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August 8, 2013

—Via Electronic Filing—

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: STATUS UPDATE  
RENEWABLE DEVELOPMENT FUND-CYCLE 1  
ECOVIATION F/K/A ANAEROBICS  
DOCKET NO. E002/M-00-1583

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits this Status Update pursuant to the Minnesota Public Utilities Commission's August 17, 2004 ORDER DEFERRING DECISION, ALLOWING TIME TO DEVELOP ALTERNATIVE USES, AND REQUIRING CONSULTATION AND REPORT (Order) in the above-referenced Docket.

The Commission's 2004 Order deferred decision on whether to disallow recovery of \$1.07 million disbursed by Xcel Energy to Ecovation f/k/a AnAerobics, Inc. (AnAerobics), under the terms of a Commission approved Renewable Development Fund (RDF) grant contract. These funds were utilized by AnAerobics to purchase two generators for use in a food biomass RDF project that was terminated in 2003 before becoming operational. The Commission deferred its recovery decision to allow Xcel Energy the opportunity to locate replacement projects or buyers for the two generators. After an extensive and prolonged search to repurpose the two generators, Xcel Energy has recently executed a purchase agreement for sale of one of the generators and has located a substitute project for the other generator. As a result, Xcel Energy submits this filing to update the Commission on these recent developments and seeks Commission guidance as to whether the Commission would like to revisit its 2004 Order.

The Department's stated objective in recommending disallowance of recovery of the AnAerobics funds was to encourage Xcel Energy to improve oversight and administration of RDF projects.<sup>1</sup> As outlined in this filing, the Company believes this objective has been satisfied and thus a disallowance is unnecessary. The AnAerobics project was the first and only RDF project to be terminated and this termination provided valuable lessons to the Company on certain ways to improve the terms of future grant contracts and the Company's administration and oversight of these projects. In this filing, Xcel Energy will:

- Provide background information related to the termination of the AnAerobics Project;
- Describe how the recent sale of one of the generators is in the public interest; and
- Highlight RDF program improvements that resulted from the lessons learned from the termination of the AnAerobics project and other RDF projects.

## **I. Background**

During the first RDF funding cycle, AnAerobics submitted a proposal for the development of an innovative food biomass project in Montgomery, Minnesota (Project). The AnAerobics' Project was to employ first-of-its-kind technology to convert both solid and liquid waste from the Seneca Foods Corporation (Seneca Foods) corn and pea processing plant into methane gas and carbon dioxide. The methane gas would then be scrubbed and used as fuel to generate 1.7 MW of electricity to be sold to Alliant Energy. The grant awarded by the RDF Board was to be used for the purchase of electrical generation equipment, specifically two biogas fuel generators, for the Project.

In the first RDF funding cycle, recommended projects were examined by the Department and approved by the Commission after the contract negotiation process between the Company and the winning bidder was completed.<sup>2</sup>

On March 5, 2002, Xcel Energy and AnAerobics executed a RDF grant contract (Contract) for the design, procurement, and installation of electrical generating equipment for the biomass Project. Xcel Energy filed this Contract with the

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<sup>1</sup> Comments of the Minnesota Department of Commerce at 5, Docket E002/M-00-1583, Jan. 27, 2005.

<sup>2</sup> See Order Approving Selected RDF Projects and Requiring Filing on Process Improvements at 2, Docket E002/M-00-1583, Apr. 3, 2002 ( "On December 3, 2001, the Department of Commerce (Department) filed comments on the final selection of Category A projects. It noted concern over costs for some projects. However, it recommended that Xcel proceed to contract negotiations. The Department indicated that it would examine costs once grant contracts and purchased power agreements (PPAs) are negotiated with the selected project bidders." ).

Commission on March 26, 2002; the Department filed comments recommending the Commission approve the grant contract on April 3, 2002; and the Commission approved the Contract on May 13, 2002.

Following approval of the Contract by the Commission, AnAerobics commenced work on designing and procuring the facilities necessary for the Project. Under the terms of the Contract, Xcel Energy was obligated to “make grant payments to [AnAerobics] for completion of the Project payment milestones identified in Exhibit C.” Contract, Section 4. Based on these terms, payment for each of these milestones was due<sup>3</sup> as soon as that milestone was fulfilled and was not contingent on the ultimate completion of the Project. Exhibit C outlines the contractual milestone, the AnAerobics’ deliverable, and Xcel Energy’s required payment for completion of that milestone. Exhibit C to the Contract is recreated below along with the dates on which AnAerobics met specific milestones and the dates on which attainment of these milestones was communicated to Xcel Energy.

<b>Milestone</b>	<b>Task</b>	<b>Deliverable</b>	<b>Payment</b>	<b>Milestone Met<sup>4</sup></b>	<b>Compliance Communicated to Xcel Energy</b>
1.	Design of electrical generating equipment and installation	Executive Summary of design	\$30,000	12/03/2002	12/11/2002
2.	Secure all electrical generating equipment permits	List of permits including that date of acquisition	\$170,000	1/27/2003 4/15/2003	4/15/2003
3.	Order major electrical generating equipment components	Proof of orders(s)	\$250,000	2/4/2003 2/5/2003 3/24/2004	4/15/2003
4.	Delivery of major electrical equipment components to site	Proof of major electrical generating equipment components to site	\$650,000	3/14/2003 3/17/2003 3/20/2003 3/27/2003 3/28/2003 4/04/2003 4/08/2003 4/10/2003	4/15/2003
5.	Start-up and acceptance testing of electrical generating equipment	Acceptance testing report including owner acceptance certificate	\$190,000	Not met	

<sup>3</sup> Under the terms of the contract, AnAerobics was required to submit a request for payment of milestones to Xcel Energy along with the requisite documentation and payment was to be made by Xcel Energy within 30 days of receipt of correct and complete documentation.

<sup>4</sup> The Milestone Met column is added for information purposes. It is not a complete listing, but indicates order and deliver dates which could be identified by documentation that Xcel Energy has in its possession.

<b>Milestone</b>	<b>Task</b>	<b>Deliverable</b>	<b>Payment</b>	<b>Milestone Met<sup>4</sup></b>	<b>Compliance Communicated to Xcel Energy</b>
6.	Final Report	Report describing design, construction and the first 6 months of operation	\$0	Not met	
7.	1 <sup>st</sup> Operating Report	Report describing the second 6 months of operation	\$0	Not met	
8.	2nd Operating Report	Report describing the second month of operation	\$0	Not met	

As shown above, milestones 2, 3, and 4 were contractually satisfied when AnAerobics provided proof that the requisite permits were obtained, major electrical equipment ordered, and major electrical equipment delivered to the Seneca Foods plant. The major electrical equipment referenced in milestones 3 and 4 included two biogas fuel generators, a Waukesha 1100 kW generator and a Kohler 600 kW generator.

On April 8, 2003, AnAerobics notified Xcel Energy that it was suspending work on the Project due to the potential termination of its relationship with the Project host, Seneca Foods.

On April 15, 2003, AnAerobics notified Xcel Energy milestones 2, 3, and 4 were satisfied and requested payment of \$1.07 million per the terms of the Contract. While AnAerobics had suspended work on the Project at the time it invoiced Xcel Energy for achievement of milestones, all parties were hopeful that AnAerobics and Seneca Foods would be able to resolve their issues.

Upon submission of the milestones reports, the terms of the contract still required payment for the completed milestones. The Contract section on "Termination," Section 16, provides for both termination for breach and termination for cause. In either event, the Contract expressly requires payment, either based on the reasonable value of the completed Project milestones or payment for services rendered and expense incurred.

On June 5, 2003, the RDF board met to discuss the work suspension and payment to AnAerobics for attainment of the completed milestones. At this meeting, Xcel Energy and the RDF Board confirmed that milestones 2, 3, and 4 were met. Following this meeting and verification by Xcel Energy that the requisite electrical equipment was physically at the Seneca Foods plant and was being properly

protected, Xcel Energy paid AnAerobics \$1.07 million on June 10, 2003 for completion of milestones 2, 3, and 4.

In a letter dated July 22, 2003, AnAerobics formally notified Xcel Energy that their relationship with Seneca Foods was terminated. AnAerobics indicated that Seneca Foods determined it could reduce operating expenses by disposing of wastes necessary for the Project by returning those wastes to the supplying farmers. Accordingly, Seneca Foods determined it was in their best interest to discontinue their relationship with AnAerobics for on-site waste management and conversion. Following termination of the relationship between AnAerobics and Seneca Foods, the Project terminated and the two generators were never installed. Xcel Energy took possession and title to the two generators in July 2004.

On September 2, 2003, Xcel Energy submitted its 2003 annual automatic adjustment (AAA) report to the Commission.<sup>5</sup> Attachment I to this report contains the RDF compliance report including a footnote stating that the AnAerobics project was cancelled.

In comments filed on March 30, 2004 in the AAA docket, the Department of Commerce, Division of Energy Resources (Department) recommended that the Commission disallow recovery of AnAerobics' dispersed grant costs of \$1.07 million. The Department recommended disallowance because (a) the funds were paid by Xcel Energy to AnAerobics after AnAerobics notified Xcel Energy that it was suspending its work on the Project; (b) Xcel Energy made no significant attempt to recover the funds paid to AnAerobics after the Project failed; and (c) the RDF Board failed to file required annual evaluations.

On April 7, 2004, the Commission issued a notice instructing interested parties to file comments on the AnAerobics issue in the RDF docket rather than the AAA docket.<sup>6</sup> In a June 17, 2004 order, the Commission accepted Xcel Energy's AAA filing.<sup>7</sup> Based on the Commission's acceptance of its AAA filing, Xcel Energy recovered the RDF payments to AnAerobics through the fuel clause adjustment. The Company understood that this recovery was subject to a Commission decision on disallowance in the RDF docket.

Xcel Energy responded to the Department's concerns in filings on April 15, 2004 and July 21, 2004 in the RDF docket. In these filings, Xcel Energy explained that it was legally obligated to pay the funds to AnAerobics under the Contract and that

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<sup>5</sup> Docket No. E,G999/AA-03-1264.

<sup>6</sup> Notice of Comment Period and Changed Docket No., Docket No. E,G999/AA-03-1264, April 7, 2004.

<sup>7</sup> Order Accepting Electric Utilities' 2003 Annual Automatic Adjustment Reports, Docket No. G,E999/AA-03-1264, June 17, 2004.

there was no legal basis for Xcel Energy to recover the costs of the equipment. Moreover, the RDF Board provided appropriate oversight over the Project, and additional reporting would not have changed the ultimate outcome of the Project.

On August 4, 2004, Xcel Energy filed a letter in the RDF docket requesting that the Commission defer action on this matter to allow the Company the time to find other applications for the two purchased generators, thereby recouping for ratepayers some value of the original grant.

In an August 17, 2004 Order, the Commission deferred its decision on the issue of disallowance of the dispersed grant funds to a later date to allow Xcel Energy the opportunity to repurpose the two generators.<sup>8</sup> The Commission's Order required Xcel Energy to provide updates to the Commission on its progress regarding locating alternative uses for the AnAerobics' generators.

Since 2004, Xcel Energy has used its best efforts to recoup the RDF funds by attempting to sell the two generators or use them in another renewable energy project. Xcel Energy has provided the Commission with regular updates on these efforts.

The Company's resale efforts include issuance of Formal Notices of Opportunity in 2005 and 2009. The 2005 Notice of Opportunity was sent to over 700 potential bidders, but did not result in a feasible proposal. In 2009, a Notice of Opportunity was sent to 317 vendors that were targeted as entities that have some form of involvement in anaerobic digestion, methane utilization, biomass, and energy production. The 2009 Notice of Opportunity resulted in four proposals for the Kohler generator, but none of these proposals resulted in a sale.

There have also been prospects outside of a Formal Notice of Opportunity. In 2007, the Kohler generator was included as an option for a Cycle 3 proposal (RD3-16) submitted by AURI that would install and demonstrate biomass gasifier at the Polaris facility in Roseau, Minnesota. Ultimately, this RDF bid was not considered as an option due to its bid score. The generators were also posted on a website for surplus equipment by the Company's Investment Recovery group in 2012.

There have been many challenges to locating a purchaser or a new use for these two generators. One of the main challenges is the specialized nature of these two

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<sup>8</sup> Order Deferring Decision, Allowing Time to Develop Alternative Uses, and Requiring Consultation and Report, Docket No. E002/M-00-1583, August 17, 2004.

generators. The two generators are biogas fueled and there are a limited number of purchasers that are in the market for this type of generator. Another challenge has been the rapid depreciation of the value of the generators. The generators, which were shipped and delivered in 2003, are now ten years old. Moreover, due to the added costs of moving and storing the generators indoors, the generators were kept outside at Xcel Energy's Maple Grove facility, which created moisture corrosion of the generators' electrical components.

Despite these challenges, Xcel Energy recently located a buyer, Net Distributed Power, LLC (NDP)<sup>9</sup> for the Kohler 600 kW generator. Xcel Energy entered into a Purchase and Sales Agreement with Net Distributed Power on June 17, 2013, to sell the Kohler generator for \$50,000. The purchase price is within the range of appraised value for this generator of \$25,000 to \$75,000 based on a 2008 valuation obtained by Xcel Energy.

As of the date of this filing, the Company is in the negotiation with Sanimax, Inc. to sell the Waukesha generator for use in Sanimax's biomass operations.

Although the sale and repurposing of the two AnAerobics generators has taken longer than expected, as described below, the Company believes that the recent purchase agreement for the sale of the Kohler generator is in the public interest. In addition, while termination of the AnAerobics project was a less than ideal result, this termination did result in improvements to the RDF process which are described in greater detail below.

## **II. Sale of Generator in the Public Interest**

Xcel Energy believes that the sale of the Kohler generator will serve the public interest. The \$50,000 sales price is in line with the appraised value of this generator. The proceeds from this sale will also recoup a portion of the RDF funds disbursed to acquire this generator. It is the Company's recommendation that the proceeds from the sale be credited to customers in our annual RDF filing. Finally, this sale will likely allow this generator to be put to use in another renewable energy project rather than remaining in storage.

## **III. RDF Program Improvements**

While the Company acknowledges that the sale and repurposing of the two generators will not recoup the \$1.07 million of RDF funds expended by ratepayers, the untimely termination of the AnAerobics Project did provide the Company

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<sup>9</sup> NDP is a generator company that buys and sells used generators all over the world. NDP intends to test, repair, and then market the Kohler 600 kW generator to its clients.

with valuable insights on ways to improve administration and oversight of RDF projects.

One of the key lessons learned from the AnAerobics Project was that the RDF grant contract must have terms that increase the likelihood that the grant recipient obtains all necessary components for successful completion of an RDF project. These necessary components could include a site use agreement, additional third-party financing, a fuel supply agreement, or required permits. As a result of the AnAerobics Project, additional special conditions were added to grant contracts to require representations from grant recipients that the necessary site control and components will be available to Xcel Energy's satisfaction. While these special conditions do not ensure that all critical components will be obtained by the grant recipients, these additional contractual provisions do minimize risks and protect ratepayers.

Some of these special conditions can be found in the grant contract with Coaltec Energy USA, Inc. (Coaltec) entered into during the third cycle of the RDF. The Coaltec project is a biomass project located at a third-party farm in Northfield, Minnesota. One of the terms of the grant contract between Xcel Energy and Coaltec required Coaltec to attest that a "Site Use Agreement acceptable to [Xcel Energy] and [the third-party farm] will be entered into for which [Coaltec] will have sufficient site control to complete the project."<sup>10</sup>

Another lesson from the AnAerobics Project was that project milestones and grant payments in the energy production grant contracts should be structured to provide payments upon project completion rather than completed interim tasks to support a project's cash flow needs. This type of payment structure was used in the cycle three RDF contract with the City of Minneapolis for the 600 kW solar photovoltaic project at the Minneapolis Convention Center. In this contract, all grant payments were made after the solar project was operational. While Xcel Energy understands that holding payments until after a project is operational is the least risk for ratepayers, this payment structure is not always an option as some grant recipients rely on RDF funds to get a project off the ground. Nevertheless, in the fourth funding cycle, a preference was given to energy production projects that propose to receive RDF funding in one lump sum at the completion of the project.<sup>11</sup>

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<sup>10</sup> Renewable Development Fund-3<sup>rd</sup> Cycle Grant Contracts for 7 Projects, Docket No. E002/M-07-675, Sept. 24, 2008.

<sup>11</sup> Intent to Issue a Renewable Development Fund Cycle 4 Request for Proposals and Petition for Approval of a Standard Grant Contract, Docket No. E002/M-12-1278, Nov. 29, 2012.



The AnAerobics Project is unique in that it was the first and only RDF project that received grant funds that was terminated. Despite this untimely termination, it served as an impetus for changes to the RDF administration and oversight. It is important to note that although the AnAerobics Project provided valuable lessons for improving the RDF process, this was not the only impetus for improvements to the RDF. Over the course of three completed grant cycles, Xcel Energy has gained valuable insights from each and every grant contract and has utilized these insights to improve the RDF program. Several of these RDF program enhancements were outlined in the Company's May 12, 2010 Biennial Progress Report.

In the May 12 filing, Xcel Energy noted the improvements to reporting which include the development of standardized formats for monthly progress reports and milestone reports to keep the Commission, the Department, and other stakeholders informed of project developments. Administrative processes have also been established to review reports and invoices from RDF grant recipients to assure compliance with RDF contracts. Communication enhancements were also outlined in this filing including, posting RDF milestone reports, final reports, and publications on the RDF website. In addition, the filing noted that the Company has made several modifications to the standard RDF contract to minimize risks to ratepayers. For instance, Xcel Energy standardized certain RDF contract provisions pertaining to renewable energy credits, intellectual property rights, contract payments, and events of default.

As noted in a January 27, 2005 filing, the Department's goal recommending disallowance of recovery of the AnAerobics funds, "was to hold the Company accountable for the contract management inadequacies . . . and ensure that Xcel Energy would have incentives to improve its oversight of the RDF projects."<sup>12</sup> Although the termination of the AnAerobics contract was disappointing, it resulted in certain improvements to the RDF process that reduce the possibility of a similar situation occurring in the future. As the Department's goal in recommending disallowance has been satisfied, the Company believes that no disallowance is necessary.

#### **IV. Conclusion**

Xcel Energy appreciates the opportunity to keep the Commission informed of its efforts to find a suitable new use for the two generators acquired with RDF funds. As Xcel Energy has recently executed a purchase agreement for sale of one of the generators and has located a substitute project for the other generator, Xcel

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<sup>12</sup> Comments of the Minnesota Department of Commerce at 5, Docket E002/M-00-1583, Jan. 27, 2005.

Energy provides this update to the Commission in the event it wishes to make a decision on this matter. While the termination of the AnAerobics Project was unfortunate, the Company respectfully believes no disallowance is necessary. Following the termination of the AnAerobics Project, Company has utilized the lessons learned from this termination to implement certain process improvements to minimize risks to ratepayers in later RDF projects.

Please contact me at [paul.lehman@xcelenergy.com](mailto:paul.lehman@xcelenergy.com) or (612) 330-7529 if you have any questions regarding this filing.

Sincerely,

/s/

PAUL J LEHMAN  
MANAGER, REGULATORY COMPLIANCE AND FILINGS

c: Service List

## **CERTIFICATE OF SERVICE**

I, SaGonna Thompson, 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 NOS. E002/M-00-1583**

Dated this 8<sup>th</sup> day of August 2013

/s/

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SaGonna Thompson  
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