

February 20, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/AI-19-810

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Petition Requesting Approval of a Shared Facilities Agreement for Interconnection Service between Crowned Ridge Wind LLC, Crowned Ridge Wind II LLC, and Crowned Ridge Interconnection, LLC.

The Petition was filed on December 20, 2019 by:

Bria Shea
Director, Regulatory and Strategic Analysis
Xcel Energy
414 Nicollet Mall (401–7th Floor)
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the Petition with reporting requirements**. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

/s/ NANCY CAMPBELL
Analyst Coordinator

SR/NC/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E002/AI-19-810

I. INTRODUCTION

On September 1, 2017 in Docket No. E002/M-16-777 the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Petition, Granting Variance, and Requiring Compliance Filing* (2017 Order). The 2017 Order approved several wind projects proposed by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company). Among the projects approved by the Commission was the 600-MW Crowned Ridge project, which came in two parts. The Crowned Ridge project includes 300 MW obtained through a purchased power agreement (PPA) with NextEra Energy Inc. (NextEra) and another 300 MW obtained through a build-own-transfer (BOT) process in which ownership of the project is transferred from NextEra to Xcel after the project is constructed.

On August 30, 2019 in Docket No. E002/M-16-777 the Company filed a letter to notify the Commission that the Crowned Ridge project may undergo a size reduction.

On December 20, 2019 in Docket No. E002/M-16-777 Xcel formally notified the Commission that the PPA has been amended to reflect a reduction from 300 MW to 200 MW and that the BOT portion was also reduced from 300 MW to 200 MW.

Also on December 20, 2019, in this proceeding, Xcel filed the Company's *Petition of Northern States Power Company for approval of a Shared Facilities Agreement for Interconnection Service Among Crowned Ridge Wind, LLC and Crowned Ridge Wind II, LLC and Crowned Ridge Interconnection, LLC* (Petition). The Company requests approval of the *Shared Facilities Agreement for Interconnection Service* (AI Agreement) between Crowned Ridge Wind, LLC (CR 1), Crowned Ridge Wind II, LLC (CR 2), and Crowned Ridge 1 and 2 Interconnection, LLC (CR Interconnection) by May 1, 2020. Regarding the AI Agreement, the Petition stated that the AI Agreement:

which is final but not yet executed – is provided as Attachment B. We expect the Agreement will be executed between CR 1 and CR 2 in January 2020 and will file it in this docket at that time.

On February 13, 2020 Xcel filed the Company's *Supplemental Filing* (Supplement), which contained the executed version of the AI Agreement per the initial Petition. The Supplement notes that the executed AI Agreement differs slightly from the version filed with the Petition.

Below are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the Petition.

I. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Company filed the Petition pursuant to Minnesota Statutes § 216B.48 and Minnesota Rules 7825.2200 (B). Regarding the need for the Commission to approve the AI Agreement, Minnesota Statutes § 216B.48 states in part:

No contract or arrangement, including any general or continuing arrangement, providing for the furnishing of management, supervisory, construction, engineering, accounting, legal, financial, or similar services, and no contract or arrangement for the purchase, sale, lease, or exchange of any property, right, or thing, or for the furnishing of any service, property, right, or thing, other than those above enumerated, made or entered into after January 1, 1975 between a public utility and any affiliated interest as defined in subdivision 1, clauses (1) to (8), or any arrangement between a public utility and an affiliated interest as defined in subdivision 1, clause (9), made or entered into after August 1, 1993, is valid or effective unless and until the contract or arrangement has received the written approval of the commission.

Regarding the standard to be applied by the Commission, Minnesota Statutes § 216B.48 states in part:

The commission shall approve the contract or arrangement made or entered into after that date only if it clearly appears and is established upon investigation that it is reasonable and consistent with the public interest... The burden of proof to establish the reasonableness of the contract or arrangement is on the public utility.

Minnesota Rules 7825.2200 (B) provides certain completeness requirements:

- B. Petitions for approval of affiliated interest contacts or agreements accompanied by the following:
- (1) a descriptive title of each contract or agreement;
 - (1) a copy of the contact or agreement, or modifications or revisions of an existing contract or agreement;
 - (3) a list and the past history of all contracts or agreements outstanding between the petitioner and affiliated interest, the consideration received by the affiliated interest for such contracts or agreements, and a verified summary of the relevant cost records pertaining to the same;
 - (4) a descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest;

- (5) competitive bidding:
 - (a) if invitations for sealed written public proposals for the furnishing of the service sought under the contract or agreement have been made, a summary of the terms of the proposals received, including the name of each bidder or representative of a bidding group; and as an exhibit to the petition, a copy of each proposal received;
 - (b) if invitations for sealed written proposals have not been made, an explanation of the decisions to that effect will be submitted.

The Commission's September 14, 1998 *Order Initiating Repeal of Rule, Granting Generic Variance, and Clarifying Internal Operating Procedures*¹ (1998 Order) also provides certain completeness requirements:

1. A heading that identifies the type of transaction.
2. The identity of the affiliated parties in the first sentence.
3. A general description of the nature and terms of the agreement, including the effective date of the contract or arrangement and the length of the contract or arrangement.
4. A list and the past history of all current contracts or agreements between the utility and the affiliate, the consideration received by the affiliate for such contracts or agreements, and a summary of the relevant cost records relating to these ongoing transactions.
5. A descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest.
6. The amount of the compensation and, if applicable, a brief description of the cost allocation methodology or market information used to determine cost or price.
7. If the service or good acquired from an affiliate is competitively available, an explanation must be included stating whether competitive bidding was used and, if it was used a copy of the proposal or summary must be included. If it was not competitively bid, an explanation must be included stating why bidding was not used.
8. If the arrangement is in writing, a copy of that document must be attached.
9. Whether, as a result of the affiliate transaction, the affiliate would have access to customer information, such as customer name, address, usage or demographic information.
10. The filing must be verified.

¹ Docket No. E,G999/CI-98-651.

The Department reviewed the Petition for completeness under Minnesota Rules 7825.2200 (B) and the 1998 Order. Based upon this review the Department concludes that the Petition is substantially complete.

B. DEPARTMENT ANALYSIS

1. Need For and Alternatives To the AI Agreement

Regarding the need for the AI Agreement, the Petition explains that “NextEra has combined them [CR 1 and CR 2] into a single Generator Interconnection Agreement (GIA) with Otter Tail and the Midcontinent Independent System Operator (MISO).”² The complication is that “MISO rules do not allow for both CR 1 and CR 2 to be listed as the Interconnection Customer on the Projects’ GIA.” Xcel, as the future owner of CR2, and NextEra formed CR Interconnection to hold the GIA. Structuring the project agreements in this manner “enables both Projects [CR 1 and CR 2] to deliver energy to the MISO system at the single POI [point of interconnection], under a single GIA.”³

Regarding alternatives to the AI Agreement, the Petition explains that “it is likely that either the Projects’ ownership structure would need to be consolidated, or one of the Projects would have to expand the Big Stone South substation and construct a new transmission line between it and the Project.”⁴ Since one project (CR 1) is under a PPA agreement while the other project (CR 2) is under a BOT agreement, the Department agrees with Xcel that consolidating the ownership structure is not a reasonable alternative. The Department also agrees with Xcel that constructing a new transmission line is not a reasonable alternative due to the increased costs and environmental impacts that would result from a second line. Therefore, the Department concludes that there is a clear need for the AI Agreement and that the alternatives to the AI Agreement are inferior.

2. Risks in the AI Agreement

The Department reviewed the AI Agreement, including the changes in the Supplement, and agrees with the Petition that the general approach of the AI Agreement is to require a party that created a cost (possibly due to an adverse event) to pay for that cost. Only when cost causation is unclear are costs assigned on a pro-rated capacity basis—here expected to be about 50 percent to CR 1 and 50 percent to CR 2.

The main risk appears to be that CR 1 will be responsible for the day-to-day management of CR Interconnection for both CR 1 and CR 2. That conceivably could put CR 1 in the position of using CR Interconnection to the benefit of CR 1 and detriment of CR 2. However, given the structure of the overall project, a single point of interconnection fed by a single transmission line required to respond

² Petition at page 2. Note that the GIA is available at: <https://cdn.misoenergy.org/Otter%20Tail%20Power%20Company-Crowned%20Ridge%20Wind%20II,%20LLC%20GIA%20G736%20J442%20ER19-2711-000416522.pdf>

³ Petition at page 6.

⁴ Petition at page 9.

to operating directions of MISO, it is not clear how this risk could manifest itself. In addition, the AI Agreement contains standard language regarding acting in a reasonable and non-discriminatory manner, not taking actions that would result in a breach of contract, acting in accordance with good utility practices, and so forth. Overall, the Department concludes that risks associated with the AI Agreement appear to be minimal.

3. Costs of the AI Agreement

The Petition notes at page 3 the expectation that “any costs associated with the operation of CR Interconnection as an affiliated interest to be *de minimis*.” This assurance of expected costs being *de minimis* is repeated in the Petition at pages 7, 9, and 10. Given the limited nature of the activities assigned to CR Interconnection and the AI Agreement, the Department suspects the costs likely will be small. However, since these costs are incurred as part of an affiliated interest agreement, the Department recommends that costs and revenues, including the resulting assignment or allocation used to share costs and revenues between CR 1 and CR 2, be reported on an annual basis. The Department notes that if an “adverse event” occurs, the costs could be more material and it would be helpful to have the reporting of costs, revenues and resulting direct assignment or allocation used to share costs and revenues between CR 1 and CR 2.

II. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission approve the Petition. The Department also recommends that costs and revenues, including the resulting assignment or allocation used to share costs and revenues between CR 1 and CR 2, be reported on an annual basis.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/AI-19-810

Dated this **20th** day of **February 2020**

/s/Sharon Ferguson

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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-810_AI-19-810

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