



414 Nicollet Mall
Minneapolis, Minnesota 55401

December 20, 2013

— VIA ELECTRONIC FILING —

Dr. Burl W. Haar
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: IN THE MATTER OF UTILITY RENEWABLE ENERGY COST IMPACT REPORTS
REQUIRED BY MINNESOTA STATUTES SECTION 216B.1691, SUBD. 2E
DOCKET NO. E999/CI-11-852

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's November 6, 2013 Notice regarding renewable energy cost impact reports.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6732 or james.r.alders@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JAMES R. ALDERS
STRATEGY CONSULTANT

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF UTILITY RENEWABLE
ENERGY COST IMPACT REPORTS
REQUIRED BY MINNESOTA STATUTES
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COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's November 6, 2013 Notice regarding renewable energy cost impact reports. Specifically, the Notice requests comments on Commission Staff's proposed guiding principals and uniform reporting system to be used for utility renewable energy cost impact reporting required under Minnesota Statutes Section 216B.1691, Subd.2e. We appreciate the work of Commission Staff in this matter and provide the following comments to respond to specific questions posed by Staff. We also discuss our recommended modifications to the proposed uniform reporting template and provide a modified template for consideration.

We support the four general guiding principals proposed by Staff:

- 1) Foster transparency;
- 2) Support consistency, coordination and non-burdensome administration;
- 3) Provide realistic representation of baseline, actual (to date) and future expected costs for achieving and maintaining standard compliance;
- 4) Enable comparison across utilities.

We believe these principals are consistent with both the statutory reporting requirement and our previous compliance filing in this docket. However, we believe there are several details that should be addressed to achieve reporting that will meet the spirit of the guiding principals.

In the following we first address each line item in the proposed reporting spreadsheet and respond to certain questions posed by Commission Staff. We conclude with a discussion of our proposed modifications to the reporting spreadsheet. Our proposed spreadsheet for consideration is provided as Attachment A.

Response to Staff Questions

A. We believe the proposed start date of 2005 and the 15-year forecast period creates a reasonable time frame.

B and C. We do not believe it is necessary to track REO and RES rate impacts separately. The RES has supplanted the REO as the driving compliance standard, and many utilities are not likely to still be tracking which renewables in their portfolios were for REO and which were for RES compliance.

In addition, clarification regarding which renewable resources should be reported in this form would be helpful to ensure consistent reporting between utilities.

Alternatives include:

- all renewables that are used to comply with the RES standard; or
- only renewables added since 2005, where the primary driving factor for acquisition of the resources were for RES compliance.

We believe the spirit of Subd.2e. is that all renewable resources that are counted towards RES compliance should be included in the cost impact calculations. In the case of Xcel Energy, we have hydroelectric resources that were constructed in the early 1900s, refuse derived fuel (RDF) plants from the 1980s, and our first large-scale wind project came on line in 1992. While these resources were not acquired specifically for the purpose of RES compliance, their generation is counted towards our goal. If all renewables are not included in the calculation, the reporting template should provide clear and unambiguous guidance on which renewables should be included.

D. Because the solar energy standard (SES) is a distinctly separate standard from the RES, we recommend that SES costs be tracked separately. The attached modified reporting template can also be used for separate reporting on the solar energy standard.

With regard to projects that are in development, we recommend that only costs that are being passed on to customers be listed in the RES reporting sheet. That is, costs for projects that are in development would not be reported until the actual

or expected in-service date. We believe this approach best represents the cost impact to customers.

With regard to levelized and annualized costs, we believe the intent of Subd.2e is to provide stakeholders with a reliable estimate of actual cost incurred for renewable energy. The use of levelized cost could potentially obscure the actual rate impacts and would not be consistent with the guiding principals proposed by Commission Staff. Levelization calculations smooth out cost variations over time. These changes in costs can be important considerations to stakeholders and should be transparently reported.

- E. With regard to how to differentiate and report renewable energy costs, as previously stated, we do not believe it is necessary to report costs for projects that are in development. Only after projects are brought on-line and the costs are being recovered from customers should the costs be reported. Our proposed modified reporting spreadsheet provides an alternate format for the reporting of costs. The costs for the RES and SES are reported separately. The total cost for RES compliance is divided into direct costs, indirect costs, and transmission costs. We discuss these cost categories in more detail in the following section. The total cost as well as the average \$/MWh are reported. We believe this approach will facilitate comparison across utilities on an average costs basis.

We also propose to include line items for avoided energy costs, avoided capacity costs, and avoided emission costs. Subd.2e requires the estimation of rate impacts associated with activities necessary to comply with RES standards. In our view, the rate impacts are not only the costs of renewables but also should also account for estimates of costs that are avoided when renewables are added to the system. For example, through the development of our renewable energy portfolio, we have been able to avoid the construction of new natural gas plants and have avoided burning additional fossil fuel across our entire generation fleet. If these cost saving are not included in the calculations, the rate impacts of renewable energy will be inflated. We believe reporting the net cost impact is consistent with the intent of the statute.

Regarding sources for renewable energy cost information, we agree that it would be preferable if all the data could be drawn from public sources. However, a large portion of cost information is not publicly available. For example, we are not aware of any public data regarding total revenue requirements for owned renewable generation. However, for data on purchased power, FERC Form 1 is a good source and is publicly available. In our modified reporting spreadsheet we provide additional details on potential sources of data.

- F. With regard to the best available source from which to report and calculate the non-renewable generation revenue requirement, we believe it is preferable to use actual sales data and annual revenues reported by the utilities instead of attempting to estimate historic revenue requirement. The first and second sections of our modified reporting template calculate the net cost of renewables, the third section reports the total revenues of the company and calculates the percentage impact of renewables. Reporting total revenue is simpler than attempting to estimate historic revenue requirements, and the two values should be comparable. Forecasted total revenues can be based on detailed revenue requirement forecast but may also utilize more general assumptions regarding growth in sales and changes in average rates.
- G. With regard to the use of a percentage measure to compare the relative cost of compliance with 216B.1691, the use of a percentage is one useful approach and is included in our modified reporting template. However, the percentage will be impacted by the level of renewables required of each utility and how close each utility is to achieving its target. Our alternate methodology also puts net costs in terms of \$/MWh. By using this measure, stakeholders can measure the relative cost effectiveness of renewables acquired by each utility.
- H. With regard to the supply-side expenditure without Minn. Stat. § 216B.1691, we believe this line item is of critical importance to the reporting template because it provides the base-line comparison for the reported RES cost impacts. Our proposed modification presents a methodology for developing assumptions for avoided costs and the calculations for the net cost of renewables. Our avoided cost methodology relies on estimates of the cost to construct new power plants and the cost to generate power from conventional power as reflected in location market prices (LMPs).

Modified Reporting Template

Attachment A is our proposed modified version of the RES reporting template. Our modifications include reporting both total costs and average costs in terms of \$/MWh. We have also subdivided renewable energy costs into the following components:

- Direct Costs – PPA payments and revenue requirements for owned projects
- Indirect Costs – Costs associated with integrating renewables, including but not limited to additional ancillary services and incremental costs associated with baseload cycling caused by intermittent resources

- Transmission Costs – Recognizing that most transmission projects provided multiple benefits in addition to the delivery of renewables, a proportional share of costs attributable to renewables would need to be developed for reporting in this template

Our modified template also includes additional detail on the avoided cost benefits that result from adding renewable generation to a utility's portfolio. These avoided cost are reported in total dollars and average \$/MWh to facilitate comparison across utilities. The avoided costs categories in the modified reporting template include:

- Avoided Energy – Fossil fuel, variable O&M, and purchased power costs that are avoided by the inclusion of renewable energy resources in the utility's generation portfolio.
- Avoided Capacity – Revenue requirements or fixed annual PPA payments associated with the construction of a new natural gas plant that has been avoided by renewable resources. The amount of capacity created by renewables should be based on the accredited capacity as specified by MISO.
- Avoided Emissions – In past years, renewables may have offset permit prices from the emissions trading program established under Title IV of the Clean Air Act Amendment. Forecasted cost may include, but do not require, estimated costs savings from reductions in CO₂ and other emissions.

Our proposed modified template concludes with total renewable energy as a percentage of sales and the net cost impact of renewables on rates.

CONCLUSION

We appreciate the opportunity to participate in the development of the reporting requirement under 216B.1691 Subd. 2e. Through our comments and modified reporting template provided for consideration, we hope to support the transparent reporting of the cost of Minnesota's renewable energy standard and solar energy standard. We look forward to working with parties to further refine and implement the reporting structure.

Dated: December 20, 2013

Northern States Power Company

A	Minn Stat 216B.1691 Subd.2a	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	
B	Capacity Associated With Renewable Energy Standard (RES) MW	<p>Forecast of total renewable resources should be based on recent resource plans and reflect compliance with the Renewable Energy Standard (RES) including the utilization of banked credits</p>																									
C	Accredited Capacity Associated With Renewable Energy Standard (RES) MW																										Total capacity of resources that are used for compliance with the Renewable Energy Standard (RES)
D	Generation Associated With Renewable Energy Standard (RES) GWh																										Total accredited capacity of resources that are used for compliance with the Renewable Energy Standard (RES) as determined by MISO
																											Generation total should correspond to generation listed in FERC Form 1. Deviations from generation listed in FF1 should be notes (e.g. projects from which only a portion of output qualifies for RES compliance)
E	Direct Expenses Associated With Renewable Energy Standard (RES) (\$millions)	<p>Direct expenses include payments under purchased power agreements (PPAs) and revenue requirements associated with utility owned renewable energy projects. Historic payments for PPA contracts should correspond to expenses reported in FERC Form 1. Revenue requirements for owned projects should include O&M expenses, book depreciation expense, deferred taxes, current taxes, capital financing expenses, property taxes, insurance, and any tax credits or other subsidies.</p> <p>Forecasts of total direct expenses should be based on recent resources plan. Assumptions regarding the cost of future renewable resources should be clearly documented including assumption regarding the availability of tax credits or other cost subsidies.</p>																									
F	Average Direct Expenses \$/MWh = E/D	Average costs expressed in \$/MWh																									
G	Indirect Expenses Associated With Renewable Energy Standard (RES) (\$millions)	<p>Indirect expenses include additional ancillary services costs and baseload cycling costs that may have been incurred as a result of adding renewable resources to the utilities generation system.</p> <p>Forecasts of indirect costs should be consistent with assumptions used in recent resource plan and reflect costs such as additional ancillary services and baseload cycling costs.</p>																									
H	Average Indirect Expenses \$/MWh = G/D	Average costs expressed in \$/MWh																									
I	Transmission Expenses Associated With Renewable Energy Standard (RES) (\$millions)	<p>Transmission expenses include approximation of transmission associated with addition renewable energy to the utilities system. Recognizing that transmission investments can be made for multiple reasons including renewable energy, utilities are asked to provide documentation related to specific transmission project and the proportion of costs deemed attributable to adding renewable energy resources</p>																									
J	Average Transmission Expenses \$/MWh	Average costs expressed in \$/MWh																									
K	Total Expenses Associated With Renewable Energy Standard (RES) =E+G+I (\$millions)	Total expenses associated with complying with the renewable energy standard																									
L	Average Total Expenses \$/MWh = K/D	Average costs expressed in \$/MWh																									

A	Minn Stat 216B.1691 Subd.2a	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
M	Avoided Energy Benefit (\$millions)	Historic avoided energy benefit should be based on historic locational marginal prices (LMPs) as published by MISO											Forecasted avoided costs should be based on forecasted LMPs or dispatch simulation													
N	Average Energy Benefit \$/MWh = M/D	Average benefits expressed in \$/MWh																								
O	Avoided Capacity Benefit (\$millions)	Historic avoided capacity benefit should be based on the cost of a natural gas combustion turbine											Forecasted avoided capacity cost benefit should reflect the forecasted cost of natural gas combustion turbine consistent with recent resource plan or resource acquisition processes. Capacity credit for new resources should reflect the first year that the utility expected to need new thermal generation													
P	Average Capacity Benefit \$/kW-mo = O/C/12	Average benefits expressed in \$/kW-mo																								
Q	Avoided Emissions Benefit (\$millions)	Historic avoided emissions costs may reflect the costs of avoided SO2 and NOx permits under Title IV of the Clean Air Act Amendment											Forecasts emission benefits may reflect the savings expected from future emission regulation but inclusion of future emission costs are not required. Assumptions regarding future emission costs should be clearly documented.													
R	Average Emission Benefits \$/MWh = Q/D	Average benefits expressed in \$/MWh																								
S	Total Avoided Cost Benefits Associated with Renewable Energy Standard (RES) =M+O+Q (\$millions)	Total avoided costs benefits associated with complying with the renewable energy standard																								
T	Average Total Avoided Cost Benefits \$/MWh = S/D	Average benefits expressed in \$/MWh																								

S	Total Net Costs of Renewable Energy Standard (RES) \$millions = L-T	Net cost of RES related activities																								
T	Total Utility Revenues \$millions	Total historic revenues can be taken from sales information reported in FERC Form 1											Forecasted total revenues can be based on detailed revenue requirement forecast but may also utilize more general assumptions regarding growth in sales and changes in average rates.													
U	Percentage Rate Impact Associated with Renewable Energy Standard (RES) % = S / (T-S)	Net cost of RES related activities in percentage terms																								
V	Total Utility Sales GWh	Total historic sales can be taken from information reported in FERC Form 1											Forecasted total sales should reflect the sales forecast used in recent resource plans or other regulatory filings													
U	Energy Associated With Renewable Energy Standard (RES) as a Percentage of Total Sales % = S / (T-S)	Percentage of sales represented by renewable energy generation.																								

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota;

by email; or

by electronic filing.

Docket No. E999/CI-11-852 RES Energy Cost Impact Reports

Dated this 20th day of December 2013

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_11-852_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129 St. Paul, MN 55116	Electronic Service	No	SPL_SL_11-852_Interested Parties
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	15347 Boulder Pointe Road Eden Prairie, MN 55347	Electronic Service	No	SPL_SL_11-852_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_11-852_Interested Parties
Andrew	Serri	aserri@bepc.com	Basin Electric Power Coopertive	1717 E Interstate Ave. Bismarck, ND 58503-0564	Electronic Service	No	SPL_SL_11-852_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_11-852_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	SPL_SL_11-852_Interested Parties
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Electronic Service	No	SPL_SL_11-852_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11-852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_11- 852_Interested Parties
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_11- 852_Interested Parties
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_11- 852_Interested Parties
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