

June 25, 2018

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

**RE: Request for Authority to Seek Specialized Technical Services**  
Docket Nos. E002/RP-15-21, E015/RP-15-690, and E017/RP-16-386

Dear Mr. Wolf:

Attached is a request for authority to seek specialized technical services of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding its analyses of upcoming integrated resource plans.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Department's request for authority to seek specialized services**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ STEVE RAKOW  
Analyst Coordinator

SR/ja  
Attachment

## I. BACKGROUND

Approximately every two years, or as determined by the Commission, nine electric utilities file an integrated resource plan (IRP) explaining how the utility intends to meet customers' electric needs for a 15-year planning period. The overall goal of an IRP is for the Commission to determine the general size, type, and timing of resource additions during the 15-year planning period. The Commission's IRP decision guides resource acquisitions, where specific resources are selected that meet the IRP's size, type, and timing determination.

The primary tool used to analyze IRPs is referred to as a capacity expansion model (CEM). Currently, the Department and several utilities use Strategist as a CEM.<sup>1</sup> CEMs use a wide variety of inputs, representing factors such as forecasts of customer energy requirements, fuel prices, existing power plant capabilities, wholesale market prices, environmental costs, reliability requirements, and so on. CEMs use the inputs to determine least-cost expansion plans—such as new power plants that should be added or retired—that meets limits established by the user.

The Department notes that, given the uncertainty regarding the future, economic models of the benefits and costs of a 15-year IRP cannot reveal “the truth.” CEMs are, however, an important way and available tool to identify underlying assumptions, ensure that they are consistent, and test what happens when the assumptions change. That is, a CEM enables other parties to determine if a party's arguments involve plausible combinations of events and behaviors. Therefore, while CEMs do not explain everything, the discipline, transparency, and accountability imposed by development and use of a CEM is critical in a successful IRP process.

The Department has performed independent economic modeling in IRPs for two decades with CEM models that were developed to address planning for the electric utility industry. The first docket where the Department performed independent modeling, using Strategist, was E017, et al/CN-05-619. However, prior to the use of Strategist the Department performed independent modeling with a different CEM (EGEAS); for an example see Docket No. E002/RP-00-787.

IRPs, along with rate cases and certificates of need, tend to have significant participation from the public, concern utilities where the Commission has jurisdiction over various aspects of utility service, often involve decisions regarding large amounts capital, and involve the assessment of numerous Minnesota energy policy goals such as:

- achieving the state greenhouse gas emission reduction goals established in Minnesota Statutes § 216H.02, subdivision 1;

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<sup>1</sup> Utilities using Strategist include Minnesota Power, an operating division of ALLETE, Inc. (MP), Missouri River Energy Services (MRES), Northern States Power Company d/b/a Xcel Energy (Xcel), and Otter Tail Power Company (OTP). Utilities using other CEMs include Great River Energy, Interstate Power and Light Company (Interstate), and Southern Minnesota Municipal Power Agency (SMMPA). Only Minnesota Municipal Power Agency (MMPA) and Minnkota Power Cooperative (Minnkota) did not use any CEM in their most recent IRP.

- enforcing the state’s preference for renewable energy facilities in Minnesota Statutes § 216B.2422, subdivision 4;
- progress towards the renewable energy standard under Minnesota Statutes § 216B.1691; and
- progress towards the solar energy standard under Minnesota Statutes § 216B.1691, subdivision 2f.

**II. EXPLANATION FOR REQUEST**

In the summer of 2017 the Department was informed by the owner of Strategist, ABB Group, that the model would no longer be supported. While Strategist remains a valid CEM and will be used by several utilities in at least their 2019 IRPs, the lack of on-going support caused concern that Strategist may eventually be open to question regarding its up-to-date functionality. Therefore, to be proactive, the Department requested MP, OTP, and Xcel to start a process to evaluate various CEMs and select a potential replacement CEM, which the utilities could use not only for IRPs but for any other utility purposes.<sup>2</sup>

The utilities ran an open process; informing the Department and other interveners such as the Clean Energy Organizations about the steps being taken and providing the ability to participate when vendors made presentations to the utilities regarding their CEM.

The current schedule for IRPs is shown below.

**Table 1: IRP Schedule**

<b>UTILITY</b>	<b>FILING DATE</b>
<b>Great River Energy</b>	On-going
<b>SMMPA</b>	On-going
<b>Interstate</b>	On-going
<b>MMPA</b>	01-Aug-18
<b>Xcel</b>	01-Feb-19
<b>OTP</b>	03-Jun-19
<b>Minnkota</b>	01-Jul-19
<b>MP</b>	01-Oct-19
<b>MRES</b>	01-Jul-21

At this time the Department understands that the utilities are evaluating two CEMs that were selected as finalists via the evaluation process. While final decisions have not been made, at this time the Department understands that Xcel intends to use Strategist for the IRP due February 1, 2019 while OTP

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<sup>2</sup> Note that Great River Energy joined the CEM evaluation group on a voluntary basis.

intends to use the new CEM for its IRP due June 3, 2019. The benefit of this schedule is that it allows the Department and other parties to learn how to use the new CEM while reviewing the IRP of OTP, a relatively small utility. However, the schedule would involve the Department having to have access to two models (Strategist and the other CEM chosen) at least for 2019 and potentially longer, depending on events. Considering the time required to obtain a CEM, go through training, and potentially obtain databases to use in further understanding the CEM, to be ready for OTP's IRP the Department would have to trigger the CEM acquisition process in the near future. However, the funding that the Department anticipated using under Minnesota Statutes §216B.62, subd. 3b for these efforts is no longer available.

Minnesota Statutes § 216B.62, subd. 8 provides:

If the commission, in a proceeding upon its own motion, on complaint, or upon an application to it, determines that it is necessary, in order to carry out its duties imposed under this chapter or chapter 216, 216A, 216E, 216F, or 216G, to conduct an investigation or audit of any public utility operations, practices, or policies requiring specialized technical professional investigative services for the inquiry, the commission may request the commissioner of commerce to seek authority from the commissioner of management and budget to incur costs reasonably attributable to the specialized services.

As discussed above, a CEM is a specialized technical service required for the professional investigation of IRPs. In light of the need for two CEMs to evaluate the IRPs to be filed in 2019, the Department requests that the Commission determine that it is necessary for the Department to obtain specialized technical professional investigative services for both of these CEMs. The Department makes this request pursuant to Minnesota Statute §216B.62, subd. 8.

### **III. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission approve the Department's request for authority to seek specialized services. Specifically, the Department would both obtain the CEM selected by the utilities and the necessary training in preparation for IRPs to be filed in 2019, along with continuing to use Strategist for the utilities that use that CEM.

/ja

**CERTIFICATE OF SERVICE**

I, Linda Chavez, 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.

**MINNESOTA DEPARTMENT OF COMMERCE – REQUEST FOR AUTHORITY TO SEEK SPECIALIZED TECHNICAL SERVICES**

Docket Nos. **E002/RP-15-21, E015/RP-15-690, E017/RP-16-386**

Dated this **25th** day of **June, 2018**.

/s/Linda Chavez

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-386_16-386

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