

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
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Commissioner

In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities

ISSUE DATE: November 8, 2023

DOCKET NO. E-999/CI-19-704

In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis

DOCKET NO. E-002/M-19-809

ORDER ACCEPTING ANNUAL FILINGS AND REQUIRING ADDITIONAL FILING

PROCEDURAL HISTORY

On March 1, 2023, Minnesota Power, Otter Tail Power Company (Otter Tail), and Northern States Power Company d/b/a Xcel Energy (Xcel) each filed an annual self-commitment and self-scheduling practices compliance report.

On April 21, 2023, Xcel filed a corrected version of its narrative report.¹

On May 31, 2023, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments.

On June 30, 2023, Xcel filed reply comments.

On July 31, 2023, Minnesota Power and Otter Tail filed reply comments. Fresh Energy and Sierra Club also filed joint comments.

On August 15, 2023, the Department and Xcel each filed reply comments.

On October 26, 2023, the Commission met to consider this matter.

¹ Xcel explained that it inadvertently filed the wrong document on March 1.

FINDINGS AND CONCLUSIONS

I. Introduction

Midcontinent Independent System Operator, Inc. (MISO) operates the regional transmission grid and wholesale energy markets for 16 states and provinces, including Minnesota. MISO markets identify the supply of electric generation available throughout the MISO region and the anticipated and actual demand for electricity in each area, selecting generators for dispatch to minimize overall costs to the system while meeting reliability requirements.

MISO unit commitment is the process that determines which generators (and other resources) will operate to meet the upcoming need. MISO scheduling and dispatch sets the hourly output for each committed resource to clear and dispatch the energy and reserve markets.

Under economic commitment or economic dispatch, a market participant—that is, anyone registered for participation in MISO markets—can specify the production cost of its generator, and MISO will refrain from dispatching the resource until market prices meet or exceed that level, subject to reliability requirements. But under some circumstances a participant will prefer to commit its generator to be available for MISO dispatch (self-commit), and unilaterally set the generator's output level (self-schedule). Under this process, the utility must accept whatever market price results, even if that price does not cover the cost of operating the unit.

Another dispatch option is seasonal dispatch, where normal operations of a generating plant are suspended on a seasonal basis—usually during the spring and fall when system load is relatively low—except when needed for reliability.

Renewable sources of generation have the advantage of incurring no fuel costs, which tends to reduce their operating costs and make them attractive options for MISO dispatch. However, self-committed and self-scheduled generators may displace these resources—even if, at any given moment, the renewable resource had lower operating costs.

Since 2019, the Commission has required utilities to submit annual filings that discuss and analyze the impacts of their own self-commitment and self-scheduling practices and model comparisons of potential costs and benefits for various dispatch scenarios. The Commission also requires that the filings provide analysis of the potential options for seasonal dispatch generally, and potential options and strategies for utilizing economic commitments for specific coal-fired generating plants, including the barriers or limitations to these potential options.

II. Annual Reports

A. Utilities' Filings

Minnesota Power, Otter Tail, and Xcel each filed annual reports addressing aspects of their generators' operations during the 2022 calendar year.

Minnesota Power provided data and analysis related to the operation of Boswell Energy Center (Boswell) units 3 and 4.

Otter Tail provided data and analysis related to the operation of the Big Stone Plant (Big Stone) and Coyote Station (Coyote).

Xcel provided data and analysis related to the operation of the Allen S. King Generating Station (King), Monticello Nuclear Generating Station (Monticello), Prairie Island Nuclear Generating Station (Prairie Island) units 1 and 2, and Sherburne County Generating Station (Sherco) units 1, 2, and 3.

The utilities' reports provided information and discussion addressing units' self-commitment and self-scheduling, seasonal operations, plant changes, curtailment of wind energy, equivalent forced outage rate (EFOR), impacts on carbon emissions, and best- and worst-case estimates for economic commitment.

B. Department Comments

The Department reviewed the utilities' filings and submitted comments that focused on evaluating the reasonableness of the utilities' actions when a generator's variable cost was greater than the generator's locational marginal price. According to the Department, this type of operational situation can result in unnecessary cost increases and unnecessary displacement of lower-cost renewable resources.

The Department stated that Boswell unit 3 operated under economic commitment in 2022, and the Department opined that the experience should provide valuable insight to Minnesota Power as it works to move Boswell unit 4 to greater economic dispatch in future years.

The Department stated that higher electricity prices enabled Big Stone and Coyote to perform better in 2022 than in 2021. The Department also noted that its analysis showed that the co-owners of Big Stone and Coyote would benefit from better aligning their financial incentives to allow more flexible operation of the units.

The Department stated that Xcel's King and Sherco units 1, 2, and 3 implemented a mix of economic and must-run commitment status and the results should provide insights into determining an optimal mix of these that maximizes benefits for rate payers. The Department recommended that Xcel continue operating these units flexibly while also identifying opportunities to further reduce costs and operating minimums.

The Department requested that each utility provide additional information in reply comments.

After reviewing the supplemental information provided in the utilities' reply comments, the Department recommended that the Commission find that the filings of Minnesota Power, Otter Tail, and Xcel are adequate and meet the filing requirements.

C. Commission Action

The Commission appreciates the important data, analyses, and discussion provided by the utilities in their annual reports. This information allows utilities and other stakeholders to evaluate deployment of generating units to determine optimal ways for utilities to offer them to the MISO markets to serve the best interests of utility customers.

Having reviewed the filings of the utilities and the Department's analyses of the data, the Commission finds that Minnesota Power, Otter Tail, and Xcel each submitted adequate annual reports that contained sufficient information to comply with the filing requirements.

III. Change to Minnesota Statute § 216B.2422

The February 2023 amendment of Minn. Stat. § 216B.2422 provides the Commission authority to order a utility to reduce carbon dioxide emissions from certain coal-fired electric generating units in Minnesota by either (1) requiring the utility to develop and implement a plan to seasonally operate the units or (2) establishing an annual limit for carbon dioxide emissions from the units.² Commenters addressed whether the Commission should modify this docket's current reporting requirements due to the recent change to Minn. Stat. § 216B.2422.

A. Positions of the Commenters

1. Fresh Energy and Sierra Club

Fresh Energy and Sierra Club contended that Xcel is well positioned to offer the Sherco 2 and King units seasonally since the units did not clear the 2023/2024 MISO Planning Reserve Auction (PRA) for summer, fall, or spring seasons,³ and they recommended that the Commission direct Xcel to limit King to seasonal operation until the unit's retirement. Fresh Energy and Sierra Club argued that historical operating data and modeling analyses demonstrate that seasonal operation of these units is in the public interest by providing cost savings for customers and reducing carbon dioxide emissions. Therefore, because seasonal operation of King would be in the public interest, Fresh Energy and Sierra Club urged the Commission to require Xcel to file and implement a seasonal operations plan that the Commission could authorize subject to a 30-day negative checkoff process.

2. The Department

The Department expressed support for utilities' efforts to reduce costs and carbon emissions, but it noted that utilities may already offer their coal-fired generation facilities under flexible operating conditions including seasonal dispatch, and such decisions have the potential to reduce energy costs and carbon emissions simultaneously. However, because utilities already have the obligation to operate efficiently, the Department did not recognize any need for the Commission to further advise utilities how to operate their systems. According to the Department, adding additional reporting requirements in this docket may cause unnecessary confusion and complexities due to the utilities' ongoing obligations to also comply with applicable rules and regulations of the Federal Energy Regulatory Commission and MISO.

² See 2023 Minn. Laws Ch. 7, sec. 22, to be codified at Minn. Stat. § 216B.2422, subd. 8.

³ Despite Sherco 2's scheduled retirement at the end of 2023, Fresh Energy and Sierra Club's written comments filed on July 31, 2023, recommended seasonal operation for both King and Sherco 2 because of the possibility that seasonal idling could be implemented in the fall of 2023. During the October 26, 2023 hearing, they recommended that the Commission require Xcel to create a seasonal operation plan that only addressed King's operation.

3. The Utilities

None of the utilities recommended changing the current reporting requirements in this docket.

a. Xcel

Xcel noted that in 2020, the Commission approved Xcel's plan to operate King and Sherco 2 on a seasonal basis and required reporting on the impact of seasonal operations.⁴ However, Xcel explained that it ceased seasonal operations at King and Sherco 2 in the spring of 2022 because MISO's Independent Market Monitor raised concerns about the company's plans to idle the units in March 2022 and King and Sherco 2 both cleared in the 2022/2023 MISO PRA, so Xcel was required to offer the units into the MISO market for the 2022/2023 planning year. Neither Sherco 2 nor King cleared the 2023/2024 PRA auction for the summer, fall, or spring seasons, which Xcel stated may provide additional opportunity to idle the units.

Xcel explained that its coal units are currently being committed on a limited basis due to low gas commodity and market energy prices, so it did not anticipate that a change to seasonal operations at Sherco 2 or King would have a significant near-term impact on operations.

Xcel indicated that it could begin seasonal operations at King within a short timeframe, likely a few days after issuance of a Commission order. Xcel also stated that it was not opposed to working with stakeholders to develop a long-term plan, as proposed by Fresh Energy and Sierra Club. Xcel reaffirmed its commitment to providing analysis of the impacts of seasonal operations in its annual reports consistent with past reporting. If the Commission orders seasonal operations of the units, Xcel stated that it would comply with the order, provided it could do so in a way that maintained reliability and safety. Additionally, the company noted that instances of emergency or reliability purposes are driven by MISO's resource needs, which are not predictable.

B. Commission Action

In 2020, the Commission approved Xcel's proposal to seasonally deploy King and Sherco 2. At that time, the Commission noted that seasonal deployment of the two units could achieve a meaningful reduction in carbon output while also reducing ratepayer costs. Recognizing the opportunity to learn from Xcel's experiences implementing its seasonal deployment plan, the Commission also required Xcel to submit annual filings that analyze seasonal operations and compare cost and carbon output to alternative unit-deployment scenarios. Xcel operated King and Sherco 2 seasonally until the spring of 2022 when MISO's Independent Market Monitor expressed concern about the company's plan to idle the units and the 2022/2023 PRA results obligated Xcel to offer both units throughout the entire 2022/2023 MISO planning year.

Fresh Energy and Sierra Club argued that requiring Xcel to seasonally operate King could further the public interest by decreasing costs for ratepayers and reducing carbon dioxide emissions. Previous annual reports filed by Xcel show that seasonal operations at King provided significant cost savings and reduction in carbon output compared to alternative must-run deployment

⁴ See *In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis*, Docket No. E-002/M-19-809, Order Approving Plan and Requiring Filing (July 15, 2020).

scenarios. Economic deployment resulted in higher carbon dioxide emissions, but it provided more financial benefit than seasonal deployment; however, these financial benefits are offset by reductions in operations and maintenance cost created by seasonal deployment.

The Commission finds that requiring seasonal operation of King is in the public interest because it will decrease carbon dioxide emissions and reasonably control costs for ratepayers. For the remainder of 2023, Xcel shall operate King seasonally according to the terms approved in the Commission's order issued on July 15, 2020.⁵ For 2024 and thereafter, the Commission will require Xcel to develop and implement a plan to operate King only during the months of June, July, August, December, January, and February, other than for emergency or reliability purposes, unless Xcel must offer the unit to fulfill capacity obligations. The Commission will require Xcel to file its plan within 30 days of October 26, 2023, and delegate authority to the Executive Secretary to approve the plan if no one files an objection to the plan within 30 days of its filing.

⁵ See *In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis*, Docket No. E-002/M-19-809, Order Approving Plan and Requiring Filing (July 15, 2020).

ORDER

1. Xcel Energy's March 1, 2023 filing in this docket, as amended on April 21, 2023, is adequate and met the filing requirements.
2. Minnesota Power's March 1, 2023 filing in this docket is adequate and met the filing requirements.
3. Otter Tail Power's March 1, 2023 filing in this docket is adequate and met the filing requirements.
4. For 2023, Xcel shall operate the coal-fired electric generator Allen S. King plant seasonally consistent with the plan previously approved in the Commission's July 15, 2020 order in Docket No. E-002/M-19-809. For 2024 and thereafter, Xcel shall develop a plan to operate the Allen S. King plant only during the months of June, July, August, December, January, and February, other than for emergency or reliability purposes, unless Xcel must offer the unit to fulfill capacity obligations. Xcel shall file the plan in this docket within 30 days of October 26, 2023. The Commission delegates authority to the Executive Secretary to approve the plan via notice if no objections are filed within 30 days of the plan's filing.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



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CERTIFICATE OF SERVICE

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission

**ORDER ACCEPTING ANNUAL FILINGS AND REQUIRING ADDITIONAL
FILING**

Docket Number **E-999/CI-19-704 & E-002/M-19-809**

Dated this 8th day of November, 2023

/s/ Mai Choua Xiong

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