



Minnesota Center for Environmental Advocacy

Using law, science, and research to protect Minnesota's environment, its natural resources, and the health of its people.

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April 21, 2016

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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VIA ELECTRONIC SERVICE

*Re: In the Matter of Establishing an Estimate of the Costs of Future Carbon
Dioxide Regulation on Electricity Generation under Minn. Stat. § 216H.06
PUC Docket No. E-999/CI-07-1199
Related Docket No. E999/CI-15-708*

Dear Mr. Wolf:

In connection to the above-captioned docket, please find attached Comments of Clean Energy Organizations. Also attached is an Affidavit of Service.

Sincerely,

/s/ Christine B. Hottinger
Christine B. Hottinger
Attorney for CEOs

CBH/em

Enclosures

cc: Attached Service List

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

In the Matter of Establishing an Estimate of the
Costs of Future Carbon Dioxide Regulation on
Electricity Generation under
Minn. Stat. § 216H.06

Docket No. E999/CI-07-1199
Related Docket No. E999/CI-15-708

CLEAN ENERGY ORGANIZATIONS' COMMENTS

On Behalf Of

**Fresh Energy
Minnesota Center for Environmental Advocacy
Sierra Club
Wind on the Wires**

April 21, 2016

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I. VALUES FOR 2016

On April 1, 2016, the Public Utilities Commission requested comments on the regulatory cost of carbon estimates. The Minnesota Pollution Control Agency (“MPCA”) and the Minnesota Department of Commerce, Division of Energy Resources (“DOC”) (together, the Agencies) requested and received comments on their recommendation for the estimate of the costs of future carbon dioxide (“CO₂”) regulation on electricity generation under Minn. Stat. § 216H.06.

The Agencies recommend that the Commission maintain the current estimate of the range of likely costs of CO₂ regulation at between \$9 and \$34 per ton of CO₂ emitted, and change the starting date from 2019 to 2022.¹

The Clean Energy Organizations (“CEOs”) support moving the date at which utilities begin applying the range of CO₂ regulatory costs from 2019 to 2022 due to the 2022 implementation date of the Clean Power Plan (“CPP”). This is appropriate. At this time, the Agencies’ recommendation to maintain the range of CO₂ regulation costs is also appropriate, but the Commission should begin to consider updating regulatory cost estimates to reflect CPP implementation.

The CEOs do not support the Commission adopting CO₂ values for 2017 at this time. The governing statute anticipated “annual updates,”² and it is reasonable to update again in 2017. As Minnesota’s CPP State Implementation Plan is developed over the next year, the Commission should update regulatory cost estimates to reflect known factors. We know the emission target for Minnesota, and CPP compliance estimates could be based on restricting resource planning

¹ Mike Rothman, Commissioner, Department of Commerce, and John Stine, Commissioner, Pollution Control Agency, Analysis and Recommendation of the Minnesota Department of Commerce and the Minnesota Pollution Control Agency, Docket Nos. E999/DI-15-708, E999/CI-07-1199 (Mar. 29, 2016).

² Minn. Stat. § 216H.06 (2014).

models to the amount of emissions permitted under the rule, or utilities' CPP compliance cost estimates.³ The current regulatory cost estimates were based on cap and trade programs that seemed likely in 2007 and 2009,⁴ but have little relationship to the CPP. The Commission should bear in mind the planning purpose of Minn. Stat. § 216H.06, and facilitate utilities' planning for the regulations that will be implemented. As it noted in 2009, "[a] utility's failure to correctly forecast the magnitude of CO₂ regulation costs may result in the utility's making choices that prove to be costly in retrospect, the same as any other forecasting error."⁵

Xcel Energy's Comments on the Agencies' 2014 Recommendations appear to agree that the use of the current regulatory planning values could change in the future:

[W]e believe it may be appropriate to consider other methods beyond the carbon proxy price method to simulate the effect of EPA's carbon regulatory program in resource planning. . . . While we have no plans to build new coal plants, a more accurate simulation of [EPA's New Source Performance Standard's effect on new coal plants] in resource planning modeling would be to simply require carbon capture and sequestration and the associated costs be incorporated into the assumptions for coal plants. A carbon proxy price might achieve a similar outcome, but would be a much less direct and accurate way to simulate EPA's actual rule. Similarly, when existing source rules are promulgated, we may

³ Otter Tail Power indicated in its January comments to the Agencies that the current cost estimate range is "within the range of estimates made by various consulting firms for the cost of allowances under the Clean Power Plan[.]" Otter Tail Power, Comments, Docket Nos. E999/DI-15-708, E-999-07-1199. If other utilities have begun to examine their own compliance costs, this information may be useful for the Commission to examine.

⁴ See Barbara Freese, consultant to the Union of Concerned Scientists, & Beth Goodpaster, attorney for Isaak Walton League of America-Midwest Office, Fresh Energy, and Minnesota Center for Environmental Advocacy, Joint Comments, Pub. Util. Comm. Docket No. 999-07-1199 8, 13 (Oct. 8, 2007) (proposing a high estimate value of \$30.20, which is very close to the current value, based on a 2005 Synapse report that examined cap and trade programs that had been suggested in Congress); Paul Eger, Commissioner, MPCA, & William Glahn, Director, Office of Energy Security, Comments Pub. Util. Comm. Docket No. 999-07-1199 3 (Mar. 27, 2009) (supporting the now-adopted regulatory values with a proposed Presidential budget that noted a cap and trade program).

⁵ Order Establishing 2009 and 2010 Estimate of Future Carbon Dioxide Regulation Costs, Pub. Util. Comm. Docket No. E-999-07-1199 2 (Oct. 8, 2009).

find that a carbon proxy price is not the only or even best way to plan future resources with respect to the actual rules.⁶

At this time it is unclear if enough information will be known on the State's Implementation Plan to inform values in 2017, but it is clear that more will be known about the progress on the Plan in 2017 than is known now.

In addition to the CPP requirements, Minnesota has a statewide greenhouse gas emissions-reduction goal across all sectors to a level of at least:

- 15 percent below 2005 levels by 2015,
- 30 percent below 2005 levels by 2025, and
- 80 percent below 2005 by 2050.⁷

The cost to comply with these goals should be considered in resource planning cost assumptions, and the Commission should stay abreast of the progress Minnesota has made on its greenhouse gas reduction targets.⁸ The Next Generation Act's reductions targets fall within the CPP goals for 2030.⁹ But the Act has larger goals for Minnesota by 2050. The Commission should consider these statutory goals and their potential for promoting additional regulation of CO₂.

⁶ Xcel Energy February 18, 2014 Comments in Docket Nos. E999/CI-07-1199 AND E999/DI-13-796.

⁷ Minn. Stat. § 216H.02, subd. 1.

⁸ The PCA reports to the state Legislature every other year on this progress, the most recent report is available at <https://www.pca.state.mn.us/sites/default/files/lraq-2sy15.pdf>.

⁹ Minnesota's CO₂ emissions in 2005 were 35.5 million metric tons, forming the baseline against which the Next Generation Act's goals will be measured. Minnesota Carbon Dioxide Emissions by Sector, Energy Information Administration, <http://www.eia.gov/environment/emissions/state/> (follow emissions by state, "Minnesota") (release date October 26, 2015). The CPP sets Minnesota's CO₂ goals at 25.4 million metric tons for the interim period of 2022-2029, with 27.3 million metric tons as its recommended benchmark for 2024. This is roughly equivalent to a reduction of 30% below 35.5, the 2025 goal established by the Next Generation Act. Minn. Stat. § 216H.02, subd. 1.

The Commission should consider whether there is enough information at the time of its next update to make any changes to CO₂ regulatory costs or the way they are accounted for in resource planning. It should not postpone that update to 2018.

II. THE COMMISSION SHOULD REASSESS HOW THE REGULATORY AND EXTERNAL COST VALUES INTERACT.

The Commission has asked interested parties whether it “[s]hould . . . open a docket to reexamine the relationship between the external cost of CO₂ and the anticipated regulatory cost of CO₂[.]” The Clean Energy Organizations (“CEOs”) contend that it should because the current interaction is not theoretically sound.

The Commission’s 2007 Order ruled that external cost estimates would not apply to years to which regulatory cost estimates applied.¹⁰ In the same Order, the Commission also determined that it could not make a ruling on a mechanism to determine whether or when regulatory costs internalized external costs:

at this time the record does not indicate what mechanism the Commission could adopt to determine when the “costs of future carbon dioxide regulation on electricity generation” have been fully incorporated into the cost of electricity.¹¹

The Commission explicitly reasoned that it did not know whether or when regulatory costs would be internalized. Yet the decision to not require utilities to calculate external costs of CO₂ in years that they calculate regulatory costs requires that regulations eliminate external costs of CO₂. Based on the known forthcoming CO₂ regulatory schemes, this will not be the case.

¹⁰ *Order Establishing Estimate of Future Carbon Dioxide Regulation Costs*, Pub. Util. Comm. Docket No. E-999-07-1199 4 (Dec. 21, 2007) [hereinafter “Order”].

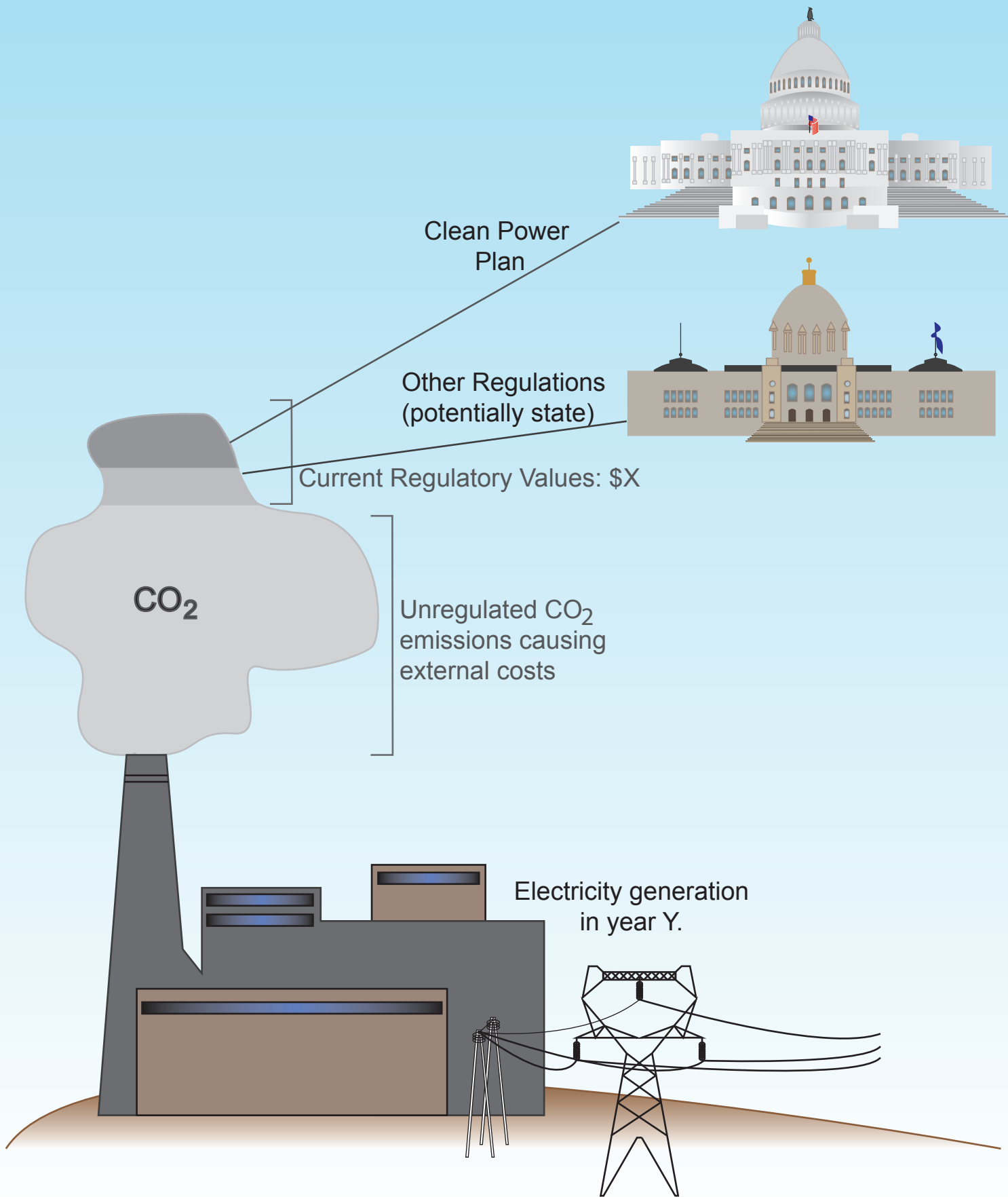
¹¹ *Id.* at 10.

Because the Environmental Protection Agency (“EPA”) established state-by-state emissions reductions targets in the Clean Power Plan (the first-ever national regulation of CO₂ from existing power plants) the Commission may reasonably predict the proportion of emissions that will be subject to this regulation. Because the CPP is not likely to eliminate all or even a majority of CO₂ emissions, those emissions will continue to exert costs on society.

At the time the Commission last decided how the regulatory and external costs should interact, little was known about CO₂ regulatory schemes, and it was reasonable that utilities not be required to apply both regulatory and external cost estimates to resource planning. At that time, the Commission decided “it would be inappropriate to use both the CO₂ value and regulatory cost estimate” for “another ton” of CO₂.¹² This reasoning remains correct. When a utility calculates the costs of emitting a given ton of CO₂ in a year, it would be inappropriate to use both the CO₂ externality value and the CO₂ regulatory cost estimate *for that ton*. That is, a given ton of CO₂ should be covered by the regulatory cost *or* the externality value. But that does not mean that in a given year, all CO₂ emitted by a utility would only have a regulatory cost or an external cost. Utilities and the Commission should assess the external costs of CO₂ emissions that will not be mitigated by carbon regulations. Figure 1, below, illustrates this concept.

¹² *Id.* at 4.

Figure 1: CO₂ Costs in Commission Dockets



The Agencies briefly responded to the CEOs' comment urging a new docket to update the interaction between regulatory and external cost estimates:

The Agencies agree that the question as to at what point an external cost is internalized is an interesting and relevant one, and notes that, while damages still exist under regulation, so too does the possibility of stricter regulations.

CEOs agree that other and more regulations may be implemented at the state or federal level. But this is not a reason to fail to update the regulatory values' application to resource planning. Because the CPP establishes specific emission reduction targets for Minnesota, the Commission is in the position now to estimate how many tons of CO₂ will be regulated. Either the state-wide CPP target or the Next Generation Energy Act goals may be a good proxy for regulated emissions, the proportion of a power plant's emissions that will need to be regulated nationally in the near term. Utilities could then apply the external cost of CO₂ to the remaining projected emissions.

III. RECOMMENDATIONS

In summary, the Clean Energy Organizations:

- 1) Support the Agencies' recommendation to move the date at which the utilities shall apply the regulatory planning values to 2022;
- 2) Do not support the Commission adopting values for use beyond 2016;
- 3) Recommend the Commission open a docket to consider how to update regulatory cost estimates to better reflect known federal or state regulations and to re-examine the relationship between the external cost of CO₂ and the anticipated regulatory cost of CO₂ to ensure consistency in resource plans.

Dated: April 21, 2016

Respectfully submitted,

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