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May 8, 2014

VIA E-FILING

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

Re: In the Matter of Minnesota Power's Utility
Renewable Energy Cost Impact Report
Required by Minn. Stat. § 216B.1691, subd. 2e.
Docket No. E-999/CI-11-852

Dear Dr. Haar:

The Minnesota Public Utilities Commission ("Commission") issued a Notice of Supplemental Comment Period on Cost Impact Reports ("Notice") on April 18, 2014, in the above referenced docket. Minnesota Power respectfully submits its Supplemental Comments in response to the Notice.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

Lori Hoyum

Attachment
cc: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

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

Docket No. E-999/CI-11-852

**SUPPLEMENTAL
COMMENTS**

I. Introduction

The Minnesota Public Utilities Commission (“Commission”) issued a Notice of Supplemental Comment Period on Cost Impact Reports (“Notice”) on April 18, 2014 in the above referenced docket. Minnesota Power (or the “Company”) respectfully submits its Supplemental Comments in response to the Notice.

II. General Comments

In its December 20, 2013 Comments in the docket, Minnesota Power laid out its initial considerations on a streamlined reporting process. One of the identified outcomes of this process is to create a reporting mechanism by which stakeholders can easily make cost impact comparisons for State renewable policies across utilities. The Company still believes this to be worthwhile undertaking and submits these Supplemental Comments with that goal in mind.

III. Responses to Topic/s Open for Comment

Minnesota Power appreciates the work done by the Department of Commerce – Division of Energy Resources (“Division”) and Xcel Energy in creating the two templates offered for consideration. After thorough review of the templates, Minnesota Power believes that Template 2 as created by the Department is the best approach to streamlining the reporting process.

The Department’s proposed template creates ease of use and presents a format that is approachable to the general public. The Company contends that the Department’s proposed template most closely reflects the guiding principle of creating a reporting system that can be utilized by stakeholders. Template 2 also allows transparency of numbers because there would be no Trade Secret information needed to create the Report. Any stakeholder would be able to pick up the Report and view all pertinent information and also compare that information across multiple utilities. The Company recognizes the Department’s approach is only a high level estimate for cost impacts based on a simplified approach and does not reflect the actual cost impact to an individual utility.

The Company is in agreement with rows A through C of the Department’s proposed Template. In Row D of Template 2 the Department recommends the use of the U.S. Energy Information Administration’s (“EIA”) most recent estimate of levelized cost for a gas-fired combined cycle (“CC”) or a gas-fired combined cycle turbine (“CT”) in the calculation for the renewable energy cost impact. After reviewing the EIA’s most recent Annual Energy Outlook¹ (“Outlook”) Minnesota Power would not recommend using the levelized cost for a CC or CT as part of the calculation due to several factors. The EIA states in its Outlook, “Since projected utilization rates, the existing resource mix, and capacity values can all vary dramatically across regions where new generation capacity may be needed, the direct comparison of Levelized Cost of Energy across technologies is often problematic and can be misleading as a method to assess

¹ “Levelized Cost and Levelized Avoided Cost of New Generation Resources in the Annual Energy Outlook 2014”

the economic competitiveness of various generation alternatives”. In contrast to this guidance, the Department is recommending the comparison of Levelized Cost of Energy calculations.

Within the EIA Outlook is a Levelized Avoided Energy Cost (“LACE”) for each technology, including both renewable and traditional technologies. The LACE is a measure of what it would cost the grid to generate electricity and provide capacity that is otherwise displaced by a new generation resource. Minnesota Power believes that a LACE for a renewable technology such as wind is a more appropriate value to use for reporting purposes as opposed to the levelized cost of energy for a CC or CT.

While the LACE is a more appropriate comparison, it does have a few challenges associated with utilizing it as a value. For example, the LACE represents the average avoided cost of a technology across the United States, and as such, does not take into consideration the regional energy mix. Also, the LACE is the levelized avoided cost over thirty years with a 2019 installation and should not be used to compare revenue requirements for the 2005 through 2019 period. The Company does not currently have a methodology identified to reconcile the issue of misaligned time periods for the comparison, but is open to suggestions from the Department or other stakeholders on possible resolutions. It is important to note the ‘misaligned time periods’ is also an issue when using the EIA’s levelized cost of energy as suggested by the Department.

Ultimately, the cost/benefit of the RES mandate is a complicated comparison and would seem to lead to consistency, conflicting objectives and comparability issues, either as proposed by the Department in Template 2 rows D-F, or by Xcel in Template 1 rows L-S of the April 18, 2014 Notice. In the Commission’s original Notice on November 6, 2013, the renewable mandate comparison is provided as a possible alternative in Attachment II: Staff’s Proposed Format, Row H. Unless all utilities use the same comparison and the complications are reconciled, the resulting theoretical net impact would not satisfy the Commission’s guiding principle of enabling comparisons across utilities. Seeing as the cost/benefit comparison was originally included as an alternative, the possibility of removing such a comparison is feasible.

IV. Clarifications

Minnesota Power reinforced that the uniform reporting process future time period should consist of the same five years as the Integrated Resource Plan's short-term action plan in its December 20, 2013 Comments. This is due to the fact that the cost impact forecasts will be more consistent if aligned with procedures already established for resource planning purposes. The Company still contends that a five year outlook is more realistic and consistent than a fifteen year outlook and will serve to provide a clearer picture to stakeholders. These values will be updated every 2-3 years with tangible assumptions and as such, the values of a five year outlook will remain relevant on a consistent basis.

Minnesota Power also seeks clarification on which renewable resources and associated costs should be included in Rows B and C of the Department's template. There is some question as to whether the utilities should include only those facilities recently built to meet RES obligations or if previously existing renewable resources such as small hydro should also be included.

V. Conclusion

Minnesota Power continues to support the process of streamlining the Renewable Energy Standard Cost Impact Reporting process. A robust and consistent process will serve to provide stakeholders with an overview of state-wide renewable energy cost impacts. The Company will continue to examine the ways in which this goal can best be achieved while keeping the Commission's guiding principles as a priority in its deliberations.

Dated: May 8, 2014

Respectfully submitted,

A handwritten signature in black ink that reads "Lori Hoyum". The signature is written in a cursive style with a large, sweeping initial "L" and a trailing flourish.

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