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May 15, 2017

PUBLIC DOCUMENT

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-16-777

Dear Mr. Wolf:

Attached are the **PUBLIC** reply comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Xcel Energy for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan.

The request for proposals (RFP) was filed on September 22, 2016, the petition for utility-owned generation was filed on October 24, 2016 and the selection of projects from the RFP was filed on March 15, 2017 by:

Aakash Chandarana
Regional Vice President
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

The Department responds to issues raised by other parties in comments. The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the petition with modifications**. The Department's team of Sue Peirce, Mark Johnson and myself are available to answer any questions the Commission may have.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

PUBLIC REPLY COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. E002/M-16-777

I. INTRODUCTION

On September 22, 2016, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a letter informing the Minnesota Public Utilities Commission (Commission) that the Company issued a request for proposals (RFP) for wind resources that would achieve commercial operation prior to December 31, 2020 in order to qualify for 100 percent of the current production tax credit (PTC). RFP bids were to be submitted to Xcel by October 25, 2016.

On October 24, 2016, Xcel filed the Company's *Petition for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan* (Petition). The Petition requested approval for the Company to build, own, and operate a 750 MW portfolio consisting of four separate self-build wind projects. The Petition also indicated that Xcel would supplement the Petition in the first quarter of 2017, after the Company evaluated bids received in response to the pending RFP.

On November 4, 2016, the Commission issued a notice indicating that no comment period was being established on the Petition.

On November 17, 2016, the Company provided a corrected Attachment C to the Petition.

On January 4, 2017, Xcel filed a progress report regarding the RFP.

On March 14, 2017, Xcel filed the Company's *Application for Consideration of a Resource Treatment Framework to Address Jurisdictional Cost Allocation Issues*, a petition originally filed December 31, 2016 in Docket No. E002/M-16-223.

On March 15, 2017, Xcel filed the Company's *Supplement: Wind Generation Acquisition* (Supplement).

On March 20, 2017, the Commission issued its *Notice of Comment Period on Petition* on various issues concerning Xcel's total proposed portfolio of 1,550 MW of wind, providing the due dates of May 1, 2017 for comments and May 15, 2017 for reply comments.

On April 3, 2017, Xcel filed a letter (April 3 Letter) regarding the application of Minnesota Statutes § 216B.50 and Minnesota Rule 7825.1800 to the Petition and the Supplement.

On April 7, 2017, the Commission issued a *Revised Notice of Comment Period on Petition* (Notice), maintaining the due dates for comments but expanding the topics open for comment.

On May 1, 2017, comments were filed by the following parties:

- Clean Energy Organizations;¹
- Department;
- Geronimo Energy;
- Laborers District Council of Minnesota and North Dakota;
- Minnesota Chamber of Commerce (Chamber); and
- Office of Attorney General—Residential Utilities and Antitrust Division (OAG).

Below are the Department's reply comments.

II. REPLY TO PARTIES

A. RES ANALYSIS

Xcel requested that the Commission “confirm that the 1,550 MW proposed wind portfolio is a reasonable and prudent way to continue to meet the obligations under Minnesota’s Renewable Energy Standard (RES)” under Minnesota Statutes §216B.1691. The Department’s May 1, 2017 comments stated “at this time the Department has requested further information regarding the Company’s response to Commission Information Request No. 6 and will provide a complete RES [renewable energy standards] analysis in reply comments.” The Department continues to evaluate Xcel’s response to Commission IR No. 6, and expects to offer supplemental comments on this issue.

B. PROJECT VIABILITY CONCERNS

The Clean Energy Organizations recommended that the Commission:

Require Xcel to notify the Commission if, for any reason, one or more of the projects in its proposed portfolio fall through. The notification shall identify a list of alternative projects that could replace the lost capacity.

Currently, in the Supplement Xcel committed to:

¹ The Clean Energy Organizations are Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Wind on the Wires.

... filing a project progress report with the Commission in January 2018. This report will allow the Company to raise any viability concerns that arise with any of the projects, and will give the Company and Commission the opportunity to address those concerns in a timely fashion.

The Department understands the Clean Energy Organizations' recommendation to extend Xcel's proposal to include both a one-time status report and an on-going obligation to report project failures. The Department concludes that it is reasonable to require the Company to report, both annually and on an ongoing basis until the projects are in-service, any project failures or material delays, along with the options available to the Commission to remedy the failure. In support of this recommendation, the Department notes that the production tax credit (PTC) ramp down indicates that replacement projects are likely to be considerably more expensive than the current projects. Further, projects from the recently concluded RFP process may no longer be available.

C. *SHARED SAVINGS MECHANISM*

The OAG's comments concluded:

...these Comments focus on the Company's proposal to be granted guaranteed cost recovery from ratepayers of the entire amount of projected project costs. The Commission should not approve such a mechanism. Instead, the Commission should approve a hard cap, on an individual project level, with a 95/5 shared savings mechanism for cost savings ...

The Commission should approve this mechanism and retain an independent consultant to design the details, with parties' input.

The Department's overall concern regarding any modification to a proposed bid is the integrity of the resource acquisition process. While the Department recognizes the Commission's ability to modify petitions, such modifications can lead to problems if the modifications undermine the resource acquisition process.

As has been made clear by Xcel, time is of the essence in this proceeding. Taking the time to design a shared savings mechanism, only to find out that the mechanism might cause Xcel to terminate one or more of the proposed projects would be problematic in that the PTC ramp down indicates that replacement projects are likely to be considerably more expensive.

However, as discussed further below under Section "Ongoing Operation and Maintenance Costs" the Department recommends that the Commission hold Xcel accountable to the costs it proposes in this proceeding, using a method similar to the Commission's ratemaking principles in a recent acquisition process for Xcel.

D. 5-YEAR LEVELIZATION

The Chamber's comments recommended that the Commission "levelize the revenue requirements for the first five years." The Department experimented with this idea by levelizing costs that would be charged to ratepayers for the first five full years of operation for two proposed projects—Foxtail and Freeborn. The result was that rates would decrease in years one and two for one project and in years one to three for the other, while rates would increase in the remaining years. Overall, the effect of the levelization process was that ratepayers would initially "borrow" an amount equal to the difference between the actual revenue requirements and the levelized payment from the Company at the discount rate. Ratepayers would then repay the "borrowed" funds in the later years. The discount rate, Xcel's overall cost of capital, is higher than the inflation rate. Thus, the result means that ratepayer costs, in real dollars would be increased by the levelization process.

As demonstrated by Chart 2 in the Department's May 1, 2017 comments, there is a spike in costs in the first few years that a levelization approach could mitigate. However, the larger issue is the significant increase in annual revenue requirements once the production tax credits stop. The Chamber's proposal would not address the larger issue. Nor has the Chamber explained why it is reasonable to require ratepayers to borrow money from Xcel at the Company's approved rate of return.

This approach is discussed further under the Section below, "Ongoing Capital and Maintenance Costs".

E. CURTAILMENT

While preparing these reply comments the Department noted an error in the Department's comments in the calculation of the impact of curtailment on the levelized cost of energy (LCOE). The error overstated the impact of curtailment.² The corrected estimates of the impact of curtailment are included in Table 1 below, along with an additional row demonstrating the impact of an 8 percent annual curtailment for all projects, due to Xcel underestimating the degree of curtailment.

² Technically the Department included the adjustment necessary for a Company-owned project (a reduction in a benefit line) and the adjustment necessary for a power purchase agreement project (an increase in a cost line) in all projects.

Table 1: Curtailment and LCOE (\$/MWh)

[TRADE SECRET DATA HAS BEEN EXCISED]

F. ON-GOING CAPITAL AND OPERATION AND MAINTENANCE COSTS

1. Background

The Chamber recommended that:

Since the Company has gained significant experience with wind projects, it may be reasonable to expect that it has a solid ability to project O&M and ongoing capital costs, especially since most of the costs are associated with insurance and maintenance agreements, which typically have built in escalation factors. Since the specific self-build projects were chosen over other competitively priced proposals, the Commission may want to consider cost caps for on-going O&M and capital costs based on the Company projects provided in this docket.

So that the Commission and parties can understand the various costs included in Xcel's LCOE model and their magnitude, the Department provides a detailed cost breakdown for Xcel's proposed Freeborn Wind Project (Freeborn). In terms of net present value (NPV) of the revenue requirements per MWh, the LCOE before tax benefits of Freeborn is **[TRADE SECRET DATA HAS BEEN EXCISED]** Of the total, Xcel's LCOE model estimates that:

[TRADE SECRET DATA HAS BEEN EXCISED]

This result demonstrates that capital related revenue requirements along with O&M expenses are estimated by Xcel to be the most important considerations in determining the LCOE.

Of the **[TRADE SECRET DATA HAS BEEN EXCISED]** Xcel's LCOE model estimates that:
[T TRADE SECRET DATA HAS BEEN EXCISED]

To provide a breakdown of the relative importance of the initial capital expenditure versus the estimated on-going capital expenditure, the Department converted both figures into real (2016) dollars. The two types of expenditures amount to **[TRADE SECRET DATA HAS BEEN EXCISED]** The initial capital investment amounts to **[TRADE SECRET DATA HAS BEEN EXCISED]** of the total capital expenditure and the estimated on-going capital investment amounts t **[TRADE SECRET DATA HAS BEEN EXCISED]** of the total capital expenditure. Thus, the initial capital expenditures are estimated to be far more important than on-going capital expenditures.

2. Department Analysis

Regarding how these types of expenditures are currently treated by the Department in rate recovery proceedings, a recent example can be found in the June 14, 2016 *Direct Testimony of Nancy A. Campbell* (Campbell Direct) in Docket No. E002/GR-15-826.³ The Campbell Direct at pages 41 to 45 addressed nuclear O&M expenses. In essence, the O&M expenses were reviewed by the Department due to Xcel's proposed high cost recovery in the test year amounts, compared to the amounts approved by the Commission in Xcel's certificates of need. Since Xcel did not show why the high costs were reasonable to charge to ratepayers, the Department recommended use historical data to determine a reasonable level of O&M expenses. The Campbell Direct at pages 83 to 96 reviewed ongoing nuclear capital expenditures. In this case, the capital expenditures were reviewed due to Xcel notifying the Commission of significant cost overruns (above the amounts used in the certificate of need filing).

The last thing to note is that the Campbell Direct at page 43 recognized a tradeoff between O&M expenses and capital expenditures:

...when significant amount of a plant is replaced, there is an expectation that O&M expenses should decrease because the new plant would presumably require less maintenance during the earlier years of the plant or plant replacement.

Therefore, while focusing on initial capital expenditures appears to be reasonable at first glance since capital expenditures represent a majority of the revenue requirements (see the discussion above), there is an O&M versus capital trade off. This trade off can lead to a misalignment between the Company's incentives and ratepayer costs.

A cap on recovery related to capital expenditures only, as Xcel proposes, would create an incentive for the Company to reduce capital expenditures even if the result is higher O&M expenditures. Under the Company's proposal, the Company would be able to retain the revenues related to any reduction in capital expenditures and ratepayers would not see any reduction related to the capital expenditures (because ratepayers are charged the same amount regardless of actual expenditures, absent a capital true-up). However, ratepayers would be liable for any resulting increase in O&M expenditures that are included in rate cases or eligible for rider recovery. Furthermore, it is possible that a reduction in capital expenditures—either initial or on-going capital—would translate into a lower level of energy production, further increasing the per-MWh cost of Xcel's self-build projects.⁴ Therefore, the Company's proposal creates the opportunity for the Company to increase profits by decreasing capital expenditures but increase per MWh costs charged to ratepayers by creating a resulting increase in O&M costs and a decrease in energy production.

³ All references are to the public version of the Campbell Direct.

⁴ A decrease in energy production related to decreased capital expenditures would be a lesser issue for a combustion turbine (peaking) unit such as Black Dog # 6 that Xcel used as a model for the proposal in this proceeding is of lesser concern since CT units have a much lower capacity factor than wind units.

There are alternatives to Xcel's proposal available that might better manage this trade off. One alternative would be to modify Xcel's recovery to be a levelized per MWh payment—the LCOE has already been estimated by Xcel for all projects. This approach would resolve the tradeoffs between energy production, O&M expenses, and capital expenditures. It would also resolve any perceived intergenerational-equity issues over the life of the project.⁵ However, as discussed above, this approach would also result in ratepayers, in essence, acting as a bank—at times borrowing from Xcel and at times lending to Xcel, all using the Company's rate of return as the interest rate. The amounts borrowed/lent are equal to the difference between the levelized cost and the actual cost.

Furthermore, if this alternative were to be pursued, the issue of energy curtailment would have to be addressed. There are times when it would be cheaper to curtail energy production rather than continue to produce energy. Xcel's power purchase agreements recognize this fact through a curtailment provision; however, it would take time to develop a similar provision for Xcel-owned projects to ensure that this alternative would function properly. Also, such an approach might incentivize cost reductions in areas where such reductions may be counter-productive, such as reducing the level of insurance.

To implement this approach the Commission would have to order Xcel's recovery to be a per MWh payment equal to the LCOE calculated by the Company and also order the development of a curtailment payment process.

A second alternative would be to modify Xcel's recovery to use the Commission's standard approach, but extended and modified. Currently, ratepayers pay the revenue requirements for actual capital expenditures, subject to a soft cap. Under the soft cap process, the Company can recover revenue requirements for capital expenditures up to the level in the resource acquisition process in a rider filing. Only in a rate case can any overruns be requested. During the rate case, for any cost overruns to be recoverable the Company has to demonstrate that the cost overruns could not have been anticipated during the resource acquisition process. This soft cap applies to both the initial capital cost estimate and to the estimate of on-going capital expenditures. The extension would be to apply the cap to O&M expenditures as well. The modification would be to use Xcel's proposal to fix payments to Xcel at the levels proposed, but for both the capital and O&M cost categories. This approach would address the tradeoff between O&M and capital expenditures.

Further, this approach would be consistent with the Commission's ratemaking directives in Xcel's competitive resource acquisition process. Specifically, the Commission put Xcel on notice regarding the following ratemaking principles:

- A. ... Xcel shall be held to the prices and terms used to evaluate each bid for the purpose of cost recovery from Xcel ratepayers. Ratepayers must not be put at risk for costs that are higher than bid or for benefits assumed in

⁵ "Intergenerational-equity issues over the life of the project" refers to the fact that some ratepayers will pay significantly more for energy from the proposed projects than others merely due to using energy in the last years of the projects life rather than in the early years.

bids that do not materialize. If actual costs are lower than bid, the bidders should be allowed to keep those savings.

- B. The agreements must provide terms that sufficiently protect ratepayers from risks associated with the non-deliverability of accredited capacity and/or energy from the project(s) as proposed.
- C. The Commission is unlikely to find it reasonable for Xcel to enter into an agreement in which negotiated terms shift risk or unknown costs to ratepayers.⁶

The principles above did not identify only capital costs; in fact, item C is clear that Xcel is responsible for justifying increases in any costs the Company would propose to charge to ratepayers. Thus, the Department concludes that the Commission should apply these principles to Xcel's selected projects.

To implement this approach the Commission would have to order the Company to report in future rate cases the O&M and capital expenditure amounts used to develop the LCOEs used in this proceeding and require the use of the Commission's standard soft cap approach for both O&M and capital costs.⁷

Therefore, the Department recommends that the Commission require Xcel to account, clearly and separately, for all costs, including costs related to capital, operation and maintenance expense, and any other costs related to these facilities, throughout the lives of the facilities, to allow for a comparison between the proposed and actual costs.

This approach may not address intergenerational equity issues but would avoid issues relating to ratepayers lending to/borrowing from Xcel amounts equal to the difference between actual costs and levelized costs at the Company's rate of return. By focusing on both of the major cost categories, O&M and capital, this approach would not involve the potential for creating counter-productive incentives in the smaller cost categories. Furthermore, if this alternative were to be pursued the issue of energy curtailment would not have to be addressed at this time.

Considering the benefits and costs of the two alternatives, Xcel's proposed cost recovery, and the need to arrive at a decision in a timely manner, the Department recommends that the Commission follow the second approach—extending the current soft cap approach to cover O&M expenditures as well and modifying it to fix ratepayer payments to Xcel at the levels in Xcel's proposals. The Department concludes that this approach is consistent with the ratemaking principles the Commission previously set out in Docket E002/CN-12-1240, but the clarification that O&M costs are included is helpful. As noted in comments, the

⁶ Page 5 of the Commission's February 5, 2015 Order Approving Power Purchase Agreement with Calpine, Approving Power Purchase Agreement with Geronimo, and Approving Price Terms with Xcel, *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*. Docket No. E002/CN-12-1240.

⁷ These amounts are available in the Company's response to Department Information Request No. 10.

Department will make a final recommendation upon review of data to be supplied by Xcel in reply comments and its review of the RES requirements.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission:

- approve New Lake Benton under § 216B.50;
- approve a variance from Minnesota Rules 7825.1800 (B) for New Lake Benton;
- put Xcel on notice that:
 - the Commission will hold Xcel accountable for the prices and terms used to evaluate each of the selected projects for the purpose of cost recovery from Xcel ratepayers;
 - ratepayers will not be put at risk for any costs that are higher than bid or for assumed benefits that do not materialize;
 - ratepayers must be sufficiently protected from risks associated with the non-deliverability of accredited capacity and/or energy from the projects;
- allow Xcel to retain any savings resulting from actual costs that the Company demonstrates are lower than bid;
- require Xcel to account, clearly and separately, for all costs, including costs related to capital, operation and maintenance expense, and any other costs related to these facilities; and
- require Xcel to file a progress report in January, 2018.

In addition, the Department recommends the Commission order Xcel to report in its monthly fuel clause filings and annual automatic adjustment (AAA) filings the amount of any curtailment payments, along with explanations for the curtailments.

Based upon the above analysis, the Department also recommends that the Commission require the Company to report, until the projects are in-service, project failures along with the options available to the Commission to remedy the failure.

The Department intends to provide supplemental comments as to whether or not Xcel's proposed portfolio is a reasonable way to meet the requirements of the RES.

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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
Public Reply Comments**

Docket No. E002/M-16-777

Dated this 15th day of May 2017

/s/Sharon Ferguson

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