

Criteria Pollutants
Revised Commission Decisions Options
Filed on: July 25, 2017

Use an On-Record Value

Selection of any of the values included in Options 1-3 include those parties' concentration response function and value of statistical life.

1. Adopt Xcel's Values

Staff recommends consideration of ALJ Conclusion 27.

2. Adopt Agencies' Values

Staff recommends consideration of ALJ Conclusion 15, 20-23 and providing guidance on how to use the values, whether to use the county by county values, averaged values for a geographic range, etc.

3. Take No Action and Do Not Adopt New Values

If any of 1-4 are selected, no further decisions are necessary. If none of the options 1-4 are selected, the Commission should move to option 5.

If any of the options 1-3 are selected, no further decisions are necessary.

Modify Inputs/Take Further Action

If the Commission elects to modify inputs to the value, largely three issues will need to be decided:

- **Emissions Models and Modeling**, the emissions model to use (and within that decision are decisions relating to geographic scope and emission sources),
- **Concentration Response Function**, and
- **Value of Statistical Life**.

[Cont'd]

Emissions Models and Modeling

4. Adopt a Party's Emission Modeling Results

**This decision option differs from 1-3 in that it does not adopt any party's concentration response function or value of statistical life, but assumes their positions on geographic scope and emission source locations.*

A. Use Xcel's Emission Modeling Results

Staff recommends consideration of ALJ Conclusion 27.

B. Use the Agencies' Emission Modeling Results

Staff recommends consideration of ALJ Conclusion 15, 20-23 and providing guidance on how to use the values, whether to use the county by county values, averaged values for a geographic range, etc.

5. Modify and Rerun Emission Modeling

A. Select the CAMx Model

B. Select the AP2 Model

If 5 is Selected the Commission should provide guidance on the following topics (6-8) which would differ by models.

6. *Specify who should rerun the model and in what timeframe*

7. *The parameters by which the model should be run:*

- *Geographic Scope: national or MN-based geographic scope, or other;*
- *Emission source locations (within Minnesota, Minnesota plus 200 miles,);*
- *Emission source location sensitivity (county-by-county, 3-representative locations, 5-6 representative locations);*
- *If necessary, how values should be treated (not averaged, genericized, etc.)*
- *Output of year dollar values should be provided in (2017\$, etc.)*

8. *The process by which the model results should be evaluated (results, comment period, contested case, etc, delegate to the Executive Secretary)*

Staff views options 4 and 5 as likely mutually exclusive.

[Cont'd]

Concentration Response Function

- 9. ALJ Recommendation Point Value - 6.8%
- 10. ALJ Recommendation Range - 6.0-7.3%
- 11. ALJ Recommendation Corrected Range – 6.0-7.3%
- 12. Take some other action

Concentration Response Function Summary of Positions					
	Original	ALJ Rcmdn	ALJ Summary of Position	Final Rcmdn	Acceptable (Exceptions)
Agencies	6-14%	6.8% 6.0-7.3% if range	6-14% (7.8% not fundamentally disagreeable)	6-14%	ALJ's (corrected) Range 6.8-7.3%
CEOs	7.8-14%	<i>(Note: FOF 50 states that 6.8-7.3% is a reasonable range).</i>	7.8% (6% not unreasonable)	7.8-14%	7.8-14%: CEOs take exception to the ALJ's characterization of their position.
MLIG	NA		NA	NA	NA
Xcel	5.3-7.3%		5.3-7.3% (6.8% mean)	5.3-7.3% or ALJ Range	ALJs Range As-Is 6.0-7.3%

Value of Statistical Life

- 13. ALJ Recommendation - \$7.7 million
- 14. Take some other action

Value of Statistical Life Summary of Positions					
	Original	ALJ Rcmdn	ALJ Summary of Position	Final Rcmdn	Acceptable
Agencies	\$3.7 - \$9.5/EPA VSL (2011\$)	\$7.7m	\$3.7 - \$9.5/EPA VSL (2011\$)	\$3.7 - \$9.5/EPA VSL (2011\$)	ALJ's \$7.7m
CEOs	\$9.8/EPA VSL (2015\$)		\$9.8 Alt \$7.7 (2015\$)	\$9.8/EPA VSL (2015\$)	Exceptions = only \$9.8/EPA VSL is acceptable.
MLIG	NA		NA	NA	NA
Xcel	\$4.1 - 7.9 (\$5.9 mean) (2014\$)		\$4.1-7.9 (\$5.9 mean) (2014\$)	\$4.1-7.9m (2014\$)	\$4.1-7.7m (ALJs Number as High Value)