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**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy’s Petition for  
Approval of the Sherco Solar Project

DOCKET NO. E-002/M-20-891

**COMMENTS OF THE OFFICE OF  
THE ATTORNEY GENERAL**

**INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these Comments in response to the Commission’s July 14, 2021 Notice of Comment Period regarding the petition of Northern States Power Company d/b/a Xcel Energy (“Xcel” or “Company”) for approval of the Sherco Solar project (“the Project”).

Xcel placed restrictions on its solar request for proposals (“RFP”) that undermined the competitive process and stifled participation. The only proposal that emerged from this process—the Sherco Solar project—would cost customers hundreds of millions of dollars more than if Xcel instead procured the same amount of solar through a power purchase agreement (“PPA”) with a third party. In light of the exorbitant cost of the Sherco Solar project and the failure of Xcel’s RFP process, the Commission should take steps to ensure that Xcel’s customers do not overpay for solar generation. Specifically, the Commission should not approve the Sherco Solar project at this time but should instead require Xcel to issue a new solar RFP without ownership or geographic limitations.

ANALYSIS

**I. XCEL’S RESTRICTIVE SOLAR RFP SUPPRESSED COMPETITION.**

Xcel’s claims that it conducted “a thorough and competitive bid process”<sup>1</sup> are belied by the geographic and ownership restrictions in the RFP process that undermined the competitive process and suppressed participation. As a result, Xcel received just *two* third-party bids—neither of which fully met the RFP’s requirements—and the only proposal that made it through the full review process was the Company’s own.

In its Petition, Xcel repeatedly emphasizes the value of the existing interconnection rights at the Sherco site.<sup>2</sup> The Company estimates the value of these interconnection rights to be between \$140 and \$350 million.<sup>3</sup> Xcel seems to assume that these interconnection rights would give a project located at the Sherco site a cost advantage over solar projects located elsewhere. As a result, the Company decided to forego an open competitive bidding process and instead pursued a Modified Track 2 bidding process limited to solar projects located at the existing Sherco interconnection point.

Under the Modified Track 2 process, a utility is allowed to bid its own proposal into a competitive process overseen by a third-party evaluator. The utility’s bid is to be considered on equal footing with the other bids, with no preference given to utility-owned projects. The process is intended to spur competition and, ultimately, reduce costs for customers, as noted by the Commission in its Order adopting the two-track procurement process:

The purpose of the competitive process—getting the best overall price for ratepayers—cannot be achieved without robust competition. And robust competition cannot be achieved without two things: (1) a fair, predictable, and transparent competitive process; and (2) widespread agreement that the process is fair, predictable, and transparent.

Potential suppliers will not commit the resources necessary to compete effectively, and will not disclose the sensitive information often required to

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<sup>1</sup> Xcel Energy Petition at 4.

<sup>2</sup> Xcel Energy Petition at 1, 3, 4, and 27.

<sup>3</sup> Xcel Energy Petition at 28.

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evaluate their competitive proposals, unless they have confidence in the objectivity, good faith, and predictability of the competitive process.<sup>4</sup>

Xcel, however, undermined the competitive process by placing two restrictions on its solar RFP. First, the Company included a geographic restriction, requiring projects to be interconnected at the existing Sherco interconnection point. Second, Xcel included an ownership restriction, limiting the RFP “to Build-Transfer projects, where ownership of the Project could be transferred to the Company before the Project was interconnected, or earlier.”<sup>5</sup> The Company itself acknowledged that this restriction “limited participation by potential bidders.”<sup>6</sup>

As a result of these restrictions, the response to Xcel’s RFP was dismal. Xcel estimated an open solar RFP would have received bids for **46 projects** totaling over **7,000 MW** in capacity.<sup>7</sup> Xcel’s restrictive RFP received third-party bids for just **2 projects** totaling **525 MW** in capacity. For comparison, Minnesota Power’s 2016 solar RFP received 83 proposals from 26 developers,<sup>8</sup> and Xcel’s own 2014 solar RFP received 111 proposals from 36 developers.<sup>9</sup>

Moreover, of the two third-party bids Xcel received, one was incomplete and removed from consideration almost immediately, and the other was “non-conforming” and was eliminated in the “Threshold Review” phase.<sup>10</sup> Thus, the only project that actually advanced to the “Key Parameters Review and Scoring” phase was Xcel’s own submission. To make matters worse, Xcel also disregarded the Commission’s explicit requirement to file a contingency plan to address the potential

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<sup>4</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy's Application for Approval of its 2004 Resource Plan*, MPUC Docket No. E-002/RP-04-1752, ORDER ESTABLISHING RESOURCE ACQUISITION PROCESS, ESTABLISHING BIDDING PROCESS UNDER MINN. STAT. § 216B.2422, SUBD. 5, AND REQUIRING COMPLIANCE FILING at 6 (May 31, 2006) (eDocket No. [3131110](#)).

<sup>5</sup> Xcel Energy Petition at 30.

<sup>6</sup> Xcel Energy Petition at 27.

<sup>7</sup> Xcel Energy Petition, Attachment B (Guidehouse report) at 7 of 29.

<sup>8</sup> See *In the Matter of Minnesota Power's Petition for the Approval of the Acquisition of Solar Power to Support Economic Relief and Recovery* MPUC Docket No. E-015/M-20-828, Minnesota Power Response to PUC Information Request No. 1 (Jan. 12, 2021) (eDocket No. [20211-169735-05](#)) (attaching public and trade-secret versions of July 10, 2017 Independent Evaluation Report for Minnesota Power Company’s 2016 Solar Resource Solicitation).

<sup>9</sup> *In the Matter of the Petition of Xcel Energy for the Approval of a Solar Portfolio to Meet Initial Solar Energy Standard Compliance*, MPUC Docket No. E-002/M-14-162, PETITION at 6 (Oct. 24, 2014) (eDocket No. [201410-104139-01](#)).

<sup>10</sup> Xcel Energy Petition at 33-34.

for the bidding process to fail.<sup>11</sup> From the perspective of participation, the Sherco Solar procurement process was an abject failure.

## II. XCEL'S PROPOSED SHERCO SOLAR PROJECT IS EXORBITANTLY EXPENSIVE.

The sole project to emerge from the RFP process—Xcel's own Sherco Solar project—has a levelized cost that is dramatically higher than recent utility-scale solar projects in the region. If the Project were approved, customers would be forced to pay hundreds of millions of dollars more over the life of the Project than if Xcel had instead procured competitively priced solar generation.

Several data sources demonstrate that Sherco Solar is greatly overpriced. Xcel's projected levelized cost of energy ("LCOE") for the Sherco Solar project is [TRADE SECRET DATA BEGINS ... ... TRADE SECRET DATA ENDS].<sup>12</sup> By comparison, the U.S. Department of Energy's most recent *Utility-Scale Solar* report—an in-depth, annually updated analysis of utility scale solar projects in the U.S.—found that the average solar PPA price in MISO in 2019 was \$37.07/MWh.<sup>13</sup> More specifically, LevelTen Energy—which maintains “the world's largest collection of PPA pricing offers, spanning 21 countries in North America and Europe”—found that the 25<sup>th</sup> percentile solar PPA in the Minnesota Hub of MISO was \$36.50/MWh in Q2 2021.<sup>14</sup> Similarly, Lazard's most recent Levelized Cost of Energy Analysis report found that the levelized cost of solar projects receiving the Investment Tax Credit ranges from \$24 to \$35 per MWh, depending on the region and technology used.<sup>15</sup>

Further, Xcel itself has acknowledged that Xcel-owned solar will be significantly more expensive than third party-owned solar. In its Integrated Resource Plan ("IRP"), Xcel developed

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<sup>11</sup> *In the Matter of Xcel Energy's 2016–2030 Integrated Resource Plan*, MPUC Docket No. E-002/RP-15-21, ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE RESOURCE PLAN FILINGS at 11 (Order Point 5c) (Jan. 11, 2017) (eDocket No. [20171-128000-01](#)).

<sup>12</sup> Xcel Energy Petition at 5.

<sup>13</sup> Bolinger et al. "[Utility-Scale Solar, 2021 Edition](#)," *Lawrence Berkeley National Laboratory* at 32 (Oct. 2021).

<sup>14</sup> LevelTen Energy, "[PPA Price Index: Q2 2021](#)," at 3, 26 (Jul. 19, 2021).

<sup>15</sup> Lazard, "[Levelized Cost of Energy Analysis—Version 14.0](#)," at 3 (Oct. 19, 2020).

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two separate cost forecasts for utility-scale solar using the Sherco interconnection, one for generic—i.e., non-Xcel-owned—solar projects and one for Xcel-owned projects. Importantly, the projected cost of Xcel-owned solar was at least [TRADE SECRET DATA BEGINS ...  
...  
TRADE SECRET DATA ENDS] higher than generic solar in each year of the planning period, and it was as much as [TRADE SECRET DATA BEGINS ...  
... TRADE SECRET DATA ENDS] higher in some years.<sup>16</sup> This bears repeating: *Xcel's own IRP modeling* recognizes that the same solar generation will be significantly more expensive if owned by the Company than if owned by a third party.

Schedule 1 to these comments provides a comparison of the customer bill impact of the Sherco Solar project and a market rate solar PPA of the same size. For Sherco Solar, Schedule 1 includes the full annual revenue requirements as estimated by the Company.<sup>17</sup> For the third party-owned solar, Schedule 1 calculates the PPA cost for solar in Minnesota using the same source used by Xcel to develop its solar cost forecasts in its IRP, namely the U.S. Department of Energy's Annual Technology Baseline.<sup>18</sup>

The results of this comparison are summarized in Figure 1, below. As the figure shows, third party-owned solar would save customers more than [TRADE SECRET DATA BEGINS ...  
... TRADE SECRET DATA ENDS] hundred million dollars over the life of the project, including more than [TRADE SECRET DATA BEGINS ...  
... TRADE SECRET DATA ENDS] hundred million dollars in the first ten years alone.

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<sup>16</sup> Xcel's generic gen-tie utility scale solar cost assumptions are included on Table 24, page 29 of Appendix A to its Reply Comments in Docket 19-368 (June 25, 2021) (eDocket No. [20216-175386-01](#)). The cost assumptions for Xcel-owned gen-tie solar are included in Xcel's response to OAG Information Request 16 in Docket 19-368 (Sep. 29, 2021) (eDocket No. [20219-178341-02](#)).

<sup>17</sup> Xcel Energy response to OAG Information Request 2, Attachment A. This response is included in Schedule 2, below.

<sup>18</sup> The market rate solar PPA cost is calculated using the [2021 ATB's](#) Utility PV Class 8—the region that includes southwestern Minnesota—with a \$100/kW interconnection cost. The market rate solar alternative includes one 25-year PPA beginning in 2025 and a second 25-year PPA beginning in 2050. In 2024, the market rate solar alternative includes market purchases using the market energy cost forecasts from Xcel's IRP.

**Figure 1: Customer cost impact comparison: Sherco Solar and third party-owned solar**

Total revenue requirements			
Period	Sherco Solar	Third party-owned	Customer savings
[TRADE SECRET DATA BEGINS ...			
... TRADE SECRET DATA ENDS]			

The Sherco Solar project's staggeringly large cost premium raises the question of why it is so much more expensive than third party-owned solar. The value of the existing interconnection rights at the Sherco site is one of the primary reasons Xcel gave for pursuing the Project. While these interconnection rights have *some* value, the exorbitant price of Xcel's proposal demonstrates that they are outweighed by other project-specific factors. If the interconnection rights were as valuable as Xcel claims, the Project's levelized cost would be below that of other solar projects in the region, because competing projects would have to build in large interconnection costs that Sherco Solar would avoid. In reality, Sherco Solar's cost is dramatically higher. The most plausible explanation for the Project's large price premium is the lack of meaningful competition in the bidding process.

### **III. XCEL SHOULD ISSUE AN OPEN SOLAR RFP.**

In light of the exorbitant cost of the Sherco Solar project and the failure of Xcel's RFP, the Commission should take steps to ensure that Xcel's customers are not overpaying for new solar generation. The OAG recommends that the Commission decline to approve the Project at this time and instead require Xcel to issue a new solar RFP without geographic or ownership restrictions. This approach will provide the Commission with the information it needs to properly evaluate the prudence of the Project.

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Issuing an open solar RFP is in the public interest for several reasons. First and foremost, it is a necessary customer protection. Open competitive bidding for renewables has routinely resulted in pricing far below utilities' IRP projections.<sup>19</sup> An open solar bidding process would almost certainly produce bids with significantly lower levelized costs. At the very least, it would give the Commission greater insight into the current solar market, which would not only aid its evaluation of the Project's prudence but also provide a useful data point for evaluating all utilities' resource plans.

An open solar RFP would also fit into Xcel's existing solar procurement plans. As noted in its response to PUC Staff IR 4, Xcel's Alternate Plan in its IRP would add 300 MW of solar—beyond that of the proposed Sherco Solar project—in 2024 and another 550 MW of solar in 2025.<sup>20</sup> This means Xcel will already likely be completing a solar RFP process in the near future. And while a new RFP process may slightly defer the in-service date of the new solar, the delay would likely be minimal, and it would not jeopardize Xcel's resource adequacy, as the Company has stated that it does not have a capacity need until 2026.<sup>21</sup>

Finally, a new RFP would not necessarily preclude the Sherco Solar Project. In the unlikely event that the new RFP process does not produce lower-cost bids, the Commission could still approve the Project, provided Xcel chooses to bid it into the RFP. Under the current retirement timeline, Xcel will have until 2026 to use the interconnection rights associated with Sherco 2, which provides more than enough time to complete a solar RFP process and still pursue the Project.<sup>22</sup>

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<sup>19</sup> See, e.g., Xcel Energy's response to PUC Staff Information Request 15 in Docket 19-368 (Sept. 23, 2021) (eDocket No. [202110-178521-08](#)); Minnesota Power's 2016 solar RFP, as summarized in the Sedway Consulting Independent Evaluation Report (July 10, 2017) (eDocket No. [20211-169735-04](#)); Xcel Energy Colorado's 2017 all-source bidding solicitation, as summarized in Xcel's response to OAG Information Request 4 in Docket 19-368 (July 7, 2021) (eDocket No. [20217-176294-05](#)). Even Otter Tail Power's recent solar RFP, which was not open to all developers, still resulted in much lower prices than forecasted in that utility's 2016 IRP (*In the Matter of Otter Tail Power Company's 2017–2031 Resource Plan*, Docket No. E-017/RP-16-386, Compliance Filing, ex. 1 (July 1, 2020) (eDocket No. [20207-164461-01](#)).

<sup>20</sup> Xcel Energy's response to MPUC Information Request 4, Attachment A (July 14, 2021) (eDocket No. [20217-176560-02](#)).

<sup>21</sup> Xcel Energy Modeling Compliance Filing at 15.

<sup>22</sup> Xcel Energy Petition at 27.

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**IV. A DELAY WILL NOT IMPAIR MINNESOTA’S RECOVERY FROM THE COVID-19 PANDEMIC.**

One of the main justifications Xcel gives for the Sherco Solar project is its potential to “help drive economic relief and recovery in the wake of COVID-19.”<sup>23</sup> Thus, there may be concerns that the new RFP process in the OAG’s recommendation would delay the Project’s economic benefits. This concern is misplaced for at least two reasons: First, the Project would provide relatively little stimulus and no construction jobs until the summer of 2022 at the earliest. And second, the rapidly changing economic environment has obviated the need for utility-financed fiscal stimulus.

While the Sherco Solar project would provide some economic benefits, they would come far too late to impact the state’s recovery from the COVID-19 pandemic, and they would be far outweighed by the Project’s massive price premium. Economic benefits are not a unique feature of the Sherco Solar project: *any* new solar project would create jobs, provide landowner payments, and deliver tax revenue. Thus, most of the benefits estimated by Xcel would also exist for a similarly sized solar project located elsewhere. And even if one accepts Xcel’s full estimated economic benefits, they are still far eclipsed by the Project’s exorbitant price: The Company proposes to collect a total of [TRADE SECRET DATA BEGINS ... ... TRADE SECRET DATA ENDS] from customers over the life of the Project to create just \$355 million in estimated benefits. Xcel also estimates that the Project “could support about 900 well-paying union jobs during the project development and provide an estimated \$115 million in wages.”<sup>24</sup> By comparison, the Company’s shareholders would earn [TRADE SECRET DATA BEGINS ... ... TRADE SECRET DATA ENDS] in return on CWIP/rate base over the life of the Project. This bears repeating: the Sherco Solar project would provide roughly [TRADE SECRET DATA BEGINS ... ... TRADE SECRET DATA ENDS] *times more* stimulus for shareholders

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<sup>23</sup> Xcel Energy Petition at 1.

<sup>24</sup> Xcel Energy Petition at 39.



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than it would provide in wages for workers.<sup>25</sup> Finally, the construction jobs provided by the Project would not begin until next summer at the earliest, far too late to be considered COVID-19 stimulus.<sup>26</sup>

Moreover, the rapidly changing economic environment has obviated the need for utility-financed stimulus. Minnesota's economy has rapidly recovered from the recession brought on by the pandemic. After rising to over 11 percent in May 2020, Minnesota's unemployment rate fell to 3.7 percent in September 2021, which is well below its historical average of 4.8 percent.<sup>27</sup> The total output of Minnesota's economy—i.e. Gross State Product—has also fully recovered, and now exceeds pre-pandemic levels.<sup>28</sup>

For these reasons, any delay associated with a new RFP will not impair Minnesota's economic recovery, and the Commission should protect customers by requiring an open, competitive process even if it requires additional time.

**V. THE COSTS OF SHERCO SOLAR WOULD FALL DISPROPORTIONATELY ON LOW-INCOME CUSTOMERS.**

If approved, Sherco Solar's excessive costs would eventually be recovered from customers. Xcel's proposal to recover the Project's costs solely from Minnesota customers would exacerbate the harm of the Project's large price premium. Considering the size of the potential bill impacts of Sherco Solar, it is important to consider the distributional impacts of energy costs.

When fiscal stimulus is funded through federal or state income taxes, the distributional impact is progressive, meaning higher-income households pay a higher percentage of their income toward the costs than lower-income households. Stimulus funded through utility rates, on the other hand, is regressive, because energy costs tend to make up a much higher portion of lower-income

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<sup>25</sup> Xcel Energy's response to OAG Information Request 2, Attachments B and C (included in Schedule 2, below).

<sup>26</sup> Xcel Energy Modeling Compliance Filing at 2.

<sup>27</sup> U.S. Bureau of Labor Statistics, [Unemployment Rate in Minnesota \[MNUR\]](#), retrieved from FRED, Federal Reserve Bank of St. Louis (Oct. 27, 2021).

<sup>28</sup> U.S. Bureau of Economic Analysis, [Gross Domestic Product: All Industry Total in Minnesota \[MNNQGSP\]](#), retrieved from FRED, Federal Reserve Bank of St. Louis (Oct. 11, 2021).

households' budgets than for higher-income households. The percentage of household income spent on energy costs is referred to as the "energy burden."

**Figure 2: Average energy burden in Minnesota by household income**

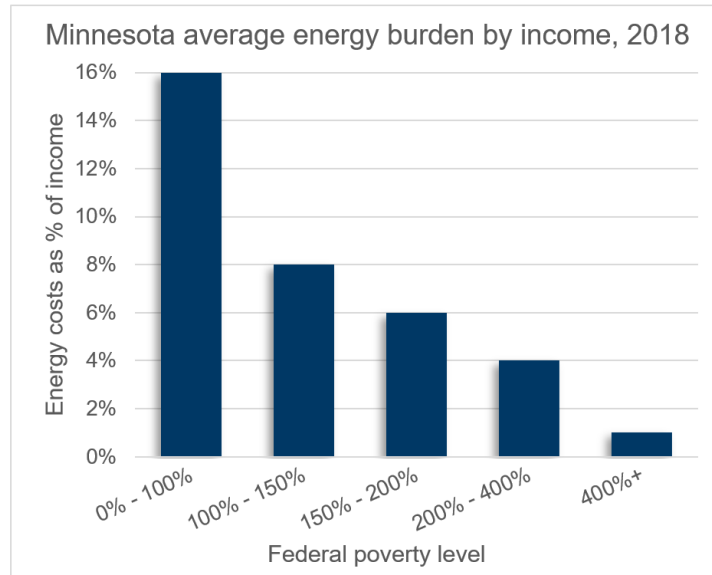


Figure 2 displays Minnesota's average energy burdens by income level in 2018.<sup>29</sup> The state's average energy burden in 2018 was just two percent. However, for Minnesota households at or below the federal poverty level, energy costs took up 16 percent of household income on average, or *eight times more* than the statewide average. Even households earning slightly more than the federal poverty level still faced average energy burdens of eight percent. This includes a significant number of Minnesotans: in 2018, 15 percent of Minnesota households had incomes at or below 150% of the federal poverty level (\$37,650 for a family of four).<sup>30</sup>

The distributional impacts of Xcel's proposal are especially concerning in light of the large returns that would accrue to Xcel's shareholders if the Project were approved. As noted above, Xcel's shareholders stand to earn [TRADE SECRET DATA BEGINS ...

<sup>29</sup> U.S. Department of Energy, [Low-Income Energy Affordability Data \(LEAD\) Tool](#) (last visited Oct. 21, 2021) (utilizing data from the U.S. Census Bureau's American Community Survey 2018 Public Use Microdata Samples).

<sup>30</sup> *Id.*

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**TRADE SECRET DATA ENDS]** in return on CWIP/rate base from the Project, compared to just \$115 million in construction wages.

**CONCLUSION AND RECOMMENDATION**

Xcel placed restrictions on its solar RFP process that severely limited participation and undermined competition. The only proposal that emerged from this process—the Sherco Solar project—is exorbitantly expensive, costing customers hundreds of millions of dollars more than a PPA for third party-owned solar. In light of the excessive cost of the Sherco Solar project and the failure of its RFP, the Commission should take steps to ensure that Xcel’s customers do not overpay for solar generation.

The Commission should not approve the Sherco Solar project at this time and instead require Xcel to issue a new solar RFP without ownership or geographic limitations. Specifically, the Commission should require Xcel to provide, within 30 days of the order in this docket, a proposal for a competitive bidding process to procure additional utility-scale solar generation through either a Track 1 or Modified Track 2 process. At minimum, Xcel’s proposed process should include the following components:

- A list of potential independent auditors to oversee the bidding process and evaluate the proposals;
- The criteria that the independent auditor will use to evaluate proposals;
- The proposed text of the request for proposals;
- The proposed timeline for the issuance of the request for proposals, the allowed response time, the date upon which Xcel will submit its self-build proposal (if applicable), and the date upon which the independent auditor will submit its report to the Commission detailing the bid results;

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- Confirmation that the request for proposals will be published publicly and open to any interested developer;
- Confirmation that there will be no geographic or ownership limitations on the proposals; and
- A contingency plan in the event of an unsuccessful bidding process.

Dated: November 10, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

**Andrew Twite**  
\_\_\_\_\_  
ANDREW TWITE  
Rates Analyst

**Peter G. Scholtz**  
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ATTORNEYS FOR OFFICE OF  
THE ATTORNEY GENERAL—  
RESIDENTIAL UTILITIES DIVISION

Customer cost impact comparison: Sherco Solar and third party-owned solar						
	Sherco Solar			Third party-owned solar		
	Revenue requirements	Generation (MWh)	Levelized cost (\$/MWh)	Revenue requirements	Generation (MWh)	Levelized cost (\$/MWh)
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OAG Comments - November 10, 2021  
Schedule 2

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☐ Public Document

Xcel Energy	Information Request No. 2
Docket No.: E002/M-20-891	
Response To: Office of the Attorney General	
Requestor: Andrew Twite	
Date Received: April 19, 2021	

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Question:

Provide the supporting calculation that produced the projected levelized cost of energy included on page 15 of the Petition.

Response:

See Attachment A for the total project LCOE calculation and supporting models as Attachments B and C.

Attachments A, B, and C are marked “NOT PUBLIC” as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes confidential pricing, bid information, and contractual terms, as well as confidential information regarding Company financials. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Attachments A, B, and C provided with this response contain information classified as trade secret pursuant to Minn. Stat. § 13.37 for the above-noted reasons and is marked as “NOT-PUBLIC” in its entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

Attachments A, B, and C:

1. **Nature of the Material:** LCOE calculations, in Excel format, for each bid/project where an LCOE was calculated.
2. **Authors:** The RFP evaluation team compiled the proprietary revenue requirements model using RFP responses submitted by the bidding party.
3. **Importance:** This information includes confidential information on Company financials and third party bidder pricing and bid information.
4. **Date the Information was Prepared:** Q1 2021.

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Preparer: Stan Dufault  
Title: Director  
Department: Corporate Development  
Telephone: 612.215.4577  
Date: April 29, 2021

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Attachments A, B, and C provided with this response contain information classified as trade secret pursuant to Minn. Stat. § 13.37 for the above-noted reasons and is marked as “NOT-PUBLIC” in its entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

Attachments A, B, and C:

1. **Nature of the Material:** LCOE calculations, in Excel format, for each bid/project where an LCOE was calculated.
2. **Authors:** The RFP evaluation team compiled the proprietary revenue requirements model using RFP responses submitted by the bidding party.
3. **Importance:** This information includes confidential information on Company financials and third party bidder pricing and bid information.
4. **Date the Information was Prepared:** Q1 2021.





The Office of  
**Minnesota Attorney General Keith Ellison**  
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November 10, 2021

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project***  
**MPUC Docket No. E-002/M-20-20-891**

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find both PUBLIC and TRADE SECRET Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

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[peter.scholtz@ag.state.mn.us](mailto:peter.scholtz@ag.state.mn.us)

## CERTIFICATE OF SERVICE

**Re:   *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project***  
**MPUC Docket No.   E-002/M-20-20-891**

I, JUDY SIGAL, hereby certify that on the 10<sup>th</sup> day of November, 2021, I e-filed with eDockets *both PUBLIC and TRADE SECRET Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal  
JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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