

February 5, 2020

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
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RE: REPLY COMMENTS  
ESTIMATE OF THE COSTS OF FUTURE CARBON DIOXIDE REGULATION ON  
ELECTRICITY GENERATION  
DOCKET NOS. E999/CI-07-1199 AND E999/DI-19-406

Dear Mr. Barlow:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to comments filed by other parties in this docket.

We continue to believe the evidence currently available argues for retaining the Commission's current CO<sub>2</sub> range and 2025 threshold year for planning years 2020 and 2021. There is insufficient basis to increase the CO<sub>2</sub> regulatory cost range today. Doing so would be speculative when the prevailing Statute requires the estimated values be *likely*. To the extent there is new evidence that a different approach to CO<sub>2</sub> regulation is likely in the future, the Commission has the authority to reopen this docket to update the values and/or the threshold year at any time.

## REPLY COMMENTS

### A. Other Utilities and MLIG

The positions of Minnesota Power, Great River Energy, Otter Tail Power Company, and Minnesota Large Industrial Group (MLIG) are unchanged from the positions those parties took in their September 6, 2019 comments to the Pollution Control Agency and Department of Commerce. Since we responded to those positions in our January 24 comments, we do not address them in detail here. In brief, the other utilities and MLIG either support or do not object to retaining the current CO<sub>2</sub> regulatory cost range of \$5 to \$25 per ton. We agree. The utilities do not object to the threshold year of 2025, but suggest a later threshold year may be more realistic – 2028 (Great River Energy and Otter Tail) or 2030 (Minnesota Power). MLIG

proposes delaying the threshold year to 2037. We believe it remains plausible that federal or state carbon regulation could be in place in 2025, and that it is unlikely no regulation will be in place before 2037, so recommend retaining the current 2025 threshold year. We agree with the other utilities on adopting the new regulatory cost range for plans filed in both 2020 and 2021, and retaining the Commission’s five application scenarios.

## **B. Clean Energy Organizations**

The Clean Energy Organizations (CEO) advance several arguments for a higher regulatory cost range and earlier threshold year. Most are premised on speculation regarding shifts in the federal landscape and/or actions Minnesota might take to regulate power sector CO<sub>2</sub> emissions. The Statute directs the Commission to identify the *likely* range of regulatory costs. The shifts CEO suggests are indeed possible; however, there is not yet sufficient evidence they are likely to justify adjusting the regulatory range. As more information becomes available regarding the future developments cited by CEO such that changes are likely, the Commission could reopen this docket – sooner than 2022 if warranted – and update the values and threshold year accordingly. We discuss each of the CEO arguments below.

### *1. Use of RGGI Allowance Price Floor for the Low Value*

CEO propose basing the low end of the regulatory costs range on the “Emissions Containment Reserve” trigger price, i.e. the allowance price floor, in the Regional Greenhouse Gas Initiative (RGGI) cap-and-trade program.<sup>1</sup> As explained in our January 24, 2020 Comments, the allowance price floors and ceilings in RGGI and the Western Climate Initiative (WCI) are *not* estimates of actual CO<sub>2</sub> prices faced by regulated entities in those markets. Instead, they are regulatory safeguards – built into the programs to contain prices within a range considered politically acceptable – that trigger certain regulatory remedies (withholding allowances from the market if prices hit the floor; releasing additional allowances or triggering other cost containment measures if prices hit the ceiling). The Agencies agree this is the case.<sup>2</sup>

Moreover, Minnesota does not participate in RGGI. If Minnesota were to enact a CO<sub>2</sub> cap-and-trade program similar to RGGI, the State may or may not adopt an allowance price floor at a similar level. Because of this – and because, even in RGGI,

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<sup>1</sup> Clean Energy Organizations’ Comments *In the Matter of Establishing an Updated Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06*. Docket No. E999/CI-07-1199 and E999/DI-19-406. January 24, 2020. (Hereafter “CEO Initial Comments.”) Page 5.

<sup>2</sup> See Recommendations of the Minnesota Pollution Control Agency and Minnesota Department of Commerce, Division of Energy Resources. *In the Matter of Establishing an Updated 2020 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation under Minn. Stat. § 216H.06*. Docket Nos. E999/CI-07-1199 and E999/DI-19-406. December 17, 2019. Page 3, footnote 2.

the allowance price floor does not reflect actual CO<sub>2</sub> abatement costs – there is not a basis to conclude the RGGI price floor is more representative of likely CO<sub>2</sub> regulatory costs in Minnesota than the Commission’s current low value.

## 2. *Use of Synapse 2016 High Estimate for the High Value*

CEO propose basing the high end of the regulatory costs range on a national CO<sub>2</sub> price forecast prepared by Synapse Energy Economics in 2016.<sup>3</sup> This change may reflect that the CEO’s earlier primary proposal – basing the high end on the average of allowance price ceilings in WCI and RGGI<sup>4</sup> – faces the reality that actual CO<sub>2</sub> prices in those markets have generally remained far below the price ceilings.

However, the Synapse forecast was developed at a time when the EPA’s Clean Power Plan, finalized in 2015, was the primary context for power sector CO<sub>2</sub> regulation. This gave regulated entities and other stakeholders a common understanding of the basic regulatory framework, stringency, carbon market mechanisms, compliance flexibilities, and other key determinants of regulatory costs. The Clean Power Plan has since been repealed and replaced by a fundamentally different approach in the Affordable Clean Energy rule, which is limited to heat rate improvement at coal-fired power plants and explicitly prohibits states from using CO<sub>2</sub> markets. This Rule is also being litigated; however, even if it is overturned, one cannot assume a return to an approach similar to the Clean Power Plan.

This makes the Synapse 2016 forecast no longer a rational basis for the Commission’s range. We believe the Commission should retain its current high value pending greater clarity on the approach that may prevail at the federal and state levels.

## 3. *“Future” CO<sub>2</sub> Regulatory Costs*

CEO argue that rather than considering historical or current CO<sub>2</sub> pricing (e.g. the latest available prices in WCI and RGGI), the Commission should consider “future” costs because of the direction in Minn. Stat. §216H.06 to “establish an estimate of the likely range of costs of *future* carbon dioxide regulation on electricity generation.” CEO maintain that CO<sub>2</sub> prices are likely to be higher in the future than they are today.<sup>5</sup>

We believe this attempts to infer too much legislative intent in a single word. *All* CO<sub>2</sub>

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<sup>3</sup> CEO Initial Comments, pages 5-6.

<sup>4</sup> See CEO Comments to the Agencies at page 3, *In the Matter of Establishing an Updated Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06*, September 6, 2019. (Docket Nos. E999/CI-07-1199 and E999/DI-19-406).

<sup>5</sup> CEO Initial Comments, page 4.

regulation, at least in the United States and Minnesota, was future regulation at the time the Statute was passed in 2007. This is no longer the case in 2020. We believe it is a stretch to assume the Legislature, by including that word in the statute, intended the Commission to ignore current, actual CO<sub>2</sub> prices when updating the range in 2020.

In fact, CO<sub>2</sub> prices affecting the power sector may or may not be higher in future years than today. They could be higher, if federal or state regulation sets a high carbon tax economy-wide and applies that tax to the power sector. They could remain low, if power sector-specific CO<sub>2</sub> regulation sets a lower tax, provides market mechanisms or other compliance flexibilities that keep prices low, or takes another approach. If the costs of clean energy continue to fall as they have in recent years, it could remain quite cost-effective to reduce CO<sub>2</sub> emissions even under more stringent regulations: consider, for example, that economics are driving a significant shift from coal power to renewables even in jurisdictions with no carbon price today.

In any case, it would be speculative to set a higher range now based on an assumption that a poorly designed future regulatory program would impose high costs on electricity consumers. Instead, it is more reasonable for the Commission to retain the current range and reopen this docket if future developments warrant an update.

#### 4. *Escalation Rate*

CEO assert the Commission's CO<sub>2</sub> regulatory costs remain flat over time and are not escalated for inflation like other costs. They propose regulatory costs should be escalated at a rate of roughly seven (7) percent – i.e. five (5) percent plus inflation – as does the RGGI allowance floor price.<sup>6</sup>

We addressed above why another program's regulatory trigger is not necessarily reflective of CO<sub>2</sub> regulatory costs likely to be faced by Minnesota utilities. Actual CO<sub>2</sub> prices in RGGI and WCI have not escalated at seven percent per year, or any other uniform rate; they have moved up and down because they reflect supply and demand for allowances and, more generally, the relatively low cost of CO<sub>2</sub> abatement in the power sector. If the cost of clean energy is low, allowing utilities to achieve significant CO<sub>2</sub> reductions at low cost to their customers, *this is a good thing* – not a reason to impose arbitrary higher values or escalation rates merely because of how a program in which Minnesota does not participate has chosen to escalate its floor price.

In fact, Xcel Energy does escalate the CO<sub>2</sub> regulatory costs for inflation – currently, at

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<sup>6</sup> CEO Initial Comments, page 4-5.

two (2) percent per year – just as we do other costs.<sup>7</sup> Until the Commission has more information about the design of federal or state CO<sub>2</sub> regulation, there is no objective basis to escalate these costs at seven percent while escalating all other costs only for inflation.

##### 5. *Changes in the Federal and State Regulatory Landscape*

CEO cite the potential for “a dramatically different political landscape” after 2020 leading to a more aggressive approach to power sector CO<sub>2</sub> regulation and higher regulatory costs. They cite the platforms of Democratic presidential candidates, as well as a variety of proposed federal bills, as evidence that CO<sub>2</sub> costs will be higher.<sup>8</sup>

CEO primarily cite carbon tax proposals as their examples of likely federal legislation.<sup>9</sup> It is worth noting that the currently proposed approach to power sector CO<sub>2</sub> regulation, both in Minnesota and in the most recent federal legislation, is not a carbon tax but a Clean Energy Standard – i.e., a technology-neutral requirement for electricity suppliers to provide an increasing share of retail sales from clean energy, reaching 100 percent by 2050. This was the approach in the Walz Administration’s 2019 legislation, likely to be re-proposed this year,<sup>10</sup> and is the approach in the *Climate Leadership and Environmental Action for Our Nation’s (CLEAN) Future Act* just released by the U.S. House Energy and Commerce Committee.<sup>11</sup> Thus, there is not a strong argument at present for basing the Commission’s regulatory costs on carbon taxes.

A different federal and/or state political landscape and more aggressive CO<sub>2</sub> regulation as CEO describe are possible, but so are other outcomes. The statute directs the Commission to establish an estimate of the *likely* range of costs of CO<sub>2</sub> regulation – not speculation about elections or broad shifts in policy. The Commission has discretion to reopen this docket whenever it determines necessary – including sooner than 2022 if the Commission chooses at this time to adopt a range for both 2020 and 2021. We believe it would be appropriate to do so at such time as the federal and/or state developments that CEO describe come to pass such that the Commission’s current range or threshold year of application appear no longer reasonable.

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<sup>7</sup> See 2020-2034 *Upper Midwest Integrated Resource Plan*, Appendix F2, Strategist Modeling Assumptions and Inputs, pages 1-3 (Docket No. E002/RP-19-368).

<sup>8</sup> CEO Initial Comments, pages 1, 3-4, 7-8.

<sup>9</sup> CEO Initial Comments, page 7 footnote 28.

<sup>10</sup> House File 1956 at <https://www.revisor.mn.gov/bills/bill.php?b=House&f=HF1956&ssn=0&y=2019>.

<sup>11</sup> See <https://energycommerce.house.gov/sites/democrats.energycommerce.house.gov/files/documents/Section-by-Section%20of%20CLEAN%20Future%20Act%20.pdf>.

6. *Potential for Minnesota to Regulate CO<sub>2</sub> Administratively or Join an Existing Cap-and-Trade Program*

CEO propose that the Minnesota Pollution Control Agency (MPCA) has sufficient statutory authority to regulate CO<sub>2</sub> emissions without new legislation, and/or to join WCI or RGGI.<sup>12</sup> Without taking a position on whether this is in fact the case, we note that unless or until MPCA exercises such authority, it would be premature to revise the CO<sub>2</sub> regulatory costs range on the speculation that Minnesota might join one of those programs. Indeed, MPCA itself, in the Agencies' recommendations to the Commission, said nothing in regard to joining one of those programs and recommended that the Commission retain the existing range. If MPCA's approach should change, the Commission could reopen this docket.

Even granting CEO's hypothetical that Minnesota joins WCI or RGGI, it is far from certain what impact Minnesota's joining would have on the CO<sub>2</sub> allowance price in those markets, which is determined by supply and demand across all the participating states in each program. Minnesota's electric sector emissions, at about 40 million tons as of 2016,<sup>13</sup> are relatively small in comparison to the total emissions regulated under both programs. Whether Minnesota's joining would cause the allowance price to go up, down, or be unaffected would depend on whether Minnesota's electric utilities are net allowance sellers or purchasers, which in turn would depend on the allowance allocation method chosen by MPCA. A reasonable assumption would be that Minnesota's joining would not substantially affect CO<sub>2</sub> allowance prices, making the current allowance prices a reasonable proxy for CO<sub>2</sub> regulatory costs if Minnesota should join. However, MPCA exercising statutory authority that the Legislature may or may not agree it has, its choice of program to join, and the unknown effect on allowance prices are too many degrees of speculation to be "likely," and therefore not a reasonable basis for adjusting the CO<sub>2</sub> regulatory costs range until more is known.

7. *Comparison to International Carbon Taxes*

CEO also point, as support for their proposed range to various international carbon pricing initiatives – from Poland at <\$1/ton to Sweden at \$127/ton – with a midpoint of \$29.47.<sup>14</sup> We believe these programs are not relevant to the Commission's decision. Some reflect carbon taxes, arrived at via political negotiations in those countries, and set significantly higher than the current low cost of CO<sub>2</sub> abatement in the U.S. power sector. U.S. federal and/or state power sector regulation may or may not take the form of a CO<sub>2</sub> tax, and if it does, may or may not be set as high as the level other countries have chosen.

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<sup>12</sup> CEO Initial Comments, pages 8-9.

<sup>13</sup> See <https://www.pca.state.mn.us/air/greenhouse-gas-emissions-data>.

<sup>14</sup> CEO Initial Comments, page 7.

## 8. *Analysis of Cost Impacts of a Carbon Tax*

Finally, CEO provide an analysis, based on CO<sub>2</sub> emission forecasts requested from the utilities, of the potential total tax liability and customer rate impacts if a CO<sub>2</sub> tax were imposed at the mid-level of the Synapse 2016 forecast. For Xcel Energy, CEO estimate this would impose costs of \$354 million in 2022, declining to \$169 million in 2031, which they estimate translates to incremental electric rate impacts of \$0.008 to \$0.004 per kWh.<sup>15</sup> The Company has not attempted to duplicate or validate this analysis. We do not dispute that a CO<sub>2</sub> tax in the Synapse “mid” range (\$20-30 per ton) would have a dramatic cost impact on our customers. Rather than supporting the CEO argument for a higher range, the analysis illuminates the reasons the Company has generally opposed CO<sub>2</sub> tax proposals.

As already discussed, the Synapse 2016 forecast is no longer relevant, and there is at present insufficient evidence of a CO<sub>2</sub> tax gaining traction – or the level at which the tax may be set – to make it likely and thus justify revising the current range. Once again, it would be appropriate for the Commission to reopen this docket if passage of a CO<sub>2</sub> tax begins to appear likely.

We observe that due to the steadily improving economics of carbon-free energy, it has been possible in recent years – and appears likely to continue to be possible – to reduce electric sector CO<sub>2</sub> emissions at relatively low cost to our customers. The electric sector Minnesota-wide has reduced CO<sub>2</sub> emissions 29 percent since 2005, far more than any other sector.<sup>16</sup> Xcel Energy reduced electricity CO<sub>2</sub> emissions 34 percent from 2005 to 2018, with a preliminary estimate of 42 percent for 2019. In our July 1, 2019 *Upper Midwest Resource Plan*, we propose to reduce CO<sub>2</sub> emissions over 80 percent by 2030 – achieving Minnesota’s economywide statutory goal twenty years early – and we believe we can do so affordably for our customers. We have shown in our proposal for seasonal dispatch that even before retiring coal units, we can reduce their CO<sub>2</sub> emissions further *at a net savings* to our customers.<sup>17</sup> And approximately a dozen U.S. electric utilities have now followed Xcel Energy’s lead in setting a carbon-free or net zero goal for 2050.<sup>18</sup>

This transition is happening because clean energy is an outstanding investment, is in demand from our customers and communities, is available at an affordable cost, and is positive for the climate. More specific to this docket – this transition is happening

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<sup>15</sup> CEO Initial Comments, page 1-2.

<sup>16</sup> See <https://www.pca.state.mn.us/air/greenhouse-gas-emissions-data>.

<sup>17</sup> Xcel Energy. *Petition - Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis*. December 20, 2019. Docket No. E002/M-19-809.

<sup>18</sup> In addition to Xcel Energy, to date Arizona Public Service, Avista, DTE, Duke, Green Mountain Power, Hawaiian Electric, Idaho Power, Madison Gas & Electric, National Grid, PNM, PSEG, and Southern California Edison have announced either 100% clean energy, carbon-free or net zero goals.

with an *actual* CO<sub>2</sub> price of zero dollars per ton – i.e., there is no current CO<sub>2</sub> price in MISO acting as a forcing factor in our plans. The Commission’s current planning range of \$5 to \$25 per ton has been sufficient to show that our resource choices are cost-effective from a societal perspective and increasingly, the same plans are cost-effective in real dollar (PVRR) terms.

## CONCLUSION

The Company appreciates the opportunity to provide these comments. We do not believe there is a strong rationale at present to increase the CO<sub>2</sub> regulatory cost range based on largely speculative evidence from other jurisdictions, proposed bills, future elections, or outdated studies. The Commission should retain its current range and threshold year for 2020 and 2021 planning purposes. The Commission has the authority to reopen this docket if evidence shows a likely case for a different approach.

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](mailto:Nicholas.F.Martin@xcelenergy.com), or me at (612) 330-6064 or [Bria.E.Shea@xcelenergy.com](mailto:Bria.E.Shea@xcelenergy.com), if you have any questions.

Sincerely,

/s/

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DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures

c: Service List



## CERTIFICATE OF SERVICE

I, Paget Pengelly, 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 5<sup>th</sup> day of February 2020

/s/

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