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July 18, 2016

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 Camp Ripley Solar Project Petition
Docket No. E015/M-15-773

Dear Mr. Wolf:

Minnesota Power hereby electronically submits its Reply Comments in response to comments submitted from the Department of Commerce – Division of Energy Resources (“Department”) on July 7, 2016, and the Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) and Fresh Energy, both filed on July 6, 2016. All of these comments reference a compliance filing submitted by Minnesota Power in the above-referenced Docket on April 25, 2016. An Affidavit of Service is included.

Please contact me at the number above if you have any questions about this filing.

Yours truly,

Susan Ludwig

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Camp Ripley Solar Project for Recovery through Minnesota Power’s Renewable Resources Rider under Minn. Stat. § 216B.1645 and Related Tariff Modifications

Docket No. E015/M-15-773

**REPLY COMMENTS
TO APRIL 25, 2016
COMPLIANCE FILING**

I. INTRODUCTION

On August 21, 2015, Minnesota Power (“the Company”) filed a Petition with the Minnesota Public Utilities Commission (“Commission”) seeking approval of investments and expenditures in the Camp Ripley Solar Project (“Camp Ripley Project”) and for cost recovery pursuant to Minn. Stat. § 216B.1645. The Company also requested Commission approval for changes necessary to appropriately allocate costs to customers as set out in the Minnesota Solar Energy Standard (“SES”) in Minn. Stat. § 216B.1691, subd. 2f. On February 24, 2016, the Commission issued an Order approving certain aspects of the Company’s Petition, but requested more information on the Solar Energy Adjustment (“SEA”) and the Camp Ripley Project facility lease. On April 25, 2016, the Company submitted a compliance filing (“Compliance Filing”) in response to the Commission’s Order.

Minnesota Power provides these Reply Comments in response to comments submitted from the Department of Commerce – Division of Energy Resources (“Department”) on July 7, 2016, and the Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) and Fresh Energy, both filed on July 6, 2016.

II. RESPONSE TO DEPARTMENT RECOMMENDATIONS

A. Results of Independent Appraisal

In its Compliance Filing, the Company included an independent appraisal for the utilization of a land parcel similar to the land which will be leased from Camp Ripley for the

solar project. The Company also included an independent evaluation of the benefits of permitting and security that the Camp Ripley Project will realize due to its location. The resulting independent appraisals were lower than the amount Minnesota Power negotiated to pay to Camp Ripley, by \$19,059 of operation and maintenance expense per year. The Department recommended that the total approved recovery amount for the Camp Ripley Project be based on the appraised value.

Minnesota Power disagrees that the recovery amount should be adjusted based on the appraised value. The Company negotiated in good faith with a state agency, mindful of the importance of agreeing to a fair value of the costs and the benefits, both for customers of the utility and citizens of Minnesota who are ultimately owners of the land and who fund Camp Ripley’s operations. Land appraisals are not an exact science and the Camp Ripley land valuation was in line with the seven comparable properties included in the independent valuation that were not state-owned land, as shown in Table 1 below.

Table 1. Land Sale Information Comparison

| Site Number | Price per Acre |
|-------------------------------|----------------|
| Camp Ripley Land Lease | \$2,500 |
| Site 1 | \$2,531 |
| Site 2 | \$1,800 |
| Site 3 | \$2,157 |
| Site 4 | \$2,000 |
| Site 5 | \$2,700 |
| Site 6 | \$2,084 |
| Site 7 | \$2,326 |

Additionally, this land appraisal was based on sales of land, not long-term leases of land. The land lease terms with Ripley were negotiated to fit Minnesota Power’s objectives in developing the Camp Ripley Project, including leveraging a customer relationship with a valued customer and providing the basis for potential future initiatives, such as back-up generation and smart grid implementation, all on one of the most secure sites in the state and without

corresponding permitting risks. Another site would likely not have included these opportunities and benefits. Minnesota Power believes its land lease terms with Camp Ripley are appropriate and cost recovery should not be adjusted.

B. Allocation of Capacity Benefits

The Department did not agree with Minnesota Power's conclusion about the value of the Camp Ripley Project's solar capacity and stated it would be helpful to know the amount of capacity that is accredited by MISO.

When it is fully operational by the end of 2016, the Camp Ripley Project will add approximately 5 MW of accredited capacity per year to Minnesota Power's power supply for solar-paying customers. Capacity can be sold through the annual Midcontinent Independent System Operator ("MISO") Planning Resource Auction once a resource is qualified. Once Camp Ripley operates through its first MISO peak season (June to August), it will qualify and be eligible for capacity sales and thus have a theoretical capacity value. The earliest date this would occur is June, 2018. Although it is difficult to predict the market value of future capacity sales through MISO, the value of capacity in MISO's last capacity auction for the 2016/2017 MISO planning year for Local Resource Zone 1 (Minnesota Power's capacity zone) was \$600/MW-Month. This equates to \$36,000 per planning year for Camp Ripley's 5 MW of capacity.

Since there can be no positive market value of the solar capacity until June, 2018 at the earliest, Minnesota Power continues to believe it is best to address a methodology of allocating the solar capacity valuation between solar-exempt and solar-paying customers in its next rate case as previously agreed by the Company.

C. SEA Calculation

The Department concluded that Minnesota Power's proposed SEA adjustment to account for the time of generation was sound, with one exception, and recommended that the Commission approve the Company's FPE and SEA riders. The exception is a revision to the Company's proposed tariff to reflect a change in the calculation of the Time of Generation Adjustment ("TOGA"). The Department concluded that the TOGA calculation should be calculated by comparing the time value of solar energy to actual average costs of non-solar energy, rather than an hourly projected avoided cost of energy. Minnesota Power agrees with the

Department's recommendation and proposes one additional clarifying edit to the SEA tariff language on page 96.1, shown underlined below:

- (f) Calculate the simple average of actual non-solar energy cost (\$/MWh) for the first two of the preceding three months by dividing total monthly costs of non-solar generation by total monthly non-solar MWh sales;

III. RESPONSE TO OAG AND FRESH ENERGY

The OAG recommended that the Commission require Minnesota Power to calculate the impact of all Value of Solar ("VOS") components for the Camp Ripley facility in its next rate case and incorporate the components that the Company believes are appropriate in its class cost of service study ("CCOSS"). Fresh Energy recommended the Commission direct Minnesota Power to resubmit its compliance filing with quantitative analysis of the VOS components and show cause as to why each of the components should not be included in the FPE adjustment for the SEA Rider as applied to the Camp Ripley Project.

The Commission's February 24, 2016 Order in this docket required Minnesota Power to include an analysis of the applicability of the VOS methodology components. The Company included this analysis in its Compliance Filing on April 25, 2016. The OAG had previously requested the Commission to amend its February 24 Order to require Minnesota Power to calculate a value for each VOS component. On May 13, 2016, the Commission issued an Order denying the OAG's request.

In its October 23, 2015, Reply Comments, Minnesota Power explained why the use of VOS is not appropriate in the Camp Ripley Project as a way to allocate costs and benefits between solar-exempt and solar-paying customers. The VOS is intended to be used as an alternative tariff to net metered and small cogeneration facilities less than 1MW in size, as spelled out in Minn. Stat. § 216B.164, subd. 10(b). Minnesota Power has not established a VOS and not required by statute to establish a VOS. Furthermore, the Commission has already approved a motion requiring Minnesota Power submit a VOS calculation in its Community Solar Garden docket (see E015/M-15-825 order pending).

Minnesota Power has proposed a methodology to appropriately allocate costs and benefits of the Camp Ripley Project to solar-paying customers. The Company is concerned that the application of values for solar beyond those that are known and measurable may result in a breach of Minn. Stat. § 216B.1691, subd. 2f(d), which states that customers exempt from the SES “may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified by this subdivision.”

Because of the solar exemption statute, it is not appropriate for Minnesota Power to incorporate VOS components in its CCOSS. As described in its initial filing, the Company proposes to use the SEA Rider and the Solar Renewable Factor as mechanisms to separate solar costs Minnesota Power incurs to meet the SES in order to comply with the solar exemption statute. Consequently, the Company must exclude these types of costs in calculating the CCOSS, and costs to meet the SES will continue to be included in the SEA Rider and the Solar Renewable Factor, even after the Company’s next rate case.

IV. CONCLUSION

Minnesota Power appreciates the thorough review provided by the Department, the OAG, and Fresh Energy. The Company requests the Commission approve cost recovery for the Camp Ripley Project of amounts included in its initial filing as already limited by the February 24, 2016 Order and approve its proposed FPE Rider and SEA Rider as modified by the DOC and clarified in these comments. Timely resolution of these matters will ensure Minnesota Power will be in compliance with the SES exemption provisions well in advance of Camp Ripley beginning to generate solar energy around November 2016.

Dated: July 18, 2016

Yours Truly,



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AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Dawn LaPointe of the City of Hermantown, County of St. Louis, State of Minnesota, says that on the 18th day of July, 2016, she served Minnesota Power's Reply Comments to April 25, 2016 Compliance Filing in Docket No. E015/M-15-773 on the Minnesota Public Utilities Commission via electronic filing. The persons on the attached service list were served as requested.

 /s/ Dawn LaPointe

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