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May 8, 2014

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VIA E-FILING

Burl W. Haar
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 §216B.1691, Subd. 2e
Docket No. E-999/CI-11-852**

Dear Dr. Haar:

Enclosed please find the Joint Comment of the Minnesota Large Industrial Group and Minnesota Chamber of Commerce.

If you have any questions, please contact me.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:kap
Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 50
St. Paul, Minnesota 55101-2147

In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd. 2e.	Docket No. E-999/CI-11-852
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**JOINT COMMENT OF THE MINNESOTA LARGE INDUSTRIAL
GROUP AND MINNESOTA CHAMBER OF COMMERCE**

The Minnesota Large Industrial Group (“MLIG”)¹ and Minnesota Chamber of Commerce (“Chamber”)² (collectively, Joint Business Intervenors, or “JBI”), appreciate the opportunity to provide a comment in response to the Notice of Comment Period on Cost Impact Reports (the “Notice of Comment”) issued by the Minnesota Public Utilities Commission (the “Commission”) on April 18, 2014. The Notice of Comment solicited stakeholder input on the reporting templates proposed by Xcel Energy and the Department of Commerce - Division of Energy Resources (the “Department”). JBI believes the themes surrounding these issues were addressed, at least partially, in its comment filed on October 1, 2012 (“JBI 2012 Comment”) and comment filed on December 20, 2013 (“JBI 2013 Comment”). JBI submits this brief comment to respond to the Notice of Comment and further supplement and clarify its intentions.

¹ MLIG is an ad hoc consortium of large industrial customers in the State of Minnesota spanning several utilities and paying in excess of \$360 million annually for electric rates.

² The Chamber represents over 2,400 business locations throughout the state of Minnesota. As the voice of Minnesota businesses on statewide policy issues, the Chamber’s main goal is to make Minnesota’s business environment competitive relative to other states and nations. Energy is a critical component to a successful business environment. Therefore, a focal point of the Chamber’s policy is ensuring Minnesota has reliable and competitively priced energy rates.

I. INTRODUCTION

JBI's principal concern continues to be that the cost impact analysis simply be as accurate and objective as possible. To that end, all costs, including back-up and integration costs, as well as impacts associated with the risks and benefits of implementing the Renewable Energy Standard ("RES") and the Solar Energy Standard ("SES") must be considered. In fact, only by requiring uniform reporting that is consistent and comparable, can the Commission impartially implement section 216B.1691, subd. 2e of the Minnesota Statutes. JBI offers its specific comments in response to the Notice of Comment below.

II. ANALYSIS

A. Comment on Xcel Energy's Template

In concept, JBI supports Xcel Energy's proposed template. JBI appreciates the effort and thought put into the template. But like any template, there could be disagreement on the details. JBI hopes the parties can work together to resolve any differences and move this docket into application. JBI's specific concerns are set forth in the paragraphs below.

1. Historical Costs

JBI agrees that expenses associated with the RES/SES should include direct expenses, indirect expenses, and transmission expenses. And JBI appreciates the attempt to incorporate avoided cost benefits associated with RES and SES. But JBI emphasizes that the methods of these calculations may remain subject to some debate. In its initial filing, Xcel Energy compared costs of renewable resources with average monthly Minnesota hub prices.³ JBI believes this approach is not accurate and could overstate savings. Since hourly generation output and hourly prices at the Xcel Energy load zone are available, there is no reason to utilize monthly price average. It is more appropriate and realistic to use these actual prices and output to calculate the savings.

JBI also appreciates Xcel Energy's attempt to be thorough and include the avoided emissions benefit. Avoiding the costs of permits could be a legitimate benefit if accurately

³ *In the Matter of Utility Renewable Energy Cost Impact Reports*, PUC Docket No. E-999/CI-11-852, XCEL ENERGY REPORT, pg. 11 (October 25, 2011).

calculated. JBI would not, however, support an attempt to incorporate other unknown or immeasurable emissions costs that do not appear in ratepayers' bills.

2. Forecasted Costs

Looking forward, JBI believes a critical aspect of the uniform reporting process is that it should be dynamic. JBI respectfully requests updates with each resource plan filing. Specifically, JBI recommends that the utilities track the investments in the following manner. First, the actual impacts should be calculated consistent with JBI's recommendations in this and prior comments. Second, the actual impacts for years that were previously part of a forecast should be compared against the forecasted costs. JBI understands that forecasted costs will rarely, if ever, match actual costs. But the utility should explain any significant discrepancy between a forecast and actual costs. Third, the future costs should be calculated in a manner consistent with JBI's recommendations in prior comments. In other words, JBI requests that the Commission rectify the following four limitations in Strategist: (i) it does not model power flow and assumes that there are no transmission constraints; (ii) it ignores variability risk associated with renewable generation; (iii) it ignores fuel price variability; and (iv) the modeling assumptions built into Strategist fail to reflect existing regulations. In its January 2014 comment, Xcel Energy cautions that utilizing the Promod Model for a 15 year time could be very labor intensive.⁴ In response, JBI clarifies that similar to MISO, JBI recommends that utilities run Promod model runs every fifth year. The modeling results for every fifth year could (and should) be used to augment the Strategist analysis and populate the analysis regarding transmission constraints as well as the impacts of wind output variability.

With respect to future avoided costs, JBI agrees with Xcel Energy that the analysis should be based on forecasted locational marginal prices ("LMPs") or dispatch simulation. These hourly forecasts can be derived through Promod simulations because the model will not assume static LMPs in response to wind generation (as is the case today using Strategist). The analysis conducted every fifth year can incorporate the interactive impacts of wind and other generation on prices.⁵ The forecasted LMPs are a more reasonable predictor of avoided costs

⁴ See XCEL ENERGY REPLY COMMENT, January 27, 2014, pg. 3.

⁵ This approach will also alleviate the Department's issue regarding LMPs remaining constant throughout the resource planning horizon. See Department of Commerce Comment, January 27, 2014, pg. 3.

than natural gas generation because wind generation is not a one for one replacement of natural gas capacity. Furthermore, it cannot be claimed that wind predominantly displaces natural gas in the energy market since it is conventionally known to operate relatively more in the off peak hours.

B. Comment on the Department's Template

JBI does not believe it is appropriate to compare the costs of renewable generation against the cost of a gas-fired generation source. It is not clear that gas-fired generation would have been added in the absence of renewable generation. It is also apparent that gas-fired generation has been added to support renewable generation. Therefore, JBI fails to understand how this comparison would be an appropriate metric for either historical costs or future costs. JBI is also concerned with the Department's claim that wind offsets the volatility of natural gas.⁶ While that can be true, the statement's focus is on gas price volatility and ignores wind generation volatility. For example, although wind resources in MISO peaked on January 6, 2014, around 7,500 MW at the time of system peak, wind resources dropped significantly on January 7, 2014, to about 1,050 MW at the time of system peak.⁷ This variability is an example of why it is critical that a Promod-type analysis be conducted to analyze the net impacts.

III. CONCLUSION

JBI appreciates the opportunity to continue the dialogue on this important issue. JBI supports many of the proposals contained in the Notice of Comment. JBI believes, however, that certain clarifications to Xcel Energy's proposed uniform reporting template are necessary to ensure that the Commission receives accurate cost reports consistent with Minnesota law.

⁶ See DEPARTMENT OF COMMERCE COMMENT, January 27, 2014, pg. 4.

⁷ https://www.misoenergy.org/Library/Repository/Communication%20Material/Key%20Presentations%20and%20Whitepapers/January2014ExtremeWeatherEvent_PreliminaryReview_MISO.pdf

Dated: May 8, 2014

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On Behalf of Minnesota Large Industrial Group

Dated: May 8, 2014

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On Behalf of Minnesota Chamber of Commerce

CERTIFICATE OF SERVICE

I, Kathy Prestidge, 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 Minneapolis, Minnesota.

**JOINT COMMENT OF THE MINNESOTA LARGE INDUSTRIAL
GROUP AND MINNESOTA CHAMBER OF COMMERCE**

In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes
Section 216B.1691, Subd. 2e
Docket No. E-999/CI-11-852

Dated this 8th day of May, 2014.

/s/ Kathy Prestidge

Kathy Prestidge

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