

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Minnesota Power’s 2015 Integrated Resource Plan Docket No. E015/RP-15-690

In the Matter of Minnesota Power’s Petition for Approval of the *EnergyForward* Resource Package Docket No. E015/M-17-568

Minnesota Power’s 2016 Rate Case Docket No. E015/GR-16-664

Comments of the Citizens Utility Board of Minnesota

As an advocate for the state’s residential and small business utility consumers, the Citizens Utility Board of Minnesota (“CUB”) has been watching with growing concern Minnesota Power’s (the “Company’s”) ongoing delay in filing an Integrated Resource Plan (“IRP”). As noted in the timeline included in the Public Utilities Commission’s (“PUC’s” or “the Commission’s”) Notice of Comment Period issued on July 4, 2020, the Company’s last IRP was filed in 2015 in Docket No. 15-690 and approved with modifications on July 18, 2016.¹ If the Company’s request is granted, more than five and a half years will have passed since the Company last filed an IRP. We believe that allowing the Company to further delay the filing of its IRP is inconsistent with Minnesota regulations pertaining to the IRP requirements as well as with public policy underlying those requirements. Ultimately, we believe it is in the public interest for the Commission to grant variances from established IRP filing requirements only when the value added as a result of the variance is consistent with the public interest and outweighs the value lost due to lack of transparency and collaboration in the IRP process. From our perspective, five and a half years is an unacceptable amount of time for the Commission, and the public, to go without having deeper insight into the Company’s resource planning.

For the purposes of discussing the Company’s extension/variance request, we first offer a summary of applicable regulations and the public policy considerations underlying those regulations and discuss why we believe careful adherence to applicable regulations, policies and procedures in the IRP context is important, both in this docket and in future IRP dockets. We then react specifically to the factors the Company lists as necessitating further delay of its IRP filing. Finally, we discuss two resource plan issues that particularly warrant timely consideration. We conclude by recommending that the Commission deny the extension/variance request.

¹ Minnesota Public Utility Commission, *Notice of Comment Period*, Docket No. E-015/M-17-568 (June 4, 2020), at 1-2 (the Commission’s Notice includes a timeline of the Company’s activities with respect to the Company’s IRP filing).

A. Summary of Key Minnesota Regulations and the Policies Behind Them

Minn. Stat. 216B.2422 Subp. 2 requires utilities to file a resource plan with the Commission “periodically in accordance with rules adopted by the Commission” and authorizes the Commission to approve, reject, or modify the plan “consistent with the public interest.” Based on this authority, the Commission promulgated rules codified in Minnesota Rules Chapter 7843 clarifying how often IRPs must be filed and what factors the Commission should consider when deciding whether to approve, deny, or modify an IRP. CUB recommends that the Commission consider each of these rules, and the policies behind them, when evaluating whether to grant the Company’s extension/variance request.

1. The Policy Behind the “Every Two Years” Requirement

Minn. Rule 7843.0300 Subp. 2 states a utility “shall” file an IRP beginning in 1991 or 1992 and “every two years afterward.” In a Statement of Need and Reasonableness published in 1990 in support of Minnesota Rules Chapter 7843 (the “Chapter 7843 SONAR”), the Commission described the reasonableness and need for timely, periodic resource planning as follows:

The need for least-cost planning has become more and more apparent over the past decade or two, as load growth has become less predictable, the number and cost of utility resource options have increased, and concern over the potential consequences of pursuing certain options has multiplied. As a result of these changes, the utility and its ratepayers face a greater chance of adverse consequences from improper planning decisions.²

Though Minn. Rule 7843.0300 Subp. 2 and the Chapter 7843 SONAR were written 30 years ago, the need for least-cost planning on a regular, timely basis is just as prevalent in 2020 as it was in 1990. The price of renewable energy has declined significantly since Minnesota Power last filed an IRP. The levelized cost of energy generated by wind declined by between 12 and 32 percent between 2015 and 2019, according to a widely cited analysis by the financial service and asset management company, Lazard. The cost of utility scale solar energy has declined by more than 30 percent over the same period. Both renewable energy options are now considerably less expensive than coal and typically less expensive than natural gas generation, as well. Since 2015, wind and solar have lost their categorization as “alternative energy” resources in Lazard’s analysis and are now considered on par with “conventional” generation sources like coal and natural gas.³ In addition, consumer demand is changing, driven by increasing energy efficiency, distributed generation, electric vehicles, and changing consumer demands. Echoing the 1990 Commission, it remains true today that, “as a result of these changes, the utility and its ratepayers face a greater chance of adverse consequences from improper planning decisions.”

² Minnesota Public Utilities Commission, *In the Matter of the Proposed Adoption of Rules Governing the Resource Planning Process for Electric Utilities, Minn. Rules, Parts 7843.0100 to 7843.066: Statement of Need and Reasonableness*, Reviser Number R-01617 (Jan. 19, 1990), available at https://www.leg.state.mn.us/lrl/sonar/sonar_results?searchtype=agency&agencyids=85

³ Lazard. *Levelized Cost of Energy Analysis*, Version 9.0 (2015) and Version 13.0 (2019).

In order for resource planning to be most effective, IRPs must be filed on a regular basis and continuously adjusted to meet shifting needs of consumers and the constantly evolving economic, environmental, technological, and regulatory factors that influence energy use, production, and transmission. In the period between a utility's IRP filings, the utility alone has visibility into its plans and the full picture of factors impacting resource decisions. In this opaque period, decisions are made regarding procurement of additional generation resources, demand response programs and rate design options that affect the utility's load curve, distribution system investments that affect resource need, and more. The IRP is crucial so that the public and the Commission can understand the *current* (or at least updated) context in which these choices are made and the impacts that they have on energy and capacity needs and resources. Delaying such a review increases the likelihood that decisions are made that are inconsistent with the public interest.

2. *The Policy Behind the Commission's "Five Factor" Test*

Minn. Rule 7843.0500, Subp. 3 establishes five factors the Commission considers when determining whether the approval, denial, or amendment of an IRP is in the public interest. Namely, the Commission evaluates IRPs on their ability to:

- A. maintain or improve the adequacy and reliability of utility service;
- B. keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints;
- C. minimize adverse socioeconomic effects and adverse effects upon the environment;
- D. enhance the utility's ability to respond to changes in the financial, social, and technological factors affecting its operations; and
- E. limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors that the utility cannot control.

The Commission's Chapter 7843 SONAR describes the need for and reasonableness of each of the "five factors" in permitting the Commission to meaningfully review an IRP. For example, the 1990 Commission noted about Item B: "the Commission recognizes the logical connection between low rates and state goals such as promoting economic development, creating jobs, and minimizing the problems of low-income customers." The 1990 Commission further recognized, in comments about Item D, that "planning errors across the United States have translated into billions of dollars of plant disallowances and/or rate increases [and it] is possible to minimize the effect of planning errors if utility plans remain flexible and respond to changing conditions." Finally, the 1990 Commission noted that:

Item E indicates that resource options and resource plans will be evaluated on their ability to 'limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors which the utility cannot control.'" [...] These factors cannot be entirely controlled by the utility or the Commission. Yet, these factors can have a large effect on a utility and its customers

(e.g., through rate increases and environmental quality). As a result, it is reasonable during resource planning to assess the risk posed by the various resource options and resource plans.

Again, we believe the 1990 Commission's comments about the importance of resource planning based on each of these factors continue to be relevant today. Multiple state agencies and institutions, including the Commission, are actively promoting economic development and job-creation initiatives, many of which are specifically designed to address inequities affecting low-income customers. Utilities, including the Company, are currently navigating quickly changing conditions that are likely to remain changeable and uncertain as our communities, state, and nation continue to adjust to the fallout stemming from the COVID-19 Pandemic. And an unprecedented global pandemic coinciding with intense social unrest sparked by an event occurring within our own state exemplifies as well as anything the need for utilities to "limit the risk of adverse effects on the utility and its customers from financial [and] social [...] factors which the utility cannot control." In order to allow the Commission and other stakeholders the opportunity to meaningfully understand and evaluate the Company's resource planning alongside the economic development initiatives, COVID-19 responses, and other actions addressed in other active dockets, the Commission should not permit the further delay of the Company's IRP filing.

3. The Procedure for Requesting the Extension of an IRP Filing Deadline

In its Extension/Variance Request filed on May 29, 2020, the Company does not directly cite any applicable regulation upon which it bases its extension/variance request, though it generally lists and summarizes in Attachment A thereto numerous rules and statutes it identifies as applicable. In Attachment A, the only rule listed that potentially applies to an extension/variance request is Minn. Rule 7843.0300. Minn. Rule 7843.0300 Subpart 4 reads as follows:

Before submitting a proposed resource plan, the utility may be exempted from a data requirement of parts 7843.0100 to 7843.0600 if the utility (1) submits a written request for an exemption from specified rules and (2) shows that the data requirement is unnecessary or may be satisfied by submitting another document. A request for exemption must be filed at least 90 days before the resource plan is due. Interested persons or parties may submit comments on the request within 30 days of the date the request is filed. As soon as practicable, the commission shall provide a written response to the request and include the reasons for its decision.

In its Chapter 7843 SONAR, the Commission noted, in part, about Minn. Rule 7843.0300:

Under subpart 4, the Commission will allow a utility to request exemption from a data requirement upon good cause shown. Grounds for exemption are lack of necessity for certain information and availability of alternative information which may be more suitable than that called for under the rules.

In light of these comments, and the language of Subpart 4, itself, we believe the primary purpose of Subpart 4 is to permit utilities to request an exemption from a particular substantive "data requirement." It is awkward for the Company to rely on Minn. Rule 7843.0300 Subpart 4 (if that is the Company's intention)

to request an extension of, or variance from, the filing deadline; it is not clear the 1990 Commission had extensions of filing deadlines in mind when drafting this rule.

That said, CUB acknowledges and does not question that complex socioeconomic, environmental, regulatory, technological, political, and practical factors reasonably require the Commission to have flexibility in enforcing filing deadlines and other requirements upon utilities subject to its jurisdiction. We also acknowledge without question that other Minnesota rules grant the Commission broad discretion to approve variances to filing deadlines and other Commission rules. Namely, Minn. Rule 7829.3200 Subp. 1 broadly allows the Commission to grant a variance to its rules when it determines the following requirements are met:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

Though the Commission's authority to grant variances is broad, we recommend that the Commission grant variances only when the value added as a result of granting the variance outweighs the value lost when a rule is not strictly enforced. In order for the Commission to make this assessment, we believe the burden for addressing each of the three requirements found in Minn. Rule 7829.3200 should rest on the party requesting the variance. Though the Company has made arguments as to why making a timely IRP filing would burden the Company, the Company has failed to adequately address why granting the variance "would not adversely affect the public interest" and why granting the variance "would not conflict with standards imposed by law," including the rules cited above and in Attachment A to the Company's extension/variance request.

B. CUB's Reaction to the Company's Reasons for the Extension/Variance Request

In requesting a variance from the IRP filing deadline, the Company primarily argues that meeting the filing deadline would be burdensome on the Company. Specifically, the Company cites economic uncertainty the COVID-19 Pandemic creates for MP's large customers, the implementation of a new capacity expansion modeling tool, EnCompass, and the inability to engage in in-person stakeholder meetings regarding the Boswell Energy Center as reasons why an extension is warranted. The Company also notes that Governor Walz's "stay at home" orders have made it more difficult for the Company's staff to address myriad issues and tasks. CUB respectfully disagrees that the burdens the Company cites are sufficient to warrant a delayed IRP filing.

First, CUB believes the effects of the COVID-19 pandemic, and the economic uncertainties that follow, support the need for *more immediate* planning, not less planning or delayed planning. As Minnesotans strive to adjust to the economic damage and uncertainty resulting from the Pandemic, many will face

changing financial burdens and hurdles that will likely continue for months or even years to come. Though we acknowledge that a six month extension will allow, as the Company suggests, “additional insight”⁴ into the pandemic’s impact on customer’s energy needs, no one can predict the value and depth any such insight will or will not bring to the IRP planning process. It is quite possible that, six months following the current IRP filing deadline, considerable uncertainties will remain as to the lasting impact of the Pandemic. Extending the Company’s IRP filing merely kicks the can down the road without clear indication that such a kick will add any value to the process.

Second, holding meetings, Commission hearings, and even U.S. Supreme Court oral arguments remotely has become a new reality. Online meetings, though less desirable, have clearly become an acceptable substitute for in-person meetings during these unprecedented times. We respectfully disagree with the suggestion that the disruption caused by Governor Walz’s stay at home orders or inability to hold in-person stakeholder meetings regarding the Boswell Energy Center prevents the Company from meaningfully interacting with stakeholders on this initiative.

Third, though we do not question or make light of the impact Governor Walz’s orders have had on the Company and its workforce (CUB employees, too, have been similarly affected), we believe the potential burdens imposed upon the Company’s ratepayers resulting from a further-delayed IRP filing outweigh the known burdens imposed upon the Company and its workforce resulting from Governor Walz’s orders. Many Minnesota workers have had to adjust to working from home, and we have now had several months to make those adjustments. We also respectfully note that the recent settlement of the Company’s rate case removes what would have been a time-intensive process from the plates of Company staff devoted to preparing Commission filings. We believe that this should free up staff resources to devote more time and attention to an IRP filing.

In short, we do not believe that the Company has demonstrated that filing an IRP in a timely fashion imposes an “excessive burden” upon the Company. Therefore, the Company has not met requirement under Minn. Rule 7829.3200 Subp. 1.A, let alone those found in Subp 1.B or 1.C, for demonstrating why a variance is warranted.

C. Timely action is required to realize potential benefits from securitization and changing Boswell dispatch

Minnesota Power’s upcoming IRP includes at least two additional issues that warrant attention as soon as practicable: potential changes to how the Boswell Energy Center (“Boswell”) is dispatched and consideration of securitization.

First, evidence strongly suggests that ratepayers could see immediate savings from changing Boswell from a self-committing resource to economic dispatch. In addition, changing Boswell to economic dispatch could have secondary effects on other decisions in Minnesota Power’s resource mix. The Department of

⁴ Minnesota Power, *Extension/Variance Request*, Docket No. E015/M-17-568 (May 29, 2020), at 6.

Commerce has concluded that Boswell Units 3 and 4 operate at a net loss over 30 percent of the hours for all months when there has not been a lengthy maintenance outage, and concludes “that a more detailed analysis of both Boswell unit 3 and Boswell unit 4 is merited.”⁵ A May 2020 analysis by the Union of Concerned Scientists estimates that Minnesota Power would see \$13.7 million in gross benefits from switching Boswell to economic dispatch.⁶ Xcel Energy and Otter Tail Power, facing similar circumstances with their coal plants, are transitioning quickly from self-commitment to economic dispatch, saving customers millions of dollars and significantly reducing greenhouse gas emissions.⁷

Second, securitization must be addressed in a timely manner if it is to help mitigate the costs of stranded assets. The Commission ordered Minnesota Power to file a securitization plan for the Boswell units “to address any depreciation expenses that will remain unrecovered at the end of Unit 3 and 4’s expected service lives” and “to find a solution to the problem of stranded fossil-fuel investments.”⁸ The securitization plan was ordered in Minnesota Power’s 2016 rate case, particularly because that rate case extended depreciation on the Boswell plant beyond its expected operating life. Though the depreciation schedule has since been re-aligned with the plant’s expected operating life,⁹ our region continues to see accelerated economic retirement of coal plants, increasing the stranded asset risk that the Commission seeks to address by exploring securitization. Furthermore, enabling securitization in Minnesota may require legislative action, putting further pressures on the timeline. CUB commends Minnesota Power for its work on the securitization plan, particularly in contracting with the Rocky Mountain Institute to conduct a detailed examination. It is important that the Commission conduct its consideration of this plan as soon as possible if the tool is going to be useful for the transition of Minnesota Power’s generation fleet.

Should the Commission grant Minnesota Power’s request for a delay in its IRP filing, CUB suggests that it require the Company to move forward with the consideration of Boswell dispatch options in Docket No. 19-704 and the securitization plan filing on the current schedule. The Company states that “the comprehensive conclusions of the Company’s securitization research and modeling is closely tied to the outcomes of both the Baseload Retirement Study as well as its IRP,” and that it can report only “some key takeaways and high level learnings” prior to the completion of the Baseload Retirement Study and IRP. If the securitization plan were to proceed on a faster timeline than the IRP, CUB suggests the Commission require the Company to consider multiple hypothetical retirement dates for Boswell Units 3 and 4, including at least one accelerated retirement option, and to discuss the necessary elements of enabling legislation.

⁵ Minnesota Department of Commerce, Division of Energy Resources, *Public Comments*, Docket No. E999/CI-19-704 (June 8, 2020) at 9-11.

⁶ Daniel, Joe et al. “Used, But How Useful? How Electric Utilities Exploit Loopholes, Forcing Customers to Bail Out Uneconomic Coal-Fired Power Plants.” (May 2020) at 45.

⁷ Minnesota Public Utilities Commission, May 21, 2020 Hearing, Docket No. E-002/M-19-809 (written order pending); Otter Tail Power Company, *Reply Comments*, Docket No. E999/CI-19-704 (January 28, 2020).

⁸ Minnesota Public Utilities Commission, *Findings of Fact, Conclusion, and Order*, Docket No. E-015/GR-16-664 (March 12, 2018) at 14-15.

⁹ Minnesota Public Utilities Commission, *Order Granting Reconsideration in Part, Revising March 12, 2018 Order, and Otherwise Denying Reconsideration Petitions*, Docket No. E-015/GR-16-664 (May 29, 2018) at Order Point 1a.

D. Conclusion

CUB respectfully recommends that the Commission deny Minnesota Power's request for an extension for submitting its IRP, Baseload Retirement Study, and Securitization Plan.

If the Commission does grant the Company an extension to its IRP filing, CUB suggests that the Commission (1) require that the Company move forward with the review and potential switch to economic dispatch of the Boswell Energy Center in Docket No. 19-704 and (2) require the Company to file its Securitization Plan on the current schedule, including a review of multiple hypothetical retirement dates for Boswell and a discussion of the necessary elements of legislation to enable securitization.

Respectfully Submitted,

July 1, 2020

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