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March 13, 2019

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

RE: Minnesota Power's Industrial Demand Response Product
Docket No. E-015/M-18-735

Dear Mr. Wolf:

Enclosed please find Minnesota Power's Reply Comments in the above referenced Industrial Demand Response Docket. Feel free to contact me with any questions related to this matter.

Respectfully,

Jennifer J. Peterson
Manager – Regulatory Affairs

JJP:sr
Attach.
c: Official Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Petition for Approval of Minnesota Power's Industrial Demand Response Product

Docket No. E015/M-18-735

MINNESOTA POWER
REPLY COMMENTS

I. INTRODUCTION

On January 2, 2019, the Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment Period ("Notice") on Minnesota Power's newly proposed suite of Demand Response ("DR") product options for its largest industrial customers. The Department of Commerce ("Department") filed initial comments on Minnesota Power's proposed DR products, as did the following organizations: Fresh Energy, the Advanced Energy Management Alliance ("AEMA"), the Large Power Intervenors ("LPI"), the Citizens Utility Board of Minnesota ("CUB") and the Office of the Attorney General ("OAG"). Minnesota Power (or, "the Company") appreciates all of the continued collaboration from interested stakeholders on the development of this innovative DR product, which represents the first DR program in the state to include an economic curtailment option, in addition to curtailment for emergency purposes. In these Reply Comments, the Company responds to the specific requests for additional information from the Department, along with issues raised by other stakeholders. Overall, the Company appreciates the recommendations from the Department, LPI and Fresh Energy that the Commission approve the Company's proposed Products A, B and C.

Minnesota Power continues moving towards a cleaner energy future with a projected 2025 energy mix that includes 44 percent renewable energy and a 40 percent reduction in carbon emissions by 2030. DR programs represent an efficient, flexible, customer-driven resource to work alongside renewable energy resources to maintain system reliability and reduce the need for new peaking generation assets. As the OAG noted in its Initial Comments, no other regulated utility in Minnesota offers an economic interruption DR product, as Minnesota Power is proposing in this Docket. The Company's proposed DR products will leverage the largest amount of industrial DR capability in the state and through innovative, forward looking products that are responsive to both policymakers and customer interests.

II. RESPONSE TO DEPARTMENT RECOMMENDATIONS

In its Initial Comments filed on February 20, 2019, the Department requested that Minnesota Power provide the following information in Reply Comments:

A. Explain if the $5/MWh would be retained by the Company or returned to customers via the Fuel and Purchased Energy Adjustment ("FPE");
B. Discuss if there is significant risk of there being an event where the Company is not able to purchase enough energy from the market to account for customers buying through the Firm Load Control Period when MISO is NOT in an emergency condition;
C. A discussion of the rate impacts for a customer if they are under EITE pricing and one of the Company's DR products, specifically Product B;
D. Further support its proposal to recover the Physical Interruptible Energy Credit of Product B through MP's FPE, including justification for any rule variance that may be required, and;
E. Clarification as to whether customers participating in Product B would be charged the applicable fee associated with whichever cost recovery might be implemented.

Finally, while Minnesota Power is agreeable to the Department's recommendation to require an annual compliance filing with the information listed in its Initial Comments, it believes additional quarterly reporting as requested by some stakeholders is unnecessarily burdensome and the Company does not support that recommendation.

A. <u>Discussion Regarding the $5/MWh Charge</u>

As stated in the Company's December 7, 2018 Petition, during a Firm Load Control period customers will have the option to buy through or reduce their load. Through many customer and stakeholder meetings, these large industrial stakeholders stated their need for a buy through provision to ensure flexibility in their operations and the opportunity to make economic decisions that are required to compete in a global marketplace. If the customer elects to buy through during a Firm Load Control period, the energy charge will be based upon the Company's hourly incremental energy costs during the time of the sale, including MISO costs incurred by Minnesota Power, plus a $5.00/MWh adder. The incremental energy cost is determined for each hour which energy is taken in the buy through provision and shall include fuel costs associated with Minnesota Power generating energy to serve this need, or the cost to purchase energy in the wholesale market. For clarity, incremental energy is the remaining energy after the assigning of lower cost or renewable energy to all firm retail and firm resale customer requirements, and all inter-system sales.

The $5/MWh adder will be retained by the Company to account for the portion of fixed costs that are included in the current Large Power firm energy rate, which will allow Minnesota Power to be made partially whole. The fixed cost recovery included in the firm energy rate is $6.78/MWh, which is calculated by taking the Large Power firm energy cost of $27.78/MWh minus the $21.00/MWh base cost of fuel. However, at the time of Minnesota Power's next rate case the adder becomes a revenue credit that will benefit all customers.

B. Discussion of Risk Related to Customer's Buy Through Option

As described in the Petition, a participating DR customer has the option to buy through at an incremental energy rate, which can result in less than the theoretical annual maximum of 90,000 MWh being curtailed. The actual amount of curtailed energy will also vary depending on the number of customers participating in the product. The buy through option provides the customer with the flexibility to make an economic business decision of whether they should reduce energy usage or continue to operate. Depending on the cost of buy through energy and the status of operations, the participating industrial customer will make a decision to either curtail demand or buy through. During an emergency event the DR customers will not have the buy through option and DR customers will reduce demand so that system reliability can be maintained. By participating in Product B, the DR customer takes on both the risks of being physically curtailed to maintain system reliability and the price risk for buy-through energy.

The Company is not aware of significant risk from an event where energy cannot be purchased to meet the buy through energy need in non-emergency operations, as Minnesota Power participates in the MISO market. A benefit of this market is that if the Company does not have its own generation to meet customer needs, then other resources participating in the market can provide the needed energy during normal system conditions. Minnesota Power has not been in a situation where the system was in non-emergency operations and energy from the greater MISO market was not available to purchase. If the MISO market did not have energy to make available they likely would be in an emergency procedure and the DR customer would be curtailed for that reason. The risk that does exist is if the system is tight on energy availability that the price of energy purchased to meet the buy through need may be high. However, this price risk is borne by the industrial customers participating in this DR product. Therefore, Minnesota Power assesses the risk of not being able to purchase energy during non-emergency operations as minimal.

C. Rate Impacts of Simultaneous EITE and DR Participation

Though the Energy Intensive Trade Exposed ("EITE") rate is a separate product from the DR suite proposed in this Docket, some large industrial customers that are currently on EITE could also be enrolled in the DR program at the same time.[1] For those EITE eligible customers[2], the average rate reduction received was 5.0 percent in January of 2019 for the EITE load factor discount. If the proposed DR Product B was fully subscribed to, the total combined discount the average EITE customer would receive for both EITE and participating in the DR program would be 6.8 percent under Allocation Method #1 (as outlined in Minnesota Power's December 7, 2018 Petition), and 7.4 percent under Allocation Method #2. The proposed DR rate accounts for a 1.8 – 2.4 percent decrease in addition to the 5.0 percent discount for EITE. However, it should be noted that the individual customer discounts could vary greatly depending on individual circumstances that determine customers' ability to receive both the high load factor discount and their degree of participation in the demand response program. It should also be noted that the apparent discount from the proposed DR rate is the result of the system capacity and/or energy benefit being provided

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[1] The EITE rate term was set at four years per the MPUC's Order in Docket No. E015/M-16-654 and is currently set to expire in February 2021.

[2] Docket E015/M-16-664. MPUC Order Dated December 21, 2016. The eleven EITE customers are: ArcelorMittal-Minorca Mine, Blandin Paper Company, Boise Paper Company, Hibbing Taconite Company, Magnetation, Mesabi Nugget, Mining Resources, Sappi Cloquet, United States Steel Corporation, United Taconite/Northshore Mining Company, and Verso Corporation.

by the interruptible portion of the customer's load, and the effective discount the customer receives is subject to the market pricing risk the customer incurs during interruptions.

D. Physical Interruptible Energy Credit Justification

Minnesota Power believes it is justifiable and appropriate to modify the existing Rider for Fuel and Purchased Energy to include the cost of the Physical Interruptible Energy Credit of $30 per MWh, which is paid to customers when they reduce energy demand during a Firm Load Control Period under the Rider for Large Power Demand Response Service. When industrial customers physically curtail energy it avoids the need to generate energy or purchase energy from the market to meet the demand that would have occurred if this DR product did not exist. The $30/MWh credit replaces the cost of energy that would have needed to be generated or purchased from the market – the credit represents energy costs already being recovered through the Rider for Fuel and Purchased Energy. As shown in the analysis, this $30/MWh credit is lower cost than the expected cost to generate or purchase energy, resulting in a benefit for all customers. Minnesota Power believes it's reasonable for the Commission to allow the Physical Interruptible Energy Credit be recovered through the Rider for Fuel and Purchased Energy because it is designed to represent the cost of energy that would have been needed if this product did not exist.

Minnesota Power is not aware of a Physical Interruptible Energy Credit being recovered through another utility's Rider for Fuel and Purchased Energy. However, as noted by the OAG, this program is the first of its kind in Minnesota, and given this unique and pioneering DR product, having precedent for recovering this energy credit through the Rider for Fuel and Purchased Energy is not expected to be present. So long as the program is deemed to be in the public interest and imposes just and reasonable rates, the Commission should allow this program cost to be recovered through the appropriate method outlined above.

E. Cost Allocation Clarification

In the December 7, 2018 Petition, Minnesota Power offered two options for cost allocation: Method 1 – a flat per kWh recovery for all firm customers, and Method 2 – recovery based on rate case apportionment of final rate increase. As outlined in Minnesota Power's December 7, 2018

Petition, the energy associated with the participating load in the DR program would not be subject to the per kWh cost allocation under either Method 1 or Method 2 (please refer to 985,500 MWh estimate of Large Power DR energy excluded from cost allocation assuming the program is fully subscribed). However, the energy associated with non-participating (firm) load, would be subject to the DR rider rate. As a result, participation in the program does not exempt customers from paying for the program, it only decreases the amount they pay by removing the energy associated with participating load from cost allocation.

III. RESPONSE TO OTHER STAKEHOLDERS

In addition to the Department, the following organizations provided public comments on the Company's proposed suite of DR products: the OAG, LPI, CUB, Fresh Energy and AEMA. Feedback from stakeholders is important to the Company, and Minnesota Power addresses issues raised by various stakeholders in this section.

A. Cost Recovery of the Proposed DR Program

In its Initial Comments filed on February 20, 2019 in this Docket, the Department noted that it "recognizes that due to the uncertainty as to the actual cost of DR Product B, the Company would prefer to recover the capacity costs through a rider, at least until those costs become somewhat predictable, however best practices would suggest that these costs should be recovered in a rate case to ensure that MP has the incentive to implement DR product B in a way that reduces costs between rate cases. In general, rate riders are extraordinary recovery mechanisms, each of which have a specific statutory basis. In general, current rider mechanisms were put in place to remove disincentives to investing in certain public policy goals."

Minnesota Power agrees that current cost recovery riders are not to be used to recover routine costs and should be used sparingly. However, due to the unique scale and nature of its large industrial customers, a current cost recovery rider is the most appropriate method of cost recovery for this innovative program. Additionally, a cost recovery rider was explicitly stated in both of the Commission's orders directing the Company to develop a demand response program. Minnesota Power is proposing that the current cost recovery rider be treated the same as all other current cost recovery riders at the time of the next rate review, in that the costs of the DR program would be evaluated on whether to be incorporated into base rates.

Current cost recovery, and the clarity it provides to both Minnesota Power and the potential large customers participating (or not participating) for various DR products, is necessary for proceeding forward to implement this innovative DR program, which would be the first to include economic curtailment in Minnesota and advance the utilization of DR (a public policy priority). Minnesota Power cannot implement a program for which the ability to recover costs is uncertain, and customer's risk/reward analysis of the amount of DR to agree to participate in will be based on both the financial value of the DR products themselves and the specifics of the cost recovery mechanism and cost allocation decisions. Deciding on the product, current cost recovery and cost allocation in this Docket, as recommended by the Commission order, is necessary to provide clarity on both the benefit of the DR product suite to the large industrial customers who would participate, and to the utility who manages the program. Minnesota Power observed the complexity imposed on the 2016 rate case[3] proceeding by evaluating EITE cost recovery issues as part of the rate case, and wishes to minimize that complexity in its next rate case (planned for the fall of 2019) by deciding cost recovery for DR in this Docket.

B. <u>Cost Allocation of the Proposed DR Program</u>

In the initial filing the Company did not take a position on either cost allocation option presented. However, since reviewing Initial Comments from all stakeholders, particularly from LPI who would be the participants in this program, the Company prefers Cost Recovery Method 2. MP agrees with the LPI comments which note that Cost Recovery Method 2 allocates more cost to the customer classes that contribute more to the need for peaking capacity, and is most likely to result in the new Product B being successful. LPI also noted, "The balance of risk and reward offered by Product B may already be too marginal for some eligible customers. Using a cost recovery method such as Cost Recovery Method 1, which would allocate more cost to the large power class, would further undermine the benefits of Product B to eligible customers and potentially put even a modest level of participation at risk. In determining whether it makes sense to participate, customers will consider the net costs and benefits to them – including their share of

[3] E015/GR-16-664.

the cost of the product. Thus, over-allocating costs to the large power class would be a disincentive for customers to participate even nominally." In the interest of encouraging customers to participate in this innovative new DR program, Minnesota Power also now recommends Cost Recovery Method 2.

C. Need for the DR Program

In the OAG's comments, they recommended the Commission "require MP to demonstrate that there is a need for the DR resources it seeks to acquire." As stated in its initial Petition, the Company has demonstrated the need for 150 MW of DR several proceedings and is also responding to three different Commission orders to develop a DR program. Minnesota Power's 2015 Integrated Resource Plan ("IRP") identified a need for DR, and this need of 150 MW of DR was further refined through the Nemadji Trail Energy Center ("NTEC") docket. The Company has also received several orders from the Commission to investigate or develop a DR program, to include an order in the 2015 IRP to initiate a competitive bidding process for DR (which it completed in 2016), an order in its 2016 Rate Case to work with LPI and other stakeholders to develop a DR rider and corresponding cost recovery[4], and a January 24, 2019 order in the NTEC docket requiring the Company to develop a DR rider and cost recovery methodology.[5] Minnesota Power believes the need for a DR resource and the Commission intent for the Company to develop a DR program is clearly defined and articulated through the three dockets referenced above: the 2015 IRP, the 2016 Rate Case, and the 2017 NTEC proceeding.

D. Response to AEMA

Minnesota Power appreciates AEMA's thoughtful participation in the Company's DR workshops and the insight it has shared regarding its broad experience with demand response. The Company will respond to the AEMA recommendations to allow customers the option to designate an aggregator to manage participation on their behalf, and to increase the 150 MW cap to 400 MW.

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[4] MPUC Order, Dated March 12, 2018. E015/GR-16-664.
[5] MPUC Order, Dated January 24, 2019. E015/AI-17-568.

Minnesota Power has had interruptible agreements in place with large industrial customers and has been utilizing this resource in response to system emergencies since 1993. The system used to curtail customer load is automated. When Minnesota Power receives a directive from MISO, the Company executes a customer communication plan and operators are able to interrupt all or a percentage of available (operating) interruptible load by sending an interrupt signal to participating industrial customers. These customers have equipment installed and programming in place that enables the required amount of load to be shed automatically. Based on the history of the program and automated systems Minnesota Power does not see the need for aggregators to manage its industrial DR program. In addition, as previously discussed in depth in the Commission's Aggregators of Retail Customers docket[6], having a third party administer Minnesota Power's industrial DR program would impinge on the Company's service territory and also Minnesota Power's obligation to serve customers.

As stated in section C above, Minnesota Power identified a resource need of 150 MW for DR. While the Company is encouraged by its large industrial customer's interest in participating in DR, Minnesota Power has not identified a need for more than 150 MW at this time. However, the Company will be filing its next Integrated Resource Plan in the fall of 2020 and will reevaluate the need for DR at that time.

IV. CONCLUSION

Minnesota Power appreciates the thoughtful and thorough review provided by stakeholders for its proposed suite of DR products for its largest industrial customers, and has attempted to address the major issues raised in the Initial Comment Period through these Reply Comments. The Company has worked with stakeholders not only through this Docket, but during the development of the product itself, well in advance of submitting its initial Petition. Minnesota Power serves some of the nation's largest industrial customers, and working collaboratively with them and other stakeholders has developed this new, a first-of-its-kind in the state, Demand Response program that includes an economic curtailment option in addition to the traditional emergency curtailment. Minnesota Power continues moving towards a cleaner energy future and will be 44 percent

[6] MPUC Docket No. E999/CI-09-1449.

renewable by 2025, having reduced its carbon emissions 40 percent by 2030. Demand response programs can represent an efficient, flexible, customer-driven resource to work alongside renewable energy resources and prevent the need to build new peaking generation assets. The Company looks forward to Commission approval of this innovative program.

Dated: March 13, 2019

Respectfully,

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STATE OF MINNESOTA)
)ss
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AFFIDAVIT OF SERVICE VIA ELECTRONIC FILING

Jodi Nash of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 13th day of March, 2019, she served Minnesota Power's Reply Comments in Docket No. E015/M-18-735 on the Minnesota Public Utilities Commission and the Office of Energy Security via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.

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Jodi Nash

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