

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

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Joseph Sullivan	Vice-Chair
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John Tuma	Commissioner

In the Matter of Xcel Energy’s Petition for
Approval of the Sherco Solar Project

DOCKET NO. E-002/M-20-891

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

INTRODUCTION

The Office of the Attorney General – Residential Utilities Division (“OAG”) respectfully submits these Comments in response to the Commission’s April 16, 2021 Notice of Comment Period regarding the petition of Northern States Power Company d/b/a Xcel Energy (“Xcel” or “Company”) for approval of the Sherco Solar Project (“the Project”). In its Notice, the Commission requests comments on (1) whether the Project requires a certificate of need and (2) whether the Commission has sufficient information to evaluate the Project.

For the reasons explained below, the Sherco Solar Project requires a certificate of need and does not qualify for any exceptions to that requirement. Accordingly, the Commission should require Xcel to seek a certificate of need if it wishes to continue with the Project. But even if the need for the Project were established, the current record is not adequate to evaluate the Project’s reasonableness compared to alternatives. Therefore, if the Commission disagrees with the OAG’s certificate-of-need analysis, it should protect ratepayers by requiring a new procurement process that ensures robust competition and a complete record on which to evaluate the Project’s cost.

ANALYSIS

I. THE SHERCO SOLAR PROJECT REQUIRES A CERTIFICATE OF NEED.

The OAG previously argued that the Sherco Solar Project requires a certificate of need.¹ The Project is a 460 megawatt (“MW”) solar photovoltaic facility proposed to be located near Xcel’s existing Sherburne County (“Sherco”) generating station and to go into service in 2024. Because it would have a capacity greater than 50 MW, the Project would be a “large energy facility.”² No large energy facility can be sited or constructed in Minnesota unless the Commission issues a certificate of need for the facility.³ Therefore, Xcel must obtain a certificate of need for the Project before siting or constructing it.

Xcel has identified two statutory exceptions to the certificate-of-need requirement for which it believes the Project qualifies.⁴ Neither exception, however, applies to the Project. First, Xcel argues that the Sherco Solar Project will be used to meet the Company’s Renewable Energy Standard obligations.⁵ But as the OAG previously explained, Xcel already has a significant supply of solar resources well in excess of its Renewable Energy Standard requirements.⁶

Second, Xcel argues that the Sherco Solar Project does not require a certificate of need because the Company is acquiring the Project through the “modified Track 2” bidding process

¹ See *In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota’s Economic Recovery from the COVID-19 Pandemic*, Docket No. E,G-999/CI-20-492, OAG Reply Comments at 5–11 (Oct. 30, 2020). The OAG incorporates those arguments herein by reference.

² A large energy facility is “any electric power generating plant or combination of plants at a single site with a combined capacity of 50,000 kilowatts or more” Minn. Stat. § 216B.2421, subd. 2(1).

³ See Minn. Stat. § 216B.243, subd. 2 (“No large energy facility shall be sited or constructed in Minnesota without the issuance of a certificate of need by the commission”).

⁴ See Docket No. E,G-999/CI-20-492, Xcel Comments at 10–11 (Oct. 16, 2020); Docket No. E-002/M-20-891, Petition for Approval of the Acquisition of Solar Generation at Xcel Energy’s Sherburne County Site at 40–42 (Apr. 12, 2021) (hereinafter “Xcel Petition”).

⁵ See Minn. Stat. § 216B.243, subd. 9 (stating that certificate-of-need statute “does not apply to a wind energy conversion system or a solar electric generation facility that is intended to be used to meet the obligations of section 216B.1691 . . .”).

⁶ Docket No. E,G-999/CI-20-492, OAG Reply Comments at 7–9.

approved in its last integrated resource plan (“IRP”) proceeding.⁷ As the OAG previously explained, however, the Commission’s IRP order did not approve a bidding process for solar additions with in-service dates after 2021.⁸ The Commission, instead, identified a need for “approximately 750 MW of intermediate capacity” in 2026 and authorized Xcel to “file a petition for a certificate of need” to address it.⁹

A certificate of need is not merely a legal requirement; it fulfils an important ratepayer-protection function. Acquiring resources of the wrong size or type—or even the right size and type too soon—would harm ratepayers by requiring them to pay for a suboptimal resource mix. A certificate of need helps ensure that this does not happen by requiring a utility to show that it needs the resource to provide reliable service to ratepayers. In seeking approval of a large energy facility for which it has not yet established any need, Xcel is asking the Commission to put the cart before the horse. The Commission should instead protect ratepayers by directing the Company to pursue a certificate of need for the Sherco Solar Project, consistent with the Commission’s IRP order.

II. THE RECORD LACKS SUFFICIENT INFORMATION TO EVALUATE THE PROJECT.

Even if Xcel had established a need for 460 MW of new solar generation in 2024, there is insufficient information in this record to evaluate the Sherco Solar Project. There are at least two reasons for this. First, contrary to the normal Track 2 bidding process, Xcel artificially constrained competition by limiting eligible proposals to build–transfer projects located at the Sherco site.¹⁰ Second, and likely because of this limitation, the Company received too few bids to ensure that

⁷ See Minn. Stat. § 216B.2422, subd. 5(a) (stating that utility “may select resources to meet its projected energy demand through a bidding process approved or established by the commission” in a resource-planning proceeding).

⁸ See Docket No. E,G-999/CI-20-492, OAG Reply Comments at 10 n.31. The Commission approved a bidding process “for the limited purpose of acquiring wind and solar resources in the 2016–2021 timeframe.” *In the Matter of Xcel Energy’s 2016–2030 Integrated Resource Plan*, Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings at 8 (Jan. 11, 2017) (hereinafter “IRP order”). The Sherco Solar Project’s Q4 2024 in-service date is well outside this timeframe.

⁹ IRP order at 11.

¹⁰ Xcel Petition at 32.

the winning proposal was competitively priced. For these reasons, if the Commission determines that the Project is needed, it should direct Xcel to undertake a new solar solicitation with additional conditions designed to ensure a truly competitive result.

A. Xcel Artificially Limited Competition, Contrary to Standard Practice.

The first reason the record is incomplete is that Xcel’s request for proposals (“RFP”) limited bids to “build–transfer” projects interconnecting at the Sherco site.¹¹ One effect of this limitation was that it prevented participants from submitting power purchase agreement (“PPA”) proposals. PPAs—as compared to utility-owned generation—benefit ratepayers because they reduce costs in the early years of a project, limit operational risks, and can often reduce overall ratepayer cost. Including PPA proposals in a solicitation thus protects ratepayers by requiring utility self-build proposals and build–transfer proposals to compete against PPAs.¹²

In this case, however, Xcel limited competing proposals to projects interconnecting near the existing Sherco plant, to be built by Xcel or transferred to the Company.¹³ Not only did this foreclose PPA proposals, but it also foreclosed build–transfer proposals at locations other than Sherco. Xcel states that projects needed to interconnect near the Sherco plant, and be owned by Xcel, to take advantage of the Company’s valuable interconnection rights at the Sherco site. The OAG does not dispute that interconnection rights have value. But by preventing other owners and locations from even being considered, Xcel arbitrarily limited competition and prevented the Commission from understanding the market price of large-scale solar.

¹¹ “Build–transfer” denotes a project whose ownership is transferred to the utility once the project is complete.

¹² See also *In the Matter of Xcel Energy’s Application for Approval of Its 2004 Resource Plan*, Docket No. E-002/RP-04-1752, Order Establishing Resource Acquisition Process, Establishing Bidding Process Under Minn. Stat. § 216B.2422, Subd. 5, and Requiring Compliance Filing at 6 (May 31, 2006) (“The purpose of the competitive process—getting the best overall price for ratepayers—cannot be achieved without robust competition.”).

¹³ Xcel Petition, attach. B at 6 (RFP evaluation).

The Company, in other words, is asking the Commission to simply assume that its interconnection rights make the Sherco site preferable to any other possible location. Once again, Xcel has gotten the process backwards. The purpose of an RFP is to compare competing proposals on their merits; but by artificially constraining the types of projects that could be considered, the Company put its thumb on the scale in a way that favored its own proposal. Put differently, if Xcel's interconnection rights are as valuable as Xcel suggests, its proposal would naturally "win" a competitive-bidding process. But Xcel prevented that process altogether, essentially claiming that it was not necessary because its bid *would have* won. Approving the Sherco Solar Project based on this flawed RFP process would not be in the public interest.

B. Xcel Received Too Few Bids to Ensure a Competitive Price.

The record is incomplete for a second, related reason: Xcel's RFP garnered too few competing bids to establish that the Sherco Solar Project's price is reasonable.

Xcel's RFP elicited only two competing proposals. The first was almost immediately eliminated because it was incomplete.¹⁴ The second bid was eliminated in the initial evaluation phase because it was "unable to show a clear path to site control for the Project or the generator tie line to interconnect the Project to the Sherburne County Substation, and also did not have a complete preliminary technical design."¹⁵ Despite its own proposal being the only one left, Xcel resolutely proceeded to score the proposal to aid in determining "which project or projects to pursue further."¹⁶ After scoring its own proposal, Xcel "shortlisted" it.¹⁷ Finally, Xcel selected its own proposal from the shortlist and brought it forward for approval.¹⁸

¹⁴ Xcel Petition at 33–34 & n.26.

¹⁵ *Id.* at 34.

¹⁶ *Id.*

¹⁷ *Id.* at 35.

¹⁸ *Id.*

The underwhelming response to Xcel’s RFP stands in stark contrast to competitive procurements by other Minnesota utilities. For example, in August 2016, Minnesota Power issued an RFP for up to 300 MW of solar generation. In response, the utility received 83 proposals from 26 developers.¹⁹ While an RFP need not garner this much interest to yield a meaningful process, the Commission should not accept a utility’s “going through the motions” of competitive procurement as a substitute for actual competition.

Finally, the subdued RFP response in this case was exacerbated by Xcel’s apparent lack of a contingency plan to address a failed bidding process. The Commission’s last IRP order required Xcel to “file a contingency plan early in [any Track 2 bidding] process . . . to address the potential for the bidding process to fail.”²⁰ The Commission did not define a “failed” bidding process, but the clear purpose of this order point is to address a situation where the Company receives insufficient qualifying bids to instill confidence in the result. That is exactly the case here, where the *only* bid that Xcel did not reject was its own.

Given that the purpose of an RFP is to foster robust competition, it is impossible to view Xcel’s RFP in this case as a success. Yet the Company never had a contingency plan to address a failed bidding process. Rather than making a contingency plan or simply redoing the solicitation, Xcel opted to charge ahead with an insufficiently vetted proposal. By doing so, however, the Company has created a record on which it *cannot* establish the reasonableness of its own proposal.

CONCLUSION

The OAG supports acquiring renewable generation in a responsible way that maximizes the benefits to all Minnesotans while minimizing the cost to ratepayers. But this cannot be

¹⁹ See Docket No. E-015/M-20-828, Minnesota Power Response to PUC Information Request No. 1 (Jan. 12, 2021) (attaching public and trade-secret versions of July 10, 2017 Independent Evaluation Report for Minnesota Power Company’s 2016 Solar Resource Solicitation).

²⁰ IRP order at 11.

accomplished by short-cutting standard regulatory processes designed to protect ratepayers. For the reasons explained above, the Commission should require Xcel to seek a certificate of need for the Sherco Solar Project. Failing that, the Commission should direct the Company to conduct a new competitive procurement under the following conditions:

- The competitive-bidding process shall include a request for proposals that is posted publicly and open to any interested developer.
- The request for proposals shall not include geographic limitations.
- The request for proposals shall be open to power purchase agreements, build–transfer proposals, and utility self-build projects.
- Xcel’s proposed bidding process, timeline, evaluation criteria, and request for proposals language shall be filed with the Commission at least one month prior to the issuance of the request for proposals. This filing shall also include a contingency plan describing the subsequent process should the bidding process fail to elicit a meaningful number of bids.

Dated: April 30, 2021

Respectfully submitted,

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April 30, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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Re: *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project*
MPUC Docket No. E-002/M-20-20-891

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Peter G. Scholtz

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CERTIFICATE OF SERVICE

Re: *In the Matter of Xcel Energy's Petition for Approval of the Sherco Solar Project*
MPUC Docket No. E-002/M-20-20-891

I, JUDY SIGAL, hereby certify that on the 30th day of April, 2021, I e-filed with eDockets *Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, 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/ Judy Sigal

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