for one or more electrification projects that result in the St. Paul district heating and cooling system being powered by electricity generated from renewable energy technologies. The plan must evaluate electrification at three or more levels from ten to 100%, including 100% of the energy used by the St. Paul district heating and cooling system to be implemented by December 31, 2027. The proposal may also evaluate alternative dates for implementation.

(4) the power purchase agreement provides a net benefit to the utility customers or the state.

The Commission may approve, or approve as modified, the electrification project proposed under subd. 5c(b)(3) only if the Commission finds the electrification project is in the public interest.² This public-interest analysis may consider effects of the electrification project on air emissions from the St. Paul district heating and cooling system and how the emissions impact the environment and residents of affected neighborhoods.

Further, Minn. Stat. § 216B.2424, subd. 5c(d) requires the cogeneration facility, during the agreement period, to attempt to obtain funding to reduce the cost of generating electricity and enable the facility to continue to operate beyond the agreement period to address the removal of ash trees, without any subsidy or contribution from any power-purchase agreement after 2024.

III. Approval of Power-Purchase Agreement

A. Comments

1. The Department

The Department recommended that the Commission approve the PPA if the Commission finds that the petition complies with Minn. Stat. § 216B.2424, subd. 5c. However, the Department highlighted several areas in which Xcel's petition may fall short of statutory requirements.

First, the Department asserted that the text of the proposed PPA did not specifically require St. Paul Cogeneration to adhere to subdivision 5c(b)(1) requirements relating to emerald-ash-borer control in the transport of waste wood. Therefore, the Department recommended that Xcel amend the proposed PPA to ensure compliance with those specific statutory provisions.

Regarding the subdivision 5c(b)(4) requirement that the PPA provide a net benefit to either the utility's customers or the state, the Department concluded that the agreement would not provide a net benefit to Xcel's customers in terms of electricity costs because the proposed PPA price is significantly higher than average wholesale market prices.

Further, the Department concluded that the record lacked sufficient evidence to determine whether the proposed PPA would provide a net benefit to the state. Although Xcel discussed potential qualitative benefits to the state, the Department requested that Xcel or St. Paul Cogeneration provide a full societal cost-benefit analysis to demonstrate whether approving the

² Minn. Stat. § 216B.2424, subd. 5c(c).

PPA would provide an overall net benefit to the state compared to not approving it. This analysis would also inform an analysis of whether approving the agreement is in the public interest.

Finally, the Department recommended that the Commission either order St. Paul Cogeneration to submit periodic reports regarding its efforts to seek funding as required by subdivision 5c(d), or require Xcel to modify the agreement to explicitly require compliance with that subdivision.

2. Xcel

Xcel asserted that section 5.5(C) of the proposed PPA would ensure compliance with Minn. Stat. § 216B.2424, subd. 5c(b)(1), relating to the transport of waste wood and biomass fuel from ash trees. PPA section 5.5(C) states that St. Paul Cogeneration must comply with the requirements of Minn. Stat. § 216B.2424, all applicable laws, and all permits.

Xcel argued that the new agreement will provide a net benefit to the state, meeting subdivision 5c(4), by assisting in the management of emerald ash borer infestation and by using efficient cogeneration processes to capture what would otherwise be waste heat from the electric production process and use it to heat buildings in downtown St. Paul. Xcel contended that the cogeneration capability makes the facility nearly twice as efficient as an electric-only dispatchable resource. Xcel also noted that the proposed PPA presents 30% savings compared to the existing power-purchase agreement and does not exceed the statutory maximum price.

3. St. Paul Cogeneration

In support of the PPA, St. Paul Cogeneration asserted that its facility provides multiple benefits including efficient heating to the St. Paul heating district capturing waste heat from the electricity-generation process, and the efficient capture of energy using biomass fuel from waste wood, which eases the burden of waste-wood disposal on local governments and assists in the state's emerald-ash-borer-management efforts.

St. Paul Cogeneration argued that the proposed PPA's value outweighs its cost to ratepayers and that many Xcel customers also benefit from inexpensive waste-wood disposal under the PPA because most of the tree waste used at the facility originated within Xcel's service territory.

St. Paul Cogeneration stated that, if the proposed agreement were not approved, the facility would not be able to continue providing heat to the St. Paul heating district absent electric generation without significant additional investment. Further, it argued that it likely would not be able to find a third-party purchaser for the facility's output because wholesale market prices are lower than the PPA price and alternative buyers likely would not take the public-interest benefits into account. If the proposed PPA were not approved and an alternative purchaser could not be found, the facility would likely stop burning biomass and switch to natural gas.

Finally, St. Paul Cogeneration argued that denying the proposal would diminish the incentive for St. Paul Cogeneration and Xcel to work on electrification, undermining a legislative goal of Minn. Stat. § 216B.2424, subd. 5c(b)(3).

4. MPCA

MPCA recommended approving the PPA, arguing that it will benefit the state by continuing to provide an option for managing waste wood that would have less harmful consequences for air quality and the climate than alternatives. MPCA asserted that the PPA is consistent with legislatively-recognized policy goals related to waste-wood management and the recovery of energy from waste wood. Further, MPCA indicated the state has no current alternative for large-scale waste-wood management. Thus, if St. Paul Cogeneration stopped taking the biomass for fuel, the wood would likely be stockpiled and burned, resulting in public-health and safety risks.

MPCA also supported developing a thorough societal cost-benefit analysis of Xcel's electrification proposals, including consideration of potential air-quality, health, and climate impacts that could result if the waste wood were no longer managed by the cogeneration facility, in addition to the loss of the benefit of waste-heat recovery through cogeneration.

5. Other Participant Comments

The Partnership on Waste and Energy (the Partnership), a joint powers board consisting of Hennepin, Ramsey, and Washington counties formed to address waste management and energy issues, recommended approving the PPA. The Partnership argued that the cogeneration facility provides a significant net benefit to the state by helping to manage waste wood resulting from the spread of emerald ash borer. The Partnership contended that if St. Paul Cogeneration were to stop providing this service, sudden and significant cost increases would result, likely leading to stockpiling or open burning of waste wood, which could create safety and public-health hazards.

The Minnesota Inter-County Association (MICA), a voluntary association of 15 Minnesota counties, also supported approval of the PPA. MICA noted the same waste-wood-management benefits discussed above and argued that the proposed two-year PPA would provide time to evaluate long-term solutions for waste-wood disposal.

Alan Muller submitted a public comment opposing the proposed PPA, arguing that biomass is an inferior source of energy generation because it emits greenhouse gases and other air pollutants, that the PPA imposes excessive costs on ratepayers, and that it is inappropriate to burden Xcel's ratepayers with the cost of managing the state's emerald-ash-borer and waste-wood problems.

B. Commission Action

The Commission will approve the two-year PPA. Having considered the entire record, including the arguments of all parties and participants, the Commission concludes that the PPA proposal meets the requirements for approval set forth in Minn. Stat. § 216B.2424, subd. 5c.

Consistent with the legislative directive outlined in the biomass mandate, extending Xcel's agreement with St. Paul Cogeneration for a limited period under the PPA will provide a net benefit to the state by continuing to serve heating load in downtown St. Paul using a renewable fuel source and an efficient combined heat and power generation process.

Further, the potential to develop one of the proposed electrification projects—discussed in further detail below—could offer another key benefit, giving Xcel greater flexibility to integrate more carbon-free renewable energy into the system. According to Xcel and St. Paul

Cogeneration, the use of an electric boiler with largescale thermal storage at the cogeneration facility would create an opportunity to use thermal storage to facilitate flexible balancing of renewable energy sources through the district heating system. It would facilitate the storage of variable renewable energy sources, allowing available heat to be stored for future use when needed. With the approval of this two-year PPA, Xcel will be required to further explore these efficient electrification options and come forward with a proposal to implement these technologies if the project is found to be in the public interest.³

Additionally, the new two-year PPA will benefit the state by temporarily maintaining the status quo enabling the facility to accept waste wood as a source of biomass fuel, a public purpose the Legislature has recognized as important particularly in light of the emerald-ash-borer infestation.

However, as contemplated by the statute and as discussed extensively at the Commission meeting, the approval of the two-year PPA is intended to provide only a temporary buffer to allow stakeholders time to develop a long-term solution for waste-wood management.⁴

To that end, during the term of the PPA, the cogeneration facility must attempt to obtain funding to reduce the cost of generating electricity and enable the facility to continue operating beyond the PPA period to address the removal of ash trees without any subsidy or contribution from any power-purchase agreement after 2024.⁵

In implementing the approved PPA, Xcel must adhere to all applicable obligations under Minn. Stat. § 216B.2424 and the additional requirements adopted in this order.

IV. Electrification Proposal

A. Legal Standard

Minn. Stat. § 216B.2424, subd. 5c(b)(3), requires that the power-purchase-agreement proposal also include a proposal for one or more electrification projects that result in the downtown St. Paul district heating and cooling system being powered by electricity generated from renewable energy technologies, to be implemented by December 31, 2027. The plan must evaluate electrification at three or more levels from 10% to 100%.

For each level of electrification analyzed, the proposal must contain:

- (i) a description of the alternative electrification technologies evaluated and whose implementation is proposed as part of the electrification project;
- (ii) an estimate of the cost of the electrification project to the public utility, the impact on the monthly energy bills of the public utility's Minnesota customers, and the impact on the monthly energy bills of St. Paul district heating and cooling system customers;

³ Minn. Stat. § 216B.2424, subd. 5c(b)(3), (e).

⁴ See Minn. Stat. § 216B.2424, subd. 5c(d).

⁵ *Id.*

(iii) an estimate of the reduction in greenhouse gas emissions resulting from the electrification project, including greenhouse gas emissions associated with the transportation of waste wood;

(iv) estimated impacts on the operations of the St. Paul district heating and cooling system; and

(v) a timeline for the electrification project.⁶

The Commission may approve a proposed electrification project if it finds the project is in the public interest, or it may reject a proposed electrification project that is not in the public interest.⁷

Upon approval of the new PPA, the Commission must require periodic reporting regarding progress toward development of a proposal for an electrification project.⁸

B. Xcel's Proposal

Xcel's filing discussed three electrification options it has explored in partnership with St. Paul Cogeneration. Option 1 would involve a 20-megawatt boiler and would electrify 11.5% of thermal load at the cogeneration facility. Option 2, a 30-megawatt boiler, would electrify 17% of thermal load. Option 3, a 175-megawatt boiler, would electrify 100% of thermal load. However, Xcel stated that Option 3 would be significantly more costly and difficult to justify financially, so it intended to focus on Options 1 and 2 for further development and potential implementation.

Xcel stated that, under Options 1 and 2, the boiler would be connected to existing infrastructure, including energy storage, which would allow for using the carbon-free electric sources to match the demand for heat. Xcel stated that it is considering a number of boilers, including conventional electric boilers and more advanced electrode-type electric boilers.

Xcel argued that Minn. Stat. § 216B.2424, subd. 5c(b)(3) merely lists the filing requirements for purposes of considering a PPA, and does not require a formal request for approval of a specific electrification proposal at this time. Xcel argued that it had not had enough time to develop and finalize an electrification proposal for Commission consideration because it was required to make this filing less than 80 days after the enactment of the statutory amendment requiring the filing.

Xcel initially requested that the Commission allow it to file a finalized electrification proposal for approval in September 2024, but it did not oppose the Department's recommendation to require this filing by March 2024 instead.

C. The Department's Comments

The Department stated that the preliminary electrification proposals Xcel provided are not fully developed and that further information is needed to satisfy subd. 5c(b)(3). Specifically, the Department stated that Xcel must provide, for each level of electrification analyzed, a description

⁶ Minn. Stat. § 216B.2424, subd. 5c(b)(3).

⁷ *Id.*, subd. 5c(c).

⁸ Minn. Stat. § 216B.2424, subd. 5c(e).

of alternative electrification technologies evaluated and estimates of the reduction in greenhouse-gas emissions resulting from the project.

D. Commission Action

The Commission finds that Xcel submitted sufficient information supporting potential electrification projects to satisfy its obligations under Minn. Stat. § 216B.2424, subd. 5c(b)(3), for purposes of securing approval for its PPA. Although it has not yet provided enough details to evaluate whether the proposed electrification projects should be approved, the Commission agrees with Xcel’s interpretation that the statute permits approval of the PPA with the preliminary electrification proposal submitted, with a fully developed electrification proposal to follow. The subdivision 5c(e) directive that the Commission, “[u]pon approval of the new PPA,” require “periodic reporting regarding progress toward development of a proposal for an electrification project,”⁹ contemplates that the utility may continue developing the details of the electrification proposal after the PPA has been approved.

As the parties agreed, the Commission will require Xcel to file a complete electrification proposal by March 2024 to allow a reasonable amount of time to review and potentially approve the electrification project before the new PPA expires.

To inform the Commission’s analysis of whether the proposed electrification project is in the public interest under subdivision 5c(c), Xcel must include in its electrification proposal a societal cost-benefit analysis. Xcel must develop this analysis with input from the Department, MPCA, St. Paul Cogeneration, and any other interested parties.

V. Cost Recovery

A. Positions of the Parties

1. Xcel

Xcel requested to recover PPA purchased-energy costs through its Fuel Clause Rider from its Minnesota customers only, rather than allocating costs jurisdictionally across all states in its service territory consistent with its typical treatment of purchased-energy costs.

Xcel cited Minn. Stat. § 216B.2424, subd. 5c(h)(2), which directs Xcel to recover the costs of an electrification project approved under the biomass-mandate statute only from Minnesota customers. Although that statutory provision does not mention power-purchase-agreement costs, Xcel argued that it should be read in the context of the statute as a whole, which contemplates the new PPA coupled with the electrification project. Xcel argued that a comprehensive reading of the statute supports restricting recovery of purchased-energy costs to Minnesota customers.

Further, Xcel argued that unique features of this specific agreement with St. Paul Cogeneration justify assessing its cost solely to Minnesota customers. Specifically, Xcel argued that only

⁹ Minn. Stat. § 216B.2424, subd. 5c(e). This reporting on the development of an electrification proposal is distinct from the subdivision 5c(g) requirement of reporting “regarding the progress toward implementation of the electrification project” upon approval of an electrification project.

Minnesotans will benefit from the waste-wood-management and emerald-ash-borer-management functions of the cogeneration facility.

2. The Department

In its written comments, the Department recommended allowing Xcel to recover only the Minnesota jurisdictional costs of energy purchased under the PPA, net of any associated revenues, through Xcel's Fuel Clause Rider. The Department opposed Xcel's request to recover PPA costs from Minnesota customers without jurisdictional allocation, asserting that Minn. Stat. § 216B.2424, subd. 5c(h)(2), applies only to electrification projects. Therefore, the Department argued that the costs of electricity generation under the PPA should be shared across Xcel's electric-service customers in all jurisdictions, consistent with the typical practice.

B. Commission Action

The Commission will authorize Xcel to recover the Minnesota jurisdictional amount of PPA purchased-energy costs, net of any matching revenues, through Xcel's Fuel Clause Rider.

The Commission is not persuaded by Xcel's argument that purchased-energy costs should be recovered from Minnesota customers without jurisdictional allocation. The statutory text limiting recovery of certain costs to Minnesota customers expressly applies to electrification-project costs only and does not justify unusual treatment for PPA costs. Further, although Minnesotans will experience some local benefits, the capacity benefit of the PPA will contribute to reliability throughout Xcel's integrated system, beyond state borders. Accordingly, it is not reasonable to hold Minnesota customers responsible for more than their jurisdictional share of these costs.

VI. Reporting

The Commission will require Xcel to file reports with the Commission on December 1 of 2022 and 2023 in accordance with Minn. Stat. § 216B.2424, subd. 5c(d) and (e). Additionally, because this reporting is required by the Legislature, Xcel shall provide a copy of those reports to the Senate and House chief authors, chairs, and ranking minority members of the committees responsible for passage of the legislation creating Minn. Stat. § 216B.2424, subd. 5c.

ORDER

1. The Commission approves the two-year power-purchase agreement with Saint Paul Cogeneration, LLC, under Minn. Stat. § 216B.2424, subd. 5c.
2. Northern States Power Company d/b/a Xcel Energy (Xcel) may recover the purchased energy costs net of any matching revenues through the Fuel Clause Rider.
3. Xcel shall include in its electrification proposal a societal cost-benefit analysis, to be developed with input from the Department of Commerce, Minnesota Pollution Control Agency, St. Paul Cogeneration, LLC, and other interested parties.
4. Xcel shall file its electrification proposal by March 2024.

5. Xcel shall file reports on December 1, 2022 and 2023. Xcel shall provide a copy of the reports to the Senate and House chief authors, chairs, and ranking minority members of the committees responsible for passage of the legislation creating Minn. Stat. § 216B.2424, subd. 5c.
6. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Chrishna Beard, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER APPROVING POWER-PURCHASE AGREEMENT, AUTHORIZING
COST RECOVERY, AND SETTING ADDITIONAL REQUIREMENTS

Docket Number **E-002/M-21-590**

Dated this 24th day of January, 2022

/s/ Chrishna Beard

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