



May 9, 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

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

PUC Docket Number/s: E-999/CI-11-852
OAH Docket Number: N/A

Dear Dr. Haar:

Wind on the Wires (WOW) represents the interests of the wind industry and many environmental organizations in the Midwest. Our footprint covers the Midcontinent Independent System Operator (MISO) and our members include clean energy advocacy and public interest organizations, tribal representatives, turbine manufacturers, project developers, and businesses that supply goods and services to the wind industry. WOW's mission is to overcome the barriers to bringing wind energy to market. The organization does this through technical/transmission, regulatory and state policy work, and education/outreach.

WOW Comments on Template 1 and 2

1. WOW Prefers Template 1

Of the two options presented, WOW believes Template 1-staff adaptation of Xcel Energy's December 20th, 2013 filing-will be more useful and will better clarify the costs and benefits of Minnesota's Renewable Energy Standard (RES) and Solar Energy Standard (SES). It is our position that Template 1 offers a more granular analysis that will be more useful and transparent when determining RES/SES costs and benefits.

Additionally, WOW is pleased to see the Commission's guidance to completing Row H- "Transmission expenses associated with RES, \$millions." In WOW's experience there are multiple reasons for transmission expansion including but not limited to renewable energy integration, reliability concerns, and relieving congestion/economic needs. Renewable energy is but one of the drivers for additional transmission. It is therefore critical the Commission determine (or agree upon a process with stakeholders) the necessary utility documentation used to decide what portion of transmission costs is renewables related as opposed to other factors. Appropriately allocating transmission costs will be crucial in credibly obtaining an RES/SES cost determination.

2. Segregation of RES and SES

In comments filed on December 20, 2013 in this docket, WOW stated:

“WOW recommends that RES costs should be segregated from Solar Energy Standard (SES) costs for the reason that 216B.1691 Subd. 2f calls for solar procurement decisions to be made separately from resource acquisitions made in compliance with 216B.1691 Subd. 2a. Further, in order for a like-to-like comparison amongst utilities WOW recommends that RES costs be further segregated by the definitions set in 216.1691 Subd. 1. Not all RES eligible energy technologies have similar cost profiles. In order to foster transparency and comparability the Commission’s RES cost analysis must account for the differences in cost between eligible RES generation sources, and the different compliance strategies of each utility.”

WOW continues to believe that RES and SES costs should be segregated. To the extent that Template 1, Row C and Template 2, Row A will require a listing of individual utility RES & SES generation assets listed under FERC Form 1 to qualify, WOW is satisfied that our concern will be addressed.

WOW thanks the Commission for the opportunity to provide comments on this important docket. If the Commission has any questions please contact Joseph Sullivan, Regional Policy Manager - West at jsullivan@windonthewires.org or by phone at 651-644-3400.