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Minnesota Department of Commerce

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December 20, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/CI-11-852

Dear Dr. Haar,

On November 6, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period t on Cost Impact Reports* in the following matter:

> Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd. 2e.

Attached please find the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department). The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ KATE O'CONNELL
Manager, Energy Regulation and Planning

KO/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/CI-11-952

I. BACKGROUND INFORMATION

Minn. Stat. §216B.1691 Subd. 2(e) requires electric utilities subject to the State's Renewable Energy Standard (RES) to report the rate impact of compliance with the RES.[1]

In accordance with the above-referenced statute, at the end of October 2011, utilities submitted initial reports on the cost impact of complying with the RES requirement.

The Department subsequently filed comments on those reports, indicating the following:

> The quality of the analyses in this docket of the rate impact of the RES varied considerably. Some utility analyses were fairly simplistic and limited while others were more complex and complete. For example, some analyses simply compared the costs of renewable energy to the costs of purchases from the wholesale energy market while others considered how all costs changed, including changes in use and costs of existing generation plants along with the ability to avoid or delay adding other resources to the utility's system, thus reducing capital costs.
>
> Because additions of new resources affect how the existing resources on the system are used, it is important to examine how both existing and new resources are used after the new resource is added. Those changes affect fuel costs, capacity values, heat rates, and other operation and maintenance expenses.

[1] These comments refer to Minn. Stat. §216B.169 as the "RES statute."

> Thus, while all of the reports provided some information about the effects of the RES on rates, the reports with the more complete analyses provided more accurate information.[2]

During the 2013 legislative session, Minn. Stat. §216B.1691, Subd. 2(e) was amended to require that a uniform reporting system be developed to ensure that utility reports are consistent and comparable.

On November 6, 2013, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period on Cost Impact Reports* seeking comment on a proposed format for uniform reporting by the utilities.

II. DEPARTMENT ANALYSIS

A. CAUTION IN COST COMPARISONS

In its January 2012 comments in this docket, the Department asserted that assessing the costs of adding renewable resources to utilities' systems was best achieved through the comprehensive analysis in an integrated resource plan (IRP), because such as analysis accomplishes the goal of capturing the effects of adding new resources on use of existing resources on the utility's system. As the Department summarized:

> Resource planning provides the most comprehensive examination of costs of providing electric service and is the best venue for analyzing the costs of adding renewable resources. Utility IRPs evaluate a utility's ability to meet its forecasted demand over an extended period of time and assess the least-cost mix of resources needed to meet that demand. Resource plans view a utility's system in its entirety, including the existing mix of generation resources, and provide a comprehensive comparison of the impact resource additions or retirements will have on the overall costs on the utility's system.
>
> In addition, resource planning examines the least-cost mix of resources under a variety of scenarios and conditions. Examining the appropriate mix of resources under a variety of conditions provides more assurance that additional resources remain least cost even if the economic environment changes significantly.[3]

[2] Page 2 of the Department's January 25, 2012 comments.
[3] Page 5 of the Department's comments.

The Department continues to believe that IRP analysis is the best method for assessing whether additional renewable generation will result in a least-cost mix of resources and continues to perform this analysis in utilities' resource plans where the utility has the data to allow such a review. More limited analyses provide some information, but should be considered with care to avoid reaching unsound conclusions. Rather, such analyses could be considered as first steps in assessing the effects of adding any generation resource to a utility's system.[4]

As noted above, Minn. Stat. §216B.1691, Subd. 2(e) requires the Commission to:

> …determine a uniform reporting system to ensure that individual utility reports are consistent and comparable, and shall, by order, require each electric utility subject to this section to use that reporting system. The rate impact estimate must be for wholesale rates and, if the electric utility makes retail sales, the estimate shall also be for the impact on the electric utility's retail rates. Those activities include, without limitation, energy purchases, generation facility acquisition and construction, and transmission improvements.

Given the statutory requirement, the Department offers the following proposal for cost reporting.

B. DEPARTMENT-PROPOSED REPORTING SYSTEM

The Department recommends that utilities report their RES costs on a per-kWh basis, based on the per-kWh costs for all renewable power of a given type added in the past year and the total expected production from these renewable energy facilities over the lives of the new projects.

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[4] The EIA also cautions care:

> Since projected utilization rates, the existing resource mix, and capacity values can all vary dramatically across regions where new generation capacity may be needed, the direct comparison of the levelized cost of electricity across technologies is often problematic and can be misleading as a method to assess the economic competitiveness of various generation alternatives. Conceptually, a better assessment of economic competitiveness can be gained through consideration of avoided cost, a measure of what it would cost the grid to generate the electricity that is otherwise displaced by a new generation project, as well as its levelized cost. Avoided cost, which provides a proxy measure for the annual economic value of a candidate project, may be summed over its financial life and converted to a stream of equal annual payments, which may then be divided by average annual output of the project to develop a figure that expresses the "levelized" avoided cost of the project. This levelized avoided cost may then be compared to the levelized cost of the candidate project to provide an indication of whether or not the project's value exceeds its cost. If multiple technologies are available to meet load, comparisons of each project's levelized avoided cost to its levelized project cost may be used to determine which project provides the best net economic value. Estimating avoided costs is more complex than for simple levelized costs, because they require tools to simulate the operation of the power system with and without any project under consideration. The economic decisions regarding capacity additions in EIA's long-term projections reflect these concepts rather than simple comparisons of levelized project costs across technologies.

For example, the per-kWh cost for all wind facilities would be based on dividing the total costs of all new wind facilities by the total expected production over all of the lives of both the power purchase agreements for wind facilities and utility-owned wind facilities. In addition, each utility should report the per-kWh cost of all renewable power resources added in the past year. Finally, each utility should report the per-kWh cost of all renewable power resources on its system.

The Department recognizes that when a single generation facility has been added in a given year, the per-kWh cost may be considered trade secret, thus defeating the Commission's desire to foster transparency and comparability. In such cases, information on the per-kWh cost of all renewable resources on the utility's system may still be public information since those figures would include the cost of embedded resources rather than solely the incremental cost of adding a specific resource in a given year.

Rather than reporting the costs by a standard under which the utility might count the resource (e.g. the Renewable Energy Objective, the Renewable Energy Standard or the Solar Energy Standard), the Department recommends reporting costs by type of renewable power. Reporting by standards might lead to confusion as to which standard the utility might count production from a specific facility in the future. Reporting per-kWh costs by type of renewable energy would: 1) provide a comparison of the per-kWh costs of different types of renewable power and 2) separate out a portion of the long-standing embedded hydroelectric resources from the more recent renewable additions.

Given the goal of simplifying the reporting, providing the per-kWh cost of renewables added in the most recent year would provide the most meaningful information in this first-step analysis on the cost of adding renewable resources in a given year. However, that calculation would not compare those costs to the costs of whatever else the utilities would have added to their systems instead of the renewable power. This calculation is important because no utility has requested a modification or delay of the standard as allowed in subdivision 2b of the RES Statute, which means that no utility has indicated that the power was not needed. Thus, the utility should provide the same per-kWh calculation of whatever other new resource the utility would have added if the renewable power had not been added to its system.

If a utility indicates that growth in its needs were not large enough to warrant building a new non-renewable energy facility rather than adding the renewable power (which tends to be added in smaller increments), then the utility should report the per-kWh cost they would have incurred in adding a gas-fired combustion turbine (CT), along with the per-unit cost they would have incurred in adding a gas-fired combined cycle unit (CC). These types of facilities are the alternative resources most commonly selected in resource plans. While CT and CC resources perform different functions and thus should be expected to have different costs per kWh, they are the only comparison that can accomplish the goals of transparency and use by a wide variety of utilities. The utility should also note whether it would be necessary to add a natural gas pipeline to deliver natural gas to the utility's system, but it would not be necessary to estimate those costs.

C. DEPARTMENT RESPONSE TO COMMISSION QUESTIONS

a. What is the appropriate timeframe for reporting?

The Commission's proposal contemplates a start date of 2005 through the 15-year planning period for each utility's latest IRP. For the initial filing, the Commission may wish to obtain past information, either annually or in total, beginning with 2005, the passage of the RES statute. However, for future filings, the Department recommends that actual costs for most recent year be filed, along with estimates of future compliance costs.

b. Should REO expenditures be included in the renewable energy rate impact analysis?

As noted above, the Department recommends reporting all renewable energy expenditures on a per-kWh basis by type of renewable generation, rather than by statutory compliance. As a practical matter, generation used to comply with the REO is also available to meet the RES, and does not need to be tracked separately.

c. The statute lists required reporting cost activities to include (without limitation) renewable energy purchases, generation facility acquisition and construction, and transmission improvements. Staff assumes these categories, often referred to as RES in total to include utility-owned generation, power purchases agreements, market purchases and renewable energy credits (RECs). Should expenditures for RES be calculated separately from those for REO and the eventual SES? Why or why not?

As noted above, the Department recommends tracking costs by type of renewable generation, not statutory requirement. Tracking cost information by type of renewable power is expected to provide separate cost information on solar generation thus providing general guidance on the cost of the SES.

Additionally, tracking costs by type of renewable power would eliminate the need to determine how to report costs associated with Xcel Energy's wind and biomass mandates (Minn. Stat. §§216B.2323 and 216B.2324). This generation, while now available to meet the RES, was initially acquired to meet other statutory mandates, not the REO or RES.

Finally, with respect to market purchases, the Department does not recommend that these resources be included in the report since it is not possible to identify that market purchases are from renewable power. Instead, the focus should be only on per-kWh costs of power purchase agreements with renewable facilities or renewable generation that the utility owns or otherwise has under contract.

d. *Are expenditures for REO, RES and SES separately accounted for and calculated by utility? Would there be different treatment as to cost inclusion for on-line projects versus those in development? Should both levelized and annualized costs be provided in order to show short-term impact on rates vs. expected long-term effects?*

e. *Should expenditures be separate between existing on-line costs and those projects in development?*

As discussed above, the Department does not support separate tracking for REO, RES and SES. Since the statute requires reporting "the rate impact of activities of the electric utility necessary to comply" with the statute, information about projects in development should be reported only to the extent that such costs were reflected in rates in the previous year. To the extent that both types of costs were reflected in rates, differentiating the cost of on-line projects from those in development could provide a better indicator of current costs; however, this approach could result in less transparency to the extent costs associated with projects in development are considered trade secret.

f. *List the best available "source" from which to report and calculate, non-renewable generation revenue requirement.*

The Department recommends that the Energy Information Administration's (EIA) most recent estimate of levelized costs be the source for information about non-renewable generation. In addition, if the utility is aware that any addition of these types of resources would require further costs (such as the addition of a natural gas pipeline), the utility should note that fact. The link to EIA's levelized costs for 2013 is:
http://www.eia.gov/forecasts/aeo/er/pdf/electricity_generation.pdf.

g. *Provide alternatives (if any) to the proposed reporting system.*

The Department's proposed alternative is described earlier in these comments.

h. *What should be the "but for the renewable mandate consideration for comparison purposes"?*

As described above, the Department recommends using the per-kWh cost of a new CT unit and the per-kWh cost of a CC unit as a basis for comparison with renewable costs. As discussed in the Department's January 2012 comments, comparing renewable costs with historical market prices is not appropriate and may provide misleading information because such an analysis assumes that the utility would have relied heavily on the wholesale electric energy market at a time when wholesale energy costs were considered high. Wholesale market prices are inherently volatile and should not be relied on over the expected life of long-term period that a generation resource or power purchase agreement, so the comparison is not valid.

/sm

CERTIFICATE OF SERVICE

I, Jan Mottaz, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, 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.

Comments of the Minnesota Department of Commerce, **Division of Energy Resources**

Docket No. E999/CI-11-852

Dated this 20th day of December 2013

/s/Jan Mottaz

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Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE Minneapolis, MN 55414	Electronic Service	No	SPL_SL_11-852_Interested Parties
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