

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

In the Matter of Basin Electric Power)	Docket No. ET6125/RP-19-425
Cooperative 2019 Optional Integrated)	
Resource Plan)	
)	
)	

**Sierra Club, Fresh Energy and MCEA's First Set of Information Requests to Basin
Electric Power Cooperative**

Sierra Club, Fresh Energy and MCEA hereby submit the attached information requests to Basin Electric Power Cooperative.

Dated this 16th day of July, 2019

/s/ S. Laurie Williams

Sierra Club
Staff Attorney
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Attorney for Sierra Club

/s/ Kevin P. Lee

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/s/ Allen Gleckner

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GENERAL INSTRUCTIONS

- a) **Responses are to be provided in electronic format (e.g., text documents) should be in the original word processor file format or PDF, data files should be in native, machine-readable electronic format (e.g. Excel).**
- b) If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
 - (a) The privilege asserted and its basis;
 - (b) The nature of the information withheld; and,
 - (c) The subject matter of the document, except to the extent that you claim it is privileged.
- c) For any document or set of documents Basin Electric Power Cooperative (“Basin Electric”) objects to providing on the grounds it is burdensome or voluminous, please identify the specific document.
- d) These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
- e) If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
- f) These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
- g) For each response, identify all persons that were involved in the preparation of the answers to the interrogatories below and/or are responsible for compiling and providing the information contained in each answer.
- h) Identify which witness(es) at the hearing(s) is competent to adopt and/or discuss the response.

i) Please produce the requested documents **in electronic format** to the following individuals:

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j) Wherever the response to a request consists of a statement that the requested information is already publicly available, please provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).

k) In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

l) Petitioners reserve the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

Data Request 1-SCFEMCEA-1

July 16, 2019

Request: For each of Basin Electric Power Cooperative's coal fired electric generating units referenced on page 3 of its IRP, please provide the following information:

- a. Remaining book life for each unit as of the present date
- b. A copy of most recent depreciation study/analysis, and the current depreciation schedule
- c. Fixed operating and maintenance expenses ("O&M") by unit for the last three years
- d. Variable O&M by unit for the last three years
- e. Fuel contract duration and terms
- f. Percentage of fuel by unit that is purchased on the spot market
- g. Break fees, if any, that are stipulated in existing fuel contracts
- h. Copies of the existing fuel contracts
- i. Planned capital additions
 1. Environmental capital expenditures
 2. Non-environmental capital expenditures
 3. Depreciable life for each of the above capital additions
- j. Recent capital additions
 1. Identify and describe any capital project over \$5 million at any unit over past 5 years
- k. Outage information
 1. Number and duration of forced outages, maintenance outages, and other derating events, by unit, by month, over past five years
 2. Projected effective forced outage rate, by unit, by month, for next 10 years
 3. Any planned derates or uprates of coal plant capacity for next 10 years
 4. Current heat rate of each unit and projected changes in heat rate for each unit for next 10 years.

Response:

Data Request 1- SCFEMCEA-2

July 16, 2019

Request: Please reference page 5 of the IRP, stating that “Basin Electric released a Power Supply Request for Proposals (RFP) in February of 2019 and received proposal packages back in March 2019.”

- a. Please provide a copy of the RFP
- b. Please provide the responses to the RFP
- c. Please provide a summary of the RFP responses, including resource type, size, timing, and price as a levelized cost of energy, if available.

Response:

Data Request 1- SCFEMCEA-3

July 16, 2019

Request: For each of the company's coal-fired electric generating units referred to on page 3 of the IRP, please provide any existing analysis in Basin Electric Power Cooperative's possession comparing the cost of continued operation of the unit with retiring and replacing the unit's energy and capacity with a combination of any of the following energy resources:

- Demand-side management
- Market purchases
- Purchase power agreements
- Existing natural gas combined cycle plant or combustion turbine(s)
- New natural gas combined cycle plant or combustion turbine(s)
- Conversion of existing natural gas combined cycle plant or combustion turbine(s)
- Combined heat and power
- Wind
- Solar
- Geothermal
- Energy storage
- Demand response
- Any combination of the above

Response:

Data Request 1- SCFEMCEA-4

July 16, 2019

Request: Please refer to page 4 of the IRP. Please provide the agreements under which Basin Electric Power Cooperative purchases output from George Neal Station Unit 4, Walter Scott Units 3 & 4, and Boswell Energy Center Unit 4.

Response:

Data Request 1- SCFEMCEA-5

July 16, 2019

Request: Please refer to page 5 of the IRP: “Basin Electric is forecasting its entire member system to grow by more than 1900 MW between 2019 and 2050; with more than 600 MW of this anticipated load growth related to oil development within the Williston Basin area of North Dakota and Montana.” Please provide the referenced load forecast and underlying assumptions.

Response:

Data Request 1- SCFEMCEA-6

July 16, 2019

Request: Please refer to page 5 of the IRP, referencing a power purchase agreement for 200 MW signed in 2016 for the Burke Wind project and a second power purchase agreement signed in 2017 for Prevailing Wind Park. Please provide the power purchase price of wind in each PPA in \$/MWh. If the price is not available in that format, please provide it in the format in which it is available.

Response:

CERTIFICATE OF SERVICE

I, S. Laurie Williams, hereby certify that I have, served or caused to be served copies of the following document on the attached list of persons by electric filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States mail.

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Dated this 16th day of July 2019

/s/ S. Laurie Williams

Staff Attorney

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