

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Valerie Means	Commissioner
Matthew Schuerger	Commissioner
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In the Matter of Xcel Energy’s Wind
Repower Portfolio

ISSUE DATE: January 22, 2021

DOCKET NO. E-002/M-20-620

ORDER APPROVING WIND FACILITY
REPOWERING PROJECTS

PROCEDURAL HISTORY

On May 20, 2020, in Docket No. E,G-999/CI-20-492 (the COVID-19 Relief Docket), the Commission issued a Notice of Reporting Required by Utilities, which required all rate-regulated electric and gas utilities to file reports on investments that may assist in Minnesota’s economic recovery from the COVID-19 pandemic. The notice required utilities to provide information about ongoing, planned, or possible investments that met various conditions, including providing significant utility system benefits.

On June 17, 2020, Northern States Power Company d/b/a/ Xcel Energy (Xcel or the Company) filed its COVID-19 Relief and Recovery Report in the COVID-19 Relief Docket. Among other things, Xcel’s report discussed plans to issue a request for proposals (RFP) to repower approximately 800–1000 megawatts (MW) of its current wind facilities.

On July 27, 2020, Xcel issued the wind repowering RFP.

On September 29, 2020, Xcel filed its Petition for Approval of a 720 MW Wind Repower Portfolio (the Petition), including seven proposed repowering projects—four self-build projects and three power purchase agreements (PPAs) with developers. Xcel stated that the contracts for the three PPAs had not yet been finalized.

On October 29, 2020, Xcel filed an update (the October 29 Update), providing final details for the Ewington PPA and notifying the Commission that negotiations for the other two PPAs (West Ridge and McNeilus) were progressing slowly.

On November 2, 2020, the Commission received comments from the Sierra Club; Department of Commerce, Division of Energy Resources (the Department); and International Union of Operating Engineers, Local 49 (Local 49).

On November 12, 2020, the Commission received reply comments from Xcel and Laborers' International Union of North America Minnesota and North Dakota (LIUNA).

On November 13, 2020, the Commission received reply comments from the Clean Energy Organizations (CEOs).¹

On December 2, 2020, the Commission received supplemental comments from the Department.

On December 11, 2020, Xcel filed a letter notifying the Commission that the West Ridge and McNeilus PPAs would not be moving forward.

On December 14, 2020, the Department filed a letter recommending that the Commission approve the Ewington PPA if the Commission finds that the project is in the public interest.

On December 18, 2020, Xcel filed an additional letter.

On December 23, 2020, the Commission met to consider the matter.

FINDINGS AND CONCLUSIONS

I. Xcel's Petition

A. Bid evaluation process

First, Xcel issued an RFP, soliciting proposals from developers for wind repowering projects. The RFP did not identify a specific capacity target; Xcel stated that it was open to pursuing any project that would provide economic benefit to customers. As part of the RFP process, Xcel also proposed its own projects (referred to as "self-build" proposals).

Xcel explained that it used a four-step process to evaluate the bids:

1. First, the Company issued the RFP.
2. The day before receiving responses to the RFP, the Company submitted its own self-build proposals.
3. After receiving all bids in response to the RFP, Xcel's RFP team evaluated the bids and selected projects for contract negotiation. The self-build projects were evaluated alongside the bids received from developers.
4. The RFP team shared the results of the negotiation process with Xcel's Regulatory Team, and the two teams created the proposal to be filed with the Commission, including bid data and analysis, contracts, recommendations on which projects the Company believed merit Commission approval, and an independent third-party auditor report on the RFP process.

¹ The Clean Energy Organizations comments were submitted by Fresh Energy on behalf of Clean Grid Alliance, Fresh Energy, and Minnesota Center for Environmental Advocacy.

Xcel explained that this approach was largely the same as the Modified Track 2 process approved in its 2015 IRP docket,² with minor adjustments to accommodate the expedited timeline for the repowering projects.³

Xcel also explained the process it used to select the projects for contract negotiation. This was a four-phase analysis, including completeness review, threshold review, key parameters review, and portfolio analysis.

The Company stated that it received 11 bids from developers covering nine repowering projects; all bids passed the completeness review and were moved on to the threshold review stage. During threshold review, the bids were thoroughly evaluated to determine their expected benefits to customers by comparing the expected costs of the proposal to a baseline where the existing project would operate until the end of its expected life and then be replaced with a generic wind resource. Xcel stated that bids for two projects did not pass threshold review. Next, in the key parameters review stage, Xcel explained that it scored all remaining bids on customer value, certified diverse supplier commitment, and permitting and compliance risk.⁴

Finally, Xcel stated that it modeled the full seven-project portfolio using EnCompass software to determine whether the portfolio was expected to yield customer benefits relative to a base case where the projects were not repowered; the base case was generally based on Xcel's 2020–2034 IRP, with some updates.⁵ Xcel noted that it performed the analysis for two scenarios—one scenario assuming high externality and regulatory costs (referred to as the present value of societal cost (PVSC) scenario), and one scenario with no CO₂ costs (referred to as the present value of revenue requirements (PVR) scenario). Xcel explained that after completing the EnCompass modeling, the full portfolio of shortlisted projects did result in significant customer benefits under both scenarios.

B. Proposed projects

Based on its analysis and EnCompass modeling, Xcel proposed seven repowering projects as part of the Wind Repower Portfolio, including three PPAs (Ewington, West Ridge, and McNeilus) and four self-build projects (Grand Meadow, Nobles, Border Winds, and Pleasant Valley).

² *In the Matter of Xcel Energy's 2016-2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan With Modifications and Establishing Requirements for Future Resource Plan Filings (January 11, 2017).

³ Xcel Petition, at 9–10 (September 29, 2020).

⁴ Xcel explained that, if the full portfolio analysis in step 4 had not shown overall benefits to customers, it would have eliminated the projects that scored the lowest on the key parameters review. However, the full portfolio analysis did show overall benefits to customers, so no projects were eliminated based on the key parameters scores.

⁵ At the Commission meeting, Xcel explained that it planned to incorporate the updates to the 2020-2034 IRP modeling as part of its reply comments in that docket, scheduled to be filed in March 2021.

However, Xcel later notified the Commission that it was unable to reach agreement with the developers for the West Ridge and McNeilus PPAs, and those two projects would not be able to move forward at this time. Xcel requested that the Commission keep the current docket open for consideration of potential additional repowering projects in the future.

Although Xcel is no longer requesting approval of the West Ridge and McNeilus projects at this time, Xcel's analysis and modeling reflect the original seven-project portfolio; Xcel did not model the projects individually.

C. Cost recovery

In its initial petition, Xcel proposed to recover the costs of the self-build projects either through the Renewable Energy Standard (RES) Rider or in base rates, and noted that the Company would file those proposed recovery requests in either the annual RES Rider filing or in a subsequent rate case.

In reply comments, however, Xcel requested that the Commission authorize cost recovery for the self-build projects through the RES Rider. Xcel stated that the Commission has made this determination at the time projects were approved in certain past dockets; Xcel also argued that if it does not know in advance whether rider recovery will be approved, this would put the Company at unnecessary risk, undermining the purpose of a rider.⁶

Xcel proposed to recover the costs of the Ewington PPA through the Fuel Clause Rider.

II. Comments

A. Supporting Xcel's Petition

The Sierra Club, CEOs, Local 49, and LIUNA supported Xcel's petition.

The Sierra Club recommended that the Commission approve Xcel's petition for a number of reasons. The Sierra Club stated that it believed all of the proposed projects were cost-effective, would be in the public interest, and would give Xcel the opportunity to receive additional Production Tax Credits (PTCs). Furthermore, Sierra Club noted that the projects would increase output and extend the life of existing wind farms by using improved wind turbine technology, and take advantage of existing transmission rights, which are currently difficult to obtain.

The Sierra Club argued that Xcel had actually undervalued the repowering projects in its bid review, and in fact it would be cost-effective for Xcel to undertake even more repowering projects than it had proposed. The Sierra Club stated that Xcel's financing and performance assumptions were flawed, and Xcel had not adequately accounted for job creation and economic development benefits. Based on this analysis, the Sierra Club recommended that the Commission require Xcel to explain why additional repowering projects would not also be in the public interest.

⁶ Xcel reply comments, at 14 (November 12, 2020).

The CEOs also supported Xcel's petition but agreed with the Sierra Club's recommendation that Xcel make a compliance filing on the repowering projects that were not included in the petition. The CEOs stated that Xcel's analysis was conservative, and argued that, with more realistic assumptions, Xcel may find that additional projects should be pursued.

Local 49 commented in support of Xcel's petition because of its economic benefits, including the creation of construction jobs, extension of land leases, and improving ratepayer access to low-cost and sustainable wind power.

LIUNA also supported Xcel's petition and listed several key benefits, including leveraging existing infrastructure, reducing ratepayer costs, taking advantage of extended PTCs, limiting the footprint and impact of increased renewable generation, prioritizing union labor, and creating employment opportunities, particularly for apprenticeships and minority-, woman-, and veteran-owned contractors.

B. Opposed to Xcel's Petition

The Department recommended that the Commission deny Xcel's petition, arguing that Xcel did not demonstrate that the Wind Repower Portfolio would provide system benefits, and Xcel used an improper RFP process.

1. System benefits

First, the Department noted that Xcel had already exceeded the 1,000 MW of wind acquisitions anticipated in Xcel's last approved IRP and argued that additional wind resources were therefore not needed.

The Department also analyzed the types of energy that would increase as a result of the proposal, compared to the energy output that would be displaced or reduced. Over the first decade, the Department found that increasing wind energy output would result in an increase in market sales, a decrease in market purchases, and an increase in output from Xcel's natural gas combined cycle units. Therefore, the Department argued that "the primary benefit of the portfolio . . . represents speculation regarding the level of market prices over the next 25 years."⁷ The Department concluded that Xcel did not demonstrate that the proposed projects were needed to serve system load.

Furthermore, the Department stated that it had not received the correct data files from Xcel and had been unable to replicate the EnCompass modeling. The Department was concerned that it could not verify Xcel's analysis.

Xcel argued that, although the proposed projects were not needed to meet its IRP targets, they would lead to significant ratepayer savings and other benefits, and were therefore appropriate investments.

⁷ Department initial comments, at 28 (November 2, 2020).

Xcel and the CEOs disagreed with the Department's conclusion that the benefits of Xcel's petition were attributable to speculation on market prices, and argued that the Department's analysis was too limited. The CEOs noted that the Department only looked at incremental energy gains from repowering and ignored the higher capacity factors of the repowered projects compared to the current facilities. The CEOs argued that the repowering projects would be beneficial not only because they add additional energy, but because they reduce the cost of all energy generated from the repowered projects. Similarly, Xcel stated that one of the primary benefits of the petition was replacing existing wind capacity with newer, more efficient technology, which would reduce the overall cost of energy generated from the repowered projects.

2. RFP process

The Department also raised concerns about Xcel's RFP process. First, the Department stated that Xcel had not segregated employees who worked on the self-build proposal from those who oversaw the RFP process. The Department raised concerns with the independent audit report, noting that because of several serious errors, it was not clear that the auditor fully reviewed or understood the requirements of the RFP process.

Xcel argued that, although the RFP process was indeed not identical to the Modified Track 2 process from its 2015 IRP docket, the process was appropriate for the repowering projects. Xcel stated that, because the Company planned to accept any project that reduced costs and provided customer benefits, there was no direct competition between developer proposals and Xcel's self-build proposals, so the developer proposals had not been unfairly disadvantaged. Additionally, Xcel noted that it had a limited number of staff available with sufficient technical knowledge to develop and analyze the bids; for this reason, a small amount of staff crossover was impossible to avoid.

Finally, at the Commission meeting, Xcel acknowledged the issues with the auditor and stated that they would be using a different auditor for their next bidding process.

3. Cost recovery

Regarding cost recovery, the Department recommended further clarifications and ratepayer protection measures similar to those used in other recent wind dockets. The Department specifically recommended that the Commission clarify that any recovery through the RES Rider would require a separate Commission determination that the projects are eligible.

The Department noted that Xcel's petition implied that Xcel may seek 100% cost recovery from Minnesota ratepayers, even though the projects would be system resources. The Department recommended that the Commission limit cost recovery to only a reasonable allocation of Minnesota jurisdictional costs.

Xcel disagreed with the Department's recommendation and explained that, although the Company was in the process of seeking cost recovery in other jurisdictions, the COVID-19 Recovery Docket was the catalyst for bringing the projects forward; therefore, the Company believed it would be appropriate to request 100% recovery from Minnesota ratepayers if other

jurisdictions declined to approve cost recovery. At the Commission meeting, Xcel also stated that several economic factors—separate from the COVID-19 Relief Docket—also led the Company to propose the repowering projects.

Xcel also disagreed with the Department’s position on the RES Rider, arguing that the Commission had determined rider eligibility at the time projects were approved in some past dockets. Xcel also stated that if the Commission did not determine rider eligibility at this time, the project would be subjected to unnecessary risk because the appropriate path for cost recovery would be unclear.

4. Ewington PPA

The Department analyzed the Ewington PPA and stated that if the Commission found that the project was in the public interest, the proposed energy payments would be reasonable; furthermore, the PPA would reasonably protect ratepayers from seller non-performance. The Department recommended that the Commission clarify that if the Commission approves the Ewington PPA, this would not constitute pre-approval of any subsequent purchase of the Ewington facility or cost recovery for such a purchase. Additionally, the Department recommended certain additional ratepayer protections.

III. Commission Action

Having thoroughly reviewed the entire record, the Commission will grant Xcel’s request to repower the Grand Meadow, Nobles, Border Winds, and Pleasant Valley wind facilities, and will approve the proposed PPA for the Ewington project.

These repowering projects are in the public interest because of the significant anticipated ratepayer benefits. Even using conservative assumptions, the projects included in the portfolio represent savings to ratepayers when all appropriate factors are included in the analysis. Although the Department questioned whether Xcel demonstrated adequate benefits to ratepayers, the Department’s analysis excluded factors that the Commission believes are important. For example, the Department emphasized the potential uncertainty of future market sales and purchases. Although market sales and purchases are a factor contributing to ratepayer benefits, market participation is essential to the operation of renewable resources on the advanced electric grid and cannot be analyzed in isolation; this context is essential to a complete understanding of the ratepayer benefits of the repowering projects. As Xcel adds variable renewable generation to its system, the regional energy market provides an efficient mechanism to appropriately balance loads and resources, making the use of variable renewable resources possible. Additionally, the repowering projects allow for the use of newer, more efficient technology, and make use of existing interconnection rights, a resource that is currently in short supply throughout the Midwest region.

Approval of the repowering projects does not constitute pre-approval of rider recovery. Recovery of costs for each self-build repowering project may be appropriate either through the RES Rider or in base rates across the extended lives of the repowered projects. However, the Commission concurs with the Department that it is appropriate to require a separate Commission determination that the projects are eligible for rider recovery. Parties disagree as to whether these

projects fall under the RES Rider statute; the Commission does not have enough information to make that determination at this time but will do so in a later proceeding. Xcel will have various opportunities to request cost recovery for all appropriate costs.

Furthermore, cost recovery for the projects approved in this order is limited to the Minnesota jurisdictional allocators approved by the Commission. The proposed projects are system resources and show substantial customer benefits across Xcel's entire service territory. The Commission will limit Xcel's cost recovery from Minnesota ratepayers to the proportion of costs incurred to serve Minnesota ratepayers.

Additionally, the Commission will establish ratepayer protection measures recommended by the Department. Although the Commission believes that the repowering projects will provide significant benefits to ratepayers, it is important to ensure that ratepayers are protected in the event that these anticipated benefits do not materialize. The Commission agrees with the Department that these ratepayer protection measures are appropriate.

In future petitions that include more than one repowering project, the Commission will direct Xcel to evaluate the proposed projects both on an individual basis and as a total portfolio. Although the Commission is satisfied in the current docket that each project included in the portfolio will provide benefits to ratepayers, having detailed analysis available for each individual project would have avoided significant disagreement between parties. In the future, to avoid unnecessary disputes, Xcel must provide analysis for each individual project.

The Commission will direct Xcel to report on how the repowering projects approved in this order are consistent with the information requested in the May 20 notice issued in the COVID-19 Relief Docket. The ongoing COVID-19 pandemic has had significant impacts on Minnesota utilities and their customers, and this additional reporting will provide important information on the effect of the repowering projects on Minnesota's economy and workforce.

Finally, the Commission appreciates Xcel's ongoing efforts to reach agreement with developers on additional repowering projects. The Commission is satisfied with Xcel's analysis of the bids it received and will not require the Company to make additional compliance filings explaining why it did not pursue certain proposals. However, the Commission will keep the current docket open for consideration and potential approval of other repowering projects that Xcel may bring forward.

ORDER

1. Xcel's request to repower the Grand Meadow, Nobles, Border Winds, and Pleasant Valley wind facilities is approved.
2. Xcel may recover the costs of each self-build repowering project, including the existing rate base on each existing facility. Any recovery through the RES Rider will require a separate Commission determination that the projects are eligible.
3. The proposed PPA for the Ewington Project and cost recovery for the project through the Fuel Clause Rider are approved.

- a. Approval does not constitute pre-approval of any subsequent purchase by Xcel of the facility or cost recovery according to the terms of purchase contemplated in the PPA.
 - b. No party may transfer the proposed PPA without the consent of the Commission if that transfer would cause any material change to the terms and conditions of the existing agreement.
 - c. Xcel may not purchase the Ewington facility or equity ownership interest in the PPA seller without the consent of the Commission.
4. Docket No. E-002/M-20-620 will remain open for consideration and potential approval of other repowering projects and their associated cost recovery mechanisms.
5. For all projects approved in this order, any future cost recovery is limited to the Minnesota jurisdictional allocators approved by the Commission.
6. The following ratepayer protections apply to the projects approved in this docket:
 - a. Xcel 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, for either the Ewington PPA or the self-build portfolio. Xcel bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.
 - b. The Commission will otherwise hold the Company accountable for the price and terms used to evaluate the projects.
 - c. Ratepayers will not be put at risk for any assumed benefits that do not materialize.
 - d. Xcel customers must be protected from risks associated with the non-deliverability of accredited capacity and/or energy from the Project. The Commission may adjust Xcel's recovery of costs associated with this Project in the future if actual production varies significantly from assumed production over an extended period.
 - e. Xcel must include in its Fuel Clause Adjustment true-up filings the amount of any curtailment payments for the projects, along with explanations for the curtailments.
 - f. Xcel must clearly account for all costs incurred for the projects.
 - g. Xcel must file a compliance filing by June 30, 2021, that provides an update on the status of the projects.
 - h. Until the projects are in service, Xcel must report quarterly on project failures along with the options available to the Commission to remedy any failures that occur.
7. For future repowering petitions that include more than one project, Xcel shall evaluate the proposed wind projects both on an individual basis and as a total portfolio.

8. Xcel shall report on how the repowering projects approved in this order are consistent with the information requested in the May 20, 2020, notice issued in Docket No. E,G-999/CI-20-492.
9. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Leesa Norton, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission
ORDER APPROVING WIND FACILITY REPOWERING PROJECTS

Docket Number **E-002/M-20-620**

Dated this 22nd day of January, 2021

/s/ Leesa Norton

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-620_E002-M-20-620
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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