

October 8, 2024

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/CN-22-131

Dear Mr. Seuffert:

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

The Application of Xcel Energy for a Certificate of Need for Two Gen-Tie
Lines from Sherburne County to Lyon County, Minnesota.

The Petition was filed by Xcel Energy on March 9, 2023.

The Department recommends that the Minnesota Public Utilities Commission (Commission) consider the impacts detailed in the Environmental Report, and, if the impacts are acceptable, **approve the Certificate of Need**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. Peter Wyckoff
Deputy Commissioner, Division of Energy Resources

SR/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Division of Energy Resources

Docket No. E002/CN-22-131

I. INTRODUCTION

Northern States Power Company doing business as Xcel Energy (Xcel or the Company) requests a Certificate of Need (CN) from the Minnesota Public Utilities Commission (Commission) to construct the Minnesota Energy Connection project. The proposed project includes an approximately 160- to 180-mile double circuit 345 kilovolt (kV) transmission line connecting the existing Sherco Substation in Becker, Minnesota, and a new substation in Lyon County, Minnesota, and other associated facilities, including intermediate and voltage support substations.

A. NOTICE AND EXEMPTION PETITIONS

On May 2, 2022, Xcel filed the Company's *Notice Plan Petition* (Notice Petition).¹ The Notice Petition requested that the Commission approve Xcel's proposed notice plan to communicate the Company's intent to file a certificate of need (CN) petition for two 345 kV generation-tie lines from Sherburne County to Lyon County, Minnesota (Initial Project). Also on May 2, 2022, Xcel filed the Company's *Request for Exemption from Certain Certificate of Need Application Content Requirements* (Exemption Petition).² The Exemption Petition requested the Commission approve the Company's proposed exemptions to certain filing requirements for a CN petition for the Initial Project.

On June 28, 2022 the Commission issued an order approving the Notice Petition and the Exemption Petition with conditions.³

¹ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Notice Plan Petition (May 2, 2022) (eDocket no. [20225-185473-02](#)).

² In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Exemption Petition (May 2, 2022) (eDocket no. [20225-185473-03](#)).

³ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Order on Notice Plan and Exemption Petition (June 28, 2022) (eDocket no. [20226-186932-01](#)).

B. MAIN PETITION

On March 9, 2023 Xcel filed the Company's *Application to the Minnesota Public Utilities Commission for a Certificate of Need for the Minnesota Energy Connection Project* (Petition).⁴ The Petition requests a certificate of need for an approximately 160- to 180-mile double circuit 345 kV transmission line connecting the existing Sherco Substation in Becker, Minnesota, and a new substation in Lyon County, Minnesota, and other associated facilities, including intermediate and voltage support substations (Project). Note that the proposed Project was slightly different than the Initial Project as described in the Notice Petition and Exemption Petition—one double circuit versus two single circuits. The Minnesota Department of Commerce (Department) does not consider the difference to be significant for the CN proceeding.

On May 2, 2023 the Commission issued an order finding Xcel's Petition, as supplemented by Xcel's reply comment, to be complete.⁵

On June 5, 2024 the Commission issued its *Notice of Comment Period on the Merits of the Certificate of Need Application* (Notice). The Notice established due dates for comments and specified that the following topics are open for comment:

- Should the Commission grant a certificate of need for the proposed project?
- If granted, what additional conditions or requirements, if any, should be included in the certificate of need?
- Are there other issues or concerns related to this matter?

On September 6, 2024 comments on the Petition were filed by:

- Citizens Utility Board of Minnesota, Fresh Energy, Minnesota Center for Environmental Advocacy, Center for Rural Affairs, and the Clean Grid Alliance (collectively, the Joint Commenters);
- Clean Energy Economy Minnesota;
- Department;
- NoCapX 2020; and
- Xcel.

⁴ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Petition (March 9, 2023) (eDocket nos. [20233-193783-01](#), [20233-193783-02](#), [20233-193783-03](#), [20233-193783-04](#), [20233-193783-05](#)).

⁵ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Order (May 2, 2023) (eDocket no. [20235-195506-01](#)).

Below are the reply comments of the Department.

II. DEPARTMENT REPLY

A. Xcel

1. Revised In-service Date

Xcel’s comment⁶ revised the schedule for the project. Table 1 below compares the schedule from the Petition to the schedule from Xcel’s comment.

Activity	Estimated Dates	
	Petition ⁷	Comment ⁸
Survey Access/Land Acquisition	June 30, 2025	June 2024-2025
Federal, State, and Local Permits Obtained	Throughout 2025	Q2 2025-2026
Start Project Construction	September 30, 2025	Q1 2026
Gen Ties In-Service (1,000 MW enabled)	September 30, 2027	Q3 2028
Project Complete with all substations built out	September 30, 2031	Q4 2031

As discussed in the Department’s comments,⁹ the claimed need for the project is to interconnect new generation to the existing Sherco Substation in anticipation of the retirement of the coal-powered generators at Sherco. MISO rules¹⁰ require replacement generation to achieve commercial operation within three years of the closure date of the existing facility. As a result, the Project needs to be in-service on or before 2029 to re-use Sherco Unit 1’s interconnection rights.¹¹ Therefore, the revised timing of the Project still approximately matches the retirement dates that trigger the need. Overall, the Department concludes that the revised project schedule is reasonable.

2. Revised Cost Estimate

Xcel’s comment revised the cost estimate for the proposed project. Table 2 below compares the cost estimates from the Petition to the cost estimate from Xcel’s comment.

⁶ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Xcel Energy Comment (September 6, 2024) (eDocket nos. [20249-210022-02](#), [20249-210022-01](#)).

⁷ CN Petition at 47.

⁸ Xcel Energy Comment at 3.

⁹ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, Department Comment (September 6, 2024) (eDocket no. [20249-210008-01](#)).

¹⁰ See MISO Tariff, Attachment X.

¹¹ CN Petition at 5.

Table 2: Revised Cost Estimate

Project Components	Petition¹²	Comment¹³
Transmission line	\$689 million	\$789 million
Green Segment	N/A	\$6.6 million
Sherburne County Substation	\$9 million	\$10.6 million
Terminal Substation	\$164 million	N/A
Garvin Substation	N/A	\$356.4 million
Intermediate Substation	\$24 million	\$19.3 million
Voltage Support Substation	\$253 million	\$85.4 million
Project Total	\$1.139 billion	\$1.279 billion

First, the Department notes that the fact that Xcel is reporting cost increases during the CN proceeding indicates that the Commission's general policy of including cost caps in CN Orders is working as intended. The knowledge that there likely will be a cost cap creates an incentive for the utility to disclose cost increases during the CN proceeding, when the Commission considers them, rather than during a rate case requesting cost recovery when it is too late.

Second, Attachment A to Xcel's comments updates the per mile cost estimate for the proposed Project; the estimate is now \$4.4 million per mile. In comparison, the Department's comments used an assumption that a single circuit 500 kV alternative would cost approximately \$4.1 million per mile. The gap between the per mile cost (between Xcel's proposed Project and the 500 kV alternative) is now \$0.3 million per mile; multiplied by 180-mile route, this increase means the 500 kV alternative would cost \$54 million less than the 345 kV double circuit. However, the Department's comments also relied upon Xcel's estimate that the 500 kV alternative would require four 500 kV/345 kV transformers at Sherco (costing an additional \$75 million). Even without updating the per mile cost of the 500 kV alternative, the cost of additional transformers still outweighs the lower per mile cost of the 500 kV alternative. Therefore, the Department did not pursue a comprehensive update of the single circuit 500 kV alternative.

3. Cost Cap

Xcel's comment requested that the Commission approve the proposed Project with a condition similar to the one that the Department recommended in *In the Matter of the Minnesota Power and Great River Energy for a Certificate of Need and Route Permit for the Northland Reliability Project 345 kV Transmission Line* (Docket No. E015,ET2/CN-22-416).¹⁴ This condition would require Xcel to do the following:

¹² CN Petition at 29.

¹³ Xcel Energy Comment at 8.

¹⁴ Xcel Energy Comment at 9.

1. provide a final number or cap amount within 90¹¹ days of the Commission's Order determining the route;
2. wait until the first rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers;
3. justify fully the reasonableness of recovering any cost overruns of the proposed Project from Minnesota ratepayers. Xcel Energy must justify any costs (including operations-and-management expense, ongoing capital expense—including revenue requirements related to capital included in rate base—insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding. Xcel Energy bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.

¹¹ The recommended condition in Docket CN-22-416 was for 60 days. Xcel Energy believes that a 90-day period is better suited to enable the development of refined cost estimates based on final route selection.

The Department's comments in this proceeding recommended a cost cap virtually identical to the one recommended by Xcel above.¹⁵ The main difference being Xcel's request for 90 days to provide a final cost estimate rather than 60 days. The Department agrees with Xcel's recommended cost cap, including the requested 90 days.

B. NoCapX 2020

1. Need vs. Alternatives

In addressing need NoCapX discusses the size, type, and timing of the proposed Project.¹⁶ In response, the Department notes that, under Minnesota Rules 7849.0120, the proposed Project's size, type, and timing are issues for the alternatives analysis rather than the need analysis.¹⁷ NoCapX did not demonstrate that there is a superior alternative based on the size, type, and timing of the proposed Project compared to those of reasonable alternatives.

2. Other Transmission Projects

In addressing need NoCapX discusses several other transmission projects either approved by the Commission in the past decade or currently in process at the Commission.¹⁸ NoCapX does not

¹⁵ Department Comment at 33.

¹⁶ In re *Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines from Sherburne County to Lyon County, Minnesota*, Docket No. E002/CN-22-131, NoCapX Comment (September 6, 2024) (eDocket no. [20249-210023-01](#)).

¹⁷ See Minnesota Rules 7849.0120 B(1).

¹⁸ NoCapX Comment at 11.

demonstrate how these other transmission projects can address Xcel's need for substantial quantities of new generation and enable the Company to avoid constructing the proposed Project.

III. DEPARTMENT RECOMMENDATION

Based upon the above analysis and the Department's comment, the Department:

- Has not identified any contested issues with respect to the representations made in the Petition pertaining to the certificate of need, but relies on input from MISO studies and Department-EERA's ER on some issues; and
- Concludes that the Petition has met the requirements of Minnesota Statutes § 216B.243 and Minnesota Rules 7849.0010 to 7849.0400.
 - Xcel has met each of the five criteria listed under Minnesota Rules 7849.0120 A and thus shown that "the probable result of denial would be an adverse effect upon the future adequacy, reliability, or efficiency of energy supply to the applicant, to the applicant's customers, or to the people of Minnesota and neighboring states;"
 - Xcel has met each of the four criteria listed under Minnesota Rules 7849.0120 B and thus shown that "a more reasonable and prudent alternative to the proposed facility has not been demonstrated by a preponderance of the evidence on the record;" and
 - Xcel has shown that "the record does not demonstrate that the design, construction, or operation of the proposed facility, or a suitable modification of the facility, will fail to comply with relevant policies, rules, and regulations of other state and federal agencies and local governments" as required by Minnesota Rules 7849.0120 D.

Should the Commission find, after consideration of the ER, that the proposed facility "will provide benefits to society in a manner compatible with protecting the natural and socioeconomic environments, including human health," the Department recommends that the Commission issue a CN to the Company.

The Department recommends the Commission condition approval of the proposed Project upon requiring Xcel to:

1. provide a final number or cap amount within 90 days of the Commission's Order determining the route;
2. wait until the first rate case after the proposed Project is placed in-service to recover any cost overruns from Minnesota ratepayers;
3. justify fully the reasonableness of recovering any cost overruns of the proposed Project from Minnesota ratepayers. Xcel Energy must justify any costs (including operations-and-management expense, ongoing capital expense—including revenue requirements related to capital included in rate base—insurance expense, land-lease expense, and

property/production tax expense) that are higher than forecasted in this proceeding. Xcel Energy bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.

Finally, the Department recommends that the Commission require Xcel to update the Commission regarding the composition of voltage support equipment after resource determinations have been made.

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. E002/CN-22-131

Dated this **8th** day of **October 2024**

/s/Sharon Ferguson

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