

November 14, 2022

PUBLIC DOCUMENT

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-20-620

Dear Mr. Seuffert:

Attached are **PUBLIC** comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the October 14, 2022 updated petition of Northern States Power Company, doing business as Xcel Energy (Xcel) in Docket No. E002/M-20-620 regarding Xcel's recent wind repower proposals.

The Department will provide a recommendation after reviewing Xcel's reply comments. The Department is available to answer any questions the Minnesota Public Utilities Commission may have in this matter.

Sincerely,

/s/ STEPHEN COLLINS
Financial Analyst

/s/ HOLLY SODERBECK
Financial Analyst

SC,HS/ja
Attachment



Before the Minnesota Public Utilities Commission

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

Docket No. E002/M-20-620

I. INTRODUCTION

On October 14, 2022, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company), filed an updated petition requesting the Minnesota Public Utilities Commission (Commission):

- Approve higher capital costs for the Border Winds and Pleasant Valley wind projects, as reasonable and in the public interest; and
- Continue to allow the Company to pursue cost recovery of the Border Winds and Pleasant Valley wind projects in a future Renewable Energy Standard (RES) Rider filing.

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviews Xcel's supplemental petition below.

II. BACKGROUND

On September 29, 2020, Xcel filed its initial petition in this docket, requesting that the Commission authorize Xcel to repower several projects at the time either owned by Xcel ("self-builds") or whose power was contractually purchased by Xcel.

Two of the projects were Border Winds and Pleasant Valley, both owned by Xcel. Border Winds, located in Rolette County, North Dakota, had pre-power capability of 150 megawatts (MW) and an expected post-repower capability of 165 MW.¹ Pleasant Valley, located in Mower County, Minnesota, had a pre-repower capability of 200 MW and an expected post-repower capability of 220 MW. Both projects came into service in 2015 and with an expected life of 25 years. The repowered projects had the same expected life and Xcel expected both to go into service in 2024. The projects began initial construction for PTC purposes in 2021.²

¹ The pre-repower and expected post-repower turbines were as follows for Border Winds and Pleasant Valley, respectively: **[TRADE SECRET DATA HAS BEEN EXCISED]**.

² October 14, 2022 updated petition, pages 8-9.

Based on the information in Xcel's initial petition, Border Winds and Pleasant Valley each had an expected levelized cost of energy (LCOE) of **[TRADE SECRET DATA HAS BEEN EXCISED]** per megawatt-hour (MWh), respectively.³ These expected cost levels were based on expected production tax credit (PTC) qualification of **[TRADE SECRET DATA HAS BEEN EXCISED]**. The expected repowering capital costs were **[TRADE SECRET DATA HAS BEEN EXCISED]**, respectively.

On January 22, 2021, the Commission issued an order in this docket authorizing Xcel to repower Border Winds, Pleasant Valley, and other wind resources in Xcel's system. The order also issued the following requirements:

- Xcel may recover the costs of each self-build repowering project, including the existing rate base on each existing facility. Any recovery through the RES Rider will require a separate Commission determination that the projects are eligible.
- For all projects approved in this order, any future cost recovery is limited to the Minnesota jurisdictional allocators approved by the Commission.
- The following ratepayer protections apply to the projects approved in this docket:
 - Xcel must justify any costs (including operations-and-management expense, ongoing capital expense— including revenue requirements related to capital included in rate base— insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding, for either the Ewington PPA or the self-build portfolio. Xcel bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.
 - The Commission will otherwise hold the Company accountable for the price and terms used to evaluate the projects.
 - Ratepayers will not be put at risk for any assumed benefits that do not materialize.
 - Xcel customers must be protected from risks associated with the non-deliverability of accredited capacity and/or energy from the Project. The Commission may adjust Xcel's recovery of costs associated with this Project in the future if actual production varies significantly from assumed production over an extended period.
 - Xcel must include in its Fuel Clause Adjustment true-up filings the amount of any curtailment payments for the projects, along with explanations for the curtailments.
 - Xcel must clearly account for all costs incurred for the projects.
 - Xcel must file a compliance filing by June 30, 2021, that provides an update on the status of the projects.
 - Until the projects are in service, Xcel must report quarterly on project failures along with the options available to the Commission to remedy any failures that occur.
- For future repowering petitions that include more than one project, Xcel shall evaluate the proposed wind projects both on an individual basis and as a total portfolio.

³ Department Supplemental Comments in this docket filed December 2, 2020, page 5.

On October 4, 2022, the Commission issued an order regarding Xcel's petition requesting approval of 2022 renewable energy standard (RES) revenue requirements, in Docket No. E002/M-21-794. That order approved RES rider cost recovery eligibility for the Border Winds and Pleasant Valley repowers.

III. UPDATED PETITION OVERVIEW

Xcel states the projects "have experienced significant cost increases" and is requesting the Commission approve "updated pricing." Of note, Xcel states Vestas could not retrofit the rotor and driver in the turbines, as contemplated in Xcel's initial petition, and now Vestas must undergo replacements instead of retrofits, which Xcel states increased costs by [TRADE SECRET DATA HAS BEEN EXCISED]. In addition, Xcel states that due to some local landowners not giving Xcel permission to transport project components across their land, costs have gone up by [TRADE SECRET DATA HAS BEEN EXCISED]. Xcel also cites higher than forecasted costs for disposal, builder's risk insurance, labor, allowance for funds used during construction, storage, maintenance, and capital services. In addition, Xcel states its initial petition forgot to include North Dakota sales tax of 5.5%, which adds a cost of [TRADE SECRET DATA HAS BEEN EXCISED]. Lastly Xcel states it no longer expects to add foundation collars which the Company expects to reduce costs by [TRADE SECRET DATA HAS BEEN EXCISED]. In total, Xcel states the cost of the project has increased by [TRADE SECRET DATA HAS BEEN EXCISED] resulting in a new expected total cost of [TRADE SECRET DATA HAS BEEN EXCISED].

However, Xcel claims the increase in initial capital cost will be offset by higher production tax credit (PTC) levels. To maximize PTCs, Xcel intends to delay full-on construction by one year for both projects, beginning and ending full-on construction in 2025 instead of 2024.⁴

Xcel requests a Commission decision before March 2023.

IV. PRODUCTION TAX CREDITS AND INFLATION REDUCTION ACT (IRA) OF 2022 – OVERVIEW

The Department provides its current understanding of production tax credits below, subject to update.

A. BEFORE IRA

Under 26 U.S.C. 45, wind facilities have been eligible to receive a production tax credit for energy produced during their first 10 years. The PTC historically has been a percentage of the "full" amount. The full PTC was equal to \$15/MWh adjusted by an inflation adjustment factor.⁵ For example, in 2022 the Internal Revenue Service (IRS) application of the inflation adjustment factor resulted in a full PTC level of \$26/MWh,⁶ a slight increase from the 2021 level of \$25/MWh.

⁴ To the Department's understanding, both projects began construction for PTC purposes on or before the prior December 31, 2022 deadline. October 14, 2022 updated petition, pages 8-9.

⁵ Section 45(a) prior to amendment, section 42(b)(2), and section 45(e)(2).

⁶ 87 FR 27204 (FR Doc. 2022-09695 filed 5-6-22), correcting 87 FR 22286 (FR Doc. 2022-07967 filed 4-13-22). See <https://www.federalregister.gov/documents/2022/05/06/2022-09695/credit-for-renewable-electricity-production-and-publication-of-inflation-adjustment-factor-and>, and <https://www.govinfo.gov/content/pkg/FR-2022-04-14/pdf/2022-07967.pdf>.

The credit amount for projects beginning construction in 2020 or 2021 was 60% of the full credit.⁷ For example, if a project began construction in 2020 or 2021 and came into service in 2021, energy produced in 2021 would receive a tax credit of \$15/MWh (60% multiplied by \$25/MWh).

Projects beginning construction in 2022 or later previously could not receive PTCs.⁸ As discussed below, this has changed with the passage of the IRA.

B. AFTER IRA

On August 16, 2022, the IRA⁹ was signed into law. Among many other things, the IRA amended 26 U.S. Code § 45 (section 45).¹⁰ In addition, the IRA added 26 U.S. Code § 45Y (section 45Y).¹¹

1. Section 45

a.) Section 45 for facilities placed into service before 2022

Following the IRA, PTCs under section 45 remain the same for facilities placed into service before January 1, 2022.¹² (See “Before IRA” discussion above for details.) To receive PTCs, facilities placed into service before January 1, 2022 must also begin construction before January 1, 2022.¹³

b.) Section 45 for facilities placed into service 2022 or later

Therefore, new section 45 PTCs only apply to facilities placed in service in 2022 or later. To receive new section 45 PTCs, facilities must begin construction before January 1, 2025.¹⁴

For facilities placed into service in 2022 or later, and beginning construction before January 1, 2025—the PTCs under section 45 are calculated as follows:

- Still adjusted by an inflation factor,¹⁵
- Base PTC level is set to a minimum level of \$3/MWh,¹⁶
- However, if the facility is qualified under any of the following, the PTC level is equal to \$15/MWh (\$3/MWh multiplied by 5) and then adjusted for inflation:¹⁷

⁷ Section 45(b)(5)(D)

⁸ Section 45(d)(1) prior to amendment.

⁹ Public Law 117-119, available at <https://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf>.

¹⁰ IRA section 13101, Extension and Modification of Credit for Electricity Produced from Certain Renewable Resources. See updated law at <https://www.law.cornell.edu/uscode/text/26/45>.

¹¹ IRA section 13701, Clean Electricity Production Credit. See new law at <https://www.law.cornell.edu/uscode/text/26/45Y>.

¹² Section 45(b)(5)

¹³ Section 45(b)(5)

¹⁴ Section 45(d)(1)

¹⁵ Sections 45(b)(2) and 45(e)(2)

¹⁶ Section 45(a)(1)

¹⁷ Section 45(b)(6)

- A facility with a maximum net output of less than 1 MW in alternating current, or
- A facility which satisfies Prevailing Wage requirements under section 45(b)(7)(A) and Apprenticeship requirements under section 45(b)(8), or
- A facility which begins prior to the date that is 60 days after the Secretary publishes guidance with respect to the requirements of section 45(b)(7)(A) and 45(b)(8).¹⁸
- In addition:
 - Facilities meeting certain Domestic Content requirements receive a 10% bonus,¹⁹
 - Facilities located in an Energy Community also receive a 10% bonus (in addition, if applicable, to the Domestic Content bonus, resulting in a maximum bonus of 20%).²⁰

To the Department's understanding, the effective (after the inflation adjustment) 2022 base rate for updated section 45 PTCs is \$5.20/MWh. If Prevailing Wage and Apprenticeship requirements are met, applying the 5x multiplier results in a \$26/MWh credit. The 10% bonuses for meeting Domestic Content and Energy Community requirements in 2022 would therefore be worth either \$0.52 or \$2.60 each, resulting in a total maximum credit of \$31.20/MWh.

2. *Section 45Y – Facilities Placed into Service after December 31, 2024*

The new section 45Y applies to facilities placed into service in 2025 or later.²¹ Wind facilities can thus be eligible for both section 45 and section 45Y PTCs. However, facilities cannot receive both 45 and 45Y PTCs.²²

The base 45Y PTC level is the same as the 45 PTC level of \$3/MWh,²³ with what appears to be the same or similar inflation adjustment factor,²⁴ and also lasts 10 years.²⁵ In addition the same (as in section 45) Wage and Apprentice 5x bonus and Energy Community and Domestic Content 10% bonuses apply.²⁶

¹⁸ On October 5, 2022, the IRS issued Notice 2022-51 requesting comments on prevailing wage, apprenticeship, domestic content, and energy community requirements. The news release states, "The IRS anticipates that constructive comments from interested parties will aid the agency in drafting the guidance items most reflective of the needs of taxpayers entitled to claim energy credits." See <https://www.irs.gov/newsroom/irs-asks-for-comments-on-upcoming-energy-guidance>, and <https://www.irs.gov/pub/irs-drop/n-22-51.pdf>.

¹⁹ Section 45(b)(9)

²⁰ Section 45(b)(11)

²¹ Section 45Y(b)(1)(A)(ii)

²² Section 45Y(b)(1)(C)

²³ Section 45Y(a)(2)

²⁴ Section 45Y(c)

²⁵ Section 45Y(b)(1)(B)

²⁶ Section 45Y(g)(7),(8),(9),(10),(11)

In addition there is a phase out percentage multiplied by the base PTC level which can reduce the PTC depending on the “applicable year.”²⁷

- 100% for a facility which begins construction during the first calendar year following the applicable year,
- 75% for a facility which begins construction during the second calendar year following the applicable year,
- 50% for a facility which begins construction during the third calendar year following the applicable year,
- 0% for a facility which begins construction any subsequent calendar year.²⁸

45Y guidance is to be issued no later than January 1, 2025.²⁹

3. Summary

The Department summarizes its current understanding of PTC eligibility in the table below.

Table 1: PTCs under Sections 45 and 45Y (current understanding)

	Old 45	New 45	45Y
Placed into service	2021 and earlier	2022 and later	2025 and later
Beginning construction (for PTC purposes, with safe harbor requirements)	2016 to 2021	2024 and earlier	n/a
2022 Credit per MWh	\$15.60 (equal to \$26*60%) if beginning construction in 2020 or 2021	\$5.20 minimum; \$26 if meet Prevailing Wage + Apprenticeship req; 10% bonus for Domestic Content, 10% bonus for Energy Community --> \$31.20 maximum	same as New 45

²⁷ Section 45Y(d)(3) defines “applicable year” as: “the later of— (A) the calendar year in which the Secretary determines that the annual greenhouse gas emissions from the production of electricity in the United States are equal to or less than 25 percent of the annual greenhouse gas emissions from the production of electricity in the United States for calendar year 2022, or (B) 2032.”

²⁸ Section 45Y(d)

²⁹ Section 45Y(f)

V. REQUEST FOR SUPPLEMENTAL INFORMATION

The Department appreciates Xcel's timely updated petition. However, the Department believes the updated petition is missing key information needed to analyze whether the updated projects are in the public interest, especially compared to past petitions for resource acquisitions of this scale. Therefore, the Department requests Xcel, in reply comments, provide the following information and answer the following queries, to supplement the updated petition:

- Provide workpapers (in both PDF and spreadsheet form) detailing the forecasted and historical annual costs, benefits, and production levels of the project, as newly forecasted and as forecasted in the original September 29, 2020 petition,
- Tie the workpapers to all cost and benefit numbers cited in the October 14, 2022 petition,
- Provide updated Encompass modeling and present value of revenue requirements (PVRR) and present value of societal costs (PVSC) calculations, both on an individual basis and as a total portfolio, as required by the January 22, 2021 order,
- Explain how any new types of transfer of credits to third parties would affect revenue requirements offsets for PTCs relative to pre-IRA,
- Explain how ratepayers would benefit from any new types of transfers of credits to third parties,
- Precisely explain under what section (45 or 45Y) the new projects would receive PTCs, what PTC levels are expected, and the uncertainty regarding the level of PTCs,
- Explain and quantify to what extent the value of PTCs underlying benefit estimates depends on the prevailing wage and apprenticeship provisions or bonus credit provisions related to energy communities or domestic content,
- Explain and quantify the uncertainty in PTC estimates related to the inflation adjustment factor,
- Explain how delaying construction to 2025 or 2026 generates additional PTCs,
- Explain why the projects need to be placed in service by the end of 2025 to satisfy certain PTC requirements and explain which requirements Xcel is referring to and whether these are the safe harbor requirements,
- Provide updated information on when precisely the repowering is expected to occur, how long it will take, and the expected production cuts during construction,
- Provide an update on the current production of the facilities and any current construction or repowering activities,
- Explain the open builder's insurance claims cited on page 6 and why builder's insurance has increased by over 20 times from what the Company originally forecasted,
- Explain whether Xcel included any forecasted Border Winds and Pleasant Valley revenue requirements in its recovery request in Docket No. E002/GR-21-630 and explain how this updated petition affects that docket,
- Provide a narrative explaining the annual difference in expected PTCs and an explanation of whether the new credits include any changes for the sale or transfer to third parties,
- Explain the "uncertainty in the language surrounding the inflation adjustment factor and the resulting PTC value for credits beginning in 2022,"

- Explain any anticipated risks (with additional inflation, supply chain issues, workforce issues, land issues, etc.) with delaying construction from 2024 to 2025,
- Provide detail on cost changes as a result of contractor changes, including any changes to any costs paid to Vestas, and
- Explain whether the Company anticipates any effects on transmission issues resulting from anticipated project changes.

Once Xcel has provided this information, the Department will submit response comments as quickly as possible.

VI. RECOMMENDATION

The Department will provide a recommendation after reviewing Xcel's reply comments. The Department requests Xcel provide the information specified above.

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
Public Comments**

Docket No. E002/M-20-620

Dated this **14th** day of **November 2022**

/s/Sharon Ferguson

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