COMMERCE
DEPARTMENT

PUBLIC DOCUMENT

March 4, 2019

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-18-765

Dear Mr. Wolf:

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

> Petition of Northern States Power Company for Approval of a Power Purchase Agreement with Dakota Range III, LLC.

The Petition was filed on December 13, 2018 by:

> Aakash Chandarana
> Regional Vice President
> Rates and Regulatory Affairs
> Northern States Power Company
> 414 Nicollet Mall
> Minneapolis, MN 55401

The Department expects to recommend approval, but requests that Northern States Power Company provide additional information in reply comments. The Department will make a final recommendation as soon as possible after that, and is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

Craig Addonizio
Financial Analyst

CA/jl
Attachment

Before the Minnesota Public Utilities Commission

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

Docket No. E002/M-18-765

I. INTRODUCTION

On December 13, 2018, Northern States Power Company (NSPM, or the Company), doing business as Xcel Energy (Xcel), petitioned the Minnesota Public Utilities Commission (Commission) for approval of a Power Purchase Agreement (PPA) between the Company and Dakota Range III, LLC for new wind energy generation from a 151.2 megawatt facility (Dakota Range III) located in South Dakota. The Company's Petition requests that the Commission:

1. Approve the Dakota Range III PPA; and
2. Find that the Company may recover from Minnesota retail customers through the Company's Fuel Clause Rider, pursuant to Minn. Stat. §216B.1645, the Minnesota jurisdictional portion of the amounts incurred by the Company during the full term of the PPA.

In its Petition, the Company noted that it recently reached an agreement with a new large commercial and industrial (C&I) customer (C&I Customer) to provide electric service to a new facility planned for construction on a portion of Xcel's Sherco property (the C&I Site) in Becker, Minnesota. The agreement between NSPM and the C&I Customer requires the Company to procure sufficient incremental renewable generation to match the C&I site's expected annual energy use. The Company stated that the PPA with Dakota Range III, LLC is the first renewable resources in support of the C&I Site.

The Electric Service Agreement between NSPM and the C&I Customer is the subject of Docket No. E002/M-19-39.

II. DEPARTMENT ANALYSIS

The Department recommends that the Commission approve the PPA if and only if the PPA is in the best interest of NSPM's ratepayers. To be in the best interest of NSPM's ratepayers, the PPA must meet the following three requirements:

1. The purchase price to be paid by NSPM for the wind energy is reasonable;
2. NSPM's ratepayers are appropriately protected from the financial and operational risks of the Dakota Range III projects; and
3. The PPA contains appropriate curtailment provisions.

B. PRICE OF THE PPA

The price of the proposed PPA is **[TRADE SECRET DATA HAS BEEN EXCISED]**.[1]

While the Company stated that it considered a number of comparable options before selecting Dakota Range III, the PPA between NSPM and Dakota Range III, LLC does not appear to be the result of a competitive bidding process. The Department notes that the Commission's January 11, 2017 *Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings* in Docket No. E002/RP-15-21 (the 2015 Integrated Resource Plan, or IRP, Order) included the following ordering point:

> 5. Concerning wind and solar resource acquisitions, Xcel:
>   a. may use the modified Track 2 process for the acquisition of wind resources included in the five-year action plan, and for any additional solar, if needed, through 2021;
>   b. shall, if Xcel intends to provide a bid for wind generation, acquire wind resources through the modified Track 2 process.
>   c. shall file a contingency plan early in the process (preferably with the filing of the Company's self-build proposal) to address the potential for the bidding process to fail; and
>   d. shall, in wind acquisition proceedings, describe how revenues from wind generation sold into the MISO market will be returned to Minnesota ratepayers, and provide an estimate of these revenues.

Attachment B to the Company's Petition indicates that NSPM did not consider a bid from itself for a self-built resource, and therefore, per Ordering Point 5a above, it is the Department's understanding that NSPM was not required to follow the modified Track 2 process. However, the Department requests that NSPM provide in reply comments a discussion of whether Ordering Point 5a required the Company to follow a different Commission-approved acquisition process in selecting the Dakota Range III PPA.

Additionally, the Department requests that NSPM explain in greater detail:

- its process of considering the options presented in Attachment B to its Petition,
- how and why it selected the Dakota Range III PPA from the available projects; and
- why its process was reasonable.

While the Department believes it would be helpful to know more about NSPM's acquisition process, the Department understands that the Company's agreement with the C&I Customer

[1] See Petition, page 6.

may have limited the time available to conduct a competitive acquisition, and therefore offers the following analysis of the Dakota Range III price.

Table 1 compares the levelized cost of energy (LCOE) of the Dakota Range III PPA to the LCOEs of the eight NSPM wind projects approved in Docket Nos. E002/M-16-777 and E002/M-17-694.

Table 1
LCOE's of Recently Approved Wind Projects

Project Name	Size	LCOE ($/MWh)
Dakota Range III	*151.2 MW*	**[TRADE SECRET DATA HAS BEEN EXCISED]**
Crowned Ridge	600 MW	
Lake Benton	100 MW	
Foxtail	150 MW	
Blazing Star I	200 MW	
Blazing Star II	200 MW	
Freeborn	200 MW	
Clean Energy #1	100 MW	
Dakota Range I-II	300 MW	

As shown, the energy price of the PPA is **[TRADE SECRET DATA HAS BEEN EXCISED]** than the LCOE of all of NSPM's recently approved wind projects, and based on this comparison, the Department concludes that the proposed PPA price is reasonable.

However, the Department requests that the Company explain in Reply Comments whether the Dakota Range III facility was included in any of the bids submitted in pursuant to the request for proposals (RFP) described in Docket No. E002/M-16-777 that resulted in NSPM's acquisition of 1,550 MW of new wind projects. If Dakota Range III was included in that RFP process, the Department requests that NSPM explain why it was not selected, and what has changed since then to make the facility a more attractive option.

C. NEED FOR THE PPA

The fact that the price for the Dakota Range III project is reasonable does not necessarily mean that the project is needed. Therefore, the Department provides an analysis of the need for this wind project below.

The Department's July 8, 2016 comments in Xcel's most recent integrated resource plan (IRP) (Docket No. E002/RP-15-21) recommended that Commission order Xcel to pursue acquisition of approximately 1,000 MW of wind resources in 2018 or 2019. The Department noted, however, that the capacity expansion modeling (Strategist) results demonstrated that there appeared to be no reasonable economic limit to the amount of wind to be acquired as part of the 5-year action plan. The Department recommended that the Commission order NSPM to pursue acquisition of approximately 1,000 MW of wind in 2018 or 2019, but noted that 2,000 MW or potentially more may have been reasonable and cost effective.

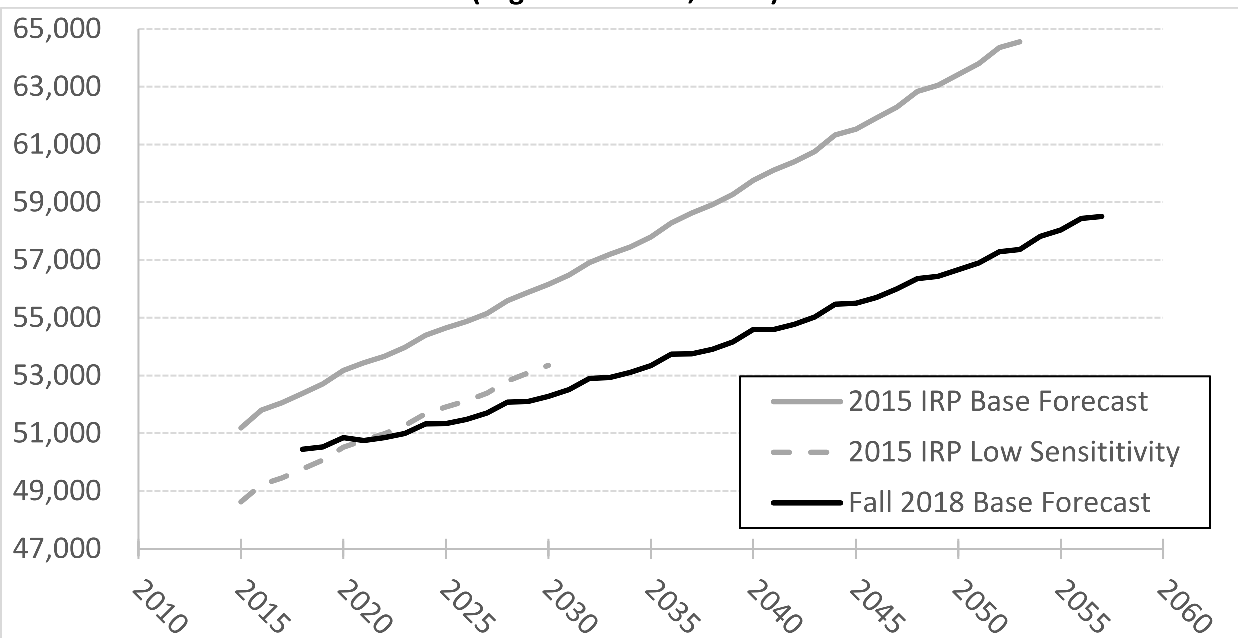
In the 2015 IRP Order, the Commission ultimately specified 1,000 MW as a reasonable amount of wind resources to pursue, while also acknowledging that more wind may be reasonable and cost effective:

> 3. It is reasonable to acquire at least 1000 MW of wind by 2019. Acquisition of greater than 1000 MW may be approved upon submission of evidence such as price, bidder qualifications, rate impact, transmission availability, and location.

The 1,850 MW of wind projects other than Dakota Range III listed in Table 1 above have all been approved for NSPM's system since the 2015 IRP. Thus, the addition of the 151.2 MW Dakota Range III facility would increase the total nameplate capacity of new wind resources to approximately 2,000 MW, the limit of the amount of new wind resources that the Department tested in the Company's 2015 IRP.

Additionally, the Department notes that NSPM's current energy and demand forecast is significantly lower than the forecast used in the 2015 IRP. Figure 1 below compares the base energy forecast and the low load sensitivity used in the Department's analysis in 2015 IRP with NSPM's current base forecast. As shown, beginning in 2021, the current base energy forecast is below the bottom of the range of energy forecasts analyzed by the Department in the 2015 IRP.

Figure 1
Comparison of 2015 IRP and Current Load Forecasts
(Gigawatt Hours, GWh)



The fact that NSPM's wind resource additions and the current load forecast are at or beyond the limits of the ranges analyzed by the Department in the 2015 IRP weakens the strength and applicability of the conclusions from that proceeding to Dakota Range III. Therefore, the Department has some minor concerns about the addition of the Dakota Range III PPA to NSPM's portfolio.

Due to time constraints, the Department was unable to conduct its own Strategist modeling to assess NSPM's results. However, the Department reviewed the modeling assumptions and inputs provided in NSPM's Petition on pages 8-13 and in Appendix C, and concludes that they are generally reasonable, and that the results support the addition of the Dakota Range III PPA.

Additionally, the Department notes that in the 2015 IRP, the Department's assumed levelized prices for wind resources added in 2019 was $34.14/MWh. Given the energy price of the Dakota Range III PPA, the Department concludes that it is very likely to be cost-effective, despite the lower load forecast. Further, as noted on page 6 of the Company's petition, Dakota Range III qualifies for a 100 percent federal production tax credit (PTC). Wind projects that began construction before January 1, 2017 are eligible for the full PTC, and face a limited window of time to be placed in service to remain eligible for the full PTC. Thus, it may be difficult to acquire wind resources that are eligible for the full PTC, and that are priced similarly, in the future.

Based on the above discussion, the Department expects to recommend that the Commission determine that the Dakota Range III PPA is needed and reasonable. However, the Department requests that NSPM provide additional explanation of its modeling and results in Reply Comments, as described below.

Figure 1 on page 12 of the Company's Petition presents the incremental cost/savings associated with Dakota Range III as measured by changes in societal costs and also by revenue requirements. The Department notes that, as measured by impact on revenue requirements, Dakota Range III results in modest cost increases in 2019-2021, modest decreases in 2023-2027, and significant cost decreases in 2028-2030. The Department requests that the Company provide a general explanation of this pattern of savings in reply comments. The Department is particularly interested in the reasons for the cost increases in the early years of the PPA, and the significant decreases in 2028-2030.

Additionally, the Department notes that Article 5.1(A) of the proposed PPA requires Dakota Range III, LLC, to seek Energy Resource Interconnection Service (ERIS) under the transmission tariff from the relevant transmission authority (in this case, the MidContinent Independent System Operator, or MISO). It is the Department's understanding that this designation means that Dakota Range III will receive no capacity accreditation and will therefore not count towards NSPM's capacity requirements unless other arrangements are made. The Department requests that NSPM confirm in reply comments that Dakota Range III is seeking or has been awarded ERIS from MISO, and that the Company's Strategist modeling reflected zero accredited capacity associated with the PPA.

D. PROTECTION OF NSPM'S RATEPAYERS FROM FINANCIAL AND OPERATIONAL RISKS

1. Financial Risks

For PPAs, there are two main financial risks that may have negative impacts on Xcel's ratepayers. They are:

- a seller default and termination of the PPA before the expiration of the contract period, and
- entitlement by a lender or other party, as a result of the seller's failure to pay debt, to take over the project and terminate the PPA.

These events may force NSPM to find more costly replacement power when the PPA is terminated.

The terms of the Dakota Range III PPA are similar to the Crowned Ridge PPA approved by the Commission in Docket No. E002/M-16-777.

Article 11 of the PPA requires the seller to establish a security fund to account for damages caused by the seller. Examples include items such as damages caused by failure to achieve commercial operations date (COD), delay in achieving the targeted COD, and replacement power costs. The Security fund will be $18.9 million ($125 per nameplate kW) before the COD, and $11.3 million ($75 per nameplate kW) after the COD. These per-kW amounts are **[TRADE SECRET DATA HAS BEEN EXCISED]** the amounts required in the approved Crowned Ridge PPA.

Article 12 of the PPA describes events that constitute seller's default and include, but are not limited to, seller's dissolution, bankruptcy, or liquidation; assignment of the PPA or the facility, failure to:

- establish and maintain the security fund;
- obtain and maintain appropriate insurance; or
- make required payments to the Company.

Article 12.1(E) of the PPA provides NSPM with the option to acquire the Dakota Range III facility in the event of a seller default and specifies the process to be followed in that event.

After reviewing the risk mitigation features of the PPAs, the Department concludes that NSPM's ratepayers would be reasonably protected from financial risks.

2. *Operational Risks*

As is typically true of PPAs, the operational risks are the risks that the wind projects will not be built and operated as expected. These risks include a complete shutdown or a partial shutdown of the project due to technical problems. In the case of a partial shutdown, ratepayers must be assured that their payments for the wind energy are reduced accordingly. In the case of a complete shutdown, may need to find what is likely to be more expensive replacement power. The PPA includes specific features that protect both NSPM and its ratepayers from the operational risks discussed above. These features include the security fund discussed above, and payments only for net energy actually delivered to the Company (except for curtailment issues discussed elsewhere in these comments).

Article 19 of the PPA includes restrictions on the transfer of the PPA. Such restrictions make it less likely that the PPAs will be assigned to a party that is unable to meet the PPA's terms. Finally, the PPA specifies the amount of time the seller has to cure an event of default. Failure

to cure constitutes an event of default and would allow Xcel to terminate the contract and draw on the security fund to compensate for any losses caused by seller's default.
After review the Department concludes that the PPA contains features that will reasonably protect from the operational risks.

3. Curtailment Provisions

Section 8.3 of the PPA defines compensable and non-compensable curtailments. In principle, NSPM must pay for the curtailed energy (i.e. a curtailment is compensable) only if the curtailment is initiated by the Company and the seller is otherwise able to produce and deliver wind energy. NSPM does not make curtailment payments in other circumstances (non-compensable curtailments).

Non-compensable curtailments are defined as any curtailments other than compensable curtailments. Examples of non-compensable curtailments include curtailments resulting from:

- a transmission-system emergency declared by MISO;
- output restrictions related to the facility's Interconnection Agreement;
- planned or unplanned maintenance outages on the transmission system; and
- lack of ability to provide energy to the point of delivery.

After review, the Department concludes that the PPA's curtailment provisions are reasonable.

E. OTHER ISSUES

1. Non-Jurisdictional Treatment

Article 6.1(D) provides the Company with the option to seek approval from the North Dakota Public Service Commission and the South Dakota Public Utilities Commission to accept that the energy produced by Dakota Range III will not be used to serve NSPM's retail load in those jurisdictions, and that ratepayers in those jurisdictions will bear no costs associated with the facility. The same article also gives NSPM the right to seek approval from the Federal Energy Regulatory Commission to amend its interchange agreement between NSPM and Northern States Power Company Wisconsin (NSPW) to achieve similar treatment in Wisconsin.

The article provides a period of 45 days after the date of the PPA (October 29, 2018) for NSPM to apply for this non-jurisdictional treatment, after which NSPM is deemed to have waived its option to do so.

The Department requests that NSPM provide in reply comments an explanation of whether it sought non-jurisdictional treatment in one or more of its non-Minnesota jurisdictions, and if so, an explanation of any impacts that treatment will have on Minnesota ratepayers if approved.

2. Other Required Permits and Approvals

In addition to the potential regulatory processes seeking non-jurisdictional processes referenced above, the Department requests that NSPM provide in reply comments an update on the status of any other permits or approvals required for the Dakota Range III project, as well as only other relevant regulatory processes (e.g. the status of interconnection requests and agreements).

3. Compliance with Minnesota's Renewable Energy Standard (RES)

The Department notes the following regarding Xcel's compliance with Minnesota's Renewable Energy Standard (RES). Per Article 7.3 of the PPA, all renewable energy credits (RECs) produced by Dakota Range III will be assigned to NSPM. However, as described on page four of the Petition, NSPM's service agreement with the new C&I Customer requires it to procure incremental renewable energy to match the C&I Customer's annual energy use. NSPM's intention is to retire RECs generated by Dakota Range III on behalf of the C&I customer. This proposed arrangement means that the RECs generated by Dakota Range III will not be available for Xcel's use to comply with Minnesota's RES[2] or for the Company's other clean energy programs (such as the Renewable*Connect Pilot Program), unless the C&I Customer's energy use is less than the Dakota Range III's energy output. Such an outcome is unlikely, however, as the Company is already working on a second PPA to support the C&I Customer.[3]

The Department notes that in Docket No. E002/M-16-777, the Company estimated that approval of the 1,550 MW of wind projects proposed in that Docket would extend NSPM's expected RES compliance through 2044.[4] Those projects were approved, and the Commission has since approved an additional 300 MW of wind resources for NSPM, which likely pushed NSPM's expected RES compliance even farther into the future. Thus, NSPM should have little or no risk of non-compliance with Minnesota's RES during the term of the PPA.

III. CONCLUSION

Based on the above analysis, the Department concludes that the price of the Dakota Range III PPA is reasonable, that the project is likely needed and cost-effective, and that the terms of the PPA reasonably protect ratepayers from the financial and operational risks of the project. As

[2] Minn. Stat. §216B.1691, Subd. 2a(b).
[3] See the Company's Petition in Docket No. E002/M-19-39, pg. 31-32.
[4] See the Department's May 1, 2017 Comments in Docket No. E002/M-16-777, page 24.

described above, the Department requests that the Company provide additional in reply comments related to:

- the requirements of the 2015 IRP Order related to NSPM's acquisition of new wind resources;
- the acquisition process NSPM used to select the Dakota Range III PPA;
- whether Dakota Range III was included in any of the bids assessed in Docket No. E002/M-16-777;
- the pattern of cost savings observed in Figure 1 on page 12 of the Petition;
- whether Dakota Range III is seeking or has been awarded ERIS from MISO, and whether the PPA was modeled with no accredited capacity;
- whether the Company has sought or plans to seek non-jurisdictional treatment of the Dakota Range PPA outside of Minnesota, and the impacts such treatment may have on Minnesota ratepayers; and
- an update on the status of other required permits and approvals, and other relevant regulatory processes.

The Department expects to recommend approval of the Dakota Range III PPA, and will make a final recommendation as soon as possible after reviewing the information provided in reply comments.

/jl

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 Comments

Docket No. E002/M-18-765

Dated this 4th day of March 2019

/s/Sharon Ferguson

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