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March 14, 2019

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
APPROVAL OF POWER PURCHASE AGREEMENT WITH  
DAKOTA RANGE III, LLC FOR 151.2 MW WIND GENERATION  
DOCKET NO. E002/M-18-765

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the Department of Commerce's March 4, 2019 Comments regarding our December 13, 2018 Petition 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 megawatts facility located in South Dakota, as filed in the above-noted docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or (612) 330-6064 or Mary Martinka at [mary.a.martinka@xcelenergy.com](mailto:mary.a.martinka@xcelenergy.com) or (612) 330-6737 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA SHEA  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures  
c: Service List

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BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY FOR  
APPROVAL OF A POWER PURCHASE  
AGREEMENT WITH DAKOTA RANGE III, LLC

DOCKET NO. E002/M-18-765

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) these Reply Comments in response to the March 4, 2019, Comments of the Department of Commerce, Division of Energy Resources (Department) regarding our Petition requesting approval of a Power Purchase Agreement (PPA) between the Company and Dakota Range III, LLC for new wind energy generation from a 151.2 megawatts (MW) facility (Dakota Range III) located in Grant and Roberts counties, South Dakota.

We appreciate the Department's thorough review of the Petition and conclusion that the PPA pricing is reasonable, the project is likely needed and cost-effective, and the agreement terms reasonably protect our customers from any related financial and operational risks.

The Department noted it expects to recommend that the Commission approve the PPA and asked the Company to provide additional information in Reply Comments related to the:

- project acquisition process;
- pattern of cost savings;
- interconnection and capacity accreditation status;
- non-jurisdictional treatment of the PPA outside of Minnesota;
- status of other required permits and approvals and other relevant regulatory processes.

We provide brief commentary on each item in our Reply below and welcome any questions the Department might have upon review.

## REPLY

### A. Requirements of the 2015 IRP Order Related to NSPM's Acquisition of New Wind Resources

The Department requested that the Company provide a discussion of whether Ordering Point 5a of the Commission's January 11, 2017, Integrated Resource Plan (IRP) Order<sup>1</sup> required the Company to follow a different Commission-approved acquisition process in selecting the Dakota Range III PPA (other than the modified Track 2 process). The Department notes that, because the Company did not consider a self-built resource, the modified Track 2 process, referenced in Ordering Point 5a, does not apply.

As background, we note that our August 12, 2016, Reply Comments in our last IRP provide background information and a proposal for a new acquisition process that informed the Commission's establishment of the modified Track 2 process.<sup>2</sup> We relied on the modified Track 2 process for acquisition of our wind portfolio and believe it proved to be successful.<sup>3</sup> The modified Track 2 process combines elements of the Track 1 and Track 2 processes, which were established by the Commission in its May 31, 2006, Order in our 2004 IRP.<sup>4</sup> Since the establishment of the Track 1/Track 2 bidding process, we have generally acquired renewable resources through a competitive bidding process, though not always the formal Track 1/Track 2 process established by the Commission. In addition, some resource additions are not acquired through competitive processes. In general, these resources are acquired through standing tariff offerings such as distributed energy resources eligible for net metering or resources added through our Solar\*Rewards Community Program.

The Dakota Range III PPA was acquired to meet the terms of the recently approved Retail Electric Service Agreement (ESA) with Google. The ESA and associated new load, rather than an IRP, provides the basis for the acquisition, and therefore the Company does not believe adherence to the Commission's formal competitive bidding process was necessary in this case. Even so, as discussed further below, the Company conducted an informal targeted bidding process for this resource, and comparison of the pricing of the Dakota Range III PPA to projects from our most recent formal competitive bidding process for new wind demonstrates that the pricing for Dakota Range III is favorable and the acquisition is reasonable.

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<sup>1</sup> ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE RESOURCE PLAN FILINGS, Docket No. E002/RP-15-21, January 11, 2017.

<sup>2</sup> *In the Matter of Xcel Energy's 2016–2030 Integrated Resource Plan*, REPLY COMMENTS, Attachment A, Docket No. E002/RP-15-21, August 12, 2016.

<sup>3</sup> *In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan*, Docket No. E002/M-16-777.

<sup>4</sup> ORDER ESTABLISHING RESOURCE ACQUISITION PROCESS, ESTABLISHING BIDDING PROCESS UNDER MINN. STAT. § 216B.2422, SUBD. 5, AND REQUIRING COMPLIANCE FILING, Docket No. E002/RP-04-1752, May 31, 2006.

## **B. Acquisition Process for Selecting the Dakota Range III PPA**

The Department requested an explanation of the Company's process for choosing the Dakota Range III PPA, among other available options, observing that the negotiations with Google may have impacted the acquisition process.

The Department's observation is on the mark. As negotiations with Google progressed, the customer's specific renewable energy requirements and needed in-service dates evolved. While those requirements were changing, it did not make sense for the Company to issue a request for proposals (RFP) for the required resources.

Eventually, as the customer's energy requirements crystalized, it became clear that, among other things, the energy needed to support the data center needed to be acquired from a MISO-connected resource. By that time, however, it was no longer practical to conduct a full RFP process. Instead, the Company conducted a targeted bid process focused on the projects that either had submitted bids in the 2016 RFP described in Docket No. E002/M-16-777 (2016 NSP Wind RFP) or that had favorable transmission interconnection positions in the MISO transmission queue.

From this targeted set of projects, we received 16 wind bids from 10 different developers with various terms. Many of the developers we had targeted opted not to bid the multiple tenures and delivery points we requested, and over time, some of the developers who initially submitted bids withdrew them to pursue other opportunities with less risk and more certainty of success for a 2020 Commercial Operation Date (COD) or because of MISO interconnection study delays. Of the remaining bids, we resolved on the Dakota Range III project because it was the lowest-cost project as well as the project with the best interconnection position.

Under the circumstances of this specific project, we believe our process for selecting the Dakota Range III PPA was reasonable. Although we did not issue an RFP, we followed a process that was as competitive as was practical, and that resulted in the Company signing a PPA with favorable terms for our customers. We further note that this was a singular situation. Now that the transaction with Google has been finalized, we are currently pursuing a formal Track 1 process for the acquisition of additional wind resources that could be used to serve the Google load.

## **C. Dakota Range III's Inclusion in 2016 NSP Wind RFP**

The Department has requested that the Company explain whether Dakota Range III was included in any of the bids submitted in the 2016 NSP Wind RFP and what has changed since then to make it a more attractive option.

Apex Clean Energy (APEX) did bid the Dakota Range III project in response to the 2016 NSP Wind RFP, but only in combination with other facilities. APEX offered the following options at that time: (1) a 700 MW Power Purchase Agreement (PPA) for Dakota Range I-V, (2) a 300 MW PPA for Dakota Range I and II, (3) a 300 MW Build-Own-Transfer (BOT) for Dakota Range I and II, and (4) a 300 MW PPA for Dakota Range III and IV. (These and other bids are tabulated in Attachment A to our December 14, 2017, Reply Comments in connection with the Company's acquisition of Dakota Range I and II, Docket No. E002/M-17-694.)

We ultimately did not pursue negotiations with APEX during the RFP based on our evaluation of the price and non-price factors for each of APEX's bids during the RFP. As an example of the non-price factors, for the bid encompassing Dakota Range III and IV, each segment was assigned to different MISO DPP Study Cycles, and at the time of RFP evaluation, the transmission score for Dakota Range IV impacted the overall score for the combined project of segments III and IV.

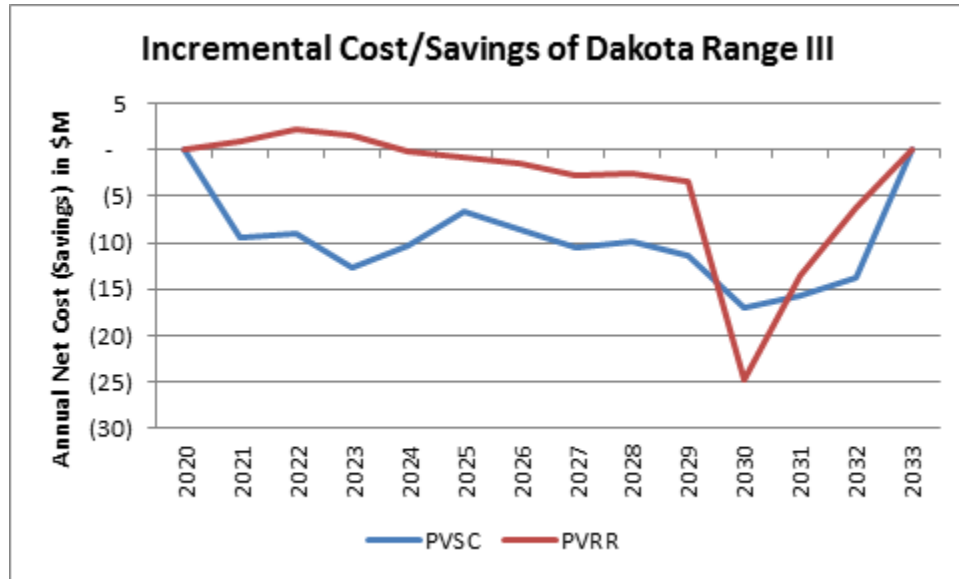
Additionally, as shown in Attachment A to the Company's December 14, 2017, Reply Comments in Docket 17-694, the pricing for APEX's bids for Dakota Range I-V and for Dakota Range III and IV was significantly less favorable than Dakota Range III's pricing is now. It is possible, had the bids separated the various segments, Dakota Range III would have received a higher bid evaluation score in connection with the original RFP, but that was not an option available to the Company at the time of the bid opening.

#### **D. Pattern of Cost Savings Observed in Petition Figure 1**

The Department requested that the Company provide additional explanation of the modeling presented in the Petition, focusing particularly on early modest cost increases and subsequent significant cost decreases.

As an initial matter, we note that the x-axis for Figure 1 on Page 12 of the Petition was incorrect in that the incremental costs/savings were incorrectly shifted two years to the left. We provide a corrected Figure 1 below. As shown in the corrected Figure 1, the modest increases are forecasted to occur in 2021-2024, and the significant savings to occur in 2030-2032. Other than this simple time-shifting error, no other revisions were made to Figure 1 or the Company's modeling.

**Figure 1 (Corrected)**  
**Annual Costs (Savings) Compared to Reference Case**



The corrected Figure 1 shows that Dakota Range III in the present value of revenue requirement (PVRR) scenario creates a small net cost in 2021-2024. This is due to a portion of the incremental energy from Dakota Range III showing as excess energy (i.e. dump energy) prior to the retirement of Sherco Unit 2. In this modeling, a conservative limit on sales volume per hour based on historical observation was used; however, the Company expects that the transmission projects that came on line in 2018 will increase the export limit from the NSP system. Since the filing, the Company has increased its purchase and sales limit in Strategist from 1,350 MW to 1,800 MW beginning in 2019. It is, therefore, likely that Dakota Range III will not actually result in significant increases in dump energy and these modeled minor cost increases will not occur, resulting in net savings to customers over this timeframe.

The significant savings shown in 2030-2032 are due to expansion plan savings in the modeling results. The additional wind on the system from Dakota Range III results in the deferral of a combustion turbine until after the PPA expires.

**E. Dakota Range III Will Be Awarded ERIS from MISO and was Modeled with Accredited Capacity**

The Department asked that the Company confirm that Dakota Range III will be awarded Energy Resource Interconnection Service (ERIS), and whether the Company's Strategist modeling reflected accredited capacity associated with the Dakota Range III PPA.

Dakota Range III will be granted 151.2 MW of unconditional Energy Resource Interconnection Service (ERIS) upon completion of all Network Upgrades, Affected System Upgrades, and transmission assumptions identified in the project's Generator Interconnection Agreement. Dakota Range III did not receive any Network Resource Interconnection Service (NRIS), and is not eligible to qualify as a capacity resource under the generator interconnection process. Dakota Range III would, however, qualify as a capacity resource by requesting, and obtaining, firm Network Integration Transmission Service (NITS) in combination with the unconditional ERIS. The Company intends to submit a NITS request for the project if and when the Commission approves the Company's Petition in the present docket. Under this scenario and the existing MISO rules, Dakota Range III would qualify as a capacity resource for the 2024/2025 planning year. Based in part on the assumption of obtaining NITS, the Dakota Range III PPA was modeled with 23.6 MW of accredited capacity, but due to the long position of the current NSP system, the capacity provides no modeled economic benefit until 2026.

#### **F. Non-Jurisdictional Treatment of the Dakota Range PPA**

The Department requested that the Company provide an explanation of whether it sought non-jurisdictional treatment of the Dakota Range III PPA 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.

To be clear, we are not seeking "Non-Jurisdictional Regulatory Treatment," as that term is defined in the Dakota Range III PPA, for any other jurisdiction. We are seeking to recover from Minnesota retail customers, through the Company's Fuel Clause Rider (Minn. Stat. § 216B.1645), only the Minnesota jurisdictional portion of the amounts incurred by the Company during the full term of the PPA.

#### **G. Status of Other Required Permits, Approvals, Relevant Regulatory Processes**

Finally, the Department asked for an update on the status of other regulatory processes related to Dakota Range III. In addition to the interconnection processes discussed above, the Company provides the following updates. First, the Conditional Use Permits for both Grant and Roberts County were approved on December 17, 2018 and January 29, 2019, respectively. The South Dakota Public Utilities Commission approved the permit allowing for construction of the project on February 22, 2019.

Second, work on both full geotechnical and American Land Title Association (ALTA) surveys has commenced.

Third, the project is currently targeting a Notice to Proceed (NTP) of mid-June 2019 with construction to start in September 2019.

Fourth, on December 27, 2018, the Company submitted an Application for an Advanced Determination of Prudence (ADP) for the Dakota Range III PPA with the North Dakota Public Service Commission. Outside counsel has been retained for both Advocacy and Advisory Staff, and Staff has indicated that it intends to hire consultants to work on the case. The consultant retention process is currently ongoing, and the case is on hold until that is complete.

### **CONCLUSION**

We appreciate the Department's review of our Petition and the opportunity to provide additional information in these Reply Comments. We respectfully request 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 (Minn. Stat. § 216B.1645) the Minnesota jurisdictional portion of the amounts incurred by the Company during the full term of the PPA.

Dated: March 14, 2019

Northern States Power Company



## CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

or

xx electronic filing

**Docket No. E002/M-18-765**

Dated this 14<sup>th</sup> day of March 2019

/s/

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Jim Erickson  
Regulatory Administrator

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