

January 29, 2018

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

RE: **Requests for Reconsideration**  
Docket No. E002/M-17-532 and Docket No. E002/AA-17-904

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matters:

Hennepin County's Motion for Reconsideration.

Neighbors Against the Burner, Alan Muller, and Carol A. Overland's Motion for Reconsideration.

The Petitions were filed on January 17, 2018 by:

David J. Hough  
County Administrator  
Hennepin County Administration  
300 South Sixth Street  
Minneapolis, MN 55487

Carol A. Overland  
Attorney for Neighbors Against the Burner  
1110 West Avenue  
Red Wing, MN 55066

The Department recommends that the Minnesota Public Utilities Commission **not reconsider its order** and is available to answer any questions the Commission may have.

Sincerely,

/s/ STEVE RAKOW  
Analyst Coordinator

/s/ SAMIR OUANES  
Rates Analyst

SR/lt  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-17-532 and Docket No. E002/AA-17-904

#### I. INTRODUCTION

On July 29, 1986, the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Electric Sale Agreement* (1986 Order) in Docket No. E002/CI-86-176. The 1986 Order Approved the *Resource Recovery Electric Sale Agreement between Northern States Power Company and Hennepin Energy Resource Co., Limited Partnership* (HERC PPA) between Northern States Power Company (NSP, Xcel, or the Company) and Hennepin Energy Resource Co., Limited Partnership (HERC). The HERC PPA originally had a termination date of December 31, 2017. However, the HERC PPA included a seven-year extension at HERC's option. HERC exercised the option.

On June 30, 2017, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed the Company's *Petition for Approval of Amendment No. 1 to the Power Purchase Agreement with the Hennepin Energy Recovery Center* (Petition) pursuant to Minnesota Statutes §§ 216B.1645 and 216B.164. The Petition contained the *First Amendment to the Resource Recovery Electric Sale Agreement between Northern States Power Company and Hennepin Energy Resource Co., Limited Partnership* (Amendment No. 1), which included proposed terms for the seven-year extension option exercised by HERC.

On August 2, 2017, the Minnesota Department of Commerce (Department) filed comments regarding the Petition.

On August 14, 2017, Xcel and Hennepin County filed reply comments.

On August 22, 2017, the Commission issued its *Notice of Comment Period*, providing for supplemental comments.

On September 11, 2017, supplemental comments were filed by Alan Muller, Carol A. Overland, Hennepin County, the Department, and Xcel.

On September 25, 2017, Neighbors Against the Burner filed a Petition for Intervention.

On November 13, 2017, Xcel filed an informational letter and Eureka Recycling filed supplemental comments.

On November 14, 2017, the Department filed supplemental comments.

On November 15, 2017, Alan Muller filed supplemental comments.

On December 28, 2017, the Commission issued its *Order Rejecting Proposed Amendment to Power Purchase Agreement (2017 Order)*.

On January 17, 2018, Hennepin County (HC) filed its *Motion for Reconsideration (HC Motion)* regarding the 2017 Order. Also, Neighbors Against the Burner, Alan Muller, and Carol A. Overland (NAB) filed their *Motion for Reconsideration (NAB Motion)* regarding the 2017 Order.

Below is the Department's answer to the motions for reconsideration.

## **II. DEPARTMENT ANALYSIS**

### **A. RULE BACKGROUND**

Minnesota Rules 7829.3000 subpart 2 states that a petition for:

...rehearing, amendment, vacation, reconsideration, or reargument must set forth specifically the grounds relied upon or errors claimed. A request for amendment must set forth the specific amendments desired and the reasons for the amendments.

The Department reviewed the NAB Motion and HC Motion to determine if they raised significant new issues, pointed to new and relevant evidence, or exposed errors in the 2017 Order.

### **B. NAB**

The NAB Motion requested the Commission to reconsider the Order based on four reasons. The first reason cited by the NAB Motion is:

...there were no deadlines set. In the interim, it appears that the unreasonably high priced power purchase agreement may still be in effect. Ratepayers are overcharged as this unreasonably high priced power purchase agreement remains. For this reason, Neighbors Against the Burner, Alan Muller, and Carol A. Overland request that the Commission set a deadline for return to the Commission with another agreement to protect the ratepayers against overpriced HERC energy.

This concern is misplaced. The HERC PPA does not contain any terms regarding the price of energy during the seven-year extension period. Therefore, the old pricing does not apply.<sup>1</sup> Also, no deadline is necessary as *there is no Commission-approved price to be paid by ratepayers*; as a result, at this time there is no basis to charge Xcel's ratepayers for any costs of power from the HERC facility after December 31, 2017. Finally, if an appropriate price is determined by the Commission at a future time, the burden will be on Xcel to explain at such a time why its ratepayers should be charged for any costs of the HERC facility; thus, no Commission action is necessary at this time.

The second reason cited by the NAB Motion is:

Mr. Muller contacted Hennepin County and learned that an interim agreement was in the works and that "the price is based off the MISO market price," was expected to be complete with a matter of days, but no further information has been provided and no contract has been filed ... Neighbors Against the Burner, Alan Muller, and Carol A. Overland request that the Commission require an interim agreement be filed immediately to protect the ratepayers against continued price-gouging while Commission approval of an amendment to the Power Purchase Agreement is pending.

While it may be preferable to have a Commission-approved price to be paid by ratepayers in place at this time, it is up to HERC and Xcel to negotiate a price and seek Commission approval. Until such approval has been obtained, Xcel should not charge its ratepayers for costs of power from the HERC facility after December 31, 2017 since, as noted above, there is no Commission-approved price to be paid by ratepayers.

Following a phone discussion on January 22, 2018 with Xcel regarding this matter, it appears that the Company is still charging its ratepayers for the cost of power from the HERC facility after December 31, 2017. As a result, the Department recommends that the Commission require Xcel to cease collection of the cost of power from the HERC facility. The Department recognizes that, if HERC is needed to serve the Company's load, it will be necessary for Xcel to purchase power to replace the loss of the HERC resource. Thus, in such a circumstance it would be reasonable for Xcel to include the costs of the lowest cost replacement power in the FCA. As a result, Xcel should refund in its next monthly FCA any differential in the costs of power from HERC compared to the lowest costs of replacement power for the period after December 31, 2017 and demonstrate compliance with this Commission's requirement in the same monthly FCA. The demonstration would need to include a showing that HERC is needed to serve the Company's load. If HERC is not needed to serve the Company's load, the wholesale revenues would offset the cost of HERC's energy, resulting in a net zero impact on the FCA.

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<sup>1</sup> The Department discussed this issue with Xcel briefly and understands that, for now, Xcel will pay HERC the MISO market price under an interim agreement.

Third, the NAB Motion requests “that the Commission condition approval of an amendment on HERC permit renewal, with notice to both parties and the MPCA of this condition.” As noted in the NAB Motion, this issue was discussed extensively during the proceeding. NAB raises no new issues. Therefore, NAB has not provided a basis for reconsideration.

Fourth, the NAB Motion recommends:

The Commission should also consider reimbursement to ratepayers in a rate true up for these admittedly excessive costs, whether just during this interim period, or going back to when the overcharges were first brought to Commission attention, or going back to the original execution of the Power Purchase Agreement.

A rate true up for these excessive costs is not an issue at this time. As noted above, Xcel's ratepayers should not be charged for any payments by Xcel after December 31, 2017 unless and until the Commission approves a rate for those payments. The Commission has not granted any deferred accounting to Xcel to recover any such costs at a later time; as a result, there is not a basis for a true-up.

In summary, the NAB Motion did not raise significant new issues, point to new and relevant evidence, or expose errors in the 2017 Order. Therefore, the Department recommends that the Commission not reconsider the 2017 Order based upon the NAB Motion.

### *C. HERC*

The HC Motion requested the Commission to reconsider the 2017 Order for three reasons. The first reason cited by HC is:

The electrical output for the seven year extension period was first offered by Hennepin County to NSP at a meeting on April 16, 2014. (Affidavit of Randy Kiser, Ex. C.). There is no factual dispute on this date.

In its December 28, 2017 Order, the Commission rejected the Proposed PPA Amendment noting that the Commission's review is “focused on whether the purchase price under the proposed PPA amendment reflects a reasonable approximation of the current fair market value of the HERC's electrical output.” (Emphasis Added). Hennepin County respectfully submits, however, that any pricing decision must be based on an analysis not of the current fair market value but the value at the time the electrical output was offered by Hennepin County to NSP.

HC supports this argument by reference to Section 7.13 of the HERC PPA which states:

If Seller decides to continue to operate the plant after the first 28 years, NSP will purchase the electrical output offered to NSP by Seller at its fair market value to NSP at the time it is offered, for up to an additional 7 years of plant operation.

In response, the Department notes that the Department's August 2, 2017 comments compared the price in Amendment No. 1 to recent MISO market prices and stated, "most recently (the last 5 years) prices have been much lower, averaging \$27.43 per MWh." Accepting HC's argument, to simplify the analysis, that fair market value in 2014 is the appropriate criterion would not change the information available in a significant way. Specifically, using the five years prior to 2014 (2009 to 2013) would change the average MISO market price to \$30.29 per MWh.<sup>2</sup> Thus changing the analysis to the five years prior to 2014 would not change the comparison significantly. Thus, even assuming that the argument is valid, this is not a significant new issue.

Second, the HC Motion argued that:

... even if the Commission were to base a determination on the current fair market value, it must not look to the MISO capacity auction price, which is based on a one year forward price of capacity and not valid for longer terms ... Rather, it should look to other measures of capacity value currently included in NSP's rate structure such as the embedded capacity value in the CIP program, curtailable rates, solar capacity value, the cost of comparable resources such as combined cycle, and the capacity value used as a basis for the IRP decision.

In response, the Department notes that the requirement under the HERC PPA is that the pricing reflect "fair market value." Embedded costs and so forth recommended by HC are not a reflection of market value. Thus, this argument is not relevant to the proceeding.

Third, the HC Motion notes that:

Hennepin County believes an unintended consequence of NSP's inability to recover capacity costs from the fuel clause adjustment rider resulted in devaluing HERC's value of capacity. The decision in

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<sup>2</sup> As explained in the Department's August 2, 2017 comments, for purposes of comparison to Amendment No. 1, the averages are calculated in real (2016) dollars using a two percent inflation rate.

this proceeding must not put economic harm on Hennepin County, which is in conflict with the language and intent of the HERC PPA.

In response, the Department notes that NSP's inability to recover capacity costs from the fuel clause adjustment is the same in all potential contracts negotiated by Xcel and HC. Either the Xcel-HC contract would include a market-based capacity price or such a price would be imputed during the Department's analysis to ensure that Xcel's ratepayers are charged reasonable rates for electric service from Xcel. Further, the fact that Xcel has a multi-year rate plan impacts the Company and not HERC in that it provides Xcel an incentive to minimize costs. Therefore, the Department concludes that this concern is without merit.

In summary, the HC Motion did not raise significant new issues, point to new and relevant evidence, or expose errors in the 2017 Order. Therefore, the Department recommends that the Commission not reconsider the 2017 Order based upon the HC Motion.

### **III. DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission not reconsider the 2017 Order.

The Department also recommends that the Commission require Xcel to cease collection of the cost of power from the HERC facility. If HERC is needed to serve the Company's load, it would be reasonable for Xcel to include the costs of the lowest cost replacement power in the FCA. As a result, Xcel should refund in its next monthly FCA any differential in the costs of power from HERC compared to the lowest costs of replacement power for the period after December 31, 2017 and demonstrate compliance with this Commission's requirement in the same monthly FCA. The demonstration would need to include a showing that HERC is needed to serve the Company's load. If HERC is not needed to serve the Company's load, the wholesale revenues would offset the cost of HERC's energy, resulting in a net zero impact on the FCA.

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## 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  
Comments**

**Docket No. E002/M-17-532 and E002/AA-17-904**

**Dated this 29<sup>th</sup> day of January 2018**

**/s/Sharon Ferguson**



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