

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities

ISSUE DATE: January 11, 2021

DOCKET NO. E-999/CI-19-704

In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis

DOCKET NO. E-002/M-19-809

ORDER EVALUATING SELF-COMMITMENT AND SELF-SCHEDULING REPORTS AND ESTABLISHING ADDITIONAL FILING REQUIREMENTS

**PROCEDURAL HISTORY**

On November 13, 2019, the Commission issued an order (2019 Order) opening an investigation into the self-commitment and self-scheduling practices of Minnesota utilities that own baseload generation.<sup>1</sup>

On December 13, 2019, the Commission issued a notice requesting comment on the process and scope of the Commission’s investigation.

By March 2, 2020, Minnesota Power, Xcel, and Otter Tail submitted reports to comply with the 2019 Order requirements.

On May 4, 2020, the Commission issued an order clarifying the filing requirements and comment schedule (2020 Order).

By June 9, 2020, the Department of Commerce–Division of Energy Resources (the Department), Fresh Energy, and Sierra Club submitted comments on the utilities’ reports.

On June 10, 2020, the Commission issued a Notice of Extended Reply and Response Comment Period, extending the deadlines for parties to submit reply and response comments on the reports.

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<sup>1</sup> *In the Matter of the Review of the 2017–2018 Annual Automatic Adjustment Report for All Electric Utilities*, Docket No. E-999/AA-18-373, Order Accepting 2017–2018 Electric Reports and Setting Additional Requirements, at 7 (November 13, 2019).

On July 8, 2020, Minnesota Power, Northern States Power Company d/b/a Xcel Energy (Xcel), Otter Tail Power Company (Otter Tail), and the Department submitted reply comments.

On July 15, 2020, the Commission issued its order in Docket No. E-002/M-19-809, approving Xcel's plan to offer the Allen S. King Generating Station (King) and Unit 2 of the Sherburne County Generating Station (Sherco 2) into the market on a seasonal basis.

On July 23, 2020, the Department, Fresh Energy, Sierra Club, and Commercial Customers with Clean Energy Goals (Commercial Customers) submitted response comments.

On October 28, 2020, the Commission met to consider the matter.

## **FINDINGS AND CONCLUSIONS**

### **I. Introduction**

#### **A. Background**

Midcontinent Independent System Operator, Inc. (MISO) operates the regional transmission grid and wholesale energy markets for a number of states, including Minnesota. MISO markets identify the supply of electric generation available throughout the MISO region and the anticipated and actual demand for electricity in each area, selecting generators for dispatch to minimize overall costs to the system while meeting reliability requirements.

The dispatch option used most often by Minnesota utilities is self-commitment and self-scheduling, whereby the utility self-commits its generator to be available for MISO dispatch and self-schedules by unilaterally setting the generator's output level. Under this process, the utility must accept whatever market price results, even if that price does not cover the cost of operating the unit. Another dispatch option is economic commitment or economic dispatch, whereby a utility specifies the production cost of its generator and MISO refrains from dispatching the resource until market prices meet or exceed that production cost, subject to reliability requirements. Seasonal dispatch involves the suspension of normal operations of a generating plant during uneconomic periods except if needed for reliability.

Renewable sources of generation have the advantage of incurring no fuel costs, which tends to reduce their operating costs and make them attractive options for MISO dispatch. However, self-committed and self-scheduled generators may displace these resources—even if, at any given moment, the renewable resource had lower operating costs.

#### **B. The Commission's Investigation**

In the 2019 Order, the Commission required Minnesota Power, Otter Tail, and Xcel to report annually on their future self-commitment and self-scheduling analyses of coal-fired baseload generation using a consistent methodology by including fuel cost and variable operations and maintenance (O&M) costs, as well as the potential options for seasonal dispatch and economic commitment of these units. The utilities were required to explain barriers or limitations to each of these potential options, including technical limits of the units and contract requirements.

In the 2020 Order, the Commission clarified the filing requirements and reporting period for the data. The Commission required the first report to cover the period from July 2018–December 2019, while all subsequent reports would cover a calendar year.

## **II. Self-Commitment and Self-Scheduling Reports**

### **A. Minnesota Power**

Minnesota Power’s report focuses on Units 3 and 4 of its Boswell coal generating facility. Minnesota Power stated that it self-commits the Boswell units because they are used to meet the Company’s resource adequacy requirements, so they are required to offer the available energy for dispatch each day. Minnesota Power found that the Boswell facility provided net benefits of \$32 million to customers in the applicable period, and other benefits include the facility’s flexible operations that allow for backing down during low-price periods but being available to increase generation to avoid purchasing higher cost energy from the MISO market.

Minnesota Power also argued that the Boswell units provide essential reliability services such as voltage regulation, frequency response, system strength, local power delivery, and redundancy. Minnesota Power noted that the Boswell units are the two largest remaining baseload generating facilities in northeast Minnesota and cautioned that market prices in the region would increase when those units are offline. Minnesota Power indicated that it would continue to consider economic and seasonal dispatch in the future but stated that it is too early to report on conditions or solutions with certainty.

### **B. Otter Tail**

Otter Tail analyzed two of its three baseload coal units: Big Stone and Coyote. Otter Tail’s Hoot Lake facility is scheduled for retirement in 2021, so it was not included in the analysis. Otter Tail concluded that over the study period, revenues exceed fuel costs for these plants during periods of self-schedule and self-commitment. Otter Tail argued that seasonal dispatch is not a viable option for its facilities because of MISO capacity accreditation requirements.

The Company also detailed the difficulties of economic dispatch for its facilities due to the joint ownership of those units and the fact that they operate within MISO and the Southwest Power Pool (SPP).<sup>2</sup> Otter Tail argued that economic dispatch of the co-owned units could lead to partial dispatch of the facility, which would result in under-recovery of payments to co-owners whose shares were not dispatched. Otter Tail noted that under the co-owner contract, one owner calling for operation of their share of the plant requires all owners to operate their shares’ minimum output.

Otter Tail discussed the coal contracts for each plant, explaining that Big Stone’s fuel costs are 100% variable while a portion of Coyote’s coal contract consists of fixed costs. Otter Tail

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<sup>2</sup> Coyote is owned by Otter Tail (35 percent), Minnkota Power Cooperative (30 percent), Montana Dakota Utilities (25 percent), and Northwestern Energy (10 percent), while Big Stone is owned by Otter Tail (53.9 percent), Montana Dakota Utilities (22.7 percent), and Northwestern Energy (23.4 percent).

explained that there are a higher percentage of hours where market pricing is lower than Big Stone's variable operating costs, while the fixed costs in Coyote's coal contract means there are relatively few hours in a year where it is uneconomic to operate Coyote. Otter Tail stated that Big Stone's owners are currently investigating the possibility of economic dispatch at Big Stone during seasonally low market pricing periods.

Otter Tail also discussed the limitations of MISO's single-day dispatch process. According to Otter Tail, MISO's process only considers the market conditions on a given day to justify the economic commitment and dispatch of a unit, which can artificially increase cycling of a unit and does not consider the economics of running a baseload plant across multiple days.

### **C. Xcel**

Xcel's report stated that its practice since 2019 is to economically commit its coal facilities as much as possible. Xcel noted its proposal in Docket No. E-002/M-19-809, since approved by the Commission, to suspend normal operations at King and Sherco 2 during nonpeak seasons. Xcel explained that it considers a number of factors when deciding whether to self-commit its coal plants, including MISO model limitations, contractual obligations, and system reliability. For example, Xcel described the joint operating agreement with Southern Minnesota Municipal Power Agency for Sherco 3 that limits Xcel's ability to offer that unit economically.

For reliability considerations, Xcel stated that it accounts for extreme weather conditions, elevated MISO conditions, high load days, tight capacity conditions, and transmission requirements. Xcel explained that it has offered baseload units into MISO on an economic basis at times when system reliability risks are low, such as times of high forecasted renewable generation, low load forecasts, and high plant availability.

Xcel also stated that it seeks market changes to better accommodate economic commitment and dispatch opportunities, particularly MISO's development of a multi-day financial commitment market design to optimize long-lead resources such as coal units. Xcel stated that MISO expects to implement the multi-day commitment process in the fourth quarter of 2021.

At the Commission's agenda meeting, Xcel offered an update to the plan that was approved in Docket No. E-002/M-19-809 to offer the King and Sherco 2 units into the market on a seasonal basis. Xcel reported that it began seasonal dispatch for the units in September through December 2020, at which point it planned to move to economic dispatch for those units.

## **III. Parties' Comments**

### **A. The Department**

The Department offered background information on how the MISO markets work as well as a detailed and thorough analysis of each utility's commitment decisions for their baseload generators. The Department found that the units analyzed in this proceeding apparently produce more uneconomic energy than those in MISO on average, but that dispatch decisions did not appear to cause significant curtailment of the utilities' renewable resources. The Department recommended that the Commission require an analysis of the overall benefits and costs of economic or seasonal dispatch from Minnesota Power for Boswell 3 and 4 and from Xcel for

Sherco 1 and 3 in the next annual filing. The Department rescinded its recommendation for Otter Tail to provide this analysis for Big Stone after Otter Tail indicated that the co-owners of that plant are offering it on an economic basis when feasible. The Department also noted that all units showed dispatch above the minimum operating levels even when a unit was not economic and recommended that each utility explain that phenomenon in reply comments.

In the Department's reply comments, it found that each utility's report was adequate and provided the required information. The Department recommended that the Commission use the information and analysis conducted in this proceeding to refine information requirements for future proceedings and order more detailed analysis of economic dispatch in next year's filings. In response comments, the Department stated its preference that decisions regarding economic or seasonal dispatch be made in this proceeding rather than IRP proceedings to avoid complicating the IRP proceedings and delaying dispatch decisions.

## **B. Stakeholders**

Fresh Energy and Sierra Club argued that the current commitment and dispatch practices of the baseload coal units analyzed in this proceeding are harming ratepayers, and that switching to economic and/or seasonal dispatch would save ratepayers money and reduce emissions. Both parties found significant periods of operating losses associated with the eight coal units under investigation, with Fresh Energy estimating a combined \$78 million in losses in 2019. Both parties also questioned the utilities' classification of certain operating costs as fixed, because the analysis only examines variable costs and thus may be underestimating losses at these plants.

Fresh Energy and Sierra Club argued that Minnesota Power's report did not provide the required information or analysis and therefore failed to comply with the Commission's order. Fresh Energy recommended that Minnesota Power be required to switch Boswell 3 and 4 to economic commitment in fall 2020. Sierra Club recommended that each utility be required to develop a clear mechanism for determining whether its commitment decisions are in ratepayers' best interests; they argued that the Commission should disallow fuel costs when baseload coal units are not operated economically due to lack of forward-looking analysis. Sierra Club also recommended utilities examine whether decreasing the minimum operating levels of their units would benefit customers, and that the Commission should scrutinize Otter Tail's coal contract associated with the Coyote plant.

The Commercial Customers indicated support for economic dispatch of baseload generation in order to lower electricity costs, reduce greenhouse gas emissions, expand renewable energy development, enhance equity for low-income customers, and maintain reliability of the electric grid. The Commercial Customers clarified that the Department's finding of minimal curtailment of renewable resources only applied to utility-owned or contracted resources and did not address potential curtailment of other renewable resources caused by dispatch decisions. The Commercial Customers emphasized the importance of carbon-free electricity to its members and argued that the overuse of self-commitment creates an artificial barrier to renewable energy.

## **C. Utilities**

Otter Tail and Minnesota Power argued that their facilities provide a net benefit to customers with revenues exceeding costs during the study period. They reiterated the difficulties posed by

MISO's single-day dispatch process and co-ownership of plants, particularly Otter Tail's plants that operate in MISO and SPP. The utilities maintained that they regularly evaluate dispatch decisions to use their baseload plants most efficiently.

Otter Tail and Minnesota Power argued that Fresh Energy's and Sierra Club's recommendations went beyond the scope of this proceeding by implicating prudence and resource planning decisions. Otter Tail and Xcel disagreed with Fresh Energy's and Sierra Club's arguments regarding fixed and variable costs, and Otter Tail opposed a requirement to provide data on unavoidable self-commitment.

In response to the Department's request regarding uneconomic dispatch above minimum operating levels, the utilities offered several explanations. Xcel explained that when evaluating the economics of a unit in a given hour, it is important to consider factors such as ancillary services, test periods and other required periods of self-commitment and dispatch, and a holistic evaluation of generation unit economics. Xcel cited environmental testing conducted at specific generating levels as an example. Minnesota Power also cited participation in MISO's ancillary service market as well as the fact that MISO uses an incremental offer curve based on an estimated cost of fuel while Minnesota Power's analysis was based on actual fuel costs. Otter Tail offered a number of explanations including dispatch for reliability purposes, co-ownership of plants, and MISO's utilization of a three-part economic offer for each unit in the day-ahead and real-time markets.

#### **D. Public Comments**

The Commission received approximately 60 public comments urging the Commission to hold Minnesota Power accountable for failing to investigate whether changing its operation of the Boswell units would save ratepayers money and reduce pollution. These comments called for disallowance of costs caused by poor planning. Many commenters emphasized the importance of reducing dependence on coal generation in order to improve air quality and fight climate change.

#### **IV. Commission Action**

The Commission required the utilities to submit self-commitment and self-scheduling reports in order to analyze the potential options and strategies for seasonal dispatch and economic commitment of baseload coal-fired generating plants, along with potential barriers or limitations to these options. After reviewing the record in this proceeding, the Commission finds that the reports submitted by Xcel and Otter Tail provide the required information and comply with the filing requirements.

The Commission finds that the report submitted by Minnesota Power did not provide the required information and therefore did not comply with the Commission's order. By its own admission, Minnesota Power failed to analyze possible options and strategies for seasonal dispatch and economic commitment at its Boswell plant, stating that it is "too early in the investigative phase to report on conditions and potential solutions with any certainty."<sup>3</sup> However, the Commission ordered Minnesota Power to provide information and analysis for a particular period of time, and compliance with this order was mandatory, not optional. The

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<sup>3</sup> Minnesota Power report, at 6.

Commission will therefore require Minnesota Power to file a complete report covering July 2018 through December 2020 in a filing due February 1, 2021, in Docket No. E-999/CI-19-704.

The Commission believes that one of the next steps in its investigation into the potential for seasonal and economic dispatch is to examine the costs and benefits of these options. The Commission will therefore require the utilities to file in their next annual filing a complete analysis of the costs and benefits of economic or seasonal dispatch relative to self-scheduling at the facilities listed in ordering paragraph 4 below.

The Commission agrees with the Department that the utilities' reports can be used to refine and improve the information requirements for future annual reports to allow for a more detailed and sophisticated analysis of economic and seasonal dispatch options. To that end, the Commission will carry forward all requirements from prior orders in Docket Nos. E-999/AA-18-373 and E-999/CI-19-704 and will include the changes and additions listed in ordering paragraph 5 for future annual reports. Attachment A to this order contains a complete list of the current filing requirements for this docket.

In addition, the Commission will require further discussion of specific issues in the next annual report that can help inform this investigation:

The Commission will require Otter Tail to provide a discussion of the options and costs of changing its current coal contract at Coyote Station, because the fixed fuel costs necessitated by that contract appear to reduce the potential benefits of economic commitment.

The Commission will require the utilities with co-ownership of baseload generating units to discuss options of economically committing those units within the terms of their partnership, because utilities identified co-ownership of facilities as a significant barrier to economic commitment.

The Commission will require the utilities to evaluate and discuss whether reducing minimum operating levels would benefit customers by allowing for operation at a lower level during uneconomic market conditions when the units are self-committed.

Lastly, the Commission will require the utilities to submit a compliance filing within 60 days of this order containing the required data consistent with the decisions in this order, with formulae intact, that the utility will fill out for each unit in future filings, including clear definitions of each input. The utilities shall do this in consultation with each other, the Department, and stakeholders. Utilities are requested and encouraged to make every effort to complete their consultations and submit their filings as soon as possible to allow sufficient time for Executive Secretary review and approval prior to the full compliance date of March 1, 2021. The Commission delegates authority to the Executive Secretary to approve this compliance filing for use in the March 2021 filings in Docket No. E-999/CI-19-704.

## **ORDER**

1. The Commission finds that Xcel Energy's filing in Docket No. E-999/CI-19-704 is adequate and met the filing requirements.

2. The Commission finds that Otter Tail’s filing in Docket No. E-999/CI-19-704 is adequate and met the filing requirements.
3. The Commission finds that Minnesota Power failed to meet the requirements in Ordering Paragraph 8 of the November 2019 Order and instructs Minnesota Power to file a complete report covering July 2018 through December 2020 with its February 1, 2021 filing in Docket No. E-999/CI-19-704.
4. Minnesota Power, Otter Tail, and Xcel Energy shall file in their March 1, 2021 filing a complete analysis of the costs and benefits of economic or seasonal dispatch relative to self-scheduling at the following facilities:
  - a. Boswell 3 and Boswell 4 – Minnesota Power
  - b. Coyote Station – Otter Tail
  - c. Sherco 1 and Sherco 3 – Xcel Energy
  - d. Big Stone – Otter Tail
5. The Commission carries forward all requirements from prior orders in Docket No. E-999/AA-18-373 and E-999/CI-19-704, and includes the following changes and additions:
  - a. Include ancillary services revenues and any other make-whole payments as a separate column in all reporting on revenue from generation.
  - b. Utilities should provide Unit Fuel Costs and Unit Variable Cost as separate line items.
  - c. If a utility excludes any fuel costs from its MISO offer curves, the utility should also provide an analysis that includes all fuel costs, including those currently treated as fixed costs due to contractual terms.
  - d. Utilities should include all preventative maintenance in O&M costs for reporting purposes.
  - e. Any hours with unavoidable self-commitment should be labeled as such, with a cause listed for the self-commitment in that hour. (Testing, contract, dispatch of co-owned generation, etc.)
  - f. Future analyses of self-commitment and self-scheduling should include all production costs including fuel, variable O&M, and other variable costs associated with the plant.
  - g. To the extent not already provided, utilities should provide the following:
    - i. Length of minimum decommit time for each unit;



- ii. Number of times in the analysis period that each unit incurred losses over a duration greater than or equal to its minimum decommit time;
  - iii. Of the periods identified in (ii), the number of periods when losses were greater than the relevant startup cost (warm or cold startup cost, depending on the length of the period); and
  - iv. Sum of losses in excess of startup cost that were incurred during periods identified in (iii).
6. Otter Tail shall provide a discussion of the options and costs of changing its current coal contract at Coyote Station and an evaluation of how potential costs of changing the contract compare to Coyote Station's past and forecast operating losses in Docket No. E-999/CI-19-704.
7. Utilities with co-ownership of baseload generating units shall discuss options of economically committing those units within the terms of their partnership in the March 1, 2021 compliance report.
8. Minnesota Power, Otter Tail, and Xcel Energy shall evaluate whether reducing minimum operating levels would benefit customers and include that evaluation and discussion in the March 1, 2021 compliance report.
9. Minnesota Power, Otter Tail, and Xcel Energy shall file a compliance filing within 60 days of this order containing the required data consistent with the decisions in this order, with formulae intact, that the utility will fill out for each unit in future filings, including clear definitions of each input. The utilities shall do this in consultation with each other, the Department, and stakeholders. The Commission delegates authority to the Executive Secretary to approve this compliance filing for use in the March 2021 filings in Docket No. E-999/CI-19-704.
10. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

## Attachment A

### Self-Commitment and Self-Scheduling Filing Requirements

- The Commission finds that Minnesota Power failed to meet the requirements in Ordering Paragraph 8 of the November 2019 Order and instructs Minnesota Power to file a complete report covering July 2018 through December 2020 with its February 1, 2021 filing in Docket No. E-999/CI-19-704.
- In the investigation docket, Minnesota Power, Otter Tail, and Xcel shall provide stakeholders with the underlying data (work papers) used to complete their analyses, in a live Excel spread sheet, including, at minimum, the data points listed below for each generating unit, with the understanding that this may include protected data.
- The first annual filing should cover the period from July 2018 to December 2019; each subsequent filing will cover a calendar year.
- Minnesota Power, Otter Tail, and Xcel Energy shall file a compliance filing within 60 days of this order containing the required data consistent with the decisions in this order, with formulae intact, that the utility will fill out for each unit in future filings, including clear definitions of each input. The utilities shall do this in consultation with each other, the Department, and stakeholders. The Commission delegates authority to the Executive Secretary to approve this compliance filing for use in the March 2021 filings in Docket No. E-999/CI-19-704.
- Hourly data for all units:
  - a. Date and hour
  - b. Commit status (Null / Economic / Emergency / Must Run / Outage / Not Participating)
    - i. Any hours with unavoidable self-commitment should be labeled as such, with a cause listed for the self-commitment in that hour. (Testing, contract, dispatch of co-owned generation, etc.)
  - c. Dispatch Status for Energy (Null / Economic / Self Schedule)
  - d. Cleared MW
  - e. Day ahead locational marginal price at unit node
  - f. Real time MW adjustment
  - g. Real time locational marginal price at unit node
  - h. Day ahead dispatch minimum
  - i. Real time dispatch minimum
  - j. Fuel cost (\$/MWh)
    - i. If a utility excludes any fuel costs from its MISO offer curves, the utility should also provide an analysis that includes all fuel costs, including those currently treated as fixed costs due to contractual terms.
  - k. Variable operations and maintenance costs (\$/MWh)

- i. Utilities should provide Unit Fuel Costs and Unit Variable Cost as separate line items.
    - ii. Utilities should include all preventative maintenance in O&M costs for reporting purposes.
    - iii. Future analyses of self-commitment and self-scheduling should include all production costs including fuel, variable operations and maintenance, and other variable costs associated with the plant.
  - l. Day ahead locational marginal price representative of utility load zone
  - m. Real time locational marginal price representative of utility load zone
  - n. Whether Day Ahead Cleared = Day Ahead Dispatch Minimum (0 or 1)
  - o. Actual production in MWh (for all 8,760 hours of the year)
  - p. Day ahead MISO payment
  - q. Real time MISO payment
  - r. Net MISO energy payment
    - i. Include ancillary services revenues and any other make-whole payments as a separate column in all reporting on revenue from generation.
  - s. Production costs  $((J+K) * O)$
  - t. Net cost or benefit  $(R-S)$
- Monthly or annual data for all units:
    - u. Revenue from ancillary services (monthly)
    - v. Fixed operations and maintenance costs (preferably monthly) or reasonable estimates in approximation thereof
    - w. Capital revenue requirements (annual) or reasonable estimates in approximation thereof
    - x. Average heat rate at economic minimum
    - y. Average heat rate at economic maximum
    - z. To the extent not already provided, utilities should provide the following:
      - i. Length of minimum decommit time for each unit;
      - ii. Number of times in the analysis period that each unit incurred losses over a duration greater than or equal to its minimum decommit time;
      - iii. Of the periods identified in (ii), the number of periods when losses were greater than the relevant startup cost (warm or cold startup cost, depending on the length of the period); and
      - iv. Sum of losses in excess of startup cost that were incurred during periods identified in (iii).
  - Minnesota Power, Otter Tail, and Xcel Energy shall evaluate whether reducing minimum operating levels would benefit customers and to include that evaluation and discussion in the March 1, 2021 compliance report.
  - Utilities with co-ownership of baseload generating units shall discuss options of economically committing those units within the terms of their partnership in the March 1, 2021 compliance report.

- Minnesota Power, Otter Tail, and Xcel Energy shall file in their March 1, 2021 filing a complete analysis of the costs and benefits of economic or seasonal dispatch relative to self-scheduling at the following facilities:
  - a. Boswell 3 and Boswell 4 – Minnesota Power
  - b. Coyote Station – Otter Tail
  - c. Sherco 1 and Sherco 3 – Xcel Energy
  - d. Big Stone – Otter Tail
- Otter Tail shall provide a discussion of the options and costs of changing its current coal contract at Coyote Station and evaluation of how potential costs of changing the contract compare to Coyote Station’s past and forecast operating losses in Docket No. E-999/CI-19-704.
- Utilities with co-ownership of baseload generating units shall discuss options of economically committing those units within the terms of their partnership in the March 1, 2021 compliance report.
- Minnesota Power, Otter Tail, and Xcel Energy shall evaluate whether reducing minimum operating levels would benefit customers and to include that evaluation and discussion in the March 1, 2021 compliance report.

**CERTIFICATE OF SERVICE**

I, Nancy Jia, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission  
ORDER EVALUATING SELF-COMMITMENT AND SELF-SCHEDULING REPORTS AND  
ESTABLISHING ADDITIONAL FILING REQUIREMENTS**

Docket Number

**E-999/CI-19-704**

**E-002/M-19-809**

Dated this **11th** day of **January, 2021**

/s/ Nancy Jia

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_19-704_Official
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_19-704_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-704_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-704_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-704_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	Yes	OFF_SL_19-704_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-704_Official
Holly	Lahd	holly.lahd@target.com	Target Corporation	33 South 6th St CC-28662 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-704_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_19-704_Official
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W.  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-704_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_19-704_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Shane	Stennes	stennes@umn.edu	University of Minnesota	319 15th Avenue SE  Minneapolis, MN 55455	Electronic Service	No	OFF_SL_19-704_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-704_Official
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-704_Official
Brian	Tulloh	btulloh@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121-2498	Electronic Service	No	OFF_SL_19-704_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_19-809_Official List
Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-809_Official List
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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_19-809_Official List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-809_Official List
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