

October 24, 2019

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/CI-19-9

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department) files these reply comments in response to the Minnesota Public Utilities Commission's (Commission) August 30, 2019 *Notice of Supplemental Comment Period* (Notice) in the following matter:

In the Matter of 2019 Cogeneration and Small Power Production Reports.

The Notice identified the following overall issue and items open for comment:

Issue: What, if any, of the trade secret designated information in Minnesota Power, Otter Tail Power, and Xcel Energy's Annual Cogeneration and Small Power Production reports should be filed as public?

Topic(s) Open for Comment:

- a. Minnesota Power, Otter Tail Power, and Xcel Energy revised 2019 annual cogeneration and small power production filings with the data each utility has proposed to make public and the rationale for these changes to trade secret designation.
- b. Provide further explanation of how the specific information claimed to be trade secret does or does not qualify as trade secret under the Data Practices Act, Minnesota Statute Chapter 13.

- c. Is any of the specific, trade secret-designated information required by Minnesota rules under part 7835.0500 (Schedule A); part 7835.0600 (Schedule B); and part 7835.1000 (Schedule G) not required by PURPA? Discuss the “public inspection” requirement under PURPA and Minn. Rules 7835.1200 and whether that can be satisfied by granting developers interested in providing generation as qualifying facilities (QFs), and their consultants and advisors, access to the data required by the rules under a Commission-approved non-disclosure agreement.

The Department provides this brief background and response.

Between January 2 and January 18, 2019, Minnesota Power, Otter Tail Power, and Xcel Energy filed their 2019 annual cogeneration and small power production reports in this docket. The 2019 annual reports include the filing requirements outlined in Minn. Rules Chapter 7835, which result in annual updates to compensation rates for qualifying distributed generation facilities. Each of the utilities’ filings with the Commission labeled some information “trade secret.”

On January 29, 2019, Joint Commenters (Environmental Law and Policy Center and Institute for Local Self-Reliance) filed comments objecting to the utilities’ designating portions of their annual cogeneration and small power production tariff filings as trade secret, and asked the Commission to reject the trade secret designations and make the data in its records public, noting that government data is presumed public unless the utilities justified the trade secret designations.

Between February 22 and March 18, 2019, the Commission received comments from the Department, Joint Commenters, Minnesota Power, Otter Tail Power, Ridge Energy LLC, and Xcel Energy.

On August 22, 2019, the Commission met to consider this issue. During oral arguments and in the initial round of comments, Minnesota Power, Otter Tail Power and Xcel Energy proposed making some of the previously designated trade secret data public. The Commission requested supplemental comments addressing the topics outlined in the above-referenced Notice.

On September 10, 2019, Minnesota Power, Otter Tail Power and Xcel Energy, submitted compliance filings that included resubmissions of their annual cogeneration and small power production tariff filings with some information initially marked as trade secret now marked as public.

On September 30, 2019 the Department submitted its review of the electric utilities’ compliance filings and noted that the filings are all similar in that each utility determined that, since their 2019 estimated marginal energy costs can be accessed in other regulatory filings publicly or can be derived using publicly available information, they can make these costs public for their 2019 cogeneration and small power production tariff filings.

On October 14, 2019, the Joint Commenters, Minnesota Power, Otter Tail Power and Xcel Energy submitted initial comments responding to the Commission's Notice.

Department Review of Initial Comments

- a. Minnesota Power, Otter Tail Power, and Xcel Energy revised 2019 annual cogeneration and small power production filings with the data each utility has proposed to make public and the rationale for these changes to trade secret designation.*

As mentioned above, on September 10, 2019 the three electric investor-owned utilities submitted updates to their filings identifying some of the trade secret designations in the utilities' initial filings as no longer having an actual or potential basis for competitive harm or deriving economic value. Thus, the utilities made some 2019 information public.

The Joint Commenters argued that Xcel's September 10, 2019 filing did not explain how bidders would use the Company's trade secret information to undermine Xcel's bidding process. The Department disagrees. The record as a whole demonstrates how and why knowledge of the designated trade secret information could harm ratepayers and the utility: bidders and suppliers could use the information designated trade secret to offer bids that are higher than they may otherwise have offered had they not possessed the trade secret information. Further, as presented below, both Xcel and Otter Tail provided good summaries of their reasons why the designated information is trade secret.

- b. Provide further explanation of how the specific information claimed to be trade secret does or does not qualify as trade secret under the Data Practices Act, Minnesota Statute Chapter 13.*

The Department notes that Otter Tail provided specific examples of how information in its Schedule A, Schedule B, Subparts. 2, 3, 5 and 6, Subpart G and Appendix E qualified as trade secret. Otter Tail concluded:

In sum, Otter Tail protects this data so it can procure energy and capacity resources in the most cost-effective manner without disclosing its data to potential vendors, suppliers and others who could use the information to gain a bargaining advantage that would tend to increase customer costs. Vigorously protecting information that affects Otter Tail's bargaining position ultimately is a benefit to customers. In that sense "independent economic value, actual or potential" associated with Otter Tail's protected data accrues to customers, whose interests must be protected in the course of promoting cogeneration and small power production.

Minnesota Power did not provide further explanation in its comments, but referred to its March 18, 2019 Comments.¹

Xcel identified how the information it marked as trade secret in Attachment A and B was specific to Unit 1 of Xcel's Black Dog plant and a particular wind unit. Xcel concluded:

Trade secret protection is sought pursuant to Minn. Stat. § 13.37 for all of the information marked as protected data. 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 possible 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, as explained in the February 22 and March 18 filings of Xcel Energy in this matter, 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, and some of these plants are owned by third parties. Also, the forward looking data in Schedule A is obtained through a subscription service from a third-party and is protected and cannot be publicly released. Therefore, the Company has designated certain portions of this filing as trade secret.

- c. Is any of the specific, trade secret-designated information required by Minnesota rules under part 7835.0500 (Schedule A); part 7835.0600 (Schedule B); and part 7835.1000 (Schedule G) not required by PURPA?*

In response to topic c, the Joint Commenters provided a helpful table showing what information required by Minnesota rules is also required by PURPA. However, none of the parties explicitly answered the question of what, if any, additional information is required by Minnesota Rules, but not PURPA.

- d. Discuss the "public inspection" requirement under PURPA and Minn. Rules 7835.1200 and whether that can be satisfied by granting developers interested in providing generation as qualifying facilities (QFs), and their consultants and advisors, access to the data required by the rules under a Commission-approved non-disclosure agreement.*

¹ The Department notes that Minnesota Power could have referenced its February 22, 2019 comments also.

The three utilities discussed situations when a non-disclosure agreement (NDA) would not be appropriate if the developer plans or might at any time in the next five years bid on a Request for Proposals (RFP) issued by the Company. The utilities also noted that NDAs would be inappropriate for developers selling energy and capacity into the MISO market or engaging in market trading of energy or capacity because developers' access to non-public data would result in an inequity for the utilities and other third parties participating in similar activities.

The Department notes that Xcel stated that any employee of a developer who has access to trade secret data should not be able to prepare or assist in developing a bid on an RFP issued by Xcel, selling directly into the MISO market, or engaging in market trading of energy or capacity for a period of five years. The Department agrees that restricting a developer employee from using the trade secret information for a certain period of time is appropriate, but is not certain that 5 years is the optimal time period to set for restricted activity. The Department suggests that, at the Commission hearing, the utilities should discuss whether a shorter period is reasonable. It would also be helpful for parties to discuss how such a restriction would be enforced and by which entity.

The Joint Commenters concluded that "public inspection" requires public access and that requiring a nondisclosure agreement limits that access. However, the Joint Commenters stated that, if an NDA is required, the Commission's order approving the trade secret designation and approving an NDA should require all utilities' data to use the same standard nondisclosure agreement. Further, the utilities should make the agreement available on their websites, or provide information on their websites on how to request the NDA ordered by the Commission. The Department does not oppose requiring utilities to make an NDA available on their websites, but concludes that use of standard "form" may be difficult, as there are likely to be many instances where the use of a "form" or "standard" NDA may be insufficient to appropriately protect ratepayers as to data in the Commission's possession, and that the Commission may need to make fact-specific determinations of how parties should appropriately handle the designated material.

Department Conclusions and Recommendations

The Department is concerned that Joint Commenters never appear to acknowledge that Minnesota ratepayers can be harmed if the Commission were to determine that the presently-designated trade secret information is instead public data.

In our March 8, 2019 comments, the Department stated:

For the reasons provided above, the Department concludes at this time that the utilities demonstrated the reasonableness of their trade secret designations and that Joint Commenters have not shown that Minn. Stat. § 13.37 is preempted by federal law.

Since submitting those comments, the utilities have made additional information public and have provided additional details explaining why their trade secret designations are reasonable. The Department continues to conclude that the utilities' trade secret designations are reasonable. The Department also concludes that Xcel, and potentially the other utilities, should justify the five-year time period (from the point at which access to trade secret information was granted) suggested as appropriate for developer employees to be limited from certain actions and explain how such a restriction would be enforced and by which entity. Finally, the Department is not opposed to the Commission requiring utilities to make a Commission-approved NDA available on the utilities' websites.

Sincerely,

/s/CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/ar
Attachment

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
Reply Comments**

Docket No. E999/CI-19-9

Dated this **24th** day of **October 2019**

/s/Sharon Ferguson

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