

June 8, 2020

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/PR-20-12

Dear Mr. Wolf:

On March 20, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Renewable Energy Certificate (REC) Retirement Process for Renewable Energy Standards, Biennial Reporting Obligations, and Green Pricing Programs*. The Notice required entities subject to Minn. Stat. §216B.1691 (RES Statute) to file a report detailing their compliance with the RES Statute for the year 2019 by June 1, 2020.

Minn. Stat. §216B.1691, subd. 2 requires utilities other than Xcel Energy to obtain at least 17 percent of their Minnesota 2019 retail sales from renewable energy sources. Minn. Stat. §216B.1691, subd. 2 (b) requires Xcel Energy to obtain 25 percent of its 2019 retail sales from renewable energy sources.

The following utilities have filed their 2019 compliance reports:

- Basin Electric Cooperative (Basin),
- Central Minnesota Municipal Power Agency (CMMPA),
- Dairyland Power Cooperative,
- East River Electric Power Cooperative (East River),
- Great River Energy (GRE),
- Heartland Consumers Power District,
- L&O Power Cooperative,
- Minnesota Municipal Power Agency (MMPA),
- Minnesota Power (MP),
- Minnkota Power Cooperative,
- Missouri River Energy Services,
- Northern States Power. d/b/a Xcel Energy (Xcel),
- Northwestern Wisconsin Electric Company.
- Otter Tail Power Company (OTP),

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- Southern Minnesota Energy Cooperative (SMEC); and
- Southern Minnesota Municipal Power Agency (SMMPA),

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed these filings and verified that utilities have complied with the RES requirement. In total, utilities retired RECs representing 21.0 percent of total Minnesota retail sales in 2019 towards RES compliance. Attached to this letter is a table summarizing each utility's compliance with the RES Statute.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Public Utility Rates Coordinator

SLP/ja

Summary of 2019 RES Compliance

Utility	2019 MN Retail Sales MWhs	RES Req. %	RES Req. MWhs	RECs Retired
Basin	867,479	17%	147,471	147,471
CMPA	381,874	17%	64,919	64,919
Dairyland Power	886,370	17%	150,683	150,683
East River Electric	567,059	17%	96,400	96,494
GRE	10,550,858	17%	1,793,646	1,793,652
Heartland	234,492	17%	39,864	39,864
L&O Power Coop	300,307	17%	51,052	51,053
Minnesota Power	9,676,563	17%	1,645,016	1,645,016
Minnkota	1,590,655	17%	270,411	270,411
MMPA	1,811,695	17%	307,988	307,989
Missouri River Energy Services	1,733,073	17%	294,622	294,623
NW Wisconsin**	630	17%	107	**
Otter Tail Power	2,678,956	17%	455,423	455,423
SMEC	805,913	17%	137,005	137,010
SMPA	2,904,495	17%	493,764	493,765
Xcel	29,161,074	25%	7,290,269	7,290,269
Total	64,150,863	21%		13,238,642

**NW Wisconsin serves approximately 98 Minnesota customers with 2018 sales of 630 MWhs.

The Company retired 24,970 RECs or 14.48% of its 3-year average Wisconsin retail sales of 171,204 MWhs.

NW Wisconsin generated 33,461 MWh of renewable energy in 2019

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
Letter**

Docket No. E999/PR-20-12

Dated this **8th** day of **June 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_20-12_PR-20-12
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-12_PR-20-12
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-12_PR-20-12
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-12_PR-20-12
Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_20-12_PR-20-12
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-12_PR-20-12
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_20-12_PR-20-12
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Krambeer	bkrամbeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_20-12_PR-20-12
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-12_PR-20-12
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-12_PR-20-12
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-12_PR-20-12
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-12_PR-20-12
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St. Grantsburg, WI 54840	Electronic Service	No	OFF_SL_20-12_PR-20-12
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_20-12_PR-20-12
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-12_PR-20-12
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-12_PR-20-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-12_PR-20-12
Audra	Skalet	askalet@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-12_PR-20-12
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-12_PR-20-12
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-12_PR-20-12