

## APPENDIX N: CROSS REFERENCE INDEX

Appendix N provides a cross reference of filing requirements contained in Minnesota Statutes and Rules applicable to the filing and content of resource plans and the plan sections and/or appendices that contain information to fulfill a requirement. In addition, this section identifies those items the Minnesota Public Utilities Commission included in its Orders that have required additional information to be included in its future resource plan filings. The table below contains a listing of each Order point and its requirement, and references the appropriate sections and/or appendices within this filing to locate the information.

Statute or Rule	Requirement	Location
Minn. R. 7843.0300, subp. 3	Completeness of filing. The resource plan filing must contain the information required by part 7843.0400, unless an exemption has been granted under subpart 4.	Refer to contents of resource plan filing points listed below.
Minn. R. 7843.0300, subp. 5	Copies of filings. A covered utility shall submit 15 copies of its resource plan filing to the commission. The commission may request up to ten additional copies of combined and common filings. A utility shall also provide copies to the Minnesota Department of Commerce, the Residential and Small Business Utilities Division of the Office of the Attorney General, the Minnesota Environmental Quality Board and member agencies, and other interested persons or parties who request copies. A utility shall maintain a distribution list. The list must include the names and addresses of the persons or organizations receiving copies and the number of copies provided. A utility is not required to distribute more than 100 copies. However, a utility shall honor reasonable requests for copies of the nontechnical summary identified in part 7843.0400, subpart 4.	See Service List inside front cover. This requirement is also met via e-Filing with the Minnesota Public Utilities Commission and Department of Commerce.
Minn. R. 7843.0400, subp. 1	Advance forecasts. A utility shall include in the filing identified in subpart 2 its most recent annual submission to the Minnesota Department of Commerce and the Minnesota Environmental Quality Board under Minnesota Statutes, sections 216B.2422, subdivision 2a, and 216C.17, and parts 7610.0100 to 7610.0600.	Appendix A

Statute or Rule	Requirement	Location
Minn. R. 7843.0400, subp. 2	Resource plan. A utility shall file a proposed plan for meeting the service needs of its customers over the forecast period. The plan must show the resource options the utility believes it might use to meet those needs. The plan must also specify how the implementation and use of those resource options would vary with changes in supply and demand circumstances. The utility is only required to identify a resource option generically, unless a commitment to a specific resource exists at the time of the filing. The utility shall also discuss plans to reduce existing resources through sales, leases, deratings, or retirements.	Section II, Section V, Appendix D
Minn. R. 7843.0400, subp. 3(A)	<p>Supporting information. A utility shall include in its resource plan filing information supporting selection of the proposed resource plan.</p> <p>When a utility's existing resources are inadequate to meet the projected level of service needs, the supporting information must contain a complete list of resource options considered for addition to the existing resources. At a minimum, the list must include new generating facilities of various types and sizes and with various fuel types, cogeneration, new transmission facilities of various types and sizes, upgrading of existing generation and transmission equipment, life extensions of existing generation and transmission equipment, load-control equipment, utility-sponsored conservation programs, purchases from nonutilities, and purchases from other utilities. The utility may seek additional input from the commission regarding the resource options to be included in the list. For a resource option that could meet a significant part of the need identified by the forecast, the supporting information must include a general evaluation of the option, including its availability, reliability, cost, socioeconomic effects, and environmental effects.</p>	Section V, Appendix B Appendix D, Appendix J Appendix M
Minn. R. 7843.0400, subp. 3(B)	The supporting information must include descriptions of the overall process and of the analytical techniques used by the utility to create its proposed resource plan from the available options.	Section IV, Section V, Appendix J, Appendix K

Statute or Rule	Requirement	Location
Minn. R. 7843.0400, subp. 3(C)	The supporting information must include an action plan, a description of the activities the utility intends to undertake to develop or obtain noncurrent resources identified in its proposed plan. The action plan must cover a five-year period beginning with the filing date. The action plan must include a schedule of key activities, including construction and regulatory filings.	Sections II, Section VI
Minn. R. 7843.0400, subp. 3(D)	For the proposed resource plan as a whole, the supporting information must include a narrative and quantitative discussion of why the plan would be in the public interest, considering the factors listed in part 7843.0500, subpart 3.	Section V, Appendix I
Minn. R. 7843.0400, subp. 4	Nontechnical summary. A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length and describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.	Section II
Minn. Stat. § 216B.1691, subd. 2e	Rate impact of standard compliance; report. Each electric utility must submit to the commission and the legislative committees with primary jurisdiction over energy policy a report containing an estimation of the rate impact of activities of the electric utility necessary to comply with this section. In consultation with the Department of Commerce, the commission shall determine a uniform reporting system to ensure that individual utility reports are consistent and comparable, and shall, by order, require each electric utility subject to this section to use that reporting system. The rate impact estimate must be for wholesale rates and, if the electric utility makes retail sales, the estimate shall also be for the impact on the electric utility's retail rates. Those activities include, without limitation, energy purchases, generation facility acquisition and construction, and transmission improvements. An initial report must be submitted within 150 days of May 28, 2011. After the initial report, a report must be updated and submitted as part of each integrated resource plan or plan modification filed by the electric utility under section 216B.2422.	Section II, Section V, Appendix I

Statute or Rule	Requirement	Location
Minn. Stat. § 216B.1691, subd. 3	Utility plans filed with commission. Report on efforts toward meeting renewable energy objective/renewable energy standard.	Appendix H
Minn. Stat. § 216B.2422, subd. 2	As a part of its resource plan filing, a utility shall include the least cost plan for meeting 50 and 75 percent of all energy needs from both new and refurbished generating facilities through a combination of conservation and renewable energy resources.	Section V
Minn. Stat. § 216B.2422, subd. 2a	Historical data and advance forecast. Each utility required to file a resource plan under this section shall include in the filing all applicable annual information required by section 216C.17, subdivision 2, and the rules adopted under that section. To the extent that a utility complies with this subdivision, it is not required to file annual advance forecasts with the department under section 216C.17, subdivision 2.	Appendix A
Minn. Stat. § 216B.2422, subd. 2c	Long-range emission reduction planning. Each utility required to file a resource plan under subdivision 2 shall include in the filing a narrative identifying and describing the costs, opportunities, and technical barriers to the utility continuing to make progress on its system toward achieving the state greenhouse gas emission reduction goals established in section 216H.02, subdivision 1, and the technologies, alternatives, and steps the utility is considering to address those opportunities and barriers.	Section II, Section V, Section VI, Section VII, Appendix E
Minn. Stat. § 216B.2422, subd. 3(a)	Environmental costs. A utility shall use the values established by the commission in conjunction with other external factors, including socioeconomic costs, when evaluating and selecting resource options in all proceedings before the commission, including resource plan and certificate of need proceedings.	Section V, Appendix I, Appendix J, Appendix K

Statute or Rule	Requirement	Location
Minn. Stat. § 216B.2422, subd. 4	<p>Preference for renewable energy facility. The commission shall not approve a new or refurbished nonrenewable energy facility in an integrated resource plan or a certificate of need, pursuant to section 216B.243, nor shall the commission allow rate recovery pursuant to section 216B.16 for such a nonrenewable energy facility, unless the utility has demonstrated that a renewable energy facility is not in the public interest. When making the public interest determination, the commission must consider:</p> <p>(1) whether the resource plan helps the utility achieve the greenhouse gas reduction goals under section 216H.02, the renewable energy standard under section 216B.1691, or the solar energy standard under section 216B.1691, subdivision 2f;</p> <p>(2) impacts on local and regional grid reliability;</p> <p>(3) utility and ratepayer impacts resulting from the intermittent nature of renewable energy facilities, including but not limited to the costs of purchasing wholesale electricity in the market and the costs of providing ancillary services; and</p> <p>(4) utility and ratepayer impacts resulting from reduced exposure to fuel price volatility, changes in transmission costs, portfolio diversification, and environmental compliance costs.</p>	Not Applicable
Minn. Stat. § 216B.2422, subd. 6	<p>Consolidation of resource planning and certificate of need. A utility shall indicate in its resource plan whether it intends to site or construct a large energy facility. If the utility's resource plan includes a proposed large energy facility and construction of that facility is likely to begin before the utility files its next resource plan, the commission shall conduct the resource plan proceeding consistent with the requirements of section 216B.243 with respect to the proposed facility. If the commission approves the proposed facility in the resource plan, a separate certificate of need proceeding is not required.</p>	Not Applicable

Statute or Rule	Requirement	Location
Minn. Stat. § 216B.2422, subd. 7	Energy storage systems assessment. (a) Each public utility required to file a resource plan under subdivision 2 must include in the filing an assessment of energy storage systems that analyzes how the deployment of energy storage systems contributes to: (1) meeting identified generation and capacity needs; and evaluating ancillary services. The assessment must employ appropriate modeling methods to enable the analysis required in paragraph (a).	Section V, Appendix D
Minn. Stat. § 216B.2426	Opportunities for distributed generation. The commission shall ensure that opportunities for the installation of distributed generation, as that term is defined in section 216B.169, subdivision 1, paragraph (c), are considered in any proceeding under section 216B.2422, 216B.2425, or 216B.243.	Section V, Appendix B, Appendix C, Appendix G

<i>In re Minnesota Power's 2015-2029 Integrated Resource Plan, Docket No. E-015/RP-15-690, Order Approving Resource Plan with Modifications (July 18, 2016).</i>	Requirement	Location
Order Point 3	Minnesota Power shall idle Taconite Harbor Energy Center Units 1 and 2 in 2016, retain the ability to restart them to address reliability or emergency needs on the transmission system, and cease coal-fired operation by the end of 2020. Future refueling and re-mission opportunities will be considered in planning and optimization of the facility for the next resource plan.	Section II, Section V, Section VI, Appendix C, Appendix E
Order Point 4	Minnesota Power shall remedy the local transmission-system issues identified in its analysis of closing Taconite Harbor Energy Center Units 1 and 2.	Appendix F
Order Point 6	Minnesota Power shall retire Boswell Energy Center Units 1 and 2 when sufficient energy and capacity are available, but no later than 2022.	Appendix C
Order Point 8	Minnesota Power's next resource plan shall include a full analysis of all alternatives, including renewables, energy efficiency, distributed generation, and demand response, for providing energy and capacity sufficient to meet its needs.	Section V, Appendix K
Order Point 10	Minnesota Power shall acquire solar units of 11 MW by 2016, 12 MW by 2020, and 10 MW by 2025 to meet its SES obligations.	Section II, Section VI, Appendix C, Appendix H, Docket No. E,G999/CI-20-492
Order Point 12	Minnesota Power's average annual energy savings goal is set at 76.5 GWh.	Appendix B
Order Point 14	Minnesota Power shall investigate the potential for an energy-efficiency competitive- bidding process to supplement its existing conservation-improvement program, open to both CIP-exempt and non-CIP-exempt customers, and shall summarize its investigation and findings in its next resource plan.	Appendix B

<i>In re Petition of Minnesota Power for Approval of an Amended and Restated Electric Service Agreement (ESA) Between United Taconite LLC, Northshore Mining Company (subsidiaries of Cliffs Natural Resources, Inc.), and Minnesota Power, Docket No. E-015/M-16-534, Order Approving Petition (Nov. 9, 2016).</i>	Requirement	Location
Order Point 2	Required Minnesota Power, in its next Integrated Resource Plan, to address how to ensure that the company has sufficient, yet not excessive, capacity resources to serve the Cliffs facilities under the terms of this ESA.	Section III, Section V Appendix A, Appendix K
<i>In re Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3, Docket No. E-999/CI-14-643, Order Updating Environmental Cost Values (Jan. 3, 2018).</i>	Requirement	Location
Order Point 1	<p>The Commission hereby quantifies and establishes the range of environmental cost of carbon dioxide emissions associated with electricity generation as follows:</p> <ul style="list-style-type: none"> <li>• The low end of the range shall reflect the global damage of the last (marginal) short ton emitted, calculated through the year 2100, with a 5.0% discount rate.</li> <li>• The high end of the range shall reflect the global damage of the last (marginal) short ton emitted, calculated through the year 2300, with a 3.0% discount rate.</li> </ul>	Section V, Appendix K
Order Point 3	In resource-selection proceedings, utilities shall continue to analyze potential resources under a range of assumptions about environmental	Section V



	values—including at least one scenario that excludes consideration of environmental externalities.	
<i>In re Minnesota Power’s Petition for Approval of the 10 MW Blanchard Solar Power Purchase Agreement, Docket No. E-015/M-18-401, Order Approving 10 MW Blanchard Solar Power Purchase Agreement and Cost Recovery Method (Oct. 2, 2018).</i>	Requirement	Location
Order Point 3	Minnesota Power shall engage in further discussion with the Department regarding its production modeling of solar resources as part of the Company’s next integrated resource proceeding	Appendix J, Appendix K, Appendix R
<i>In re Minnesota Power’s Petition for Approval of a 250 MW Nobles 2 Wind Power Purchase Agreement, Docket No. E-015/M-18-545, Order Approving Power Purchase Agreement with Revisions, Requiring Reporting, and Requiring Compliance Filing (Jan. 23, 2019).</i>	Requirement	Location
Order Point 5	In its next resource plan filing, Minnesota Power is required to report accredited wind capacity values for their existing wind plants.	Appendix C, Appendix J
<i>In re Minnesota Power’s Petition for Approval of the EnergyForward Resource Package, Docket No. E-015/AI-17-568, Order Approving Affiliated-Interest Agreements with Conditions (Jan. 24, 2019).</i>	Requirement	Location
Order Point 6	Minnesota Power shall include the following in its next resource plan:	Appendix P

	a. A baseload retirement analysis that thoroughly evaluates and includes a plan for the early retirement of Minnesota Power's two remaining coal plants, Boswell 3 and 4, individually and in combination;	
	b. A securitization plan that could be used to mitigate potential ratepayer impacts associated with any early retirement of one or both of the Boswell 3 and 4 facilities; and	Appendix Q
	c. A proposed bidding process for supply-side acquisitions of 100 MW or more lasting longer than five years, as set forth in Attachment A, for Commission consideration and potential approval.	Appendix D
Order Point 7	In developing the modeling analysis to be used in its next resource plan, Minnesota Power shall consult with stakeholders, including but not limited to the Department of Commerce and Clean Energy Organizations, regarding the Company's modeling inputs and parameters.	Section IV, Appendix J, Appendix R
<b><i>In re Minnesota Power's 2015-2029 Integrated Resource Plan, Docket No. E-015/RP-15-690, Order Extending Resource Plan Filing Deadline and Setting Additional Requirements (Sept. 25, 2020).</i></b>	<b>Requirement</b>	<b>Location</b>
Order Point 2	Minnesota Power must file an interim update by November 1, 2020, which must include:	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 2.a	An update of the Company's operations.	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 2.b	An interim report on stakeholder engagement done to date and additional engagement planned prior to the February 1, 2021 filing date.	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 2.c	Resource plan modeling assumptions that resulted from the stakeholder modeling subgroup process.	Filed November 2, 2020, Docket No. E-015/RP-15-690

Order Point 2.d	An interim report on the operating requirements and impacts of utilizing economic dispatch at each Boswell unit given impacts of the COVID-19 pandemic on the grid and MISO energy market.	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 2.e	A load and capability report and a progress report regarding the on-going,	
Order Point 3	By October 1, 2020, Minnesota Power must file a report on securitization informed by the input of stakeholders, including the Office of the Attorney General and the Clean Energy Organizations. The report should include, at a minimum:	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 3.a	A description of how securitization could be used to facilitate closure of facilities with large undepreciated balances;	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 3.b	Discussion on the feasibility of securitization in Minnesota and for Minnesota Power;	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 3.c	Specific discussion of the obstacles to securitization and how they can be resolved;	Filed November 2, 2020, Docket No. E-015/RP-15-690
Order Point 3.d	Discussion of how securitization could be used to balance the interests of ratepayers and shareholders as they apply to the Boswell Energy Center	Filed November 2, 2020, Docket No. E-015/RP-15-690
<b><i>In re Establishing an Updated 2020 Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06, Docket No. E-999/DI-19-406, Order Establishing 2020 and 2021 Estimate of Future Carbon Dioxide Regulation Costs (Sept. 30, 2020).</i></b>	<b>Requirement</b>	<b>Location</b>
Order Point 1	The Commission hereby quantifies and establishes the range of regulatory costs of carbon dioxide emissions as \$5 to \$25 per short ton effective 2025 and thereafter.	Section V, Appendix K
Order Point 2	In all electricity generation resource acquisition proceedings during 2020 and 2021, utilities shall analyze potential resources under a range	Section V, Appendix K

	of assumptions about environmental values, including—	
Order Point 2.A	Scenarios that incorporate, for all years, the low end of the range of environmental costs for carbon dioxide as approved by the Commission in its January 3, 2018 Order Updating Environmental Costs in Docket No. E-999/CI-14-643, In the Matter of the Further Investigation into Environmental and Socioeconomic Costs Under Minnesota Statutes Section 216B.2422, Subdivision 3, and set forth in Attachment A.	Section V, Appendix K
Order Point 2.B	Scenarios that incorporate, for all years, the high end of the range of environmental costs for CO2 as approved by the Commission in its January 3, 2018 order, and set forth in Attachment A.	Section V, Appendix K
Order Point 2.C	Scenarios that incorporate the low end of the range of environmental costs for CO2 but substituting, for planning years after 2024, the low end of the range of regulatory costs for CO2 regulations (\$5 per short ton) in lieu of environmental costs.	Section V, Appendix K
Order Point 2.D	Scenarios that incorporate the high end of the range of environmental costs for CO2 but substituting, for planning years after 2024, the high end of the range of regulatory costs for CO2 regulations (\$25 per short ton) in lieu of environmental costs.	Section V, Appendix K
Order Point 2.E	A reference case scenario incorporating the Commission's middle or high values of the established environmental and regulatory cost ranges.	Section V, Appendix K