

September 6, 2019

—Via Electronic Filing—

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

RE: COMMENTS
ESTIMATED COSTS OF FUTURE CARBON DIOXIDE REGULATION ON
ELECTRICITY GENERATION
DOCKET NOS. E999/DI-19-406 AND E999/CI-07-1199

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits these comments in response to the July 9, 2019 Request for Comments by the Minnesota Pollution Control Agency and Minnesota Department of Commerce, Division of Energy Resources (together, the Agencies). The Agencies invite comments on the range of cost estimates for the future cost of carbon dioxide (CO₂) regulation on electricity generation – specifically:

- Whether the currently established range of regulatory costs of CO₂ emissions of \$5 to \$25 per short ton remains reasonable, and if not, what range should be established and why;
- Whether 2025 is the appropriate threshold year for the application of the value range;
- Whether the application scenarios listed in the Commission's June 11, 2018 Order remain reasonable and appropriate; and
- Whether the Commission's update should apply to electricity generation resource planning and acquisition proceedings initiated in 2020 only, or in both 2020 and 2021.

In summary, we believe there is not a sufficient objective basis for revising the cost range or threshold year of application; retaining the current \$5 to \$25 range beginning in 2025 is reasonable. We further believe it would be reasonable to retain the application scenarios as currently ordered, and that it would be reasonable to apply all

of these parameters to electricity generation resource planning and acquisition proceedings initiated in both 2020 and 2021. In the event the federal or state CO₂ regulatory landscape shifts more quickly than expected, making aspects of these parameters no longer reasonable, the Commission would have discretion to reopen the docket sooner than 2021.

A. Background

Minn. Stat. § 216H.06 requires the Minnesota Public Utilities Commission to “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 Commission last updated its CO₂ regulatory cost range in January 2018, adopting (for resource planning and acquisition proceedings initiated in both 2018 and 2019) a range of \$5 to \$25 per short ton of CO₂, applied beginning in 2025.¹

The CO₂ regulatory cost range is intended as a proxy for regulatory costs that utilities and their customers may face, beginning in the year they are expected to incur these costs, so that resource planning and acquisition decisions can consider the impacts of those costs on long-term capital investments. This cost range is meant to capture regulatory costs only – not societal damages from climate change, which are separately addressed using the CO₂ environmental cost range under Minn. Stat. §216B.2422, subd. 3. The CO₂ regulatory cost range is applied in resource planning models as a cost faced by any fossil generation resource, affecting both the dispatch of resources and expansion plan choices. Use of CO₂ regulatory costs results in a Present Value of Societal Cost (PVSC) ranking of resource plan alternatives that differs from the Present Value of Revenue Requirements (PVRR) ranking. All else equal, a portfolio with more CO₂-emitting generation will have a higher PVSC than one with less CO₂-emitting generation. PVSC is one of the factors utilities and the Commission consider in assessing preferred resource alternatives and portfolios.

When the Commission adopted the range of \$5 to \$25 per ton in its last update, it considered a variety of factors including actual CO₂ allowance prices at that time in the Western Climate Initiative (WCI) and Regional Greenhouse Gas Initiative (RGGI) carbon markets; modeling of possible CO₂ allowance prices under the EPA’s Clean Power Plan (CPP); and the possibility that future regulatory approaches at the federal, regional, or state level might impose greater regulatory costs than the indicative carbon prices in WCI, RGGI, or the CPP.

¹ ORDER ESTABLISHING 2018 AND 2019 ESTIMATE OF FUTURE CARBON DIOXIDE REGULATION COSTS. *In the Matter of Establishing an Updated Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06.* June 11, 2018. Docket Nos. E-999/DI-17-53 and Docket No. E-999/CI-07-1199.

The Commission chose 2025 as the first year to require application of CO₂ regulatory costs, based on the belief that this is a reasonable estimate of when Minnesota utilities might face CO₂ regulatory compliance costs. The CPP had been stayed since February 2016, and EPA had proposed to repeal it. EPA had, at that time, not yet proposed a replacement rule, but it was reasonable to predict that since CPP compliance was required in 2022, any replacement rule promulgated several years after the CPP might give states until around 2025 to comply. The Commission noted its discretion to revise the cost range and start date in subsequent updates, if changed regulatory conditions made a lower or higher range, or sooner or later start date, more reasonable.

Finally, the Commission specified five scenarios that utilities must consider in all electricity generation resource acquisition proceedings during 2018 and 2019, while leaving to utilities which to use as reference assumptions and which as sensitivities:

1. Incorporate, for all years, the low end of the range of environmental costs for CO₂ as approved by the Commission in its January 3, 2018 Order Updating Environmental Costs in Docket No. E-999/CI-14-643;
2. Incorporate, for all years, the high end of the range of environmental costs for CO₂;
3. Incorporate the low end of the range of environmental costs for CO₂ but substituting, for planning years after 2024, the low end of the range of regulatory costs for CO₂ regulations, in lieu of environmental costs;
4. Incorporate the high end of the range of environmental costs for CO₂ but substituting, for planning years after 2024, the high end of the range of regulatory costs for CO₂ regulations, in lieu of environmental costs;
5. Consistent with the Commission decision in the Order Updating Environmental Costs, utilities shall include at least one scenario that excludes consideration of CO₂ costs.

Accordingly, the Company used all five scenarios in our recently filed 2020-2034 Upper Midwest Integrated Resource Plan. We selected option #4 – high CO₂ environmental costs through 2024, high CO₂ regulatory costs thereafter – as our reference assumption and ran the remaining scenarios as sensitivities.²

² 2020-2034 *Upper Midwest Integrated Resource Plan*. Docket No. E002/RP-19-368. See Appendix F2, Strategist Modeling Assumptions and Inputs.

B. Changes in the Planning Landscape

There have been changes in the carbon regulatory landscape since the Commission's last update. We summarize these below, but conclude that enough remains uncertain about the shape and timing of federal and state carbon regulation that it would be reasonable to retain the current range and year of application at this time.

1. *Repeal of CPP and promulgation of Affordable Clean Energy rule*

EPA in August 2018 proposed, and in July 2019 finalized, a rule to repeal and replace the CPP: *Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units*, which EPA called the “Affordable Clean Energy” (ACE) rule.³ The ACE rule differs from the CPP in several key respects. First, it is premised on a much narrower interpretation of EPA's authority under section 111(d) of the Clean Air Act. EPA maintains that in defining the “best system of emission reduction” (BSER) for regulated electricity generating units, EPA can only consider measures implemented at the units themselves – not the much broader array of measures throughout the electricity system on which the CPP was premised. EPA defines BSER as heat rate improvement (HRI) at coal units, for which it lists seven candidate technologies⁴ that states must evaluate in setting unit-specific performance standards and drafting ACE compliance plans. Second, the ACE rule only applies to coal units, not natural gas-fired or other units. Third, for compliance timeframes, ACE requires state plans to be submitted by July 8, 2022, and compliance at the regulated coal units by July 2024 – so relative to the CPP, moves back by at least two years the timeframe when regulatory costs, if any, would be incurred.

Most importantly for this docket, the ACE rule provides little flexibility to consider measures other than HRI for reducing carbon emissions; it also explicitly rules out CO₂ trading, which had been a core compliance strategy Minnesota and other states were considering for the CPP. As such, whereas in its last update CO₂ allowance prices – actual in WCI and RGGI, modeled for the CPP – were a reasonable proxy for CO₂ regulatory costs, they are not a reasonable proxy for ACE compliance.

This is not to suggest the ACE rule will impose no costs. Investments in HRI on coal units, if ultimately required, will have a cost. However, the Company is proposing to retire all of its remaining Upper Midwest coal units either before (in the case of Sherco 2) or soon after (in the case of Sherco 1, King and Sherco 3) the year when

³ 84 *Fed. Reg.* 32,520, July 8, 2019.

⁴ Neural network/intelligent sootblowers, boiler feed pumps, air heater and duct leakage control, variable frequency drives, blade path upgrades for steam turbines, redesign/replace economizer, and improved operating and maintenance practices.

ACE compliance could be required. Section 111(d) of the Clean Air Act gives states discretion to consider “among other factors, the remaining useful life of the existing source to which such standard applies”⁵ when they establish standards of performance for coal units in ACE compliance plans.

Those “other factors” include reasonable cost, payback period, physical constraints, whether HRI measures have already been implemented, and others. It is possible that consideration of remaining useful life and cost reasonableness would allow a coal unit owner to propose retiring a unit in lieu of implementing HRI. Specifically, the agency responsible for developing the ACE compliance plan (in this case, the Minnesota Pollution Control Agency) would evaluate HRI on all affected coal units, but could conclude that HRI investments on coal units with a remaining useful life of only a few years are not reasonable considering the short timeframe over which those investments would need to be recovered, and/or that requiring HRI would extend the life of those units. The MPCA might propose a committed unit retirement date in lieu of requiring HRI. In this case, the cost of compliance with ACE would not be zero, but would essentially be absorbed within the resource planning process.

Finally, another issue that makes quantifying ACE compliance costs in \$/ton terms difficult is that it is possible HRI, while reducing CO₂ rate (pounds per MWh), may not in fact reduce total CO₂. This could be the case if HRI makes coal units more efficient, leading them to be dispatched more (termed the “rebound effect”). If this is the case, \$/ton of CO₂ reduced would not be a meaningful metric for the ACE rule.

Considering these uncertainties, we do not propose that the Commission base its \$/ton CO₂ regulatory cost range on estimated ACE compliance costs.

2. *Federal legislation*

No federal framework regulating carbon emissions from the electric sector has passed, or even gained significant traction, since the Commission’s last update. There have been carbon tax proposals – proposals to tax CO₂ embedded in carbon-based fuels, upstream at the point these fuels enter the economy, and (in some proposals) return some or all CO₂ tax revenues to households. None has gained sufficient support to advance in Congress. There have also been proposals to establish a federal Clean Energy Standard: this would not impose a direct \$/ton cost on CO₂ emissions, but would require retail electric suppliers to provide an increasing share of retail electricity from carbon-free resources.⁶ Such proposals have likewise not advanced

⁵ See Clean Air Act section 111(d)(1) at <https://www.law.cornell.edu/uscode/text/42/7411>.

⁶ For example [S. 1359](#), the *Clean Energy Standard Act of 2019*, introduced by Senators Tina Smith (D-MN) and Ben Ray Lujan (D-NM) in May 2019.

beyond being introduced and referred to committee. At the present time there is no concrete federal legislative framework on which to base CO₂ regulatory costs.

3. *State legislation*

The 2019 legislative session in Minnesota saw robust discussion of energy policy proposals, including the Walz-Flanagan Administration’s “One Minnesota Path to Clean Energy.” Proposed legislation to implement this framework included a “Clean Energy First” preference in resource planning and acquisition, a mandate of 100 percent clean electricity by 2050, and energy optimization provisions broadening the existing Conservation Improvement Program. A goal of 100 percent clean (i.e. carbon-free) electricity does not impose a \$/ton cost on CO₂ emissions directly, but it would favor non-emitting resources over emitting.

These proposals give an indication of the Administration’s energy policy priorities and the approach that may be pursued in future legislative sessions. It is also possible that Minnesota could regulate CO₂ through other means, which could include pricing carbon directly. However, at present there is no concrete state legislative or regulatory framework on which to base an update to the CO₂ regulatory costs range.

4. *Update to RGGI and WCI carbon prices*

The WCI and RGGI carbon markets have continued to operate since the Commission’s last update. Since CO₂ allowance prices in these markets were a factor considered in the last update, we provide an updated summary of the CO₂ allowance auction clearing prices in those markets over the last two years. This illustrates there has not been a significant change in these prices since the last update.^{7,8}

⁷ WCI market CO₂ allowance auction results are posted on the California Air Resources Board website at <https://ww3.arb.ca.gov/cc/capandtrade/auction/auction.htm>. The *Summary of Auction Settlement Prices and Results* shows results from all auctions to date. See the “Current Auction Settlement Price” column, which gives the clearing price in that auction for current-vintage allowances. The California market operates in metric tonnes, so we have provided the equivalent \$/short ton in the table based on 0.907 metric tons = 1 short ton.

⁸ RGGI market CO₂ allowance auction results are posted on the RGGI website at http://rggi.org/market/co2_auctions/results, under “Allowance Prices and Volumes.” The RGGI market operates in short tons.

Table 1: CO₂ Allowance Auction Clearing Prices Summary – WCI and RGGI

Market	Auction No.	Date of Auction	Clearing Price	
			\$/metric tonne	\$/short ton
WCI	20	Aug-19	17.16	\$15.57
	19	May-19	17.45	\$15.83
	18	Feb-19	15.73	\$14.27
	17	Nov-18	15.31	\$13.89
	16	Aug-18	15.05	\$13.65
	15	May-18	14.65	\$13.29
	14	Feb-18	14.61	\$13.25
	13	Nov-17	15.06	\$13.66
	12	Aug-17	\$14.75	\$13.38
			<i>Average over last two years:</i>	
RGGI	44	Jun-19		\$5.62
	43	Mar-19		\$5.27
	42	Dec-18		\$5.35
	41	Sep-18		\$4.50
	40	Jun-18		\$4.02
	39	Mar-18		\$3.79
	38	Dec-17		\$3.80
	37	Sep-17		\$4.35
			<i>Average over last two years:</i>	

B. Questions Posed by the Agencies

The Agencies request comment on four specific topics, to which we respond below.

1. *Whether the currently established range of regulatory costs of CO₂ emissions of \$5 to \$25 per short ton remains reasonable, and if not, what range should be established and why*

The Company believes it would be reasonable to retain the current CO₂ regulatory costs range of \$5 to \$25 per short ton for the present update. As noted above, it is possible the ACE rule will impose CO₂ regulatory costs, and these could differ from the current range. However, these costs are difficult to quantify in \$/ton terms, because (1) the ACE rule does not allow CO₂ pricing via markets, (2) the rule may not actually reduce CO₂ emissions from coal units, and (3) it is possible the rule will not impose a cost that can be attributed to the rule itself. This could be the case if the statutory consideration of remaining useful life allows compliance to be achieved by retiring coal units in lieu of implementing HRI; in that scenario, compliance costs

would not be zero but would essentially be absorbed within the integrated resource planning process.

Other than ACE, no federal legislative framework regulating CO₂ emissions from electricity has been enacted or gained sufficient traction to serve as a basis for estimating CO₂ regulatory costs. And while there is clearly interest in Minnesota in reducing carbon emissions from all sectors of the economy, no state legislative framework regulating CO₂ emissions from electricity has yet been enacted to serve as a basis for estimating CO₂ regulatory costs.

Finally, CO₂ allowance prices in WCI and RGGI remain similar to what they were at the time of the last update. Neither market has seen allowance prices as high as \$25 per short ton; however, as with the last update, we cannot rule out the possibility that Minnesota might take a regulatory approach that imposes a higher cost than the CO₂ allowance prices in WCI and RGGI.

Considering these uncertainties, we believe there is not a sufficient objective basis for revising the cost range, and retaining the current range is reasonable.

2. *Whether 2025 is the appropriate threshold year for the application of the value range*

The threshold year of application is intended to reflect the timeframe when the Commission believes utilities and their customers may begin incurring a CO₂ regulatory compliance cost, which could be under federal and/or state regulation.

The ACE rule requires compliance beginning in 2024. It is possible this could be delayed, due to litigation and a potential stay of the rule during litigation, but that is unknown at this time.⁹ It is also possible Minnesota may implement some form of state-level carbon regulation, but the compliance timeframe is speculative at this time. Because we cannot rule out state or federal CO₂ regulatory costs being borne as early as 2025, we believe it would be reasonable to retain the current threshold year. If new approaches to federal or state level carbon regulation are enacted and require compliance sooner or later than 2025, the Commission could reopen this docket.

3. *Whether the application scenarios listed in the Commission's June 11, 2018 Order remain reasonable and appropriate*

⁹ As of now, challenges to the ACE rule have been filed at the U.S. Court of Appeals for the District of Columbia Circuit by the American Lung Association, American Public Health Association, and Clean Air Task Force (*American Lung Ass'n et al. v. EPA*, No. 19-1140); a group of states and cities led by New York, including Minnesota and Wisconsin (*New York et al. v. EPA*, No. 19-1165); and a coalition of environmental groups (*Appalachian Mountain Club et al. v. EPA*, No. 19-1166). Seven organizations have filed motions to intervene in support of the ACE rule.

The Company believes the five application scenarios required in the Commission's June 11, 2018 Order remain reasonable. We have applied these scenarios in our recently filed 2020-2034 Integrated Resource Plan, where we used high CO₂ environmental costs through 2024 and high CO₂ regulatory costs thereafter as our reference assumption, and ran the remaining scenarios as sensitivities.

4. *Whether the Commission's update should apply to electricity generation resource planning and acquisition proceedings initiated in 2020 only, or in both 2020 and 2021.*

We believe it would be reasonable to apply the current update to electricity generation resource planning and acquisition proceedings initiated in both 2020 and 2021. In the event the federal or state CO₂ regulatory landscape shifts more quickly than expected, making either the \$5 to \$25 cost range or 2025 application year no longer appear reasonable, the Commission would have discretion to reopen the docket sooner than 2021.

We appreciate the opportunity to provide these comments. We have electronically filed this document with the Minnesota Public Utilities Commission, and copied parties on the attached service list. Please contact Nicholas Martin at (612) 330-6255 or Nicholas.F.Martin@xcelenergy.com, or me at (612) 330-6064 or Bria.E.Shea@xcelenergy.com, if you have any questions.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, RESOURCE PLANNING AND STRATEGY
NSPM REGULATORY AFFAIRS

Enclosures

c: Service List

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E999/DI-19-406 AND E999/CI-07-1199

Dated this 6th day of September 2019

/s/

Lynnette Sweet

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