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January 27, 2014

Burl W. Haar
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**
Docket No. E999/CI-11-852

Dear Dr. Haar:

On November 6, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Cost Impact Reports* in the following matter:

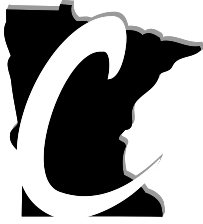
Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes
Section 216B.1691, Subd. 2e.

Attached please find the reply comments of the Minnesota Department of Commerce, Division of Energy Resources (Department). The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ KATE O'CONNELL
Manager, Energy Regulation and Planning

KO/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E999/CI-11-852

I. BACKGROUND

On November 6, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Cost Impact Reports* seeking comment on a proposed format for uniform reporting by the utilities as required by Minn. Stat. §216B.1691, Subd. 2e.

Commenting parties included:

- Wind on the Wires
- Xcel Energy (Xcel)
- Otter Tail Power Corporation
- Interstate Power & Light
- Minnesota Power
- The Minnesota Large Industrial Group and Minnesota Chamber of Commerce, (collectively, Joint Business Intervenors or JBI)

The Department offers the following reply comments.

II. DEPARTMENT ANALYSIS

A. FACILITIES USED TO COMPLY WITH THE MINNESOTA RENEWABLE ENERGY STANDARD (RES)

Xcel recommends that the cost of all facilities used to comply with the RES be included in the cost calculation, whereas Wind on the Wires recommends including only the costs of facilities acquired since 2005 because those facilities were procured specifically for compliance with the Renewable Energy Objective (REO), which preceded the RES or the RES. Wind on the Wires'

approach would exclude the cost of long-standing hydroelectric facilities, facilities mandated by Minn. Stat. §216B.2323 and 216B.2424 as part of the Prairie Island storage agreement, and some renewable facilities procured under the Public Utilities Regulatory Policies Act (PURPA).

The Department recognizes that renewable facilities obtained prior to 2005 were not specifically procured to meet the REO or RES requirements; however, to the extent these facilities are being used to meet today's RES they are part of the costs assessed to ratepayers. Furthermore, the legislative process of arriving at the REO and RES requirements involved some acknowledgement of the existence of pre-2005 renewable facilities. For example, in increasing the RES requirement applicable to Xcel from 25 to 30 percent, the statute allowed facilities acquired as part of the Prairie Island mandates, previously excluded from RES, to be used towards compliance.

Based on all of these considerations, the Department recommends that the cost of all facilities used to meet the RES be included in the reporting; however, in order to most accurately identify the cost of facilities needed to meet the requirements, the Department recommends that the utilities separate the costs of facilities acquired by utilities prior to 2005 from the costs of facilities acquired after 2005.

Several commenters recommended reporting costs of the resources utilities add to meet the Minnesota Solar Energy Standard separately from other resources. Under the Department's proposed reporting mechanism, different kinds of renewable energy would be reported separately from other types (e.g., wind, solar and biomass resources would be reported separately from each other); thus, there is agreement on the point of reporting SES resources separately from RES resources.¹

B. USE OF LOCATIONAL MARGINAL PRICE (LMP) AS POINT OF COMPARISON

A number of the commenters recommended using average locational marginal prices (LMPs) from the Midcontinent Independent System Operator (MISO) as the cost comparison with renewable costs. In resource planning, the Department has typically recommended against long-term reliance on the market for energy and capacity purchases, and the Commission has generally agreed. Consequently, reliance on LMPs over a 20-year period cannot be seen as a reasonable resource; thus, LMPs are an inappropriate cost comparison. Further, comparing the cost of renewable resources to LMPs requires an assumption that the LMPs can reasonably be known over the expected lives of the renewable resources; given the volatility of LMPs even during the last month of the "polar vortex," that assumption is not reasonable. In addition, market prices, by definition, increase with an increase in the demand for market energy, unless

¹ One of the reasons Minnesota Power cited for showing the costs of solar resources separately from other resources is that certain customers are exempted from paying for solar resources. However, under the Department's mechanism of reporting the costs per kWh on the basis of expected kWh production over the expected life of the facility, it does not matter that some customers are excluded from paying for solar resources. Nonetheless, the Department agrees with Minnesota Power that the costs of the two different types of resources should be reported separately.

supplies can increase to meet that demand. During the “polar vortex,” MISO’s LMPs remained relatively low when the front moved through and wind generation was high. This example, where wind generation materially *reduced* LMPs, indicates that comparing the market price of energy given the existence of significant renewable energy generation, and assuming the LMPs would remain the same had the renewable energy generation not existed, is unreasonable and inappropriate.

C. *THE ROLE OF RESOURCE PLANNING*

The JBI asserted that resource planning could provide an appropriate assessment of the expected future cost of renewables if a number of what they claim to be faulty assumptions are remedied. Specifically, the JBI argue that the cost of carbon should be eliminated from resource planning because it is unrealistic, and additional modeling to account for wind variability and dispatch should be undertaken.

The Department notes that the purpose of resource planning is to undertake risk assessment in order to identify the least-cost mix of resources necessary to meet forecasted future need under a variety of scenarios. As such, modeling potential carbon prices is an important part of the risk assessment. If modeling were undertaken without any assessment of the impact of the potential cost of carbon, and the utility incurred a cost due to the carbon emissions, the impact on ratepayers, and particularly on the large power customers represented by the JBI, would be significant. The risk of incurring carbon costs is no different than the risk of incurring higher costs of different kinds of fuel or capital or other risks. Thus, not only does appropriate planning require examination of such risks, it would be inappropriate to ignore such risks.

Furthermore, Minn. Stat. §216H.06 requires the Commission to establish an estimate of “the likely range of costs of future carbon dioxide regulation on electricity generation,” and to use those costs in resource acquisition proceedings. Using carbon dioxide externality costs and costs of complying with carbon regulations when acquiring resources, but not when comparing the newly acquired resources to alternatives, would be inconsistent and unreasonable. Consequently, the Department recommends continued modeling of a variety of carbon prices and other externality prices as the most prudent method for assessing possible future risks to ratepayers.

As to the JBI’s recommendation that power flow modeling be used to capture the costs of added transmission infrastructure, while the Department agrees that expected costs of transmission should be reasonably considered when adding resources, attempting to model transmission costs of hypothetical future projects is not likely to provide reliable information upon which to base a decision about an appropriate least cost resource mix. Different kinds of generation resources have different requirements, such as access to water, location to fuel resources and other considerations such as location away from population centers. Thus, if there were a comparison of transmission costs for renewable and non-renewable resources, the costs of these various considerations for different types of resources would have to be netted against each other. Such an approach would require extensive resources and likely could not meet the goals of transparency and ease of analysis in this proceeding. Thus, the Department concludes that the most appropriate way to address transmission costs is for the utilities to use bidding processes in

adding generation projects to reasonably ensure that they add the overall least-cost resources that are fueled by wind, natural gas or any fuel. Likewise, curtailment and outage costs for hypothetical future projects will depend extensively on the project's location and other considerations, and should be considered in the bidding processes.

Finally, the JBI express concerns about the perceived volatility resulting from the addition of renewable resources to a utility's generation portfolio. Wind power purchase agreements often lock in a price for the 20-year term of the contract resulting in much less pricing volatility than exists in the fossil fuel markets. In addition, the Department notes that renewables also serve to offset the volatility of natural gas. As noted above, during the recent period of cold weather, the availability of wind resources served to reduce LMPs for electricity that otherwise would have been higher due to the high demand for natural gas for heating.

II. CONCLUSIONS

The Department appreciates the helpful exchange of information in this proceeding. The following are the Department's observations and recommendations:

- 1) Overall, the Department continues to believe that IRP analysis is the best method for assessing whether additional renewable generation will result in a least-cost mix of resources and continues to perform this analysis in utilities' resource plans where the utility has the data to allow such a review. More limited analyses provide some information, but should be considered with care to avoid reaching unsound conclusions. Rather, such analyses could be considered as first steps in assessing the effects of adding any generation resource to a utility's system.
- 2) The Department recommends that utilities report their RES costs on a per-kWh basis, based on the per-kWh costs for all renewable power of a given type added in the past year and the total expected production from these renewable energy facilities over the lives of the new projects. In addition, the utilities should report the costs of these resources based on resources added before and after 2005.

For example, the per-kWh cost for all wind facilities would be based on dividing the total costs of all new wind facilities by the total expected production over all of the lives of both the power purchase agreements for wind facilities and utility-owned wind facilities. In addition, each utility should report the per-kWh cost of all renewable power resources added in the past year. Finally, each utility should report the per-kWh cost of all renewable power resources on its system.²

² The Department recognizes that when a single generation facility has been added in a given year, the per-kWh cost may be considered trade secret, thus defeating the Commission's desire to foster transparency and comparability. In such cases, information on the per-kWh cost of all renewable resources on the utility's system may still be public information since those figures would include the cost of embedded resources rather than solely the incremental cost of adding a specific resource in a given year.

- 3) To compare these costs, the utility should provide the same per-kWh calculation of whatever other new resource the utility would have added if the renewable power had not been added to its system.

If a utility indicates that growth in its needs were not large enough to warrant building a new non-renewable energy facility rather than adding the renewable power (which tends to be added in smaller increments than non-renewable resources), then the utility should report the per-kWh cost they would have incurred in adding a gas-fired combustion turbine (CT), along with the per-unit cost they would have incurred in adding a gas-fired combined cycle unit (CC). These types of facilities are the alternative resources most commonly selected in resource plans. While CT and CC resources perform different functions and thus should be expected to have different costs per kWh, they are the only comparison that can accomplish the goals of transparency and use by a wide variety of utilities.

The utility should also note whether it would be necessary to add a natural gas pipeline to deliver natural gas to the utility's system, but it would not be necessary to estimate those costs.

/lt

CERTIFICATE OF SERVICE

I, Jan Mottaz, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, 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.

Comments of the Minnesota Department of Commerce, **Division of Energy Resources**

Docket No. E999/CI-11-852

Dated this 27th day of January 2014

/s/Jan Mottaz

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Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_11- 852_Interested Parties