

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

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In the Matter of the Petition of Xcel Energy  
For Approval of the Acquisition  
Of Wind Energy**

**DOCKET NO. G-002/M-16-777**

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

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits the following Reply Comments in response to parties’ Initial Comments on the petition of Northern States Power Company, doing business as Xcel Energy, for approval by the Minnesota Public Utilities Commission (“Commission”) of its 2016 Wind Acquisition Petition.

These Reply Comments will address issues raised by labor representatives to date in this docket.<sup>1</sup> First, the Laborers District Council of Minnesota and North Dakota (“Laborers Union”) expressed concerns regarding the type of cost recovery cap envisioned by Xcel and the type of cost recovery mechanism the Company is subject to for a wind project in Colorado.<sup>2</sup> In addition, the Laborers Union invited additional information “on the intended structure of the cap and the controls that are proposed to safeguard the interest of communities, ratepayers, and workers in safe and high quality construction of new renewable generation assets.”<sup>3</sup> Second, the Minnesota

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<sup>1</sup> See May 1, 2017 Comments of the Laborers District Council of Minnesota and North Dakota and a May 1 Speak Up! comment from a representative of the Minnesota State Building and Construction Trades Council. A letter from the Minnesota State Building and Construction Trades Council was submitted via the Commission’s Speak Up! function and is attached to these Reply Comments.

<sup>2</sup> May 1, 2017 Comments of the Laborers District Council of Minnesota and North Dakota at 3.

<sup>3</sup> *Id.*

State Building and Construction Trades Council expressed concerns with “work place safety, the quality of construction processes, and the feasibility of the intended use” along with concerns regarding information available to the public.<sup>4</sup> Developing this information will help ensure that safety and quality are prioritized and that a cost recovery mechanism is designed with ratepayer interests in mind.

The primary recommendation of the OAG is that final approval of a cost recovery mechanism is premature at this stage and that the record should be further developed in order to focus on design of a properly-functioning mechanism.<sup>5</sup> The OAG’s Initial Comments recommended, as an alternative to approval of the Company’s “symmetrical” cost cap, a shared savings cost recovery mechanism that allows its ratepayers to keep 95 percent of the cost savings of the individual projects (as opposed to the Company’s proposal to allow its shareholder to retain all cost savings). This type of cost recovery mechanism is similar to a mechanism adopted by the Company in a Colorado proceeding. While such a shared savings mechanism is preferable to a mechanism that allows Company shareholders to keep 100 percent of the savings, care should be taken in the design to prevent any unintended consequences that could arise.

The comments of the Laborers Union highlight some of the unintended consequences that may arise if the Commission approves Xcel’s cost recovery mechanism at this stage of the proceeding. The Laborers Union expressed concern over Xcel’s proposed mechanism, in particular the level of public information regarding Xcel’s proposal and concerns that Xcel’s proposed mechanism could “create undue pressure to cut corners in ways that undermine the economic, environmental[,] and social benefits of the program; put the safety and well-being of

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<sup>4</sup> Speak Up! Comment from the Minnesota State Building and Construction Trades Council (May 1, 2017).

<sup>5</sup> May 1, 2017 Comments of the OAG at 13 (noting that designing “a properly-functioning mechanism via comments may not result in the most effective balancing of the web of interests at stake in this proceeding”).

workers at risk; and leave future ratepayers on the hook for the costs of maintaining poorly-built energy infrastructure.”<sup>6</sup> These concerns underscore the important policy issues at stake in implementing a cost recovery mechanism, and are an example of the “web of interests” in this docket that were noted in the OAG’s Initial Comments.

There are steps the Commission can take to address these important concerns, such as the use of Best Value Employment Metrics that were ordered in Xcel’s Colorado wind docket,<sup>7</sup> but the Commission must also put into place measures to ensure Company compliance with any metric or metrics that are intended to address concerns raised by parties. Proper design of the cost recovery mechanism used in this docket will take time, but a deliberate process that considers concerns raised by parties<sup>8</sup> in this docket will result in the proper balancing of interests. Further, the Commission has time to develop these concepts and it should provide the opportunity for record development on cost recovery.

It is important to remember that the Company is not seeking actual cost recovery for its self-build projects at this time, nor does it appear to be waiting for Commission approval to begin incurring costs for its proposed self-build projects. The Company has already secured the equipment it needs for its self-build projects<sup>9</sup> and it has issued a request for proposal for Balance of Plant (“BOP”) contractors to complete its self-build projects prior to Commission approval of

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<sup>6</sup> May 1, 2017 Comments of the Laborers District Council of Minnesota and North Dakota at 3.

<sup>7</sup> See May 1, 2017 Comments of the Laborers District Council at 3 (noting that this was ordered by the Colorado Public Utilities Commission).

<sup>8</sup> The Minnesota Chamber of Commerce also raised concerns regarding cost containment and recovery. May 1, 2017 Comments of the Minnesota Chamber of Commerce at 12 (noting that other cost containment measures include a cap on ongoing O&M and capital costs and the moderation of short-term (5-year) revenue requirements).

<sup>9</sup> Xcel affiliate Capital Services has spent approximately \$200 million to purchase towers and nacelles for 2,500 MW of potential self-build wind additions. *In the Matter of the Petition of Northern States Power Company for Approval of a Sale of Components Agreement with Capital Services, LLC*, MPUC Docket No. E002/AI-17-215, Petition at 2 (Mar. 17, 2017).

those projects or a cost recovery mechanism.<sup>10</sup> It has taken these actions without an approved cost recovery mechanism and there is no indication that future Company action hinges upon approval of its cost recovery mechanism at this time, or that tax incentives or other project funding require cost recovery approval.

Regardless, it is vital that the Commission allow parties time to develop a workable mechanism to ensure that cost recovery of these immense capital projects—if approved—is done in the public interest. To achieve this outcome, more information is required of the Company. For example, updated cost estimates, informed by bids received by BOP contractors, and any other relevant information, would help to provide a more accurate cost benchmark. In addition, more information regarding the Company’s experience in the Colorado proceeding could help avoid problems associated with an incentive to cut costs.

In summary, the Commission should refrain from making a determination on cost recovery at this time. There are unanswered questions about the Company’s proposal that would benefit from additional record development so that the Commission may craft a cost recovery mechanism based on the full picture. In particular, comments from the labor representatives highlight the potential for unintended consequences if a cost recovery mechanism is not carefully designed. The Commission has the time to develop the record on cost recovery. The Company anticipates that the earliest any of its proposed self-build projects will be in service is late-2019,<sup>11</sup> presumably with a cost recovery request to follow. Approval of a cost recovery mechanism at this time would be thus be premature. The Commission should instead direct the Company to file additional information regarding whichever self-build projects, if any, the

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<sup>10</sup> March 16, 2017 Xcel RFP Supplement at 24 (“On February 15, 2017, we issued a firm-price RFP for construction companies to provide bids for BOP services in support of our self-build projects.”).

<sup>11</sup> Mar. 16, 2017 Xcel RFP Supplement at 22.

Commission approves in this docket and then solicit comments or establish a process to design a cost recovery mechanism based upon this information and additional input from interested parties.

Dated: May 15, 2017

Respectfully submitted,

LORI SWANSON  
Attorney General  
State of Minnesota

s/ **Joseph A. Dammel**

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# Building and Construction Trades Council

Affiliated with BUILDING AND CONSTRUCTION TRADES DEPARTMENT, AFL-CIO



May 1, 2017

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place E, Suite 350  
Saint Paul, MN 55101

RE: Petition of Xcel Energy for Approval of the Acquisition of Wind Energy M-16-777

The Minnesota State Building and Construction Trades Council has a few reservations regarding the proposed project: Petition of Xcel Energy for Approval of the Acquisition of Wind Energy M-16-777. Some of these concerns includes work place safety, the quality of construction processes, and the feasibility of the intended use. With limited information provided to the public on these issues, we ask that the commission address these items before going forward with the project.

Please do not hesitate to contact me to further discuss these issues. As always, thank you for your assistance on this issue.

Sincerely,

Harry Melander  
Minnesota State Building and Construction Trades Council  
President

HM/hsw  
Opeiu12



LORI SWANSON  
ATTORNEY GENERAL

# STATE OF MINNESOTA

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May 15, 2017

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: *In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of Wind Energy***  
**Docket No. E002/M-16-777**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find *Reply Comments of the Office of the Attorney General*.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Joseph A. Dammel**

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JOSEPH A. DAMMEL

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Enclosures

## AFFIDAVIT OF SERVICE

**RE:   *In the Matter of Xcel Energy for Approval of the Acquisition of Wind Energy***  
**Docket No. E002/M-16-777**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY     )

I, RACHAEL BERNARDINI, hereby state that on this 15<sup>th</sup> day of May, 2017, I filed with eDockets ***Reply Comments of the Office of the Attorney General*** and served the same upon all parties listed on the attached service list by email, 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/ **Rachael Bernardini**  
RACHAEL BERNARDINI

Subscribed and sworn to before me  
this 15<sup>th</sup> day of May, 2017.

s/ **Patricia Jotblad**  
Notary Public

My Commission expires: January 31, 2020



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