



AN ALLETE COMPANY

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August 16, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
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VIA ELECTRONIC FILING

Re: In the Matter of Minnesota Power's 2015-2029 Integrated Resource Plan
Docket No. E015/RP-15-690

**In the Matter of Minnesota Power's Petition for Approval of the
EnergyForward Resource Package**
Docket No. E015/M/AI-17-568

Dear Mr. Wolf:

Minnesota Power hereby submits its Additional Procedural Comments in the above-referenced dockets. If you have any questions regarding this filing, please contact me by email at dmoeller@allete.com or by phone at (218) 723-3963.

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller".

David R. Moeller

Enclosures
cc: Service Lists

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Minnesota Power’s Request for
Extension to File its Next Resource Plan to Address
Wind, Solar, and Gas Resource Package

Docket No. E015/RP-15-690

In the Matter of Minnesota Power’s Petition for
Approval of the Energy*Forward* Resource Package

Docket No. E015/M/AI-17-568

**MINNESOTA POWER’S
ADDITIONAL PROCEDURAL COMMENTS**

On July 28, 2017, Minnesota Power (or the “Company”) filed a Petition for Approval of its Energy*Forward* Resource Package and Compliance Filing, requesting approval of a proposed set of cost-effective and sustainable resource additions in the above-captioned dockets. That filing seeks to address and implement the Minnesota Public Utilities Commission’s (“Commission”) July 18, 2016, Order approving Minnesota Power’s 2015 Integrated Resource Plan (“2015 Plan”)¹ and to further the Company’s ongoing fleet transformation toward an overall mix of two-thirds renewable energy and renewable-enabling natural gas and one-third environmentally compliant baseload coal. This transformation aims to reduce emissions and increase renewable penetration without sacrificing cost competitiveness and the reliability of Minnesota Power’s power supply.

On August 3, 2017, the Commission issued a Notice for Procedural Comments providing interested parties an opportunity to submit supplemental procedural comments now that the Company’s Energy*Forward* Resource Package Petition has been filed. The Commission’s Notice asks essentially three questions:

1. Whether Minnesota Power’s request for an extension of at least one year in filing its next resource plan is reasonable;

¹ *In the Matter of Minn. Power’s 2015-2029 Integrated Res. Plan*, Docket No. E015/RP-15-690, ORDER APPROVING RESOURCE PLAN WITH MODIFICATIONS (July 18, 2016) (“July 2016 IRP Order”).

2. Whether the contested case process proposed by Minnesota Power for review of the *EnergyForward* Resource Package is reasonable; and
3. Whether it is reasonable to evaluate the entire package in a single proceeding.

Minnesota Power submits these limited comments to address updates to its preferred contested case schedule in light of the anticipated timing of Commission consideration of the Company's integrated resource plan ("IRP") extension and *EnergyForward* Resource Package procedural issues. Further, Minnesota Power outlines a potential alternative procedural path that uses sets of comments, in lieu of a contested case, and would result in a final Commission decision by the end of August 2018, if the Commission prefers not to order a contested case.

Minnesota Power continues to urge review of the overall package in a single, integrated docket using a contested case. Treating this filing as a single overall package will allow for full record development of the entire package, including how the elements of that package interact with and are dependent upon one another. Further, because of the number and complexity of the issues raised by the overall resource package, a contested evidentiary process overseen by the Office of Administrative Hearings ("OAH") is the most efficient way to review the Company's Petition. The contested case procedures will ensure thorough review and complete record development and will provide parties with a predictable and efficient process that will allow the Commission to make an informed and reasoned decision on the package.

If, however, the Commission concludes a contested case is not necessary, Minnesota Power respectfully requests that the Commission establish, at the outset, a procedural schedule for discovery and comments that would ensure a decision on the complete *EnergyForward* Resource Package by the end of August 2018.

Extension in Filing the Next Resource Plan is Reasonable

The July 2016 IRP Order directed Minnesota Power to move forward with analyzing and procuring the appropriate amount of cost-effective wind and solar, within specified ranges and authorized the Company to pursue complementary natural gas resources.² The present

² The July 2016 IRP Order also directed Minnesota Power to propose a demand-response competitive-bidding process within six months of the date of this order. The demand-response request for proposal ("RFP") was issued in August 2016 as part of the broader RFP process.

proceeding will provide a full opportunity for stakeholders to assess how the proposed package of resources accomplishes the directives and authorizations within the July 2016 IRP Order. The outcomes arising out of this docket will significantly impact the content and analysis of the next IRP filing. Therefore, it is far better that the next IRP filing be deferred until after the outcome of this docket can be determined and digested.

Delaying Minnesota Power's next integrated resource plan pending the outcome of the Commission's consideration of the *EnergyForward* Resource Package is a prudent approach to the regulatory review process for all stakeholders that will ensure both thorough review of the present proposal and reasonable long-term development of Minnesota Power's generation system. Delaying the next IRP filing will allow the Company to incorporate this action plan arising out of the July 2016 IRP Order into the Company's plans before moving forward with the next IRP. It will allow all stakeholders to take the outcomes of this proceeding into account in developing and assessing the next resource plan.

Further, the Company's approach will provide the Commission, the Department of Commerce – Division of Energy Resources ("Department"), Minnesota Power's customers, and other interested stakeholders adequate time to evaluate the *EnergyForward* Resource Package fully and assess how it implements the July 2016 IRP Order. Addressing the package prior to the next resource plan filing will offer more clarity and specificity regarding the Company's plans to meet customer needs.

Furthermore, nearly 700 MW of baseload coal-fired generation has been or will be retired, removed, refueled, or idled from Minnesota Power's supply by 2025. These impending coal-fired retirements and reductions warrant proceeding with the *EnergyForward* Resource Package review process expeditiously to ensure timely implementation of the July 2016 IRP Order. Finally, timing of the new resources calls for prompt regulatory review and action. Each of the elements of the *EnergyForward* Resource Package contain critical path deadlines that call for regulatory review prior to resolution of the next resource plan cycle.³

For all of these reasons, Minnesota Power respectfully requests that the Commission grant the extension in filing Minnesota Power's next resource plan until approximately October

³ The proposed October 1, 2019 due date for the next resource plan filing would also address any concerns about regulatory resources to address other utility's resource plans.

1, 2019. This will allow the outcomes of the instant proceeding to be incorporated into that subsequent resource plan filing.

Review of the Entire Package in a Contested Case Process is Reasonable

As discussed in the Company's Petition, Minnesota Power respectfully requests that the Commission make a determination on the proposed *EnergyForward* Resource Package by the end of September 2018 in order to (1) accommodate conditions precedent in the wind, solar, and natural gas agreements that allow the competitive resource package to be available and in service for customers, (2) ensure adequate time to complete all required regulatory reviews and approvals, and (3) accommodate the long lead times required for completion of the Nemadji Trail Energy Center facility.

Minnesota Power's Petition and supporting appendices are voluminous and include detailed resource planning and need analyses. The Company is confident that the more scrutiny the proposed *EnergyForward* Resource Package receives, the better it will look and the benefits and public interests will become even more apparent. Accordingly, while perhaps daunting to some, a contested case proceeding is the best way to ensure full record development and consideration of important and interrelated resource acquisition issues in the most timely manner. Referral of the entire *EnergyForward* Resource Package to the OAH for a contested case proceeding will allow for full consideration of the important resource planning and generation need considerations that will be fundamental in evaluating the Company's Petition while also managing the timing of the proceeding. Further, as reflected in the Company's Petition and July 12, 2017 Comments, a contested case will help manage the timing of the proceeding to ensure complete evaluation by stakeholders and the Commission to facilitate a Commission decision by the end of September 2018.

The Company's preferred schedule and process to achieve a Commission decision by the end of September 2018 were laid out in Section 7 of Minnesota Power's Petition. As noted in the Commission's August 3, 2017 Notice for Procedural Comments, the Company initially proposed an August 2017 date for a Commission hearing on procedure and schedule. The Commission currently expects to address Minnesota Power's IRP extension and *EnergyForward* Resource Package procedural issues at an agenda meeting in September 2017. The Company proposes the

following minor modifications to its preferred contested case schedule to address the anticipated Commission hearing on procedure and schedule.

EnergyForward Resource Package Contested Case Schedule

Milestone/Event	Proposed Target Date
Request for Extension to File Next IRP and to Establish Procedures for Review of EnergyForward Resource Package	June 8, 2017 (filed in Docket No. E015/RP-15-690).
Commission Notice Seeking Comment on Procedure and Schedule	June 13, 2017
Initial Comments on Procedure and Schedule	June 30, 2017
Reply Comments on Procedure and Schedule	July 12, 2017
EnergyForward Resource Package Petition	July 28, 2017
<u>Commission Second Notice for Procedural Comments</u>	<u>August 3, 2017</u>
<u>Second Procedural Comments</u>	<u>August 16, 2017</u>
Commission Hearing on Procedures and Schedule	August <u>September 7, 2017</u>
Commission Referral to Contested Case Proceedings (Requested)	August <u>September 7, 2017</u>
Initial ALJ Prehearing Conference (Requested)	September <u>October 2017</u>
Minnesota Power Direct Testimony	October 6 <u>November 6, 2017</u>
Deadline for Intervention	November 17, 2017
Intervenor Direct Testimony	December 29 2 , 2017
All Parties' Rebuttal Testimony	February 9, 2018
All Parties' Surrebuttal Testimony	March 2, 2018
Prehearing Conference	March 16, 2018
Evidentiary Hearings	March 19-23, 2018
Initial Briefs	April 27, 2018
Reply Briefs/Proposed Findings of Fact	May 18, 2018
ALJ Report	June 22, 2018
Exceptions to ALJ Report	July 12, 2018
Replies to Exceptions	July 19, 2018
Commission Agenda Meeting	August 30, 2018
Commission Order	September 28, 2018

Minnesota Power is willing to work with other interested parties to refine this schedule in order to address competing dockets and other conflicts but asks that the Commission request a report from the Administrative Law Judge to provide sufficient time to allow for a Commission determination by the end of September 2018.

Although Minnesota Power supports a contested case, in consultation with Commission Staff, it was suggested that the Company provide an alternative non-contested case process for the Commission to consider. While Minnesota Power has concerns about developing a thorough record without a contested case, the Company provides this alternative for the Commission to consider if it determines that a contested case is not a reasonable way to proceed.

Minnesota Power believes one of the benefits of a contested case is that the procedural schedule overseen by the OAH adds predictability and certainty to the schedule. Minnesota Power respectfully requests that, should the Commission choose not to order contested case proceedings, the Commission establish a procedural schedule at the outset that provides for a Commission determination by the end of August 2018. This will provide Minnesota Power and stakeholders with greater certainty on the schedule and will ensure that the Commission has the information it needs to render a decision in a timeframe consistent with the Company's need for regulatory certainty by the fall of 2018.

This proposed schedule will allow the Department, Commission Staff, and other interested stakeholders ample time to engage in robust discovery and to evaluate the Company's *EnergyForward* Resource Package Petition while also balancing this docket with their other competing obligations and workload. Minnesota Power therefore suggests that the Commission include in its Order acknowledgment of the need for and importance of a determination by the fall of 2018 and encourage parties to work together to complete their review in order to accommodate a decision within this timeframe. The Commission should clarify in its order that comment deadlines may not be extended except on a written submission setting forth good cause to grant the extension⁴ and require any party seeking additional time to submit comments, or

⁴ Minn. R. 7829.1275 allows for time variances "for good cause shown." In past procedural orders, the Commission has acknowledged the importance of ensuring a final determination within a specified timer period. For example, in Minnesota Power's 2013 IRP the Commission stated in its ORDER FINDING RESOURCE PLAN COMPLETE AND

approval to submit additional sets of comments, establish that the need for such extension outweighs the potential harm resulting from delay, and can be accommodated without resulting in an overall delay of the proceeding. Ultimately, given the amount of time available, schedule extensions that result in a process that is longer than Minnesota Power’s proposed contested case schedule should not be necessary. If the Commission decides to proceed without contested case proceedings, the Company proposes the following schedule to ensure the proceeding remains on track to allow for a decision by the end of August 2018.⁵ This proposal contemplates three sets of comments (Initial, Reply, and Supplemental). If the Commission prefers, a schedule providing for either fewer or more sets of comments could also be accommodated in this timeframe.

EnergyForward Resource Package Alternative Notice and Comment Schedule

Milestone/Event	Proposed Target Date
Request for Extension to File Next IRP and to Establish Procedures for Review of EnergyForward Resource Package	June 8, 2017 (filed in Docket No. E015/RP-15-690).
Commission Notice Seeking Comment on Procedure and Schedule	June 13, 2017
Initial Comments on Procedure and Schedule	June 30, 2017
Reply Comments on Procedure and Schedule	July 12, 2017
EnergyForward Resource Package Petition	July 28, 2017
Second Round of Comments on Procedure and Schedule	August 16, 2017
Commission Hearing on Procedures and Schedule	September 7, 2017
Discovery Period	Ongoing
Initial Comments on Petition Due	October 20, 2017
Reply Comments Due	December 4, 2017

SETTING PROCEDURAL FRAMEWORK in Docket No. E-015/RP-13-53 (May 10, 2013), that “No additional comments beyond the July 3, 2013, reply comment deadline shall be allowed unless the Executive Secretary authorizes such comments with notice.”

⁵ Because a notice and comment process would require less time than contested case proceedings, Minnesota Power is proposing a final Commission decision by the end of August rather than the end of September. While a contested case decision by the end of August would also be preferable, accommodating a decision in that timeframe with contested case proceedings would be difficult.

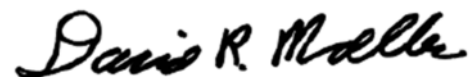
Milestone/Event	Proposed Target Date
Supplemental Comments Due	January 23, 2018
Commission Staff Review/Briefing Papers	February/March 2018
Commission Agenda Meeting(s)	May/June 2018
Commission Order	August 2018 (on or before August 31, 2018)

Conclusion

In conclusion, Minnesota Power respectfully requests that the Commission approve an extension for filing its next IRP to October 2019 to provide stakeholders and the Commission time to fully evaluate the *EnergyForward* Resource Package and ensure that the Commission's decision can be incorporated into the analysis for the Company's next IRP filing. Minnesota Power also asks the Commission to allow the *EnergyForward* Resource Package to be reviewed as a single package and be referred to the OAH for a contested case. This will allow for full evaluation of the important resource planning and generation need considerations that will be fundamental to evaluating the Company's Petition. Minnesota Power appreciates the opportunity to provide these procedural comments and looks forward to a hearing on this important procedural issue.

Dated: August 16, 2017

Respectfully Submitted,



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In the Matter of Minnesota Power's 2015-2029
Integrated Resource Plan

Docket No. E-015/RP-15-690

In the Matter of Minnesota Power's Petition for
Approval of the EnergyForward Resource Package

Docket No. E-015/M/AI-17-568

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 16th of August, 2017, on behalf of Minnesota Power, I electronically filed a true and correct copy of the enclosed Additional Procedural Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service lists.

Dated this 16th day of August, 2017.

/s/ Kristin M. Stastny
Kristin M. Stastny

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