

November 3, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE **Reply Comments of the Minnesota Department of Commerce-Division of Energy Resources**
Docket Nos. E002/CN-12-1240, E002/M-14-788 and E002/M-14-789

Dear Dr. Haar:

The Minnesota Department of Commerce-Division of Energy Resources (Department) provides these brief reply comments in response to the comments filed by Geronimo Energy, LLC (Geronimo) and the Environmental Intervenors.

Geronimo requests that the Commission approve recovery of 100 percent of the costs of the proposed power purchase agreement (PPA) with Geronimo from Minnesota ratepayers. The Department notes that least-cost resources procured to meet system needs should be recovered on a system-wide basis. It is not clear to the Department that the Commission determined that Geronimo's project was a least cost resource. In fact, the Commission's Order states that "whether an analysis shows Geronimo's proposal to be more expensive than other proposals, or less expensive, or similar in cost depends on the value given to solar energy S-RECs, externality values, and other factors."¹ Thus, the Department recommends that the Commission clarify its intention regarding cost recovery of the Geronimo project if the Commission approves the PPA.

In addition, if the Commission orders Minnesota ratepayers to pay for 100 percent of the costs of the proposed Geronimo PPA, it may be valuable to consider the mechanics of such a cost recovery either in this proceeding or a subsequent proceeding. The overall goal of such a proceeding should be to ensure that Xcel's cost recovery of resources used to serve more than one jurisdiction reasonably reflects the costs of such resources as well as the benefits each jurisdiction receives.

The Environmental Intervenors state that Xcel does not have a capacity need for any of the proposed thermal units given their belief that Xcel has supplied "more recent and reliable information" to the Commission. The Environmental Intervenors do not indicate that they reviewed Xcel's September 2014 forecast; however, they indicate that "the predicted flat growth in capacity need is conservative and should be relied on by the Commission." In addition, the Environmental Intervenors state that additional hydro and Blue Lake can be relied upon as capacity additions, but do not indicate the basis for that conclusion. The

¹ ORDER DIRECTING XCEL TO NEGOTIATE DRAFT AGREEMENTS WITH SELECTED PARTIES at 34, Docket No. E002/CN-12-1240 (May 23, 2014)

Environmental Intervenors do not indicate that they reviewed Xcel's updated capacity supply, planning reserve margins (PRMs) or coincidence factors; however, they appear to support Xcel's updated resource need calculation in its entirety and to the exclusion of other evidence in the record. Further, the Environmental Intervenors do not indicate that any risk assessment regarding the possibility of changes in forecasts, PRMs, supply resources, or overall capacity needs should be incorporated into the Commission's decision.

The Environmental Intervenors' conclusion that the Commission should rely exclusively on Xcel's internal, unreviewed updates to its forecasts, PRMs, and supply resources, without regard to risk, is contrary to both the Commission's Order and good resource planning practices. The Commission stated that:

The Commission agrees with the ALJ that uncertainty in the record is an important fact to weigh in making a commitment of resources. But the Commission concludes that the strategy recommended in the ALJ's Report gives insufficient attention to uncertainty – specifically, the uncertainty in the data suggesting that Xcel will need no more than 26 MW by 2019. Instead, the Commission will err on the side of ensuring that Xcel has enough capacity to meet the needs of its customers. The future will always be uncertain, but the Commission must proceed to make the necessary choices on the basis of a rigorous analysis of the data that *is* in the record.²

Further, regarding the updated forecast, the Department extensively examined this issue in its October 23, 2014 Comments, such as the conclusion on pages 3-4 that:

Xcel's most recent forecast remains within the band of demand forecasts analyzed by the DOC through 2024. Analysis of Xcel's updated forecast would require a significant amount of time. Further given that Xcel's recent sales increases exceeded Xcel's sales forecasts, the DOC has some concerns about the accuracy of Xcel's forecast of lower demand. Moreover, the DOC noted in its Direct Testimony in this proceeding a number of concerns regarding Xcel's September 2013 forecast, which Xcel was not able to explain. Mr. Shah concluded, overall, that:

The fundamental goal in certificate of need and resource planning proceedings is not to establish a plan that is least cost under a single forecast but for the plan to be least cost across a wide range of forecasts. Given this

² ORDER DIRECTING XCEL TO NEGOTIATE DRAFT AGREEMENTS WITH SELECTED PARTIES at 26, Docket No. E002/CN-12-1240 (May 23, 2014) citing Ex. 49 at 7 (Alders Direct) (“[T]here are factors that create uncertainty and could materially affect our resource need assessment. The new need assessment is another data point that should be considered in analyzing which resource proposals should be selected to address the range of [Xcel]’s potential need in the 2017-2019 timeframe.”).

goal, the concerns I discuss above, the Commission's decision not to require continual updating of forecasts in the 2010 IRP (*i.e.*, that the need was based on using the fall 2011 forecast), and the fact that the spring 2013 forecast is within the 5 percent contingency modeled, I conclude that Department Witness Dr. Steve Rakow's use of the fall 2011 forecast as a starting point to begin his analysis of assessing the bids is reasonable.
[footnote omitted]

Given that Xcel's most recent forecast would not materially affect the need for capacity resources in the 2017-2019 timeframe and remains within the band of demand forecasts analyzed by the DOC through 2024, the DOC concludes that there is no need to reopen the Commission's March 13, 2013 Order in this proceeding to reflect Xcel's most recent forecast.

Thus, the Commission should continue to evaluate Xcel's resource needs based on all the evidence in the record and with consideration of the risks that assumptions will change as time progresses.

As indicated in its October 23, 2014 Comments, the Department continues to conclude that Xcel should add capacity to its system by no later than 2018. Regarding which resource(s) are the most reasonable and prudent additions, the Department requested that Xcel provide additional information in reply comments on issues raised in Xcel's September 23, 2014 filing. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ CHRISTOPHER SHAW
Rates Analyst

CS/It

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
Reply Comments**

Docket No. E002/CN-12-1240; E002/M-14-788; and E002/M-14-789

Dated this 3rd day of November 2014

/s/Sharon Ferguson

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