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January 25, 2011

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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RE: *Comments* of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E999/CI-11-852

Dear Dr. Haar:

Attached please find comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the following matter:

In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd. 2e.

The Department submits these comments to the Minnesota Public Utilities Commission (Commission) to provide additional information on the analytical questions involved in this issue. The Department is available to answer any question on these comments.

Sincerely,

/s/ KATE O'CONNELL
Manager

KO/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E999/CI-11-852

I. BACKGROUND

In 2011, Minn. Stat. §216B.1691 (Renewable Energy Standard, or RES Statute) was amended to require utilities subject to the RES Statute to submit “a report containing an estimate of the rate impact of activities of the electric utility necessary to comply with section 216B.1691.” On November 1, 2011, the following utilities subject to the RES Statute submitted their reports:

- Basin Electric Power Cooperative (BEPC),
- Central Minnesota Municipal Power Agency (CMMPA),
- Dairyland Power Cooperative (DPC),
- Great River Energy (GRE),
- Heartland Consumers Power District (HCPD),
- Interstate Power and Light Company (IPL),
- Minnesota Municipal Power Agency (MMPA),
- Minnesota Power (MP),
- Minnkota Power Cooperative (MPC),
- Missouri River Energy Services (MRES),
- Northern Municipal Power Agency (NMPA),
- Northern States Power d/b/a Xcel Energy (Xcel),
- Northwestern Wisconsin Electric Company (NWEC),
- Otter Tail Power Company (Otter Tail), and
- Southern Minnesota Municipal Power Agency (SMMPA).

The Department of Commerce (Department) provides information on the RES and on the reports filed by utilities. Overall, the Department notes the following. First, because the utilities’ electrical systems are complex, it is important to consider comprehensive changes in costs when

a new resource is added to a utility's system. Second, based on detailed and complete examinations of utilities' systems, the additions of renewable energy, to date, have resulted in lower costs than would have resulted from adding other resources. Third, it will be necessary to continue to examine over time in integrated resource plans the cost effects of utilities' actions to comply with the RES.

II. OVERVIEW: COSTS OF ADDING NEW RESOURCES TO A UTILITY'S SYSTEM

The quality of the analyses in this docket of the rate impact of the RES varied considerably. Some utility analyses were fairly simplistic and limited while others were more complex and complete. For example, some analyses simply compared the costs of renewable energy to the costs of purchases from the wholesale energy market while others considered how all costs changed, including changes in use and costs of existing generation plants along with the ability to avoid or delay adding other resources to the utility's system, thus reducing capital costs.

Because additions of new resources affect how the existing resources on the system are used, it is important to examine how both existing and new resources are used after the new resource is added. Those changes affect fuel costs, capacity values, heat rates, and other operation and maintenance expenses.

Thus, while all of the reports provided some information about the effects of the RES on rates, the reports with the more complete analyses provided more accurate information.

III. RESULTS: COSTS OF ADDING RENEWABLE RESOURCES TO UTILITIES' SYSTEM

Through comprehensive analyses in integrated resource plans (IRPs), the Department has been examining the costs of adding renewable resources to utilities' systems since the renewable energy objective was first passed. The comprehensive analyses in IRPs are necessary to examine how these changes to the utilities' systems affect overall costs on the utilities' systems. For example, models used in IRP analyses examine how the addition of a generation unit increases or decreases uses of existing generation or demand resources, along with the timing and sizes of future additions of generation resources. Not only do IRP analyses consider short-term costs comprehensively, these analyses assess the expected operations of the utility systems over a longer period of time, typically 15 years.

The following are results of recent IRP analyses for IPL, MP, MPC, MRES, NMPA, Otter Tail and SMMPA.¹ In these recent IRP analyses, the Department evaluated the cost-effectiveness of the RES. In addition, for those utilities that have not yet procured sufficient renewable

¹ The Department is currently analyzing IRPs for Xcel and Dairyland. Great River Energy will file its IRP in 2012. The Commission granted BEPC a one-year extension, to January 2013, to file its IRP.

generation to meet the RES goal of obtaining 25 percent of their Minnesota retail sales from renewables, the Department examined whether it would be cost effective to require utilities to comply with the RES during the planning period of the IRP analysis. For all of these utilities, the analyses showed that complying with the RES, to date, has been cost effective.

- For IPL, RES compliance was cost effective as long as wind prices were at or below the \$60-65 per MWh range.
- For MMPA, the Department did not perform any modeling analysis on the cost effectiveness of adding renewable generation since MMPA, which acts in the best interest of its customers, has already proposed to acquire sufficient renewable energy under the RES. The Department encouraged MMPA to explore the use of tools to reduce costs of new resources.
- For MP, complying with the RES was cost effective; however, not requiring RES compliance had no cost impact.
- For MPC and NMPA (which filed a joint IRP), the Department did not perform any modeling analysis on the cost effectiveness of adding renewable generation because the Cooperative, which acts in the best interests of its members, had already acquired sufficient renewable resources to meet the RES throughout the planning horizon.
- For MRES, complying with the RES was cost effective, while the impact of not allowing renewables drove up the cost of providing power to customers.
- For OTP, wind was cost effective for OTP unless it became unreasonably expensive, at \$75/MWh or more. If no new renewable resources were added to OTP's system, costs would increase substantially, between 1.2 percent and 6.1 percent. However, when wind prices rise above \$75, the benefits of wind on OTP's system generally decline to zero.
- For SMMPA, complying with the RES was cost effective, while the impact of not allowing renewables drove up the cost of providing power to customers.

While the additions of renewable energy have been cost-effective to date, it will be necessary to continue to examine the utilities' future plans and costs of adding renewable and other resources to their electric systems. The Department intends to continue these analyses in IRPs in the future. In addition, while no utility has filed a request for an "off-ramp" from complying with the RES, if any utility does so in the future, the Department will fully analyze any such request.

IV. ANALYSIS OF UTILITIES' RES REPORTS

A number of the utilities compared their renewable costs with historical market prices to assess the cost of their renewable generation. While such a comparison relies on readily available information, such an analysis may provide misleading information. Such an analysis assumes that the utility would have relied heavily on the wholesale electric energy market at a time when wholesale energy costs were considerably high (see Chart 1 below). Since it is unlikely that a utility would rely so heavily on wholesale energy purchases at such times, this analysis would overstate benefits of wind when the wholesale energy costs were high. Further, such an analysis may understate benefits of wind when wholesale energy costs are low since, as is currently the

case for some utilities, wind prices may be even lower and may involve lower ratepayer risks than purchases from the wholesale energy market. A better analysis would compare the cost of wind to the cost of whatever other resource would have been used, on a utility-by-utility basis.

An appropriate comparative analysis of wind to other alternatives should consider different characteristics of different resources. For example, in comparing the cost of wind generation to other kinds of resources, it is necessary to reflect that development of different kinds of electric generation involves different lead times, cost risks, fuel costs, environmental risks, abilities to dispatch generation and so forth.

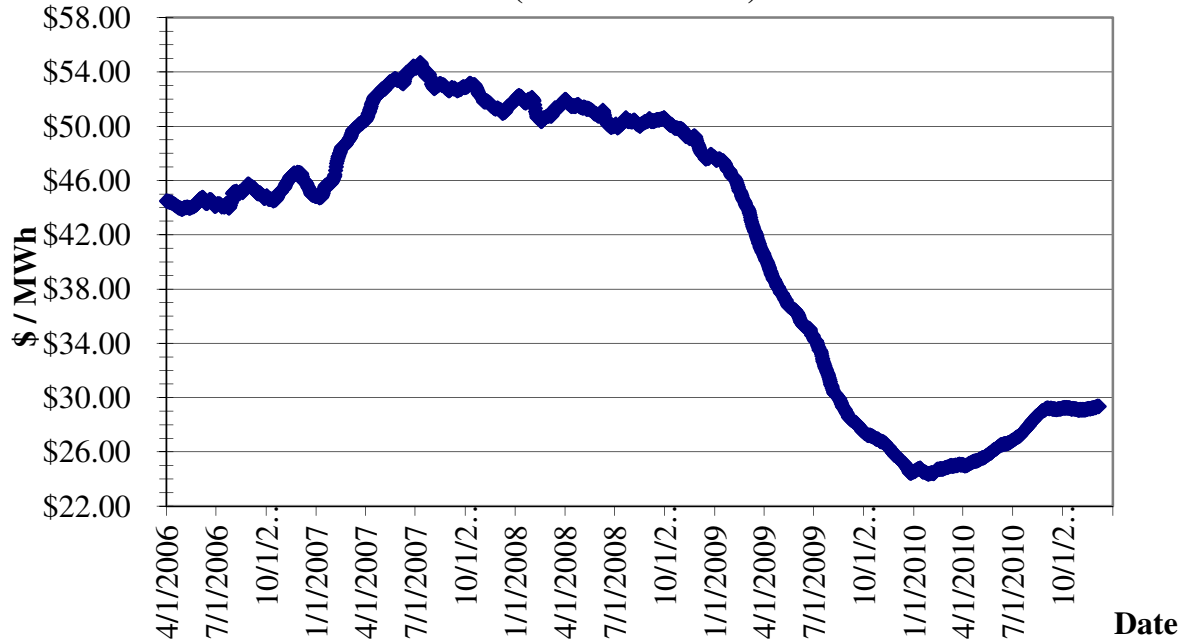
In addition, comparative analyses should be forward-looking rather than backward-looking, as much as possible. Historical prices explain conditions in the past, but may or may not be a good indicator of conditions in the future. For example, Chart 1 below shows how historical wholesale electric energy prices have varied in recent years, with the significant cost decrease in recent years being due largely to the effects of the recession. As the economy recovers from the recession, wholesale energy prices are expected to increase, especially when the weather is very hot or cold or when there are outages of large generation or transmission facilities.

A market price comparison is unable to consider the impact that the availability of renewable resources has on the market price. In the absence of renewable generation, utilities may have relied on less efficient, more costly generators to run, thereby driving up the price of energy. Further, a market price comparison cannot consider the cost of alternative forms of generation, e.g. a new coal-fired plant, nuclear facility, or natural gas fired facility, that would have been necessary to build instead of the renewable generation.

In resource planning proceedings, the Department encourages utilities to plan to meet their median forecasted needs without relying on wholesale energy market purchases. Such an approach helps ensure that electric service is reliable and is less subject to risks of large price spikes due to major changes in economic circumstances (e.g. a series of hot days or an outage of a major generating facility). Market purchases would then only be used to the extent actual consumption exceeded forecasted consumption. A strategy that relies extensively on the wholesale energy market is too risky because it does not ensure that customer needs will be met in a cost-effective manner.

Reliance on the market price and market purchases to meet customer energy needs would require customer groups, particularly high-usage customers such as large industrial companies, to assume the risk of significant fluctuations in the market price of energy. Excessive reliance in the wholesale market, especially without customer knowledge, would expose large energy consumers to significant risks of paying higher energy costs and would expose all energy users to undue amounts of risk of high costs and potentially unreliable service.

**Chart 1: 365-Day Rolling Average,
Day Ahead, Minn. Hub LMP (Energy Price)
(Nominal Dollars)**



In summary, rather than a simple comparison with a market price, a reasonable assessment of the cost of renewable generation requires consideration of the cost of existing and/or new alternative generation along with general economic conditions.

V. RESOURCE PLANS ARE THE BEST VENUE FOR ANALYZING THE COSTS OF RENEWABLE RESOURCES

Resource planning provides the most comprehensive examination of costs of providing electric service and is the best venue for analyzing the costs of adding renewable resources. Utility IRPs evaluate a utility's ability to meet its forecasted demand over an extended period of time, and assess the least-cost mix of resources needed to meet that demand. Resource plans view a utility's system in its entirety, including the existing mix of generation resources, and provide a comprehensive comparison of the impact resource additions or retirements will have on the overall costs on the utility's system.

In addition, resource planning examines the least-cost mix of resources under a variety of scenarios and conditions. Examining the appropriate mix of resources under a variety of conditions provides more assurance that additional resources remain least cost even if the economic environment changes significantly.

VI. CONCLUSION

Overall, the reports filed by utilities provide some information about the effects of renewable resources on rates. However, the rate impact of the RES is best determined through the resource planning process rather than through a simple comparison with market prices. To date, the Department's IRP analyses have indicated that RES compliance is generally cost effective for the utilities subject to Minnesota's RES Statute.

/sm

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
Comments**

Docket No. E999/CI-11-852

Dated this 25th of January, 2012

/s/Sharon Ferguson

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