

November 19, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/RP-15-21

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of Northern States Power Company, doing business as Xcel Energy's (Xcel) Request for an Extension to File its 2020-2034 IRP.

The Petitioner is:

Aakash H. Chandarana
Regional Vice President
Rates and Regulatory Affairs
414 Nicollet Mall
Minneapolis, MN 55401

The Department concludes that the Minnesota Public Utilities Commission (Commission) may not have sufficient clarity to determine whether or not there would be any action for Xcel to take in the five-year period. To resolve this issue, if the Commission approves Xcel's request to extend the due date for its 2020-2034 Upper Midwest Integrated Resource Plan to July 1, 2019, the Department recommends that the Commission require Xcel to file the Strategist files as discussed herein.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/jl
Attachment

Before the Minnesota Public Utilities Commission

**Comments of the Minnesota Department of Commerce
Division of Energy Resources**
Docket No. E002/RP-15-21

I. COMMISSION ORDER ON XCEL'S IRP

The Minnesota Public Utilities Commission's (Commission) January 11, 2017 *Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings* required Northern States Power Company d/b/a Xcel Energy (Xcel) to file its next resource plan on February 1, 2019.

On October 15, 2018 Xcel requested that the Commission extend the due date for the Company's 2020-2034 Integrated Resource Plan (IRP) to July 1, 2019.

On October 18, 2018 the Commission issued a *Notice of Comment Period* on Xcel's request and established November 19, 2018 as the due date for comments.

On October 31, 2018, the Commission issued Xcel an information request (IR) seeking additional information from the Company by November 19, 2018, the date that comments are due on Xcel's extension request. To assist the Commission's decision on whether to grant Xcel an extension to submit its 2020- 2034 resource plan, staff requested that Xcel provide in a general response to the following issues:

1. Xcel was required to "acquire approximately 650 MW of solar in 2016–2021 through a combination of the Company's community solar gardens program or other acquisitions" (Ordering paragraph 4.a.).
 - a. Based on the Company's current projections, how much of the 650 MW of solar in 2016-2021 is expected to come from CSG/small-solar versus utility-scale solar?
 - b. Does Xcel have any plans to issue an all-source, renewable energy, or solar resource solicitation of bids (similar to its November 28, 2017 all-source bid in Colorado) in the near-term?
2. As noted above, the Commission's Order required Xcel to examine retirement at Sherco, King, Monticello, and Prairie Island.

- a. Can the Company discuss at this time what baseload retirement scenarios will be included in the 2020-2034 IRP filing? Is Xcel considering relicensing its nuclear facilities?
 - b. Will the resource plan include a proposed action plan for its nuclear facilities? Can the Company discuss that action plan at this time?
3. The Commission's Order required that "Xcel shall acquire no less than 400 MW of additional demand response by 2023" (Ordering paragraph 10). Please provide a general discussion of how Xcel may propose to meet the 400 MW by 2023 requirement. (For example, will the 400 MW be limited to MISO-accredited demand response resources, or will it include a combination of conventional DR resources and AMI-enabled pricing programs?)
4. Has the Company initiated any technical studies to examine the transmission reliability impacts of retiring any of the baseload units, in order to support the economic evaluation of early retirement in the Strategist analysis? (In other words, has Xcel performed analysis similar to Attachment D of January 29, 2016 Supplement to Resource Plan in the instant docket, which examined the grid impact of retiring Sherco 1 and/or 2?)
5. How does the Company plan to include electrification scenarios in its 2020-2034 IRP filing? Generally, how might the impact on electric loads from, for example, new electric vehicles be included in the modeling?

II. DEPARTMENT ANALYSIS

When considering Xcel's request, the Minnesota Department of Commerce, Division of Energy Resources (Department) recommends that the Commission consider, among other things:

- Whether delaying the filing would impact the Company's ability to respond to already identified or newly identified resource needs in a timely, cost-effective manner; and
- The expected schedule for other utilities' filing IRPs.

A. XCEL'S SHORT-TERM RESOURCE NEEDS

On page 1 of its Extension Request, Xcel states that its requested five-month extension will:

...provide time to continue our work with stakeholders, allow for the production of additional studies and information relevant to the IRP, and will not adversely impact the plan we ultimately file since we do not have any actions necessary in our five-year action plan.

Based on the information available at this time, it is unclear whether Xcel has no action necessary in its five-year action plan. The information from Xcel's response to the Commission IR questions number 1 and 3 noted above may provide more information to answer that question. However, those responses aren't due until November 19, 2018, the same day these comments are due. Further, the responses to those IRs may not provide sufficient information to answer that question. Thus, the Commission may not have sufficient clarity to determine whether or not there would be any action for Xcel to take in the five-year period.

To help resolve this issue, the Department recommends that, if the Commission grants a time extension to Xcel, the Commission should also require the Company to establish a 2019 IRP docket in the near future and submit the Strategist files needed to recreate and test Xcel's preliminary Strategist reference case as presented in Xcel's October 23, 2018 IRP Workshop Power Point. While Xcel has not chosen its final reference case at this time, this information would be helpful at least as a starting point. In addition, to be consistent with the Commission's typical approach for IRPs, the Department recommends that the Commission also require Xcel to provide the Strategist files with the same assumptions and using the mid-point of the Commission's most recently approved externalities and regulatory costs of carbon. Such information would provide a helpful start to the analysis to be conducted in 2019.

B. IRP FILING SCHEDULE

The Department has a team of analysts who work on electric utility resource plans and generally the Department prefers that the filing of the investor-owned utility (IOU) resource plans is spread out sufficiently so that the review of issues such as capacity expansion modeling or forecasts are not impeded due to lack of available expertise.

Table 1 below shows the potential IRP filing schedule if the Commission approves Otter Tail Power Company's (OTP) request in Docket No. E017/RP-16-386 to defer filing its next IRP from current due date of June 3, 2019, to June 1, 2020 and Xcel's requested extension.

Table 1: Minnesota Electric IOU IRP Filing Schedule

Code	Utility	Most Recent Filing Date	Docket No.	Potential IRP Due Dates
E001	Interstate	01-Feb-18	17-374	
ET6133	MMPA	01-Aug-18	18-524	
E002	Xcel	29-Jan-16	15-21	01-Jul-19
ET6125	Minnkota	26-Jun-14	14-526	01-Jul-19
E017	Otter Tail	01-Jun-16	16-386	01-Jun-20
E015	Minn. Power	01-Sep-15	15-690	01-Oct-20
ET2	Great River	01-May-17	17-286	01-Apr-21
ET10	MRES	01-Jul-16	16-509	01-Jul-21
ET9	SMMPA	27-Nov-17	17-753	01-Dec-21

A review of Table 1 indicates that Xcel's proposal to submit its next IRP on July 1, 2019 coincides with the due date for Minnkota Power Cooperative (Minnkota). However, the Department will not be conducting capacity expansion modeling during our review of Minnkota's IRP filing, so that IRP should not create an unreasonable burden on the regulatory process.

This limited analysis does not consider the number of general rate cases expected to be filed during this period, including Xcel Electric's recent announcement of its intention to file a rate case in the fourth quarter of 2019, overlapping the analysis of the Company's IRP, nor the numerous rider, resource acquisition, or other typically contentious proceedings. Consideration of the resources required for those proceedings also points to the need to begin an analysis of Xcel's 2019 IRP early in 2019, even though such analysis would not be completed until later in the year, after Xcel files its IRP.

III. DEPARTMENT RECOMMENDATIONS

The Department notes that the Commission may not have sufficient clarity to determine whether or not there would be any action for Xcel to take in the five-year period. Thus, if the Commission approves Xcel's proposal to delay filing its 2020-2034 IRP until July 1, 2019, the Department recommends that the Commission require Xcel to submit the files necessary to recreate the Company's 2020-2034 Reference Case, as summarized at Xcel's October 23, 2018 IRP Workshop. Further, consistent with the Commission's typical approach for IRPs, the Department recommends that the Commission require Xcel to provide the Strategist files with

Docket No. ET6133/RP-18-524

Analysts assigned: Christopher T. Davis/Michael Zajicek

Page 5

the same assumptions as in the Company's 2020-2034 Reference Case but using the mid-point of the Commission's most recently approved externalities and regulatory costs of carbon. Such information would provide a helpful start to the analysis to be conducted in 2019.

/jl

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
Comments**

Docket No. E002/RP-15-21

Dated this 19th day of November 2018

/s/Sharon Ferguson

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