

March 29, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East 7th Place, Suite 350
St. Paul, MN 55101-2147

RE: **In the Matter of Establishing an Updated 2016 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation under Minn. Stat. §216H.06**
Docket No. E999/DI-15-708
Docket No. E999/CI-07-1199

Dear Mr. Wolf:

Attached are the Analysis and Recommendations of the Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Commerce Division of Energy Resources (Commerce) (collectively, the Agencies) regarding the 2016 update to the range of cost estimates for the future cost of carbon dioxide (CO₂) regulation on electricity generation, as required by Minn. Stat. §216H.06.

The Agencies recommend that the Minnesota Public Utilities Commission (Commission) maintain the current estimate of the range of likely costs of CO₂ regulation at between \$9 to \$34 per ton of CO₂ emitted, but extend the applicable date from 2019 to at least 2022.

The recommended timing of the effective date for the costs of complying with carbon dioxide regulations schedules is based on recent federal rulemakings regulating greenhouse gas emissions. On August 3, 2015, the United States Environmental Protection Agency (EPA) issued final rules regarding what is known as the Clean Power Plan, requiring states to develop state-based plans for existing power plants that will meet EPA's standards. On February 9, 2016, the United States Supreme Court stayed implementation of the Clean Power Plan. Given the uncertainty of the outcome and given that decisions about energy resources typically require long lead times, the Agencies conclude that the rules' published implementation schedule provides the earliest potential date for carbon regulation.

Under this assumption, the MPCA's plan to comply with these new standards is due by September of 2018. Given the time expected to implement the EPA's final rules (including the EPA's required timelines and compliance schedules), the Agencies anticipate that the earliest time by which electric utilities could be required to comply with the first interim compliance period for these new standards is starting in 2022.

The Agencies are available to answer any questions in this matter that the Commission may have.

Sincerely,



MIKE ROTHMAN
Commissioner
Department of Commerce



JOHN LINC STINE
Commissioner
Pollution Control Agency

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

ANALYSIS AND RECOMMENDATION OF THE
MINNESOTA DEPARTMENT OF COMMERCE
AND THE MINNESOTA POLLUTION CONTROL AGENCY

DOCKET No. E999/DI-15-708
DOCKET No. E999/CI-07-1199

I. STATUTORY BACKGROUND

Minnesota Statute Section 216H.06 states:

**216H.06 EMISSIONS CONSIDERATION IN RESOURCE
PLANNING.**

By January 1, 2008, the Public Utilities Commission shall establish an estimate of the likely range of costs of future carbon dioxide regulation on electricity generation. The estimate, which may be made in a commission order, must be used in all electricity generation resource acquisition proceedings. The estimates, and annual updates, must be made following informal proceedings conducted by the commissioners of commerce and pollution control that allow interested parties to submit comments.

The Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Commerce, Division of Energy Resources (Commerce) (collectively, the Agencies) developed a draft recommendation to the Minnesota Public Utilities Commission (Commission). As required by Minnesota Statute section 216H.06, the Agencies requested comments on the draft recommendation, establishing a comment deadline of January 14, 2016. After reviewing the comments submitted, the Agencies finalized the draft recommendation as more fully discussed below. A summary of the comments received, including the Agencies' responses, is included in Attachment 1.

Please note that the recommendation in this docket addresses only the costs of complying with specific regulations regarding carbon dioxide (CO₂) emissions, *i.e.*, *regulatory* costs, as specified by Minnesota Statute section 216H.06. In contrast, the Commission has established environmental costs (often referred to as externality costs) associated with CO₂

emissions (as well as other emissions) as required by Minnesota Statute section 216B.2422, subd. 3 through its Orders in Docket No. E999/CI-00-1636, and on October 15, 2014 ordered an update of the appropriate values for CO₂, referring the issue to the Office of Administrative Hearings for contested case proceedings under Docket No. E-999/CI-14-643. The externality cost associated with CO₂ is an estimate of the monetized damages associated with an increase (conventionally, one ton) in CO₂ emissions.

The regulatory cost of CO₂, however, only considers the cost of anticipated actions to comply with future regulation affecting electricity generators, such as a carbon tax, emissions permits, or some other regulatory mechanism, that would be reflected in rates charged to ratepayers in the same manner as other costs of electricity service. The purpose of this docket is to establish an expected range of these regulatory costs.

II. CURRENT REGULATORY BACKGROUND

There is significant federal regulatory activity underway that is expected to affect costs of CO₂ emissions from electrical generating units. Under Section 111 of the Clean Air Act, the United States Environmental Protection Agency (EPA) determines source performance standards for new and existing power plants. Section 111(b) addresses standards for new power plants,¹ while Section 111(d) addresses standards for existing plants in an effort the EPA calls the “Clean Power Plan.” The EPA recently (August 3, 2015) finalized standards for both new and existing plants to address CO₂ emissions. The final standards for new power plants were effective October 23, 2015, and for existing power plants, December 22, 2015. However, a February 9, 2016 United States Supreme Court ruling temporarily blocked implementation of Section 111(d). The United States Court of Appeals for the D.C. Circuit will hold oral arguments in June 2016. Given the uncertainty of the outcome and the long lead times typically required to make changes to energy resources, the Agencies conclude that the rules’ published implementation schedule provides the earliest potential date for carbon regulation.

Existing source performance standards under 111(d) require submittal and approval by the EPA of state plans demonstrating compliance with the standards. Under the assumption that there will be minimal changes in timelines, state rulemaking plans by the MPCA to comply with these new existing source performance standards will be due to the EPA by September 6, 2018. The EPA then has up to 12 months to approve or disapprove the state’s plan.

In its Clean Power Plan, the EPA has also proposed model trading rules to assist states in implementing the new 111(d) standards, along with a federal (trading-based) plan for states who fail to submit approvable state plans. The EPA’s model trading rules and federal plan regulations will have significant bearing on states’ decisions, and these rulemaking actions are expected to affect our future recommendations on the range of regulatory costs of carbon.

¹ New source performance standards under 111(b) require no further action by states and are applicable requirements for any new or modified/reconstructed sources.

Under this schedule, and given the time expected to implement the EPA's final rules (including the EPA's required timelines and compliance schedules), the Agencies anticipate that the earliest electric utilities could be required to comply with the first interim compliance period for these new standards is starting in 2022. The Agencies again note that this recommendation assumes no material delays due to the recent Supreme Court ruling.

III. RECOMMENDATION FOR COST RANGE

While there is somewhat more certainty regarding carbon regulation than existed in the previous update, the new federal regulations provide significant discretion to states in developing their compliance plans that significantly impacts the predicted cost of regulation. Therefore, the Agencies recommend that the Commission maintain the current range of \$9 to \$34 per ton of CO₂ emitted. The Agencies' next recommendation is expected to include an evaluation, based on information available at that time, of how the EPA's final CO₂ rules, model trading rule, and compliance decisions of other states may affect electric utilities serving Minnesota and the cost of complying with federal regulations.

IV. RECOMMENDATION TO EXTEND TIME FRAME

Given the anticipated time frame of the federal effort to finalize the model rule and federal plan and the time for states to respond by developing and implementing rules, 2019 is an unrealistic starting time for applying a regulatory cost of carbon. The Agencies see 2022 as the earliest year to reasonably assume applicability of a regulatory cost of carbon value. Therefore, the Agencies recommend that the Commission extend the initial date for consideration of the regulatory cost of CO₂ for emissions from 2019 to 2022.

The Commission's April 28, 2014 *Order Establishing 2014 and 2015 Estimate of Future Carbon Dioxide Regulation Costs* in Docket No. E999/CI-07-1199 established the range of likely costs of regulation at between \$9 and \$34 per ton, and indicated that that range would continue to be reasonable for both 2014 and 2015. The Agencies conclude that it may be reasonable for the Commission to determine that the approved range for 2016 could also be considered reasonable for 2017.

V. FINAL RECOMMENDATION

The Agencies recommend that the Commission maintain the current estimate of the range of likely costs of CO₂ regulation at between \$9 and \$34 per ton of CO₂ emitted, and change the starting date from 2019 to 2022.

SUMMARY OF COMMENTS

Clean Energy Organizations (CEO)

Comment: The CEO supports the Agencies' recommendations.

Response: Thank you for your comments and concurrence with the Agencies' recommendation.

Comment: “. . . as Minnesota's CPP State Implementation Plan is developed, the Commission should update regulatory cost estimates to reflect known factors. It may be more appropriate to model the estimated CPP regulatory costs based on restricting resource planning models to the amount of emissions permitted under the rule, or to examine utilities' CPP compliance cost estimates. . . . The Agencies should consider whether there is enough information at the time of their next recommendation to make any changes to the way CO₂ regulatory costs are accounted for in resource planning.”

Response: The Agencies will consider and incorporate information available at the time of the next update.

Comment: The CEO recommends that the Commission open a docket to re-examine the relationship between the regulatory cost of carbon and externality costs of CO₂ and how this information is applied in resource plans. In particular, the CEO invites the Commission to determine whether and at what point the regulatory costs of CO₂ may be fully internalized.

Response: Currently, the Commission's resource planning and acquisition proceedings are guided by the Commission's December 21, 2007 *Order Establishing Estimate of Future Carbon Dioxide Regulation Costs* in Docket No. E999/CI-07-1199 which states as follows:

[Center for Energy and Economic Development], the Department, the Environmental Intervenors and the Municipal Group asked the Commission to clarify that whatever estimates of CO₂ regulation costs the Commission may adopt in this docket would not apply *in addition to* the existing estimates of CO₂ externality costs.

While the calculation of externality values under § 216B.2422 is not directly comparable to the estimate of regulatory costs under 216H.06, they both reflect steps to account for the burdens that CO₂ emissions impose on third parties. When a utility calculates the costs of emitting another ton of CO₂ in any given year, therefore, it would be inappropriate to use both the CO₂ externality value and the CO₂ regulatory cost estimate. But utilities should continue to apply the Commission's CO₂ externality values otherwise.”

The Agencies agree that the question as to at what point an external cost is internalized is an interesting and relevant one, and notes that, while damages still exist under regulation, so too does the possibility of stricter regulations. This was true at the time of the Commission's December 21, 2007 Order and remains true today. Therefore, the Agencies do not believe there is sufficient justification to re-examine how these values are applied in the Commission's proceedings at this time.

Missouri River Energy Services and Western Minnesota Municipal Power Agency (MRES and Western Minnesota)

Comment: MRES and Western Minnesota generally support the continuation of the recommended range of values and time frame, but remain concerned that the recommended cost range may be higher than it should be based on regional trading markets.

Response: Thank you for your comments and concurrence with the Agencies' recommendation. Both the Regional Greenhouse Gas Initiative (RGGI), currently comprised of nine participating northeastern states, and California's Global Warming Solutions Act have established cap-and-trade systems, where an emitter must have a permit for each ton of CO₂ emitted. The price of the permit thus acts as the regulatory cost of emitting a ton of CO₂ and the permits are tradable. In the most recent 2015 auctions, RGGI permits were priced in the range of \$5 to \$6/ton while California permits were priced at around \$12 to \$13/ton. While the Agencies' recommended cost range is somewhat higher than the latest auction clearing prices in other regions, the Clean Power Plan (CPP) will likely impact these prices going forward. Given the uncertainty of the impact of the CPP on the regulatory price of CO₂ emissions (including emission permits or other compliance mechanisms) the Agencies maintain their recommendation to retain the current cost range.

Comment: MRES and Western Minnesota request that the Commission adopt one consolidated cost value rather than continue to apply an unnecessarily complex combination of regulatory and externality values in each proceeding.

Response: The Commission is statutorily required to establish the environmental (Minn. Stat. §216H.06) and regulatory (Minn. Stat. §216B.2422, subd. 3) CO₂ cost values. Because each type of cost measures something different, it is reasonable that the cost ranges established under each statute are different.

Minnesota Power

Comment: Minnesota Power supports the Agencies' recommendations.

Response: Thank you for your comments and concurrence with the Agencies' recommendation.

Otter Tail Power Company

Comment: Otter Tail does not oppose the Agencies' recommended cost range and supports recommended date for beginning application of these costs.

Response: Thank you for your comments and concurrence with the Agencies' recommendation.

Xcel Energy

Comment: Xcel Energy supports the Agencies' recommendations.

Response: Thank you for your comments and concurrence with the Agencies' recommendation.

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
Analysis and Recommendations**

Docket No. E999/DI-15-708 and E999/CI-07-1199

Dated this 29th day of March 2016

/s/Sharon Ferguson

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