



January 15, 2021

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Dear Chairs and Ranking Members,

Attached herewith is a utility compliance report for Renewable Energy Standards prepared by the Minnesota Department of Commerce Pursuant to Minnesota Statute 216B.1691, subd. 3(b). This is a biannual report that contains details on the progress for each individual utility subject to this statute in 2019. The overall conclusion of the report is that the utilities are in compliance with this statute.

As we continue to strive towards achieving the Next Generation Energy Act's goal of reducing greenhouse gas emissions from the power sector by 80% by 2050, the adoption of renewable energy will need to continue to grow. I look forward to working with you in the coming session on how we can best accelerate the deployment of renewable energy in order to achieve state goals and in the best interest of Minnesotans.

Sincerely,

A handwritten signature in blue ink that reads 'Grace Arnold'.

Grace Arnold
Temporary Commissioner

Minnesota Renewable Energy Standard: UTILITY COMPLIANCE

January 15, 2021

Prepared by
Minnesota Department of Commerce, Division of Energy Resources

Pursuant to Minnesota Statute 216B.1691, subd. 3(b)

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Report to the Minnesota Legislature

Progress on Compliance by Electric Utilities with the Minnesota Renewable Energy Objective and the Renewable Energy Standard

The Minnesota Department of Commerce, Division of Energy Resources (Commerce or the Department) submits the following report on the progress of Minnesota's electric utilities' compliance with the Minnesota Renewable Energy Standard (RES) contained in Minnesota Statute section 216B.1691.

All of the utilities subject to the Minnesota RES have demonstrated compliance with the 2019 Renewable Energy Standard requirements.

Introduction

Commerce provides this report in compliance with Minnesota Statute section 216B.1691, subdivision 3(b), which requires a bi-annual report to the Legislature on “the progress of utilities in the state, including the progress of each individual electric utility, in increasing the amount of renewable energy provided to retail customers,” along with the compilation of the following information from each utility:

- The status of the utility’s renewable energy mix relative to the objective and standards;
- Efforts taken to meet the objective and standards;
- Any obstacles encountered or anticipated in meeting the objective or standards; and
- Potential solutions to the obstacles.

This RES Report is divided into the following sections:

- Legislative History
- RES Reporting Requirements
- 2019 RES Compliance
- Ability to Comply with RES Requirements in the Future
- Obstacles and Potential Solutions for Meeting Future RES Requirements
- Mitigating Undesirable Economic Impacts on Ratepayers
- Solar Energy Standard (SES) Compliance
- Summary and Conclusion

Legislative History

Adoption of a Renewable Energy Objective

In 2001, the Minnesota Legislature first enacted the Minnesota Renewable Energy Objective contained in Minnesota Statute section 216B.1691. As originally enacted, the Minnesota Renewable Energy Objective Statute required electric utilities to “make a good faith effort” to obtain 10 percent of their Minnesota retail energy sales from eligible energy sources by 2015, and to obtain 0.5 percent of their renewable energy from biomass technologies. Under the REO Statute, Xcel Energy was required to meet a 10 percent renewable energy standard.

Adoption of a Renewable Energy Standard

During the 2007 Legislative session, Minnesota Statute section 216B.1691 was amended to:

1. Establish a Renewable Energy Standard with specified mandated renewable energy goals beginning in 2010;
2. Amend the definition of an eligible energy technology;
3. Require the Minnesota Public Utilities Commission (Commission) to establish a trading system for renewable credits; and
4. Establish criteria under which the Commission may waive or extend the deadline for meeting the RES targets.

The Renewable Energy Standard

Consistent with the earlier Renewable Energy Objective, the Renewable Energy Standard Statute requires that a utility generate or procure at least one percent of its retail electric sales from an eligible energy technology beginning in 2005 increasing to seven percent by 2010. However, unlike the Renewable Energy Objective, the Renewable Energy Standard mandates that electric utilities procure this level of energy. Beginning in 2010 for Xcel, and 2012 for all other utilities, the Renewable Energy Standard Statute added Minnesota Statute section 216B.1691, subd. 2(a) and (b) to require:

(a) Except as provided in paragraph (b), each electric utility shall generate or procure sufficient electricity generated by an eligible energy technology to provide its retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides wholesale service, so that at least the following standard percentages of the electric utility’s total retail electric sales to retail customers in Minnesota is generated by eligible energy technologies by the end of the year indicated:

- | | |
|---------|------------|
| 1) 2012 | 12 percent |
| 2) 2016 | 17 percent |
| 3) 2020 | 20 percent |
| 4) 2025 | 25 percent |

An electric utility that owned a nuclear generating facility as of January 1, 2007, must meet the requirements of this paragraph rather than paragraph (a). An electric utility subject to this paragraph must generate or procure sufficient electricity generated by an eligible energy technology to provide its retail customers in Minnesota or the retail customers of a distribution utility to which the electric utility provides wholesale electric service so that at least the following percentages of the electric utility's total retail electric sales to retail customers in Minnesota is generated by eligible energy technologies by the end of the year indicated:

- | | |
|---------|------------|
| 1) 2010 | 15 percent |
| 2) 2012 | 18 percent |
| 3) 2016 | 25 percent |
| 4) 2020 | 30 percent |

Of the 30 percent in 2020, at least 25 percent must be generated by wind energy conversion systems and the remaining five percent by other eligible energy technologies.

In its March 19, 2010 Order, the Commission clarified the percentages of total retail sales that utilities must generate or procure from renewable energy apply for every year forward until the next step in percentages identified by the statute. Consequently, for 2017 Xcel Energy's Renewable Energy Standard requirement remained at 25 percent, and all other utilities remained at 17 percent.

In 2010, the Renewable Energy Standard Statute definition of total retail electric sales was amended to exclude "the sale of hydroelectricity supplied by a federal power marketing administration or other federal agency, regardless of whether the sales are directly to a distribution utility or are made to a generation and transmission utility and pooled for further allocation to a distribution utility." The amendment results in the exclusion of power provided by the Western Area Power Administration from total retail sales.

Changes to the Definition of an Eligible Energy Technology

Minnesota Statute section 216B.1691, subdivision 1 defines an eligible energy technology as one that:

Generates electricity from the following renewable energy sources: (1) solar; (2) wind; (3) hydroelectric with a capacity of less than 100 megawatts; (4) hydrogen provided that after January 1, 2010, the hydrogen must be generated from the resources listed in this clause; or (5) biomass, which includes, without limitation, landfill gas; an anaerobic digester system; the predominantly organic components of wastewater effluent, sludge, or related by-products from publicly owned treatment works, but not including incineration of wastewater sludge to produce electricity; and an energy recovery facility used to capture the heat value of mixed municipal solid waste or refuse-derived fuel from mixed municipal solid waste as a primary fuel.

This definition of an eligible energy technology reflects a number of changes made by the Legislature since eligible technologies were originally defined under the Renewable Energy Objective Statute. Specifically, the capacity of hydroelectric facilities eligible for Renewable Energy Standard compliance was increased from 60 to 100 megawatts, and the definition of biomass was clarified to include landfill gas and anaerobic digester systems. Finally, the restriction was lifted on Xcel Energy's ability to count

biomass and wind generation from its Prairie Island legislative mandates.¹ The 2007 amendments to the Renewable Energy Standard Statute render generation from these mandates eligible to count toward Renewable Energy Standard compliance.

The Use of Renewable Energy Certificates to Meet Renewable Energy Standard Requirements

The 2003 amendment to Minnesota Statute section 216B.1691, subd. 4, provided that the Commission “may establish a program for tradable credits for electricity generated by eligible energy technology.” The 2007 amendment to Minnesota Statute section 216B.1691, subd. 4 required the Commission to establish a program for tradable Renewable Energy Credits (RECs) by January 1, 2008, and to require all electric utilities to participate in a Commission-approved REC tracking system once such a system was in operation.

In an October 2007 Order, the Commission approved the use of the Midwest Renewable Energy Tracking system (M-RETS) as the Renewable Energy Credits tracking system under Minnesota Statute section 216B.1691, subd. 4(d), and required Minnesota utilities to participate. In its December 18, 2007, Order Establishing Initial Protocols for Trading Renewable Energy Credits, the Commission adopted a four-year shelf life for RECs². That means the Renewable Energy Credits is eligible for use in meeting the Renewable Energy Standard requirements in the year of generation and for four years following the year of generation.

Finally, in its December 3, 2008 Third Order Detailing Criteria and Standards for Determining Compliance under Minn. Stat. §216B.1691 and Setting Procedures for Retiring Renewable Energy Credits, the Commission directed utilities to begin retiring Renewable Energy Credits equivalent to one percent of their Minnesota annual retail sales for the 2008 and 2009 compliance year by May 1st of the following year. Upon retirement, Renewable Energy Credits are transferred into a specific Minnesota Renewable Energy Standard retirement account and, once retired, are not available to meet other state or program requirements, thus addressing the statutory prohibition against double-counting the Renewable Energy Credits while also promoting the environmental benefits of renewable energy. The Commission further directed the utilities to submit an annual compliance filing demonstrating their compliance with the Renewable Energy Standard by June 1st.

Criteria for Waiving or Extending the Renewable Energy Standard Requirements

The Renewable Energy Standard Statute was amended to include criteria under which the Commission may find it in the public interest to modify or delay implementation of the Renewable Energy Standard requirements. Among the factors the Commission must consider are:

1. The impact on customer utility costs, including the economic and competitive pressure on the utility’s customers;
2. The effects on electric system reliability;
3. Technical advances and concerns;
4. Rejection or delays in obtaining site and route permits;

¹As part of earlier Legislative authorization for additional storage for spent nuclear fuel at Xcel’s Prairie Island nuclear facility, Xcel was required to obtain 825 MW of wind energy (Minnesota Statute section 216B.2423) and 125 MW of biomass energy (Minnesota Statute section 216B.2424).

² *In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits*, Docket No. E999/CI-04-1616, Order Establishing Initial Protocols for Trading Renewable Energy Credits (December 18, 2007).

5. Delays, cancellations or non-delivery of necessary equipment for construction of a facility;
6. Transmission constraints; and
7. Other statutory obligations imposed on the Commission or utility.

Upon a petition by a utility, the Commission may modify or delay a Renewable Energy Standard under numbers (1) to (3) “only if it finds implementation would cause significant rate impact, requires significant measures to address reliability, or raises significant technical issues.” For the remaining items, Minnesota Statute section 216B.1691, subd. 2b allows modification or delay in the implementation of a standard only if the Commission “finds that the circumstances described in those clauses were due to circumstances beyond an electric utility’s control and make compliance not feasible.”

To date, no utility has requested a modification or delay in the implementation of the Renewable Energy Standard requirements.

Solar Energy Standard

In 2013, the Minnesota Legislature adopted Minnesota Statute section 216B.1691, subd. 2f, establishing a Solar Energy Standard requiring public utilities to obtain at least 1.5 percent of their total Minnesota retail sales from solar energy by the end of 2020, with a goal of obtaining 10 percent of Minnesota retail sales from solar energy by 2030. The Solar Energy Standard also contained a small solar carve-out that requires at least 10 percent of the 1.5 percent solar energy standard come from small solar facilities (Small Solar Carve-out). The size threshold for the small solar carve-out was later increased from 20 kW to 40 kW for all utilities subject to the SES. Public utilities with between 50,000 and 200,000 retail electric customers may apply individual customers subscriptions of 40 kW or less to a commission approved community solar garden program toward the ten percent Small Solar Carve-out goal.

Three companies are subject to the Solar Energy Standard: Minnesota Power, Ottertail Power Company, and Xcel Energy. In addition to excluding cooperative and municipal utilities from the Solar Energy Standard requirements, the Solar Energy Standard statute excludes retail sales to customers that are iron mining extraction and processing facilities, or paper mills, wood products manufacturers, sawmills, or oriented strand board manufacturers from the calculation of 1.5 percent of retail sales.

Reporting on the Rate Impact of Renewable Energy Standard Compliance

Minnesota Statute section 216B.1691, subd. 2e, was amended to require the Commission to determine a uniform system for reporting the estimated rate impact of Renewable Energy Standard compliance. In its January 6, 2015 Order in Docket E999/CI-11-852,³ the Commission established reporting requirements for estimating the rate impact of Renewable Energy Standard compliance, including:

- calculating the direct costs of renewable generation;
- adding the costs of any new transmission improvements needed for renewable power;
- subtracting costs of resources that would have been used in place of the renewable resources; and
- discussing any impacts that renewable generation had on the utility's indirect costs (such as the effects on baseload generation facilities).

³ *In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd. 2e*, Docket No. E999/CI-11-852, Order Establishing Uniform Reporting System for Estimating Rate Impact of Minn. Stat. §216B.1691, (January 6, 2015).

Renewable Energy Standard Reporting Requirements

Entities Subject to the Renewable Energy Standard Requirements

Minnesota Statute section 216B.1691, subd. 1(b) defines an electric utility as “a public utility providing electric service, a generation and transmission cooperative electric association, a municipal power agency, or a power district.”

Based on the statutory definition of an electric utility, the Commission has determined that the following entities are subject to the Renewable Energy Standard Statute:

- Basin Electric Power Cooperative
- Central Minnesota Municipal Power Agency (CMMPA)
- Dairyland Power Cooperative
- East River Electric Cooperative
- Great River Energy (GRE)
- Heartland Consumer Power District
- Interstate Power and Light⁴
- L&O Power Cooperative
- Minnkota Power Cooperative
- Minnesota Municipal Power Agency (MMPA)
- Minnesota Power
- Missouri River Energy Services
- Northwestern Wisconsin Electric Company
- Ottertail Power Company
- Southern Minnesota Energy Cooperative
- Southern Minnesota Municipal Power Agency (SMMPA)
- Xcel Energy

The definition of an electric utility contained in Minnesota Statute section 216B.1691, subd. 1(b) was amended in 2007 to include a power district. Consequently, Heartland Consumer Power District is now subject to the Renewable Energy Standard requirements. In its November 12, 2008 Order in Docket No. E999/CI-03-869, the Commission found that East River Electric Power Cooperative and L&O Power Cooperative were required to file separate RES reporting.⁵

Prior to this Order, L&O and East River’s Renewable Energy Standard compliance reporting was aggregated with the reporting from Basin Electric. Finally, given its limited presence in Minnesota, the Commission granted Northwestern Wisconsin Electric Company the discretion to report its renewable energy compliance information as provided to the Wisconsin Public Service Commission.

⁴ On June 8, 2015, the Commission approved the sale of Interstate Power and Light’s Minnesota electric distribution system and assets, and the transfer of its Minnesota electric service rights and obligations, to Southern Minnesota Energy Cooperative (SMEC). *In the Matter of a Request for the Approval of the Asset Purchase and Sale Agreement between Interstate Power and Light Company and Southern Minnesota Energy Cooperative*, Docket No. E001, 115, 140, 105, 139, 124, 126, 145, 132, 114, 6521, 142, 135/PA-14-322, Order Approving Agreement Subject to Conditions, (June 8, 2015).

⁵ *In the Matter of Detailing Criteria and Standards for Measuring an Electric Utility’s Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. §216B.1691*, Docket No. E999/CI-03-869, Order Setting Filing Requirements and Clarifying Procedures, (November 12, 2008).

2019 Renewable Energy Standard Compliance

Utilities subject to the Minnesota Renewable Energy Standard file an annual compliance filing each year on June 1st. The most recent compliance filing was made on June 1, 2020 for compliance with 2019 Renewable Energy Standard requirements (Docket No. E999/PR- 18-12). Minnesota Statute section 216B.1691 currently requires Xcel Energy to obtain 25 percent of its Minnesota retail sales from renewables, and all other utilities subject to Renewable Energy Standard requirements to obtain 17 percent of their Minnesota retail sales from renewables. Table 1, below, summarizes utility compliance with the 2019 requirements. All of the utilities subject to the Minnesota Renewable Energy Standard have demonstrated compliance with the 2019 Renewable Energy Standard requirements.

Table 1: 2019 Renewable Energy Standard Compliance

Utility	2019 Minnesota Retail Sales (MWhs)	Total Renewable Energy Certificates Retired (for MN Retail Sales)	Percent
Basin Electric	867,479	147,471	17%
Central MN Municipal Power Agency	381,874	37,823	17%
Dairyland Power Cooperative	810,828	97,300	17%
East River Power Cooperative	425,078	51,106	17%
Great River Energy	10,550,858	1,793,652	17 %
Heartland Power District	234,492	39,864	17 %
L & O Power Cooperative	300,307	51,053	17%
Minnesota Municipal Power Agency (MMPA)	1,811,695	307,988	17%
Minnesota Power	9,676,563	1,645,016	17%
Minnkota Power Cooperative	1,590,655	270,411	17%
Missouri River Energy Services (MRES)	1,733,073	294,623	17%
Northwestern Wisconsin Power ⁶	630	(see footnote 6)	
Otter Tail Power Company	2,678,956	455,423	17%
Southern Minnesota Electric Cooperative	805,913	137,010	17%
Southern MN Municipal Power Agency	2,904,495	493,756	17 %
Xcel Energy	<u>29,161,074</u>	<u>7,290,269</u>	<u>25%</u>
Total	64,150,863	13,238,642	21%

Wind generation continues to be the largest source of renewables used to meet the Minnesota RES representing approximately 60 percent of annual renewable generation, followed by hydroelectric generation at approximately 35 percent with the balance split between biomass and solar generation.

⁶ Per the Commission’s November 12, 2008 Order in Docket No. E999/CI-03-869, Northwestern Wisconsin Electric is permitted to comply with the Minnesota reporting requirements by submitting its renewable energy compliance information as reported to the Wisconsin Public Service Commission. Northwestern Wisconsin submitted its Wisconsin RPS compliance report indicating it retired 24,367 RECs towards its compliance in Wisconsin.

Ability to Comply with Renewable Energy Standards Requirements in the Future

As noted above, for 2019, the Renewable Energy Standards requirement was 25 percent of Minnesota retail sales for Xcel Energy, and 17 percent of Minnesota retail sales for all other utilities subject to the requirement. Utilities may retire Renewable Energy Certificates towards Renewable Energy Standards compliance up to four years from the date of generation. In addition, utilities may purchase excess Renewable Energy Certificates from other utilities to meet their Renewable Energy Standards requirement or reallocate Renewable Energy Certificates to Minnesota from their other state jurisdictions with lower Renewable Energy Standards requirements. Iowa, Wisconsin and Minnesota have Renewable Energy Standards, whereas North and South Dakota have voluntary Renewable Energy Objectives at 10 percent.

As part of their biennial reporting, utilities were asked to provide the year through which the Company can maintain its Renewable Energy Standards compliance with its current renewable portfolio. Table 2, below, summarizes the year through which the utilities expect to comply with the Renewable Energy Standards.

Table 2: Estimated Year through which the Utility can Comply with Renewable Energy Standards

Utility	Compliance through year
Basin Electric	2030
Central MN Municipal Power Agency (CMMPA)	2033
Dairyland Power Cooperative	2040
East River Power Cooperative	2025
Great River Energy	2055
Heartland Power District	2044
L&O Power Cooperative	2022
Minnesota Municipal Power Agency (MMPA)	2023
Minnesota Power	2053
Minnkota Power Cooperative	2025
Missouri River Energy Services (MRES)	2021
Northwest Wisconsin	See footnote 6
Otter Tail Power Company	2028
Southern Minnesota Electric Cooperative (SMEC)	2019
Southern MN Municipal Power Agency	2040
Xcel Energy	2040

All of the utilities, with the exception of Southern Minnesota Electric Cooperative (SMEC) have sufficient renewable resources to meet compliance beyond 2019. SMEC represents the former Interstate Power & Light Minnesota operations. As part of its purchase agreement with IPL for its Minnesota operations, SMEC will receive a portion of IPL’s RECs reflecting IPL’s former Minnesota operations’ percent of IPL’s system load

(approximately five percent). SMEC indicates that it is evaluating opportunities to acquire renewable resources, or purchase Renewable Energy Certificates for future compliance.

Obstacles and Potential Solutions for Meeting the Renewable Energy Standards Requirements

The utilities provided comments on obstacles they have encountered or anticipate encountering to meeting the RES requirements. Most of the utilities indicated that they had not experienced obstacles in meeting Renewable Energy Standards compliance. The cost associated with integrating renewables into their energy portfolio as the share of renewable energy increases was cited as a concern that is being evaluated. Transmission constraints within Minnesota as well as constraints on the ability to transport excess wind energy outside of Minnesota has typically been among the most noted obstacle cited by utilities in the past. Utilities did not report transmission constraints in this year's reporting, but did state they continue to monitor for transmission constraints.

Mitigating Undesirable Economic Impacts on Ratepayers

Utilities were asked to identify efforts taken to adequately protect against undesirable economic impacts on ratepayers, including limiting rate impacts to consumers. Many of the utilities cited efforts to secure long-term contracts for renewables and transmission service as methods of limiting economic impacts. In addition, several of the utilities have sold or purchased Renewable Energy Certificates in the market as a means of limiting rate impacts to their ratepayers. The Midwest Renewable Tracking System is the tracking system approved by the Commission for registering renewable projects and maintaining an accounting of each project's renewable generation in the form of a Renewable Energy Certificate. A Renewable Energy Certificate represents one megawatt hour of renewable generation. Utilities comply with the Renewable Energy Standard by transferring the appropriate amount of Renewable Energy Certificates, as determined by the appropriate percentage of their Minnesota retail sales, into a retirement account. Utilities having more Renewable Energy Certificates than required to meet their Renewable Energy Standard may choose to sell some of their excess certificates to utilities with a shortfall. Utilities purchasing Renewable Energy Certificates typically do so because they have found that option to be a reasonable cost method of meeting Renewable Energy Standards compliance or making up the difference in REC need. Renewable Energy Certificates prices reported by the utilities typically ranged from between \$0.25 to \$1.25 per Renewable Energy Certificates.

Solar Energy Standard Compliance

Minnesota Statute section 216B.1691 was amended by the 2013 Legislature to require public utilities to generate or procure 1.5 percent of their Minnesota retail electric sales from solar energy by 2020. The statute permits utilities subject to the SES to exclude retail sales to the mining and paper mill and wood products manufacturing industries from the calculation of their Solar Energy Standard requirement. The statute further requires that at least 10 percent of the 1.5 percent Solar Energy Standard goal be met by solar energy from facilities with a nameplate capacity of 20 kW or less. Three utilities, Minnesota Power, Otter Tail Power and Xcel Energy are subject to the Solar Energy Standard and are required to submit annual reports detailing their efforts to comply. Table 3 provides a summary of the estimated amount of solar capacity and solar energy needed to meet the 2020 Solar Energy Standard requirement.

Table 3: Summary of Utility Reporting on SES

	Otter Tail	Minnesota Power	Xcel
MN retail sales (MWh)	2,678,956	9,014,804	29,161,070
Excluded Sales	67,024	5,990,228	Protected Data ⁷
MN retail sales subject to SES	2,611,932	3,024,575	TS
Annual solar generation (MWh)	277	17,386	1,258,823
Solar Renewable Energy Certificates Needed to Meet 2020 SES (MWh)	44,000	50,613	466,885
Solar Renewable Energy Certificate Balances at Year-end 2019 Available to Meet 2020 SES (MWh)	79,148	56,644	2,940,404

⁷ Xcel's Exempt sales data is protected because the small number of exempt customers could potentially lead to identification of individual customer sales data.

Otter Tail Power Company

Otter Tail Power currently has no large-scale utility projects in operation. Otter Tail Power has purchased sufficient Solar Renewable Energy Credits to meet its initial Solar Energy Standard requirement for 2020. Otter Tail Power recently filed a petition for approval to construct a 49.9 MW solar facility on the site of its existing Hoot Lake power plant in Fergus Falls, Minnesota.⁸

The Company states that it expects that meeting the ten percent carve-out for systems less than 40 kW will be a challenge. In 2019, the Company had 27 customer-owned solar facilities totaling 352 kW. Otter Tail Power received approval to move dollars budgeted for the Made in Minnesota program to provide additional funding for its Publicly Owned Property Solar projects to expand solar benefits within various communities. OTP anticipates purchasing additional small-scale Solar Renewable Energy Credits to comply with the small solar carve-out requirement.

Minnesota Power

Minnesota Power intends to meet its Solar Energy Standard through its existing Camp Ripley (10 MW) project, and its Blanchard Solar PPA (10 MW). In addition, the Company has 1.04 MW of community solar gardens, and has expanded its SolarSense Customer Solar Program to assist with customer-sited solar projects in order to meet the small solar carve-out. Minnesota Power also actively participates in the Minnesota Solar Pathways Initiative that aims to provide support and technical assistance toward meeting the 10 percent Solar Energy Standard requirement by 2030. Finally, Minnesota Power recently requested Minnesota Public Utilities Commission approval to develop approximately 20 MW of utility scale solar projects in its service territory.⁹

Xcel Energy

Xcel reported that it had approximately 25.5 MW in solar from facilities of 40 kW or less, and 752.4 MW of solar capacity from facilities over 40 kW. Xcel has 262 MW of utility-scale solar projects, some of which are earmarked for its Renewable*Connect green pricing pilot. The Company continues to offer incentives for the installation of rooftop solar through its Solar*Rewards program. The Second Generation Solar*Rewards program offers incentives based on the system's energy production to customers installing solar systems of less than 40 kW.

In its most recent Integrated Resource Plan (IRP) filing (Docket E002/RP-19-368), Xcel proposed to add 4,000 MW of solar facilities over the forecast period, 2020-2034.

Summary and Conclusion

The Minnesota Department of Commerce concludes that utilities complied with their 2019 RES obligations and appear able to comply into the future. In addition, the three public utilities subject to the SES appear on track to comply with the first-year requirement in 2020.

⁸ *In the Matter of Otter Tail Power Company's Petition for Approval of the Hoot Lake Solar Project*, Docket No. E017/M-20-844.

⁹ *In the Matter of Minnesota Power's Petition for Approval of the Acquisition of Solar Power to Support Economic Relief and Recovery*, Docket No. E015/M-20-828.