414 Nicollet Mall
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September 3, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS
ST. CLOUD HYDROELECTRIC GENERATION FACILITY
DOCKET NO. E002/M-20-614

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission in response to the August 24, 2020 Comments received from the Department of Commerce Division of Energy Resources (Department) regarding the Power Purchase Agreement (PPA) with the City of St. Cloud for the St. Cloud Hydroelectric Generation Facility (St. Cloud Hydro).

The Company thanks the Department for its review of the PPA, and its indication that it believes the PPA adequately protects customers from financial and operational risk when considering the requirements the Department noted on page 7 of its Comments. The Company agrees with these requirements.

The Department also requested the Company provide further information regarding two questions that clarify how this PPA's purchase price reflects our avoided costs and was agreed upon by the parties.

1. Identify from Xcel Energy's Annual Avoided Cost filing its avoided cost of energy and its avoided cost of capacity, as well as the relevant tariff; and

2. Demonstrate that the proposed purchase price per MWh is based on the avoided cost of energy and avoided cost of capacity identified in response to question 1 above.

Ultimately, we believe statute and Commission precedent supports consideration of avoided cost pricing consistent with the following four principles:

- The PPA pricing of avoided costs was negotiated by the parties, consistent with Minn. Stat. 216B.164, sudb. 4(b);
- The PPA pricing is based on Xcel Energy's avoided costs, the pricing reflects the type of generation technology at issue;
- The PPA pricing results in just and reasonable rates that protect the ratepayers and public, and
- The PPA pricing is consistent with PURPA that adequately and accurately reflects avoided costs.

The St. Cloud Hydro PPA is consistent with these principles. Below, the Company responds to the Department's questions, and provides additional context regarding how the Department and Commission may evaluate the PPA according to the relevant statute and Commission precedent.

A. Responses to the Department's Questions

1. The Company's avoided cost of energy and capacity and relevant tariff

In its comments, the Department cited our 2020 Cogeneration and Small Power Production report, as filed in Docket No. E999/PR-20-9. The avoided costs identified in that report are used to develop the Company's avoided cost tariff A55.[1] For 2020, these tariffs indicate that our tariffed non-time of day (non-TOD) avoided energy costs for all hours is $22.83/MWh and our estimated weighted average avoided non-TOD capacity cost is approximately $6.14/MWh. As discussed in Section A.2 below, we began negotiations with the City of St. Cloud in 2018 and the start of our pricing calculation was guided by the avoided energy and capacity costs we identified in the 2018 annual Cogeneration and Small Power Production report,[2] on which our 2018 avoided cost tariffs were based. There, the avoided non-TOD costs identified were $22.65/MWh for avoided energy and approximately an average of $4.83/MWh for avoided capacity. As we describe

[1] *See* Minnesota Electric Rate Book – MPUC No. 2., 4th Revised Sheet 9-4.2 for Rate Code A55, A56 of 2020, attached as Attachment A to this letter.

[2] *See* Xcel Energy *Cogeneration and Small Power Production* as filed in Docket No. E999/PR-18-9, and Minnesota Electric Rate Book – MPUC No. 2, 2nd Revised Sheet 9-4.2 for Rate Code A55, A56 of 2018, attached as Attachment B to this letter.

further in our response to the Department's second question, the contract we negotiated with the City of St. Cloud is based on these avoided costs, with reasonable adjustments to reflect the resource type and contract duration.

2. Demonstrate that the Proposed Purchase Price is Based on the Avoided Cost of Energy and Avoided Cost of Capacity identified in Part 1 Above.

The proposed PPA pricing aligns with the four principles above. We developed two price offer options for the St. Cloud Hydro PPA in 2018; the first being an initial valuation of the avoided costs of purchasing the facility's output with a capacity value being applied in 2026, and the second having the same levelized avoided cost but with a smoother rate curve as a result of negotiations between the parties.

a. Initial Valuation Offer

The 2018 tariffed avoided cost values noted above informed our starting point for the initial St. Cloud Hydro valuation offer. However, the tariffs provide avoided costs only for one year; as the City of St. Cloud desired a longer-term contract, we needed to develop a perspective on forward avoided cost-based pricing as well. For the avoided energy cost component, we used ***[Protected data begin***

Protected data ends]. This method is consistent with the approach we use in our resource planning modeling, reflecting potential future avoided market purchases and, in the first year, is very similar to the avoided energy cost estimates included in our 2018 and 2020 tariffs.

The capacity cost component of the PPA price is also based on the avoided costs indicated in our tariff, with certain adjustments to reflect the going forward nature of the PPA. As noted in our 2018 Cogeneration and Small Power Producer report,[3] there are several units that could be considered an appropriate basis for future avoided capacity costs, reflecting both owned and purchased power resources. For the St. Cloud Hydro PPA – a long-term contract for a run-of-river hydro resource with relatively high expected capacity accreditation – we determined the most appropriate reference point for avoided capacity costs would be the ***[Protected data begin*** ***Protected data ends]***. Therefore, we used this avoided cost benchmark for the capacity portion of the St. Cloud Hydro valuation. However, at the time the offer was developed, the

[3] As filed in Docket No. E999/PR-19-8.

Company expected to be long on capacity until 2026; therefore, ***[Protected data begin***

Protected data ends].

b. Negotiated Offer

To the extent that the eventual agreed upon PPA prices are higher in the early years than the avoided cost benchmarks would suggest, they reflect the Company's negotiations with the City of St. Cloud.[4] During the course of negotiations, the Company developed an alternative pricing offer, which resulted in a nearly identical levelized cost for the contract but with smoothed escalated payments over the full duration of the contract. The practical effect of this smoothing is that the PPA price is ***[Protected data begin***

Protected data ends]. St. Cloud preferred this option, and thus the PPA reflects this pricing.

The Company has provided, as Attachment C to these replies, a workpaper that shows both the initial and smoothed, negotiated offer provided to the City of St. Cloud.

B. Additional Context Regarding Commission Consideration of Avoided Costs for Qualifying Facilities

In consideration of the above, we note here that there is no single, formally established method of calculating the avoided cost of energy and capacity. There are many different sources that could potentially be used as the basis for avoided energy and capacity costs, depending on the contract negotiated. For example, some shorter duration qualifying facility contracts use locational marginal price (LMP) as the basis of avoided costs.[5] Moreover, under Minn. Stat. §216B.164, subd. 4(b), the avoided costs can be as negotiated by the parties, as set by the Commission, or as determined through a competitive bidding approved by the Commission.

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[4] As authorized for qualifying facilities, via Minn. Stat. 216B.164, sudb. 4(b), which states, in part: "[t]he qualifying facility shall be paid the utility's full avoided capacity and energy costs as negotiated by the parties, as set by the commission, or as determined through competitive bidding approved by the Commission."

[5] For example, see Docket No. E002/M-20-260.

Consistent with our discussion in our response to the Department's Information Request No. 1, attached to the Department's August 24, 2020 Comments in the instant docket, we note an example from Otter Tail Power in which the Commission set avoided cost rates rate for a 4.6 MW hybrid wind/solar generation project, via its May 31, 2018 order in *In the Matter of a Complaint by Red Lake Falls Community Hybrid LLC Regarding Potential Purchase Power Agreement Terms and Pricing with Otter Tail Company*, in Docket Nos. E017/CG-16-1021 and E017/CG-17-464. The principles that the Commission applied there are also pertinent here.

There, citing Minn. Stat. 216B.164, sudb. 4(b), the Commission set the avoided costs equal to an estimate of avoided costs of about $34.11/MWh based on Otter Tail Power's (OTP's) Small Power Production Tariff. The April 26, 2018 hearing transcript in that matter showed that this $34.11/MWh price reflected a blended rate from the OTP 2016 Integrated Resource Plan, applying $30/MWh for wind and $80/MWh for solar to derive the weighted average cost applicable to the type of generation at issue there.[6] The Commission motion to adopt the $34.11/MWh rate relied on OTP's statements during the hearing, that this rate is consistent with PURPA and that it would adequately and accurately reflect avoided costs. Although OTP's lowest renewable PPA rate was not in the public record, the record appears to reflect a price in the low $20s/MWh range.[7] We further note that under 18 CFR § 292.304(c)(3), the standard rates for purchases "... may differentiate among qualifying facilities using various technologies on the basis of the supply characteristics of the differing technologies."

The *Red Lake Falls* Order states that Minnesota implemented PURPA by enacting Minn. Stat. § 216B.164, which states in part that: "This section shall at all times be construed in accordance with its intent to give the maximum possible encouragement to cogeneration and small power production *consistent with protection of the ratepayers and the public*," (emphasis in the Commission Order). The Order then noted that Minn. Stat. 216B.164, sudb. 4(b), specifically states: "[t]he qualifying

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[6] *See* Hearing transcript of the Commission's April 26, 2018 Agenda Meeting, beginning at approximately 2:30 and again at approximately 3:18. Recording available at: http://minnesotapuc.granicus.com/MediaPlayer.php?view_id=2&clip_id=738

[7] See Otter Tail Opening Brief of October 6, 2017, at 30. Available at: https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={907FF35E-0000-C91B-9BBF-85082662B785}&documentTitle=201710-136206-01 ; and, Red Lake Falls Brief of October 6, 2017, at 4. Available at: https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={9060015F-0000-CA30-B8C2-A4434C00CC61}&documentTitle=201710-136210-02)

facility shall be paid the utility's full avoided capacity and energy costs as negotiated by the parties, as set by the Commission, or as determined through competitive bidding approved by the Commission." The order states that under this statute the Commission has the discretion to set the avoided cost of energy and capacity. We note that this same statute also allows the parties to negotiate the avoided costs. The Order states that there is no need to determine if there is any conflict between PURPA and state law, as both were written to encourage renewables at a time when renewable prices were high and could not effectively compete in the marketplace. The Commission found that its determination results in just and reasonable rates that are consistent with the protections of customers and public.

During the April 26, 2018 deliberations in that matter, with the introduction of the motion eventually approved by the Commission, beginning at about 3:20:00, the discussion of the Commissioners showed their alignment that the pricing being set by the Commission was based on the project being a hybrid of solar and wind and that it was not just a wind project. The specific project size and specific type of technology were important for the Commission in determining the appropriate pricing.

In accordance with this context, the Company believes the pricing in the current St. Cloud Hydro PPA is consistent with the principles adopted by the Commission in the *Red Lake Falls* Order applying Minn. Stat. § 216B.164, subd 4(b) and Minn. Rule Ch. 7835. These are:

- The PPA pricing of avoided costs was negotiated by the parties, consistent with Minn. Stat. 216B.164, sudb. 4(b),
- The PPA pricing is based on Xcel Energy's avoided costs, the pricing reflects the type of generation technology at issue;
- The PPA pricing results in just and reasonable rates that protect the ratepayers and public, and
- The PPA pricing is consistent with PURPA that adequately and accurately reflects avoided costs.

C. Conclusion

Given the information provided above, the Company believes the St. Cloud Hydro PPA is based on our avoided costs and reasonable for the type of generation at issue, and that it is consistent with our requirements under PURPA. The Department noted in its comments that it believes the PPA reasonably mitigates operational and financial risk for our customers. We hope that this letter satisfactorily answers the Department's questions; however, we invite the Department to provide additional guidance if needed. If the Department objects to the PPA pricing, we request that the Department file its objections now so that the Commission can address the PPA pricing before the PPA goes into effect.

Portions of this Letter and the enclosed Attachments are marked "NOT-PUBLIC," meeting the definition of trade secret information pursuant to Minn. Stat. § 13.37. In particular, release of this information would undermine the Company's resource bidding process by providing potential suppliers with a compilation of competitive information that derives independent economic value from not being generally known or ascertainable. This information includes data regarding costs of energy from new generating facilities that is not otherwise public. Disclosure of this information could result in higher costs of energy for Xcel Energy customers by allowing potential suppliers to modify their pricing from what they would otherwise bid. Further, the Company and its third-party vendors have taken steps to protect the confidentiality of the designated protected information. This includes cost and related information on specific operating plants owned by third parties.

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

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
c: Service List

ANNUAL NET METERING (KWH BANKING OPTION) Section No. 9
RATE CODE A55, A56 4th Revised Sheet No. 4.2

Availability
This service corresponds to Minn. R. 7835.4012, .4014 (Simultaneous Purchase and Sale Billing Rate), .4015 (Time-of-Day Purchase Rates), and .4017 (Net Metered Facility; Bill Credits), and to Paragraphs 5.a, 5.b, and 5.c of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to a qualifying facility (QF) or Net Metered Facility (NMF) customer who elects to be compensated for net input into the utility's system in the form of a kilowatt-hour credit on the customer's bill for that customer's account, subject to the following conditions:

A. The customer is not receiving a value of solar rate under Minnesota Statutes, section 216B.164, subdivision 10;
B. The customer is interconnected with the Company; and
C. The customer has at least 40 kilowatt AC capacity but less than 1,000 kilowatt AC capacity.

Metering Charge per Month	
Single Phase	$5.50
Three Phase	$8.00

The Company compensates the customer, in the form of an energy payment, for the bank balance for kWh credits annually at the rate set forth below.

	Annual	
Energy Payment per kWh for Customers on non-time of day Service Tariffs (A55)	$0.02283	R

Time of Day Service Customers (A56)	Annual	
On Peak Energy Payment per kWh	$0.02778	R
Off Peak Energy Payment per kWh	$0.02018	

Capacity Payment for Firm Power where customer receives	Oct-May	Jun-Sep	
non-time of day retail electric service per kWh	$0.00214	$0.01410	R
time of day retail electric service per on-peak kWh	$0.00617	$0.04040	R

Determination of Firm Power
The customer will have supplied firm power if during the billing period an on peak capacity factor of at least 65% was achieved. The calculation of the on peak capacity factor will be as follows: the average on peak period metered capacity delivered to the Company for the on peak period of the billing period divided by the greatest 15 minute metered capacity delivered for the on peak period of the same billing period expressed in percent and rounded to the nearest whole percent. If the percent calculated is 65 or greater, capacity payment will be made. If the percent calculated is less than 65, capacity payment will not be made.

(Continued on Sheet No. 9-4.3)

ANNUAL NET METERING (KWH BANKING OPTION) Section No. 9
RATE CODE A55, A56 2nd Revised Sheet No. 4.2

Availability
This service corresponds to Minn. R. 7835.4012, .4014 (Simultaneous Purchase and Sale Billing Rate), .4015 (Time-of-Day Purchase Rates), and .4017 (Net Metered Facility; Bill Credits), and to Paragraphs 5.a, 5.b, and 5.c of the Uniform Statewide Contract for Cogeneration and Small Power Production. Available to a qualifying facility (QF) or Net Metered Facility (NMF) customer who elects to be compensated for net input into the utility's system in the form of a kilowatt-hour credit on the customer's bill for that customer's account, subject to the following conditions:

A. The customer is not receiving a value of solar rate under Minnesota Statutes, section 216B.164, subdivision 10;
B. The customer is interconnected with the Company; and
C. The customer has at least 40 kilowatt AC capacity but less than 1,000 kilowatt AC capacity.

Metering Charge per Month	
Single Phase	$5.50
Three Phase	$8.00

The Company compensates the customer, in the form of an energy payment, for the bank balance for kWh credits annually at the rate set forth below.

	Annual	
Energy Payment per kWh for Customers on non-time of day Service Tariffs (A55)	$0.02265	R

Time of Day Service Customers (A56)	Annual	
On Peak Energy Payment per kWh	$0.02908	R
Off Peak Energy Payment per kWh	$0.01923	R

Capacity Payment for Firm Power where customer receives	Oct-May	Jun-Sep	
non-time of day retail electric service per kWh	$0.00172	$0.01105	R
time of day retail electric service per on-peak kWh	$0.00495	$0.03165	R

Determination of Firm Power
The customer will have supplied firm power if during the billing period an on peak capacity factor of at least 65% was achieved. The calculation of the on peak capacity factor will be as follows: the average on peak period metered capacity delivered to the Company for the on peak period of the billing period divided by the greatest 15 minute metered capacity delivered for the on peak period of the same billing period expressed in percent and rounded to the nearest whole percent. If the percent calculated is 65 or greater, capacity payment will be made. If the percent calculated is less than 65, capacity payment will not be made.

(Continued on Sheet No. 9-4.3)

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Assumptions		
Discount Rate	6.5%	
Contract Start	11/1/2021	
Contract End	5/31/2041	
Smoothed Price Escalator	2.5%	
Capacity MW Size	8.5	

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Annual Energy MWh	

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INPUT CELL

Contract Name
St Cloud

Initial Valuation

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Levelized
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[PROTECTED DATA BEGINS
Levelized
PROTECTED DATA ENDS]

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Year	Months	MWh	Energy Price $/MWh	Energy Cost	Capacity MW	Capacity Price $/kW-mo	Capacity Cost	Capacity $/MWh	Total $/MWh	Total Cost
2021	2				8.5					
2022	12				8.5					
2023	12				8.5					
2024	12				8.5					
2025	12				8.5					
2026	12				8.5					
2027	12				8.5					
2028	12				8.5					
2029	12				8.5					
2030	12				8.5					
2031	12				8.5					
2032	12				8.5					
2033	12				8.5					
2034	12				8.5					
2035	12				8.5					
2036	12				8.5					
2037	12				8.5					
2038	12				8.5					
2039	12				8.5					
2040	12				8.5					
2041	5				8.5					

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Smoothed Offer

[PROTECTED DATA BEGINS
Levelized
PROTECTED DATA ENDS]

[PROTECTED DATA BEGINS

Year	Months	MWh	Total $/MWh	Total Cost
2021	2			
2022	12			
2023	12			
2024	12			
2025	12			
2026	12			
2027	12			
2028	12			
2029	12			
2030	12			
2031	12			
2032	12			
2033	12			
2034	12			
2035	12			
2036	12			
2037	12			
2038	12			
2039	12			
2040	12			
2041	5			

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PPA Pricing Options

[PROTECTED DATA BEGINS

	Smoothed	Step Up	Levelized
2021			
2022			
2023			
2024			
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			
2033			
2034			
2035			
2036			
2037			
2038			
2039			
2040			
2041			

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[PROTECTED DATA BEGINS

PROTECTED DATA ENDS]

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

xx electronic filing

Docket No. **E002/M-20-614**
Xcel Energy's Power Purchase Agreement with the City of St. Cloud regarding the St. Cloud Hydroelectric Generation Facility

Dated this 3rd day of September 2020

/s/
____
Paget Pengelly
Regulatory Administrator

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Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-614_M-20-614

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