



AN ALLETE COMPANY

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June 6, 2016

VIA E-FILING

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

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

Dear Mr. Wolf:

Minnesota Power hereby electronically submits its Reply Comments in the above-referenced Docket.

Please contact me at the number or the email address provided if you have any questions.

Yours truly,

A handwritten signature in cursive script that reads "Lori Hoyum".

Lori Hoyum

LH:jn
Attach.
cc: Service List

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

In the Matter of a Commission Inquiry
Into Fees Charged on Qualifying Facilities

Docket No. E999/CI-15-755
**MINNESOTA POWER'S
REPLY COMMENTS**

I. INTRODUCTION

The Minnesota Public Utilities Commission (“Commission”) issued a Notice Requesting Information from Investor-Owned, Cooperative, and Municipal Utilities on October 13, 2015. With the October 13, 2015 Notice, the Commission opened a docket to collect information about fees applied to customers with distributed generation, also referred to as qualifying facilities, which are not charged to other customers. Minnesota Power (or “Company”) filed a response to the October 13, 2015 Notice on December 11, 2015, stating that the Company has followed an established and consistent process since Minn. Rules 7835.0100 were enacted in the 1980s and has dutifully filed its Rider for Parallel Generation with the Commission each year. On December 23, 2015, the Commission issued information requests to the six utilities currently charging additional fees for Distributed Generation (“DG”) customers in Minnesota, including Minnesota Power, Connexus Energy, Goodhue Cooperative Electric Association, Mille Lacs Electric Cooperative, Otter Tail Power and Xcel Energy. Minnesota Power submitted its responses to the Commission’s information requests on February 8, 2016.

Concurrently with the issuance of the information requests, the Commission issued a Notice of Comment Period (“Notice”). The Notice contained a list of topics open for comment including: whether any additional fee imposed on a customer with a distributed generation system interconnected with a cooperative or municipal utility before July 1, 2015, or at a time with a public utility, is permissible under Minn. Stat. §216B.164 and/or Minn. Rules, Chapter 7835, including Part 7835.3000; if an additional fee is not directly prohibited by relevant statutes or rules, what factors should the Commission consider in determining whether an additional fee charged by or proposed by a utility is permitted and is reasonable; and is the additional monthly fee imposed by Minnesota Power permissible under Minnesota statutes and rules and, if so, is the

amount reasonable. On May 6, 2016, the Department of Commerce – Division of Energy Resources (“Department”), Otter Tail Power, and nine stakeholders submitted initial comments in response to the Notice. Minnesota Power respectfully provides its Reply Comments to the initial comments submitted by the Department and responds to the applicable topics for comment identified in the Notice.

II. QUALIFIED FACILITY FEE IS APPROVED AND REASONABLE

Minnesota Power has followed the appropriate regulatory procedures to obtain a reasonable, Commission-approved fee, and has also maintained compliance with the requirements under Minnesota Stat. §216B.164. The amendment to Minn. Stat. §216B.164, Subd. 3(a) by the Minnesota Legislature addressed by the Department and several stakeholders in their initial comments became effective July 1, 2015¹ and had no impact to the established fee charged by Minnesota Power as a public utility, nor did it result in the addition of new fees for its DG customers under its Rider for Parallel Generation.

A. Minnesota Power's Fee Received Formal Commission Approval

Cogenerator or small power producers with distributed generation systems of 100 kW or less who take service under one of Minnesota Power's standard electric rate schedules and also have entered into a contract with the Company for the sale of electricity as a cogenerator or small power producer, as defined under state or federal law, are billed under the Company's Rider for Parallel Generation. All charges and credits under this rider are recalculated on an annual basis and filed with the Commission with an effective date of January 1 of each year. While this monthly service charge is recalculated on an annual basis, it is based upon a longstanding practice grounded in state law.

On March 16, 1982, the Commission initiated the public hearing portion of the administrative rulemaking process for the adoption of rules governing cogeneration and small power production. The need for the rulemaking was the result of the addition of Minnesota Stat. §216B.164 to the Public Utilities Act by the Minnesota Legislature during the 1981 session that established a statutory framework for the development of cogeneration and small power production in Minnesota. On March 7, 1983, the Commission issued an order ("1983 Order") in Docket No. E-999/R-80-560 proposing adoption of rules governing cogeneration and small power production. The 1983 Order was very detailed and clearly identified that interconnection costs are "explicitly assigned to the qualifying facility" by both the FERC (Federal Energy Regulatory Commission) and Minnesota Stat. §216B.164, Subd. 8., and can only be costs in

¹ The amendment allows a cooperative electric association or municipal utility charge an additional fee to recover fixed costs not already paid for by the customer through its existing billing arrangement.

excess of the costs of connecting non-generating customers of the same class which would not be incurred if the utility did not engage in interconnected operations with cogenerators and small power producers. Additionally, the 1983 Order specified that utilities are required to file a cogeneration and small power production tariff every 12 months beginning with January 1, 1984.

In compliance with the proposed rules outlined in the 1983 Order, Minnesota Power submitted its annual cogeneration and small power production tariff filing to the Commission on December 27, 1983. In its filing, the Company identified the type of costs and the amount proposed to be included in its monthly service charge. On June 15, 1984, the Commission issued an Order (“1984 Order”)² in Docket No. E015/CG-84-88 in the “Matter of Minnesota Power (MP) filing of purchase rates to Cogenerators and Small Power Producers.” The 1984 Order stated that “[t]his capsule will be limited in scope to the monthly service charge and the reactive demand charge proposed by MP.” Through this Order the Commission approved a monthly service charge of \$1.30, but denied the proposed reactive demand charge by the Company. The applicability and reasonableness of Minnesota Power’s monthly service charge were reviewed by the Department and the Commission as part of the regulatory review process for the tariff filing. Therefore, Minnesota Power’s monthly service charge received formal Commission approval as required by Minn. Rules 7835.0300.

On October 16, 1984, the Commission issued its Finding of Fact, Conclusion of Law and Order adopting the final rules governing cogeneration and small power production. There were no changes from what was approved in the 1983 Order that affected the monthly service charge Minnesota Power had charged as part of its Commission-approved Rider for Parallel Generation. The Company has continued to comply with Minn. Rules 7835.0300 by submitting its cogeneration and small power production tariff to the Commission for review and approval since the final rules were adopted by the Commission in 1984.

B. Minnesota Power’s Fee is Reasonable

The monthly service fee included in Minnesota Power’s Rider for Parallel Generation is comprised of reasonable interconnection costs as defined under Minnesota Rules 7835.0100, Subp. 12, and is permissible under Minnesota Stat. § 216B.164, Subp. 8(b) which specifies it is

² See Exhibit A.

the qualifying facility's obligation to compensate the utility for "costs of interconnection and wheeling in excess of those normally incurred by the utility for customers with similar load characteristics who are not cogenerators or small power producers, or from any fixed charges normally assessed such nongenerating customers."

Minnesota Rules 7835.0100, Subp. 12, defines interconnection costs to be the "reasonable costs of connection, switching, metering, transmission, distribution, safety provisions, and administrative costs incurred by the utility that are directly related to installing and maintaining the physical facilities necessary to permit interconnected operations with a qualifying facility." Minnesota Power does not currently charge DG customers an upfront interconnection fee or application fee. The Company does require that customers pay to upgrade any customer-owned infrastructure if needed. Customers are also required to pay for an engineering study if one is deemed necessary; although an engineering study is generally not essential for smaller DG systems. As communicated in the Company's December 10, 2015 response to the Commission's October 13, 2015 Notice, included in its monthly service charge are reasonable meter maintenance costs and customer accounting expenses unique to distributed generation customers. Meter maintenance costs include the cost of the meter, the cost to install or remove a meter, and a portion of administration and general service expense and distribution general engineering cost. The customer accounting expense is the average customer accounting cost per Residential or General Service customer. These costs fit within the definition of interconnection costs defined in Minnesota Rules 7835.0100, Subp. 12.

Providing low-cost and reliable energy services to its customers, including its DG customers, is a core value of Minnesota Power. In 1984, the Commission approved a monthly service charge of \$1.30. This amount was derived by dividing the total customer service expenses³ by the number of Residential and General Service customers. Following this method of calculation, the service charge would have been between \$3.00 and \$4.00 at the time of the December 30, 2015 annual filing. However, the service charge calculation⁴ has been refined to better reflect the Company's monthly costs of its customers on the Rider for Parallel Generation. At the time of Minnesota Power's December 10, 2015 response to the October 13, 2015 Notice,

³ Per Company Cost of Service Study for Actual 12/31/82 Data.

⁴ Service Charge calculation detail: February 5, 2016, Docket No. E999/CI-15-755; Information Requests – Minnesota Power's Responses to Information Request Nos. 1-5-Part 2 of 4, Exhibit I.

the monthly service charge for sellers with facilities rates at less than 40 kW was \$2.55. Over the 31-year period (1984 to 2015), the monthly service charge increased by \$1.25. On December 30, 2015, the Company submitted to the Commission for review and approval its annual tariff filing with an updated monthly service charge of \$2.48 for the same category of sellers, a decrease of \$0.07 from the previous year's filing, reducing the differential in the amount of the service charge over the 32-year period to \$1.18. Considering the cumulative inflation rate between January 1984 and December 2014 is 131.9 percent,⁵ or similarly, that \$1.30 in 1984 has the same buying power as \$2.99 in 2016,⁶ Minnesota Power is confident that its Commission-approved monthly service charge continues to be reasonable for its DG customers.

⁵ See <http://usinflation.org/us-inflation-rate-calculator>.

⁶ See http://www.bls.gov/data/inflation_calculator.htm.

III. FACTORS TO CONSIDER IN DETERMINING REASONABLENESS OF FEE

Minnesota Power generally agrees with the comments provided by Otter Tail Power in their initial comments submitted on May 6, 2016, regarding what factors the Commission should consider in determining whether an additional fee charged by a utility is permitted and reasonable. Minnesota Stat. § 216B.164 and Minnesota Rules 7835 give guidance to the Commission in determining whether a fee is permitted and reasonable. It is important for the Commission to consider the factors causing the additional cost, while also balancing what is in the public's interest with the need for the utility to sufficiently recover the cost of providing the required service(s) as outlined in Minn. Stat. § 216B.16 Subd. 6.

IV. CONCLUSION

Minnesota Power's monthly service charge assessed as part of its Rider for Parallel Generation was formally approved by the Commission as required by Minn. Rules 7835.0300. In approving the monthly charge, the Commission concurrently determined that fee was reasonable and permitted. The Company has worked to keep the cost to DG customers as reasonable as possible which has been demonstrated by the fact that the monthly service charge has increased at a pace less than inflation, and generally decreased in its most recent compliance filing submitted on December 30, 2015. Minnesota Power appreciates the opportunity to provide these Reply Comments.

Dated: June 6, 2016

Respectfully submitted,

A handwritten signature in cursive script that reads "Lori Hoyum".

Lori Hoyum
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JUN 18 1984

Philip R. Halverson

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Leo G. Adams
Harry Seymour Crump
Roger L. Hanson
Terry Hoffman
Cynthia A. Kitlinski

Chairman
Commissioner
Commissioner
Commissioner
Commissioner

To: Mr. Philip R. Halverson
Minnesota Power
30 West Superior Street
Duluth, MN 55802

Service Date: JUN 15 1984

Docket No. E-015/CG-84-88

In the Matter of

Minnesota Power (MP) filing of purchase rates to Cogenerators and Small Power Producers. This capsule will be limited in scope to the monthly service charge and the reactive demand charge proposed by MP.

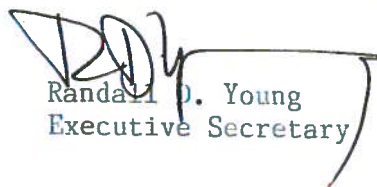
The above entitled matter has been considered by the Commission and the following disposition made:

Approval of a monthly service charge of \$1.30. The proposal for a reactive demand charge is denied. The Company is ordered to make a refund to existing qualifying facilities and report the details of this refund to the Department of Public Service within 10 days of the service date.

WITHIN TEN DAYS, the Company shall file a revised tariff page or pages. Include the approved change as stated above, the proper revision number of the page or pages, the docket number, the date the proposal was submitted to this Department, and the effective date, which is

~~JUN 15 1984~~

BY ORDER OF THE COMMISSION


Randall D. Young
Executive Secretary

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Jodi Nash of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 6th day of June, 2016, she served Minnesota Power's Reply Comments in Docket No. E999/CI-15-755 on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached Service List were served as indicated.



Jodi Nash

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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