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March 29, 2019

—VIA ELECTRONIC FILING—

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

RE: REPLY COMMENTS
RENEWABLE*CONNECT PROGRAM
DOCKET NO. E002/M-19-33

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to comments received in the above-referenced docket.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on all parties on the attached service list. Please contact Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or (612) 330-2889; or Holly Hinman at holly.r.hinman@xcelenergy.com or (612) 330-5941 if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY FOR
APPROVAL OF A RENEWABLE*CONNECT
PROGRAM

DOCKET NO. E002/M-19-33

REPLY COMMENTS

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to comments submitted on March 13, 2019 in this docket. As noted in the Company's Petition, we are pleased to bring forward this request to reopen the fully subscribed Renewable*Connect program by expanding the service options and renewable resources within the program.

We bring forward this expansion package at a time of fundamental change—both in pursuit of our goal to achieve a carbon-free grid mix, and in our early program offers that are reaching their sunset. Renewable*Connect is an important tool to help customers with sustainability goals achieve them now in a convenient, verifiable, and flexible manner. We believe the Company has carefully crafted offers that provide an appealing value proposition for customers motivated to source their energy needs from renewable sources while simultaneously protecting the interests of non-participating customers. We appreciate the recommendations of the Department of Commerce and Fresh Energy and we look forward to the Commission's review of our proposal.

REPLY COMMENTS

In these Reply Comments, we address the issues raised in Initial Comments, including the Company's proposal to acquire resources for the expansion of Renewable*Connect, the contract term lengths offered under the proposal, the program pricing and cost recovery model, and comparisons between Renewable*Connect and Solar*Rewards Community.

We appreciate the Department's analysis and recommendation that the Commission approve the Company's proposal.

A. Resource Acquisitions

As noted in the Company's Petition, we plan to acquire new wind and solar resources to serve Renewable*Connect customers. The Office of Attorney General (OAG) describes the Company's proposal to add solar and wind resources to serve the Renewable*Connect program and notes the pilot offering has been sold out since 2018. Just as it did during the comment period for the Renewable*Connect pilot program, the OAG again raises a concern about whether acquiring resources specifically to serve a program and conducted outside of an integrated resource planning process should be permitted by the Commission. The Commission approved the Company's pilot program, finding that the structure proposed by the Company was consistent with the terms of Minn. Stat. § 216B.169.¹ We believe the Company's plans are fully consistent with the law and with regulatory precedents for three primary reasons.

First, the Company brings forward these programs pursuant to the Renewable and high-efficiency energy rate options statute, which expressly provides, "(c) The utility may acquire the energy demanded by customers, in whole or in part, through procuring or generating the renewable energy directly, or through the purchase of credits from a provider that has received certification of eligible power supply pursuant to subdivision 3." The statute does not require the Company to demonstrate that the system as a whole has a resource need, but it instead contemplates resource acquisitions to fulfill the voluntary demand of participating customers², just as the Company proposes here.

Second, the Company similarly fulfilled the requirements of the statute when it brought on a portfolio of wind resources to supply the Windsource program. The Commission reviewed and approved both the resource contracts and the use of the resources to provide renewable energy for Windsource customers.³ The Windsource program was proposed by the Company in fulfillment of statutory mandates and the resources that supply this program are now nearing end of life. With the Renewable*Connect pilot currently closed to new takers, it is important to add

¹ The Commission declined to *require* the Company to acquire incrementally new resources to serve the program's needs, but it did not *prohibit* the Company from seeking out new resources.

² The statute states: "A utility may offer its customers one or more options that allow a customer to determine that a certain amount of the electricity generated or purchased on behalf of the customer is renewable energy...."

³ See Docket No. E002/M-01-1479.

resources in order to maintain the availability of an all-renewable option for customers. The resource acquisition anticipated by the Company in this proceeding is both consistent with the requirements of the statute and its purpose: to provide customers with renewable rate options.

Third, any resources identified to supply Renewable*Connect will be fully subject to Commission review and approval. The Company will bring forward Power Purchase Agreements (PPAs) for the program and, in its petition for Commission approval, will be required to demonstrate the reasonableness and prudence of those contracts. The OAG implies that the Commission's authority is somehow degraded in this process. The Company respectfully disagrees, as the Commission maintains the same oversight and approval authority over the forthcoming resource contracts as it does with all other resource acquisitions.

B. Contract Term Length

The Company has proposed a suite of customer options in its expansion Petition. These include contract term lengths that vary based on customer interests. The customer offers build on the contract lengths available since we launched the Renewable*Connect and Renewable*Connect Government pilot programs with commitment lengths that included one-time events, month-to-month, five year, ten year, and twenty years. The Company maintains the variety of contract term options based on pilot learnings that demonstrate that customers value optionality in contract term lengths.

The Company's proposal for offering a variety of contract term lengths is reasonable because it responds to customers' needs. The Company designed the pilot program, as well as the features of the current expansion package, to fulfill the Corporate Renewable Energy Buyers' Principles. Customers have identified that a top energy priority is "access to longer-term, fixed price renewable energy."⁴ The contract term length, paired with program pricing and other design features, form the basis of the value proposition for customers. Just as the Commission acknowledged when approving a long term Renewable*Connect Government contract with the Minnesota Department of Administration, some customers value a long-term option to fulfill their planning goals for long-term sustainability. The OAG does not allege any harm has befallen customers as a result of the Department of Administration's long-term contract. It is reasonable for the Company to bring forward carefully crafted terms that provide an appealing opportunity for these customers to participate.

⁴ See WRI's Corporate Renewable Energy Buyers' Principles at http://www.wri.org/sites/default/files/corporate_renewable_energy_buyers_principles_1.pdf

Further, the OAG is concerned about the potential for non-participants to be exposed to unreasonable risk as a result of the long-term contracts. The Company shares this concern. For this reason, subscription pricing is based on the cost of the resources. Participants who commit to taking energy from the resources for a longer term minimize the risk of undersubscription of the resources. Longer term offers are designed to provide more certainty in subscription levels over time.

While the OAG is concerned with *undersubscription*, they are simultaneously also concerned with *oversubscription*. Once again, the Company also shares the OAG's concern about managing risks associated with oversubscription. The Company solicited customer interest in an expanded offer of Renewable*Connect precisely to address the potential for either under- or oversubscription. The OAG alleges unfairness in the Company's efforts to quantify demand for a new offer by seeking preliminary commitments from customers.⁵ To be clear, The Company is relying on its preliminary commitments from commercial customers, as well as its growing waiting list of residential customers, to make an informed estimate about the quantity of resources to acquire for the program. To proactively address the potential concern of oversubscription, should those conditions materialize, the Company developed a plan to prioritize subscription requests. The process is not limited to "large, sophisticated customers" but also includes the Company's growing waitlist of residential customers.

The ability to match a customer with terms of service that meet their needs and to do so while protecting non-participants is at the core of the Renewable*Connect model. We believe offering a variety of contract lengths, including long term lengths, paired with the protections built into the structure of the program, reflect a reasonable and balanced design consistent with the public interest. Having reviewed the Company's careful design, the Department of Commerce has apparently reached the same conclusion.

C. Pricing

1. Non-Participant Neutrality

The Company has developed its program with the express purpose of shielding non-participants from unreasonable cost impacts that could arise from the choices of other customers to participate. The feature that enables this protection is called the Neutrality Adjustment or charge. The Neutrality charge included in the

⁵ See OAG Comments, page 13.

Renewable*Connect Pilot included several categories of potential non-participant impacts. However, with the exception of the line losses and curtailment components, little data or understanding existed about these categories of potential impact or the associated amount of impact. Since the approval of the pilot, the Company has gained more experience with renewables and, as a result, more is known about integration and balancing costs. The Neutrality Adjustment proposed in this docket includes these known areas of understanding and moves away from more general categories where impacts are less certain over a 20-year period. The Company has, therefore, incorporated these learnings (i.e., integration and balancing costs) and set the Neutrality Adjustment nearly 50 percent higher than the pilot Neutrality Adjustment amount. For all these reasons, we believe the Neutrality Adjustment is set at a reasonable level to mitigate non-participants impacts

2. Capacity Credit

The Company included a full capacity credit in the pilot because the resources were originally approved for the system. In the case of the Renewable*Connect expansion, the resources are incremental and not approved for the system. In the current petition, the Company proposed a capacity credit based on value to the system where the capacity need begins in 2025. Incorporating a capacity credit prior to system need would cause non-participants' costs to increase as a result of this program.

3. High Off Peak Usage

The Company designed a new offer for customers with high off-peak usage patterns. In one example, a premise operating continuously 24 hours a day, seven days a week (e.g., a water treatment plant) will use a higher portion of off-peak energy than an average customer. Thus, we designed a longer term offer that will be supported by a resource mix with a higher wind to solar ratio, reflecting a closer match of the load profile of the customer to the generation profile of the resource. The OAG raises a concern with the allocation of resources to a long term offer like this, noting that pricing for month-to-month subscribers is likely to be higher than this offer.

Allocating more wind to this offer is appropriate as more wind is required to support an off-peak profile with renewable energy. Allocating the newer wind resources to the longer term offers is appropriate, too, as a longer term has greater correlation to a new PPA term length than a month-to-month offer. The month-to-month offer continues to use the Windsource legacy resources through end of life, as the month-to-month offer represents continuity of service for Windsource under Renewable*Connect. The proposed allocation of resources within the program offers is a reasonable design that reflects cost causation principles.

4. *Fuel Clause Recovery and Comparison*

The Company's proposal for the program expansion maintains the same cost recovery treatment approved in both Windsource and in the Renewable*Connect pilot. There, as here, the Company proposed to apply any unsubscribed energy to the system fuel mix, and to recover costs through the fuel clause adjustment. The OAG asserts that the Company should be unable to recover costs in this way. We believe the Company's proposed treatment is reasonable, as it would be unreasonable for non-participating customers to be afforded energy at no cost. Further, as described, the Company has taken care to minimize the potential for undersubscription. Finally, a system balancing component contains important reciprocal benefits for system fuel customers.

The Company's program design reflects cost-causation principles, primarily by tying the cost of the resource directly to a participant's pricing. The program design also is built on non-participant neutrality, by quantifying cost impacts and attributing those costs to participants. The Company has carefully crafted offers that fulfill these principles while also providing a value proposition that is appealing to customers with sustainability goals. The OAG seeks to upend the design with a recommendation that the program pricing must remain greater than system fuel pricing in perpetuity. It is unclear how such a requirement would be justified especially where future fuel costs are unknown and participants have today opted to subscribe at a modest premium in exchange for a fixed rate renewable energy supply.

In addition to these concerns, the Company believes the OAG's suggestion could violate Minn. Stat. § 216B.169, which provides that

Rates charged to customers must be calculated using the utility's cost of acquiring the energy for the customer and must: reflect the difference between the cost of generating or purchasing the additional renewable energy and the cost that would otherwise be attributed to the customer for the same amount of energy based on the utility's mix of renewable and nonrenewable energy sources.

The Commission previously determined in its February 27, 2017 Order approving the the Renewable*Connect pilot in Docket No. E002/M-15-985 that the pricing under the Renewable* Connect pilot was appropriate. It authorized the pilot pricing, “[b]ecause the rate options, as proposed, meet the statutory requirements for offering a renewable rate option and are not contrary to the public interest....” Based on this reasoning, the rate options in the current petition should also be approved.

5. *Compliance*

We agree with the recommendations of the Department and Fresh Energy to file final pricing for the program within 30 days of approval of all resource acquisitions.

F. Comparisons to Community Solar Gardens

Community solar developers Sunshare, Sunrise Energy Ventures, and Solarstone Partners jointly filed comments attempting to draw similarities between the Company's community solar program, Solar*Rewards Community, and green tariff program, Renewable*Connect. The developers assert that the Company should be prohibited from offering the expanded Renewable*Connect program on the basis of unfair competition with community solar providers. Developers ignore the fact that the Company has offered its legacy green tariff, Windsource, since 2003 and that the Commission has already approved the structure of Renewable*Connect.

In approving the Renewable*Connect pilot, the Commission discarded this objection. As stated in its Order,

The Commission is also not persuaded that the public interest requires a determination that programs are impermissible for market structure or competitive reasons. The Company is expressly authorized by statute to offer one or more options to customers allowing the customer to secure renewable or high-efficiency electricity. The statute clearly contemplates that the electricity could be either generated by the utility or purchased by the utility on behalf of the customer—independent power producers could develop, and sell to Xcel, renewable electric generation to accommodate future expansions of these programs.⁶

We clarify the record with information that demonstrates the distinctions between the programs.

First, developers misstate the controlling authority. The developers cite to the irrelevant community solar statute, which controls nothing in this matter. To the contrary, this program is governed under the requirements of the renewable and high-efficiency energy rate options statute, Minn. Stat. § 216B.169. The Commission has already found the pilot program complies with the relevant statute, and the same basic

⁶ February 27, 2017 Order Approving Pilot Programs and Requiring Filings, Docket No. E002/M-15-985.

structure of the pilot program is again proposed in the Company's Petition to expand Renewable*Connect.

Second, developers fail to state critical distinction between the programs. Under Solar*Rewards Community, subscribers *sell* solar output and RECs to the Company and its ratepayers. Under Renewable*Connect, customers *purchase* output from renewable resources (both wind and solar). Subscribers to Solar*Rewards Community receive a bill credit and take system fuel, whereas subscribers to Renewable*Connect pay a surcharge and receive energy bundled with its renewable attributes. A significant portion of all customers' fuel costs fund subscriber bill credits under Solar*Rewards Community. Under Renewable*Connect, the Neutrality Adjustment protects non-participating customers from program costs by crediting the fuel clause. There are numerous critical distinctions between programs that result in different value propositions for customers and different types of market appeal. Further distinctions in the programs need not be enumerated, however, as the Commission has already found the structure of Renewable*Connect is no barrier to fair competition with solar developers.

CONCLUSION

We appreciate the opportunity to respond to Parties' comments and we look forward to the Commission's review of this matter.

Dated: March 29, 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

xx electronic filing

Docket No. E002/M-19-33

Dated this 29th day of March 2019

/s/

Jim Erickson
Regulatory Administrator

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