

August 17, 2022

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

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

Dear Mr. Seuffert:

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

In the Matter of Xcel Energy's Acquisition and Construction of the Sherco Solar Project

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

Sincerely,

/s/ KEVIN LEE  
Deputy Commissioner

KL/ja  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-20-891

#### I. INTRODUCTION

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). In the Petition the Company proposed a solar generating project developed in partnership with National Grid Renewables Development, LLC (NG Renewables).<sup>1</sup> For the proposed project Xcel would:

- acquire an approximately 1,654 acre solar site under development by NG Renewables (West Block);
- combine the NG Renewables site with a 1,826 acre site that has been under development by the Company (East Block);
- construct a 460 MW solar generating facility split into the East Block and West Block;<sup>2</sup>
- construct two collector substations, one each at each block; and
- construct two 345 kV generation-tie (gen-tie) lines which will connect the collector substations to the point of interconnect at the existing Sherburne County Substation (Project).

The expected commercial operation date for the proposed Project is December 31, 2024. The Petition specifically requests 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 Sherco Solar, LLC, which holds the property rights to a 230 MW solar site, from NG Renewables, pursuant to the terms of the January 15, 2021 Purchase and Sale Agreement (PSA);
- approve 100 percent of the costs to be recovered from Minnesota; and
- approve the Company's proposed approach of recovering project costs through the renewable energy standard (RES) rider.

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<sup>1</sup> According to the Petition, NG Renewables was formerly known as Geronimo Energy.

<sup>2</sup> The East Block and the West Block would be 230 MW each.

The Department filed Comments on November 10, 2021, finding that the company's resource acquisition process was unreasonably constrained, resulting in a project that was higher cost than potential alternatives. In Reply Comments filed on April 8, 2022, Xcel noted that the U.S. Department of Commerce anti-dumping circumvention investigation had introduced significant turmoil within the solar industry, compounding pre-existing global supply chain shortages. The company requested a temporary suspension of the current proceeding to "assess the industry impacts of this investigation, to discuss alternatives with our potential suppliers, and to reevaluate our pricing for this project."<sup>3</sup> In a Supplemental Filing on July 27, 2022, Xcel requested lifting the temporary suspension and proceeding to an expedited decision on the petition.

## II. DEPARTMENT COMMENTS

### A. *XCEL'S PETITION TO APPROVE ACQUISITION AND CONSTRUCTION OF THE 460 MW SHERCO SOLAR PROJECT, SUBJECT TO CONDITIONS AND UPDATE INFORMATION FROM THE COMPANY'S JULY 27, 2022 SUPPLEMENTAL FILING*

The question for the Commission is whether the utility's proposal is consistent with the public interest under Minn. Stat. § 216B.50. As the State's advocate for energy policy before the Public Utilities Commission, our analysis and recommendations are shaped by state energy goals defined in statute.<sup>4</sup> The goals that we are statutorily directed to support include energy savings goals, reductions in fossil fuel use, renewable energy goals, and the preservation of comparatively low electricity rates.<sup>5</sup> The State's energy policy provides that the State must:

monitor and evaluate progress toward greater reliance on cost-effective energy efficiency and renewable energy and lesser dependence on fossil fuels in order to reduce the economic burden of fuel imports, diversify utility-owned and consumer-owned energy resources, reduce utility costs for businesses and residents, improve the competitiveness and profitability of Minnesota businesses, create more energy-related jobs that contribute to the Minnesota economy, and reduce pollution and emissions that cause climate change.<sup>6</sup>

In accordance with this clearly expressed policy, the Department is directed by statute to "encourage deployment of cost-effective renewable energy developments within the state."<sup>7</sup>

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<sup>3</sup> Xcel Energy, *Reply Comments*, Docket No. E002/M-20-891, April 8, 2022, at 2.

<sup>4</sup> See Minn. Stat. § 216C.09 (authorizing the Department to "participate fully" in PUC dockets, and directing the Department to "support the policies stated in section 216C.05."

<sup>5</sup> Minn. Stat. § 216C.05, subd. 2.

<sup>6</sup> Minn. Stat. § 216C.05, subd. 1.

<sup>7</sup> Minn. Stat. § 215C.053.

With regard to the utility's proposal for the Sherco Solar project, the Department's comments from November 10, 2021 had expressed concern that project is not least-cost because the cost of Sherco Solar is greater than the cost for generic solar capacity modeled in its most recent IRP.<sup>8</sup> In particular, the Department was concerned that the RFP for the project had imposed significant limitations on the point of interconnection.<sup>9</sup> The Department recognized the value of the interconnection rights at the Sherco site, but was concerned that the price obtained by the initial RFP process was not reflective of a competitive marketplace:

In general, the Department agrees with the assumption that, for planning purposes, a significant part of Xcel's planned solar capacity will have to be acquired in a manner that avoids the MISO generation interconnection queue (GIQ). However, that does not mean that all capacity will have to be acquired outside of the GIQ. In addition, the purpose of a RFP is to use competition to check the Department's assumptions . . . and also the results of the overall resource planning analysis.<sup>10</sup>

Our concerns, in short, were that the RFP process was unnecessarily restrictive, producing a project that is not least cost.

Since those comments were filed, the PUC issued its *Order Approving Plan with Modifications and Establishing Requirements for Future Filings* for the most recent IRP, which states in part:

By 2026 Xcel shall acquire –

- A) Approximately 720 megawatts of company-owned solar powered generators to fully reutilize the interconnection capacity to be made available following the retirement of the Sherco Unit 2 – 460MW of which could come from the proposed Sherco Solar project if approved by the Commission – and
- B) An additional 600MW of solar resources unconstrained by interconnection location or ownership.<sup>11</sup>

The Department believes that the Sherco Solar project, as price capped per the Supplemental Filing, is a reasonable resource acquisition to meet the need identified in the Xcel IRP order point 5. The Department believes that the price cap proposal provides sufficient protection for ratepayers that the cost of the Sherco Solar project will reflect competitive market conditions in a price environment that

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<sup>8</sup> *Public Comments of the Minnesota Department of Commerce, Division of Energy Resources*, Docket. No. E002/M-20-891, Nov. 10, 2021, at 15.

<sup>9</sup> *Id.* at 19.

<sup>10</sup> *Id.* at 20.

<sup>11</sup> *Order Approving Plan with Modifications and Establishing Requirements for Future Filings*, Docket No. E-002/RP-19-368, April 15, 2022, at 31.

is both unstable and rapidly changing. The proposed price cap will effectively tie the cost of Sherco Solar to the results of the upcoming solar RFP for up to 1,300MW of new solar resources, and will ensure that ratepayers do not pay for a project that would not have been competitive in the forthcoming RFP. This proposal thus resolves the Department's previously expressed concerns around the cost of the project.

The Department also agrees with Xcel that the alternative of bidding the Sherco Solar project into the upcoming RFP would result in an unreasonable delay in project construction. Projects solicited by the upcoming RFP will likely be evaluated over the fall of 2022 and finalized in 2023, which would make meeting the current construction timelines for Sherco solar impossible. In addition to providing input and analysis for resource acquisition matters, the Department's Division of Energy Resources also provides technical support for the siting and environmental review of renewable energy projects, and one of the issues of concern for us is the frustration experienced by host communities when a project is delayed. Host communities can benefit greatly from production tax revenues for such projects, and when the expectation and budgeting for future tax revenues is thwarted by project delays, communities are understandably concerned.

Communities and individual community members can also invest a great deal of time and effort engaging with a particular project proposal, and when that project is delayed, many worry that they have simply wasted their time. These frustrations can extend to clean energy projects generally, fostering resentment toward newly proposed wind and solar projects. As an agency charged by statute with promoting renewable energy wherever possible,<sup>12</sup> the Department has a strong interest in ensuring that clean energy projects proceed on schedule, and we conclude that it would be unreasonable to require Sherco Solar to be rebid into the forthcoming RFP, given the fact that the proposal to price cap the project would provide the same consumer protections as a project rebid.

The Department also has a strong interest in promoting employment in clean energy careers, and we conclude that the Sherco Solar project, as price capped, would further that interest for a community that will experience economic transition over the next decade. Recently, Governor Walz spearheaded the Midwestern Governor's Association's recent report on power plant closures.<sup>13</sup> In his introductory remarks for that report, the Governor noted that:

The energy transition underway across the nation has presented challenges for many Midwestern communities. Towns and cities that have long hosted energy producers are increasingly re-thinking their economic

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<sup>12</sup> Minn. Stat. § 216C.053 (directing the Department to encourage cost-effective clean energy deployment in the State); § 216C.05, subd. 1 (finding that "the state has a vital interest in providing for . . . the development and use of renewable energy resources wherever possible."); § 216C.09(b) (directing the Department to support state energy policies of § 216C.05 in its advocacy before the PUC).

<sup>13</sup> Midwestern Governor's Association, *Growing the Communities that Have Powered the Midwest*, July 2022, available at <https://midwesterngovernors.org/power-plant-closures/>.

situation as the power plants that have provided so much economic opportunity transition. It is vital that we ensure a just transition and support these communities and workers and help to provide pathways for their continued success.<sup>14</sup>

That report provides a number of best practice recommendations for policymakers, including:

- reusing power plant infrastructure whenever possible
- identifying ways to replace lost tax revenue
- identifying ways to create jobs in a community that is losing coal assets
- exploring wind and solar as sources of passive income for impacted communities
- supporting the use of local, unionized labor at prevailing wage
- incorporating community input into regulatory actions around transition issues, and
- engaging with the state agency that conducts environmental review for site redevelopment.

The Department believes that the Sherco Solar project as currently proposed meets a number of those objectives that are so critical to smoothing this difficult economic transition. It provides economic development that is targeted to the impacted community, provides high-quality jobs to workers impacted by transitions away from fossil fuel use, provides some tax revenue replacement, and reutilizes existing infrastructure.

In particular, as the agency charged with that environmental review, the Division of Energy Resources has engaged extensively with the community of Becker in an attempt to ensure that community concerns around the Sherco Solar project have been addressed in the permitting documents. The Department believes that the community's support for the project is a strong indication that this process has worked as it should. This community engagement is an important tool in the transition toolbox, and these relationship which are so important to a fair transition, are jeopardized by unexpected project delays.

In short, with the price cap as proposed in the Supplemental Filing, the Sherco Solar project provides economic opportunity for an impacted community at a price that is fair to consumers and reflective of the overall market for solar.

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<sup>14</sup> *Id.* at 1.

**B. RESPONSE TO THE NOTICE**

1. *Should the Commission approve the Company's acquisition and construction of the 460 megawatt (MW) Sherco Solar Project, subject to conditions and updated information from the Company's July 27, 2022 Supplemental filing?*

The Department recommends that the Commission approve Xcel's request to build, own, and operate the proposed Project, subject to conditions and updated information from the Company's July 27, 2022 Supplemental Filing.

2. *Should the Commission authorize Xcel to recover costs of the Project through the Renewable Energy Standard (RES) Rider?*

The Department recommends that the Commission approve Xcel's proposed approach of recovering project costs through the renewable energy standard (RES) rider, with the clarification that any recovery through the RES Rider will require a separate determination that the project is eligible. The Department also recommends that the Commission condition any approval with the following ratepayer protections in addition to the cost cap conditions provided in the Supplemental Filing:

- a. Xcel must justify any costs (including operations and management expense, ongoing capital expense – including revenue requirements related to capital included in rate base – insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding;
- b. Ratepayers will not be put at risk for any assumed benefits that do not materialize;
- c. Xcel customers must be protected from risks associated with the non-deliverability of accredited capacity and/or energy from the proposed Project, other than non-deliverability caused by weather. The Commission may adjust Xcel's recovery of costs associated with this proposed Project in the future if actual production varies significantly from assumed production over an extended period, for reasons other than those related to weather.
- d. the Company must report in its fuel clause filing and annual automatic adjustment filings the amount of any curtailment payments, along with explanations for the curtailments, for the proposed Project;
- e. the Company must clearly account for all costs incurred for the proposed Project;
- f. the Company must report quarterly, until the proposed Project is in service, project failures along with the options available to the Commission to remedy any failures that occur; and
- g. report on how the proposed Project as built is consistent with the information requested in the May 20, 2020, notice issued in Docket No. E,G-999/CI-20-492.

3. *Are there other issues or concerns related to this matter?*

The Department is not aware of other issues or concerns related to this matter.

**III. DEPARTMENT RECOMMENDATIONS**

1. The Department recommends that the Commission approve Xcel's request to build, own, and operate the proposed Project, subject to conditions and updated information from the Company's July 27, 2022 Supplemental Filing.
2. The Department recommends that the Commission approve Xcel's proposed approach of recovering project costs through the renewable energy standard (RES) rider, with the clarification that any recovery through the RES Rider will require a separate determination that the project is eligible.
3. The Department also recommends that the Commission condition any approval with the following ratepayer protections in addition to the cost cap conditions provided in the Supplemental Filing:
  - a. Xcel must justify any costs (including operations and management expense, ongoing capital expense – including revenue requirements related to capital included in rate base – insurance expense, land-lease expense, and property/production tax expense) that are higher than forecasted in this proceeding;
  - b. Ratepayers will not be put at risk for any assumed benefits that do not materialize;
  - c. Xcel customers must be protected from risks associated with the non-deliverability of accredited capacity and/or energy from the proposed Project, other than non-deliverability caused by weather. The Commission may adjust Xcel's recovery of costs associated with this proposed Project in the future if actual production varies significantly from assumed production over an extended period, for reasons other than those related to weather.
  - d. the Company must report in its fuel clause filing and annual automatic adjustment filings the amount of any curtailment payments, along with explanations for the curtailments, for the proposed Project;
  - e. the Company must clearly account for all costs incurred for the proposed Project;
  - f. the Company must report quarterly, until the proposed Project is in service, project failures along with the options available to the Commission to remedy any failures that occur; and
  - g. report on how the proposed Project as built is consistent with the information requested in the May 20, 2020, notice issued in Docket No. E,G-999/CI-20-492.



## **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 **17<sup>th</sup>** day of **August 2022**

**/s/Sharon Ferguson**

[illegible]

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