

January 2, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/M-19-205

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2019 Biennial Transmission Projects Report.

The Report was filed on October 31, 2019, by the Minnesota Transmission Owners (American Transmission Company, LLC; Central Minnesota Municipal Power Agency; Dairyland Power Cooperative; East River Electric Power Cooperative; Great River Energy; ITC Midwest LLC; L&O Power Cooperative; Minnesota Power; Minnkota Power Cooperative; Missouri River Energy Services; Northern States Power Company; Otter Tail Power Company; Rochester Public Utilities; and Southern Minnesota Municipal Power Agency).

The Department recommends that the Minnesota Public Utilities Commission **accept the Report with reporting requirements**. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E999/M-19-205

I. INTRODUCTION

On October 31, 2019 the Minnesota Transmission Owners (MTO) submitted to the Minnesota Public Utilities Commission (Commission) the MTO's *2019 Biennial Transmission Projects Report* (Report). The MTO is a coalition of fourteen electric utilities that own or operate high voltage transmission facilities in Minnesota.¹ The Report provides a review of the MTO's transmission planning activities. Northwestern Wisconsin Electric Company (NWECC) did not file a biennial transmission report.²

The Report does not seek certification of any high voltage transmission line. Therefore, pursuant to Minnesota Rules 7848.1800, subpart 3 and the Commission's November 15, 2019 *Notice of Comment Periods and Deadlines*, comments on the Report's compliance with the filing requirements (Minnesota Rules 7848.1300) and procedural recommendations were due November 20, 2019 with initial comments on the merits of the Report due January 15, 2020, with reply comments due March 1, 2020. The Minnesota Department of Commerce, Division of Energy Resources (Department) notes that petitions to intervene³ and comments on the merits,⁴ including any procedural recommendation,⁵ are to be submitted by January 15, 2020.⁶

On November 14, 2019, comments on compliance with the filing requirements were filed by the Department. The MTO filed supplemental data November 21, 2019 in response to the Department's comments.

¹ The members of the MTO are: American Transmission Company, LLC; Central Minnesota Municipal Power Agency; Dairyland Power Cooperative; East River Electric Power Cooperative; Great River Energy; ITC Midwest LLC; L&O Power Cooperative; Minnesota Power; Minnkota Power Cooperative; Missouri River Energy Services; Northern States Power Company; Otter Tail Power Company; Rochester Public Utilities; and Southern Minnesota Municipal Power Agency. Hutchinson Utilities Commission, Marshall Municipal Utilities and Willmar Municipal Utilities are all served by Missouri River Energy Services, and thus Missouri River Energy Services does the reporting for them.

² On October 22, 2009 Northwestern Wisconsin Electric Company (NWECC) filed NWECC's *Transmission Projects Biennial Report (TPBR)*. The TPBR states "NWECC owns approximately three miles of 69kV transmission line and a portion of a 230kV substation."

³ Minnesota Rules 7848.1900, subpart 4.

⁴ Minnesota Rules 7848.1900, subpart 5.

⁵ Minnesota Rules 7848.1900, subpart 6.

⁶ Minnesota Rules 7848.1800, subpart 5.

II. REQUIREMENTS OF THE COMMISSION'S ORDER IN DOCKET E999/M-17-377

The Commission's June 12, 2018 *Order Accepting Report, Granting Variance, and Setting Additional Requirements* contained the following Order Points:

1. The Commission accepts the 2017 Biennial Transmission Projects Report.
2. In their 2019 Report, the MTO shall include content similar to 2017 Report, and include an improved and expanded assessment of non-wire alternatives and a discussion of relevant actions by FERC, MISO, and the Commission related to distributed energy resources and distribution planning.
3. In their 2019 Report, MTO shall include the requirements addressed in Minn. Stat. § 216B.2425, subd. 2.
4. The Commission varies the requirements of Minn. R. 7848.0900 to eliminate the obligation to hold public meetings as described therein.
5. This Order shall become effective immediately.

Below are the comments of the Department on the merits of the Report.

III. ANALYSIS OF PLANNING ACTIVITIES

A. NWEC

NWEC did not submit a biennial transmission plan. Given the limited nature of NWEC's Minnesota transmission system as referenced in footnote 2, the Department has no comments regarding NWEC.

B. The MTO

1. Existing Transmission Issues

The first step in maintaining a reliable transmission system is to address areas where the current transmission system cannot provide reliable service. Department Information Request No. 1 requested the MTO to list the areas where historical demand has been greater than the supply capability after a single contingency occurs. In response, the MTO listed 8 areas as follows:

1. 2019-TC-N1: Red Rock Transformer Uprate
2. 2019-TC-N2: South Afton Substation
3. 2019-TC-N3: East Metro Area Ugrades
4. 2011-NE-N2: 15 Line Upgrade
5. 2015-NE-N2: 868 Line Upgrade

6. 2019-NE-N1: 11 Line Upgrade
7. 2013-SW-N1: Heron Lake Capacitors
8. 2019-SE-N5: Thisius 161/69 kV Substation

In the list above, the year indicates when the issue first arose in the biennial plan. Department Information Request No. 1 also requested the MTO to provide an estimated date by which reliability would be restored to each of the above areas. In response, the MTO indicated that reliability would be restored as follows:

- 2019: 1 issue (2011-NE-N2)
- 2020: 1 issue (2019-NE-N1)
- 2021: 2 issues (2019-TC-N2, 2015-NE-N2)
- 2022: 2 issues (2013-SW-N1, 2019-TC-N1)
- 2023: 1 issue (2019-TC-N3)
- 2027: 1 issue (2019-SE-N5)

As indicated in the Department’s comments in prior transmission planning dockets, the Department expects that transmission deficiencies will exist for a variety of reasons that are beyond the MTO members’ control. As reported by the MTO, four of the eight issues will be fixed within the next two years (by year-end 2021).

2. Forecasted Transmission Issues

An early step in addressing forecasted inadequacies is to obtain the necessary permits. In order to monitor the MTO’s progress in terms of obtaining necessary permits, Department Information Request No. 2 requested the MTO to provide a schedule with estimated dates for the submission of certificate of need (CN) applications for situations in which the MTO has a potential solution and that potential solution may require a CN. The MTO’s response is summarized below in Table 1. Table 1 shows the schedule of estimated filing dates for CN applications for future projects. Some projects reported by the MTO are dependent upon CNs already under review or already approved by the Commission. These projects are not included in Table 1.

Table 1: Schedule of Certificates of Need

Tracking Number	Project	Estimated Filing Date	Responding Utility
2007-NE-N1	Duluth Area 230 kV	Late 2020 or Early 2021	MP

Several projects were reported as potentially requiring a CN but not yet having a filing date estimated. These projects are shown in Table 2 below.

Table 2: Potential Certificates of Need

Tracking Number	Project	Estimated Filing Date	Responding Utility
2019-NE-N12	Duluth 115 kV Loop	Late 2020 or early 2021	MP
2015-NE-N12	Iron Range-Arrowhead 245 kV Project	No current need to construct the project	MP

The Department briefly reviewed the MTO’s discussion for the projects listed in Table 2. The table shows that there are relatively few projects planned at this time that potentially require CNs where the timeline is not yet known. The Department has no concerns with any of these projects or their estimated CN filing dates.

In the 2017 Biennial Transmission Projects Report, Docket No. E99/M-17-377, the MTO stated that two other projects may require a Certificate of Need in the future depending on load growth and potential storm damage. The MTO stated that they are currently evaluating these projects further. Table 3 below lists these projects:

Table 3: Projects Formerly Under Evaluation for Certificates of Need

Tracking Number	Project	Responding Utility
2009-WC-N6	Elk River-Becker Area	GRE
2017-WC-N5	DS Line Rebuild Project	GRE

The Department sent an information request to the MTO’s requesting an update on these projects. The MTO responded that neither one of the projects is projected to need a CN at this time as forecasts do not indicate that any 115 kV line will be necessary.⁷

C. TRANSMISSION FOR RENEWABLES

The Report also contains a section regarding Minnesota’s Renewable Energy Standard (RES Report) in compliance with Minnesota Statutes §216B.2425, subd. 7. The RES Report is a joint effort by a separate group from the MTO but containing many of the same utilities.⁸ Minnesota Statutes §216B.2425, subd. 7 governing the RES Report states:

⁷ See Department Attachment 1.

⁸ The utilities sponsoring the RES Report are: Minnesota Power, Northern States Power Company, Otter Tail Power Company, Dairyland Power Cooperative, Basin Electric Power Cooperative, East River Electric Power Cooperative, Great River Energy, L&O Power Cooperative, Minnkota Power Cooperative, Central Minnesota Municipal Power Agency,

Each entity subject to this section shall determine necessary transmission upgrades to support development of renewable energy resources required to meet objectives under section 216B.1691 and shall include those upgrades in its report under subdivision 2.

In compliance with this statute, the RES Report starts with a gap analysis which provides “an estimate of how many more megawatts of renewable generating capacity a utility expects to need beyond what is presently available to obtain the required amount of renewable energy.” The RES Report shows that utilities subject to the Minnesota RES have sufficient capacity acquired to meet the Minnesota RES needs through 2030. According to the chart on page 157 of the Report, the Minnesota RES utilities also have enough capacity to meet the RES needs of other jurisdictions as well as Minnesota’s RES needs through 2030. Thus it appears that significant additional transmission investment for the purposes of the RES is not required.

D. SOLAR ENERGY STANDARD

In 2013, the Minnesota Legislature established a solar energy standard (SES) for public utilities, effective by the end of 2020. Minn. Laws 2013, Ch. 85, § 3, codified at Minnesota Statutes § 216B.1691, subd. 2f (Solar energy standard), establish a solar energy standard at 1.5 percent of a utility’s retail sales by the end of 2020.

That statute requires public utilities subject to the SES to report to the Commission on July 1, 2014, and each July thereafter, on progress in achieving the standard. The first reports were filed with the Commission in May and June of 2014, and accepted in an Order dated October 23, 2014.⁹ The second set of reports were filed in the summer of 2015 and were approved by the Commission in an October 28, 2015 Order.¹⁰ The third set of reports were filed in the summer of 2016 and were approved by the Commission in its November 28, 2016 Order.¹¹ The fourth set of reports were filed in the summer of 2017 and were approved by the Commission in its October 20, 2017 Order.¹² The fifth set of reports were filed in the summer of 2018 and were approved by the Commission in its September 21, 2018 Order.¹³ The Sixth set of reports were filed in the summer of 2019 and were approved by the Commission in its September 11, 2019 Order.¹⁴

More information is provided on the utilities’ progress toward meeting the upcoming SES in those dockets. The MTO briefly discussed the SES in the Report and presented data that indicates that the MTO utilities subject to the SES are on pace to meet the 2020, 2025 and 2030 SES requirements.

Minnesota Municipal Power Agency, Southern Minnesota Municipal Power Agency, Western Minnesota Municipal Power Agency/Missouri River Energy Services, and Heartland Consumers Power District (jointly, the RES Utilities).

⁹ Docket No. E999/M-14-321

¹⁰ Docket No. E999/M-15-462

¹¹ Docket No. E999-M-16-342

¹² Docket No. E999-M-17-283

¹³ Docket No. E999-M-18-205

¹⁴ Docket No. E999-M-19-276

E. MITIGATION COSTS

As utilities have been building more infrastructure and more significantly sized infrastructure, it has become increasingly necessary to ensure that utilities use cost discipline as they construct new resources. To encourage cost discipline and prevent ratepayers from paying more than is reasonable for new utility infrastructure, the Department and Commission have been holding utilities accountable by comparing the utilities' estimated costs of a project as proposed in a CN proceeding to the actual cost of the project requested in a rate recovery proceeding. Utilities are not allowed to recover any cost overruns through riders and at a minimum, must justify in a general rate case any cost recovery above the amount the utility originally indicated that the project would cost. This requirement is an important tool to ensure that cost discipline is maintained throughout the regulatory process. The presence of cost discipline is important to ensure the accuracy of cost estimates used in planning proceedings such as resource plans and the biennial transmission plan. Such cost estimates are used to make significant decisions so it is important to minimize errors in estimation to avoid poor decisions and higher system costs.

Due to significant additions in infrastructure expected now and in the future, the Department concludes that additional measures are necessary to help ensure that costs charged to ratepayers for upgrades to the electric system are reasonable. Further, it is important to ensure that decisions made by a utility in response to local governments reasonably consider cost implications, and that costs of upgrades are allocated appropriately to ratepayers, based on ratemaking principles such as cost-causation, cost minimization and administrative feasibility. When utilities install infrastructure in an area, there are always mitigation measures involved. So long as the costs of such measures are reasonable, prudent and relatively small in size, it is generally reasonable to allow the costs to be borne by all ratepayers.¹⁵ However, when a mitigation measure is not needed for electrical purposes and is significant in size, it is important to consider whether the costs should be allocated to the entire rate base or to a smaller group of customers, based on the entity requesting such enhancement or optional mitigation. An example of such a mitigation measure is undergrounding transmission facilities for aesthetic reasons. Because such options increase costs not only of installation but also ongoing maintenance of the facilities, and because the beneficiaries of such designs can be limited to local ratepayers, careful consideration should be given to proposals to charge the incremental costs of optional undergrounding to all ratepayers. Decisions on such proposals should be made with all participants and affected ratepayers fully cognizant of the cost implications of the mitigation measures. Application of cost-causation principles are important because, if such optional mitigation costs are consistently allocated to the entire rate base, the incentive to prudently control costs throughout the permitting processes is reduced.

¹⁵ It would not be administratively feasible or desirable to tailor rates in each area of Minnesota to reflect incremental costs of all optional mitigation measures in the area.

As in previous comments on biennial transmission reports, the Department continues to recommend that the Commission require the rate-regulated electric utilities – Otter Tail Power Company, Minnesota Power, and Xcel Energy – to provide the following information in future rate requests to recover the costs of new energy facilities:

- a summary of all mitigation measures that have been added at any step in the permitting process,
- the general reason for the mitigation measure, including whether the measure was requested or required,
- the entity requesting or requiring the mitigation, and
- the cost of the mitigation measure.

This list should include data regarding mitigation measures that the utilities undertook voluntarily. Such data will enable cost allocations to be considered in ratemaking as appropriate and in a more accurate and consistent manner. The Department also notes that these recommended reporting requirements do not in any way limit the Commission’s decision-making authority but instead would better inform the Commission’s decision-making process.

F. ASSESSMENT OF NON-WIRE ALTERNATIVES AND DISCUSSION OF DER AND DISTRIBUTION PLANNING

As noted above, the Commission’s Order on the 2017 Report required the MTO to provide an assessment of non-wire alternatives and a discussion of relevant actions by the Federal Regulatory Commission (FERC), the Midcontinent Independent System Operator (MISO), and the Commission related to distributed energy resources (DER) and distribution planning. The Report includes a discussion of non-wires alternatives to transmission projects, and a table summarizing the options and describing the benefits and challenges of each alternative.¹⁶ The MTO indicated that non-wires alternatives are considered when evaluating solutions to a transmission inadequacy.

The MTO also summarized the activities that the Commission, FERC, MISO and the Institute of Electrical and Electronics Engineers (IEEE) have initiated and continue to pursue related to DER and distribution planning.¹⁷ Highlights include the work the Commission has undertaken to update the generic DER interconnection standards (Docket No. E999/CI-16-521), FERC Order 841, which enabled electric storage resources to participate in the capacity, energy and ancillary service markets, MISO’s efforts to develop a DER participation model, and the IEEE’s DER interconnection and interoperability standard (IEEE 1547-2018).

¹⁶ Report, pages 9-14.

¹⁷ Report, pages 14-17.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission accept the Report.

Additionally, the Department recommends that the Commission require Otter Tail Power Company, Minnesota Power, and Xcel Energy to provide the following information in future rate requests to recover the costs of new energy facilities:

- a summary of all mitigation measures that have been added at any step in the permitting process,
- the general reason for the mitigation measure, including whether the measure was requested or required,
- the entity requesting or requiring the mitigation, and
- the cost of the mitigation measure.

This list should include data regarding mitigation measures that the utilities undertook voluntarily.

/ja

- Not Public Document – Not For Public Disclosure**
 Public Document – Not Public Data Has Been Excised
 Public Document

Minnesota Transmission Owners	Information Request No.	3
Docket No.: E999/M-19-205		
Response To: MN Department of Commerce		
Requestor: Michael Zajicek		
Date Received: December 11, 2019		

Question:

Topic: 2019 Biennial Transmission Projects Report

In the 2017 Biennial Transmission Projects Report two projects were identified as possibly requiring a Certificate of Need in the future due to size and length that were not already listed by the MTOs. For each of these projects please provide an update on whether a Certificate of Need is required and an explanation as to how the MTO came to this determination.

Projects:

1. 2009-WC-N6: Elk River-Becker Area
2. 2017-WC-N5: DS Line Rebuild Project

Response:

1. 2009-WC-N6: Elk River-Becker Area
 - a. A Certificate of Need is not required at this time.
 - b. To date, GRE has rebuilt the Thompson Lake-Liberty line. The line was rebuilt and operated at 69 kV, so it did not require a Route Permit or Certificate of Need. The Remmele-Thompson Lake line segment is being considered as a 2021 project. The remaining line segments, including Remmele-Thompson Lake, continue to be studied by planning but load forecasts in these areas do not currently show a need for the line segments to be rebuilt to 115 kV, so a Route Permit and Certificate of Need will not be required.
2. 2017-WC-N5: DS Line Rebuild Project
 - a. A Certificate of Need is not required at this time.
 - b. The DS Line Rebuild project was initially proposed to be reconstructed to 115 kV, but after further analysis on the need for the line, it was determined that the line should be rebuilt and operated at 69 kV based on the load forecast in the area.

Preparer: Great River Energy-Wayne Roelofs
Title: Transmission System Planning Analyst
Department: Transmission Planning
Telephone: 763-445-5952
Date: December 18, 2019

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E999/M-19-205

Dated this **2nd** day of **January 2020**

/s/Sharon Ferguson

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