

April 30, 2021

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

RE: **Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket No. E002/M-20-891

Dear Mr. Seuffert:

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

Petition of Xcel Energy for Approval of the Acquisition of Solar Generation at Xcel Energy's Sherburne County Site.

The Petition was filed on April 12, 2021 by:

Bria Shea
Director, Regulatory and Strategic Analysis
Xcel Energy
414 Nicollet Mall (401–7th Floor)
Minneapolis, MN 55401

The Department addresses procedural issues raised by the Minnesota Public Utilities Commission (Commission). The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-20-891

I. INTRODUCTION

On December 18, 2020 Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) submitted a letter to inform the Minnesota Public Utilities Commission (Commission) of the Company's planned Request for Proposals (RFP) for solar generation resources interconnecting at the Sherburne County Generating Station (Sherco) site. The letter stated that Xcel planned to follow the Commission-approved Modified Track 2 solicitation process for the RFP.

On January 13, 2021 Xcel filed a letter to inform the Commission and interested stakeholders that the Company released the RFP for solar generation at the Sherco site.

On February 1, 2021, in compliance with the Modified Track 2 RFP process, Xcel filed a self-build bid, involving Xcel developing 460 MW of solar capacity at the Sherco site.

On April 12, 2021 Xcel filed the Company's *Petition of Xcel Energy for Approval of the Acquisition of Solar Generation at Xcel Energy's Sherburne County Site* (Petition). The Petition specifically requested that the Commission:

- approve the petition to build, own, and operate the proposed 460 MW solar project at the Sherco site;
- approve the Company's acquisition of the Sherco Project Company, holding the property rights to a 230 MW solar site, from National Grid Renewables Development, LLC pursuant to the terms of a *Purchase and Sale Agreement* (PSA);
- approve 100 percent of the costs to be recovered from Minnesota ratepayers; and
- approve the Company's proposed approach of recovering project costs through the Renewable Energy Standard (RES) Rider.

On April 16, 2021 the Commission issued its *Notice of Comment Period* (Notice). The Notice states that the following topics are open for comment:

- Does the Sherco Solar project require a Certificate of Need (CN)? If not, under which exemption does it qualify? If a CN is required, what process should the Commission apply to the proposal?
- Does the Commission have sufficient information to evaluate whether the Sherco Solar project is needed and cost-effective? In particular:

- Is capacity expansion modeling needed to evaluate the project, and if so, what modeling should be required?
 - Does the Petition adequately explain how the Company will assign all of NSPM's benefits from the project to Minnesota?
 - Does the Petition include sufficient information about the cost-effectiveness of the Project under the proposed jurisdictional cost allocation method?
 - Is there any other information not included in the filing that the Commission or interested parties will require in order to evaluate the proposal in a timely manner?
- Are there other initial concerns or procedural issues that the Commission should consider at this time?

Below are the Comments of the Department regarding the issues listed in the Notice.

II. DEPARTMENT ANALYSIS

A. CN REQUIREMENT

1. CN Requirement and Exemption

The first issue listed in the Notice is “[d]oes the Sherco Solar project require a Certificate of Need (CN)? If not, under which exemption does it qualify?”

First, the Department notes that a well-developed integrated resource plan (IRP) provides the analytical basis for determinations in subsequent proceedings. In the past, when a utility's proposed resource acquisition has been consistent with the IRP analysis and subsequent Commission decision, no further resource-planning type analysis has been needed.¹ In other instances, when facts regarding the specific resources proposed by the utility have fallen outside of the analysis and Commission decision in the IRP, further resource-planning type analysis using the updated facts has been warranted in the resource acquisition proceeding. In essence, resource acquisition typically conforms with the Commission's most recent IRP order unless facts in the resource acquisition proceeding dictate that the action plan should change.² This approach is consistent with the Commission's order in a past resource acquisition proceeding:

¹ Examples include Docket Nos. IP6838/CN-10-80 and E002/M-11-713 (Prairie Rose Wind); Docket No. E015/M-13-907 (Bison 4); and Docket Nos. E017/M-09-883 and E017/M-09-1484 (Luverne Wind).

² An example is Xcel's acquisition of 750 MW of wind generation in Dockets E002/M-13-603 and E002/M-13-716. In that case Xcel's 2010 IRP called for the addition of 200 MW of wind. However, Xcel subsequently found the cost of wind generation was below the cost evaluated in the IRP. Additional analysis with updated costs was performed by Xcel and the DOC. A recent example is in the Department's November 2, 2020 comments regarding Xcel's acquisition of 670 MW of repowered wind projects in Docket No. E002/M-20-620.

... while a resource plan is intended to plot a utility's course for the next 15 years, it is based on facts known as of a specific point in time. As more facts become known, circumstances change and utilities must adapt – even in the absence of a new resource plan order.³

Second, the Department notes that, irrespective of the evaluation process ultimately used (CN or bidding), the Company's claims on the merits (items such as need, alternatives, and other issues) will be evaluated at a later date. The Department's analysis of the merits is similar regardless of the specific process chosen by the Commission. The Department's comments on the merits will analyze Xcel's claims regarding the need for the project, the reasonableness of the acquisition process, the cost of the alternatives, and so forth.

The Petition describes the proposed Sherco Solar project as consisting of 230 MW of solar panels installed at two locations near the current Sherburne County Generating Station for a total of 460 MW. The proposed Sherco Solar project also includes two 345 kV lines from the two locations to a single point of interconnection at the Sherco Substation.

Minnesota Statutes § 216B.2421 Subd. 2 (1) defines a large energy facility (LEF) as "any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more and transmission lines directly associated with the plant that are necessary to interconnect the plant to the transmission system." The two locations qualify as a LEF whether considered separately or as a single, combined site. In turn, Minnesota Statutes § 216B.243 Subd. 2 requires a LEF obtain a CN.

Minnesota Statutes § 216B.2422, Subd. 5 states in part:

(b) Notwithstanding any other provision of this section, if an electric power generating plant, as described in section 216B.2421, subdivision 2, clause (1), is selected in a bidding process approved or established by the Commission, a certificate of need proceeding under section 216B.243 is not required.

The Commission's January 11, 2017 *Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings* in Docket No. E002/RP-15-21 established Xcel's current bidding process and stated that:

³ See the Commission's December 13, 2013 *Order Approving Acquisitions with Conditions* in Docket Nos. E002/M-13-603 and E002/M-13-716.

5. Concerning wind and solar resource acquisitions, Xcel:
 - a. may use the modified Track 2 process for the acquisition of wind resources included in the five-year action plan, and for any additional solar, if needed, through 2021;

The proposed Sherco Solar project arose from Xcel's Commission-approved bidding process. Therefore, the Department concludes that a CN is not required for the proposed Sherco Solar project under the bidding exemption.

The Department notes that Minnesota Statutes § 216B.243, Subd. 9 provides a potential path related to the state's renewable energy standard for Xcel's proposed Sherco Solar project to qualify for a CN exemption. However, since the proposed Sherco Solar project already qualifies for a CN exemption the Department did not review this potential exemption.

The Department recommends that the Commission determine that the proposed Sherco Solar project is exempt from a CN requirement under Minnesota Statutes § 216B.2422, Subd. 5 (b).

2. CN Process

The Notice requests comments on "If a CN is required, what process should the Commission apply to the proposal?"

At this time the Department does not anticipate significant disputes regarding material facts in this proceeding. Therefore, whether a CN is required or not, the Department recommends the Commission rely upon the normal informal comments and reply comments process to develop the record in this proceeding. However, if other parties claim significant contested material facts and/or raise controversial issues, the Department has no objection to a Commission-ordered contested case.

B. INFORMATION REQUIRED

The second issue listed in the Notice is "[d]oes the Commission have sufficient information to evaluate whether the Sherco Solar project is needed and cost-effective?" The issue is broken down into several sub-components. Each sub-component is addressed separately below.

1. Is Capacity Expansion Modeling Needed?

The first question in the Notice under the information requirements section asked "[i]s capacity expansion modeling needed to evaluate the project, and if so, what modeling should be required?"

Broadly speaking, there are two types of economic analysis employed in resource acquisition processes. One type of analysis uses a capacity expansion model (CEM); both Strategist and EnCompass are examples of CEMs. The primary purpose of a CEM is to compare alternatives with a

significantly different size, type, and timing. The other type of analysis uses a levelized cost of energy (LCOE) model. The primary purpose of a LCOE model is to compare alternatives that are substantially the same in terms of size, type, and timing.

Generally, the Department analyzes resource acquisition petitions in two steps.⁴ The first step is to establish a need in IRP terms (meaning size, type, and timing). The second step is to determine the best alternative given the IRP's size, type, and timing determination.

Under this two-step process, in some instances new CEM analysis is not necessary during resource acquisition. This can be because the proposed project is addressing a need where comparison of differing types is not a consideration (such as certain statutory mandates) or because the most recent IRP-determined need is clear and circumstances have not changed since the IRP determination.

In absence of a valid IRP determination or other source of need (such as a statutory mandate) new CEM analysis is warranted. In this proceeding, to establish a need, Xcel relied upon:

- the solar energy standard (SES) goals of Minnesota Statutes § 216B.1691, Subd. 2f, part (e);
- the greenhouse gas emissions goals of Minnesota Statutes § 216H.02, Subd. 1;
- the Commission's COVID-19 investigation (Docket No. E,G999/CI-20-492); and
- updated CEM analysis.

For the updated CEM analysis Xcel directed parties to the Company's analysis and resulting preferred plan in the ongoing IRP (Docket No. E002/RP-19-368) as showing a large need for solar resources in the mid-2020s.⁵ The Department agrees with Xcel that CEM analysis is necessary to adequately evaluate the need for the proposed Sherco Solar project. Regarding the question "what modeling should be required" given the number of changes to the CEM inputs since the last Commission order approving an IRP, the Department agrees with Xcel and recommends that the Commission determine that updated CEM analysis is necessary. This updated CEM analysis could be new analysis particular to this docket or a reference to the analysis in the on-going IRP.

2. Explaining the Assignment of Benefits to Minnesota

The second question in the Notice under the information requirements section asked "[d]oes the Petition adequately explain how the Company will assign all of NSPM's benefits from the project to Minnesota?"

⁴ For some recent examples of this two-step process see the Department's February 10, 2021 comments in Docket No. E017/M-20-844; November 2, 2020 comments in Docket No. E002/M-20-620; and January 8, 2020 comments in Docket No. E002/M-19-268.

⁵ Note that Xcel relies upon other issues such as the CEM analysis of other parties in the IRP, Midcontinent Independent System Operator, Inc. (MISO) interconnection issues, re-use of the existing Sherco 2 interconnection rights and the timing of federal tax credits.

Xcel requests full recovery of the costs from Minnesota customers through the Renewable Energy Standards (RES) Rider. Regarding allocating benefits to Minnesota, the Petition states at page 44:

To apply the value of the energy, capacity, and ancillary services to Minnesota customers, the Company will seek to recover a proxy price for the value of these resource attributes in rates in both South Dakota and North Dakota. Any payments received from customers in these jurisdictions related to the Sherco Solar project would then be credited back to Minnesota, reducing the overall price of the project recovered in Minnesota rates.

...

Additionally, the Company would assign all RECs associated with NSPM's share of the project to Minnesota customers to assign all renewable attributes of the energy generated by the project to Minnesotans.

Regarding Wisconsin, the Petition states that:

The electric production and transmission costs of the entire NSP System are shared by NSPM and NSPW. An agreement approved by FERC between the two companies, called the Interchange Agreement, provides for the sharing of all generation and transmission costs of the NSP System, including the Sherco Solar project cost.

The merits of the Company's proposal will be the subject of analysis in future comments. At this time the Department understands that all project costs would flow through the Minnesota RES Rider and any payments from South Dakota and North Dakota would be credited through the Minnesota RES Rider. Also, the Department understands that project costs and benefits would be fully shared between Minnesota and Wisconsin via the interchange agreement.

Note that, via cost recovery, Xcel is proposing two different load and capability (L&C) charts—at least in financial terms. One L&C reflects Minnesota and Wisconsin, including the proposed Sherco Solar project. The other L&C reflects North Dakota and South Dakota, excluding the proposed Sherco Solar project. This is discussed further in the next section.

In summary, the Department concludes that the Petition explains Xcel's proposal for allocating benefits.

3. Cost-effectiveness Under the Proposed Jurisdictional Allocation

The third question in the Notice under the information requirements section asked “[d]oes the Petition include sufficient information about the cost-effectiveness of the Project under the proposed jurisdictional cost allocation method?”

As discussed above, the Company's cost allocation method allocates costs to the Minnesota and Wisconsin jurisdictions. In contrast, the CEM modeling Xcel relies upon was done at the system level.

As explained in the Department's February 11, 2021 Comments in Docket No. E002/RP-19-368 load is actually served at the MISO level. This means that all the power plants in MISO serve all the load in MISO. Meanwhile, CEM inputs are structured to include only the utility's load, the utility's power plants, and a price curve representing MISO spot market outcomes. In other words, the CEM includes only a subset of inputs actually involved in serving load. The implication of this is that the CEM cannot analyze the cost effectiveness of the power plants in load-serving terms. Instead, the CEM input structure results in analysis of the cost effectiveness of the utility's hedging strategy.

To fully capture the hedging value of the proposed Sherco Solar project the Company would have to perform its hedging analysis (the CEM analysis) on a basis that reflects allocation of hedges acquired by the proposed Sherco Solar project amongst jurisdictions. To perform CEM analysis at a system-wide level would implicitly give some of the hedging value back to North Dakota and South Dakota because the CEM would optimize the hedging for the entire system and not optimize the hedging of the Minnesota system, which has a higher proportion of renewable hedges due to the Company's allocation of the proposed Sherco Solar project. Since the various jurisdictions are currently paying for different hedges, the jurisdictions will require different hedges in the future and the CEM process must reflect that reality.

Furthermore, hedging strategies can be analyzed in a CEM at any level where inputs can be designed sensibly. Traditionally, CEM inputs have been designed around the utility system as a whole. That was done in this case and in most Commission proceedings.⁶ However, a system-wide structure to the CEM inputs is not required and must change as Xcel acquires more renewable resources to serve the Minnesota jurisdiction and not the entire system. Since the Department understands Xcel's proposal to be that the resources acquired in this proceeding will serve to hedge only Minnesota and Wisconsin load, the Department recommends that the Commission require Xcel to supplement the CEM modeling to be consistent with the proposed cost recovery—reflecting only the load and resources serving the Minnesota and Wisconsin system.

4. Other Information Required

The fourth question in the Notice under the information requirements section asked "[i]s there any other information not included in the filing that the Commission or interested parties will require in order to evaluate the proposal in a timely manner?"

The Department does not require additional information to evaluate the proposal other than information that can be obtained via the standard information request process.

⁶ Note that the Department experimented with a Minnesota-only CEM structure in the Department's July 8, 2016 comments in Docket No. E002/RP-15-21, Xcel's currently approved IRP.

C. OTHER INITIAL CONCERNS

The third issue listed in the Notice is “[a]re there other initial concerns or procedural issues that the Commission should consider at this time?”

At this time the Department has no other initial concerns or procedural issues that the Commission should consider at this time.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission:

1. rely upon the normal informal comments and reply comments process to develop the record in this proceeding;
2. determine that the proposed Sherco Solar project is exempt from a CN requirement.
3. determine that the Xcel has adequately outlined the Company’s proposal regarding assigning costs and benefits from the proposed Sherco Solar project to the various jurisdictions;
4. determine that new CEM analysis is warranted; and
5. require Xcel to supplement the CEM modeling to be consistent with the proposed cost recovery.

/ja

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/M-20-891

Dated this 30th day of April 2021

/s/Sharon Ferguson

[illegible]

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-891_M-20-891
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