

November 30, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E999/PR-16-83

Dear Mr. Wolf:

On April 11, 2015, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Renewable Energy Certificate (REC) Retirement Process for Renewable Energy Standards 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 2015 by June 1, 2016.

Minn. Stat. §216B.1691, subd. 2 requires utilities other than Xcel Energy to obtain at least 12 percent of their Minnesota 2015 retail sales from renewable energy sources. Minn. Stat. §216B.1691, subd. 2 (b) requires Xcel Energy to obtain 18 percent of its 2015 retail sales from renewable energy sources.

The following utilities have filed their 2015 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,
- Interstate Power and Light (IPL),
- 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), and
- Southern Minnesota Municipal Power Agency (SMMPA),

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The Minnesota Department of Commerce, Division of Energy Resources (DOC) reviewed these filings and verified that utilities have complied with the 2015 RES requirement. In total, utilities retired RECs representing 14.9 percent of total Minnesota retail sales in 2015. 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
Rates Analyst

SLP/lt

2015 RES Compliance

Utility	2015 MN Retail Sales MWhs	RES Req. %	RES Req. MWhs	RECs Retired
Basin	648,716	12.0%	77,846	77,846
CMMPA	315,168	12.0%	37,820	37,823
Dairyland Power	810,828	12.0%	97,299	97,300
East River Electric	425,078	12.0%	51,009	51,106
GRE	10,859,935	12.0%	1,303,192	1,303,193
Heartland	646,112	12.0%	77,533	77,535
Interstate Power	486,176	12.0%	58,341	58,523
Interstate Power-SMEC	331,761	12.0%	39,811	39,812
L&O Power Coop	245,674	12.0%	29,481	29,481
Minnesota Power	9,208,645	12.0%	1,105,037	1,105,038
Minnkota	1,534,364	12.0%	184,124	184,124
MMPA	1,434,696	12.0%	172,164	172,164
Missouri River Energy Services	1,273,126	12.0%	152,775	152,776
NW Wisconsin*	517	12.0%		
Otter Tail Power	2,383,370	12.0%	286,004	286,005
SMMPA	2,887,780	12.0%	346,534	346,534
Xcel	30,300,578	18.0%	5,454,104	5,454,105
Total	63,792,007	14.9%	9,473,076	9,473,365

*The Commission has permitted Northwestern Wisconsin to file its RPS compliance filing for Wisconsin to meet its Minnesota RES obligations. For 2015, NW Wisconsin had Minnesota retail sales of 517 MWh's. NW Wisconsin retired RECs equivalent to 14.48 % of its retail sales towards its RPS compliance in Wisconsin.

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/PR-16-83

Dated this 30th day of November 2016

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Alders	james.r.alders@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_16-83_Interested Parties
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	SPL_SL_16-83_Interested Parties
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	SPL_SL_16-83_Interested Parties
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	SPL_SL_16-83_Interested Parties
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_16-83_Interested Parties
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_16-83_Interested Parties
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_16-83_Interested Parties
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Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	SPL_SL_16-83_Interested Parties
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_16-83_Interested Parties
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	SPL_SL_16-83_Interested Parties
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	SPL_SL_16-83_Interested Parties
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
Mike	Eggl	megg1@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	SPL_SL_16-83_Interested Parties
Kristen	Eide Tollefson	N/A	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Paper Service	No	SPL_SL_16-83_Interested Parties
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Cathy	Fogale	cfogale@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_16-83_Interested Parties
Amy	Fredregill	Amy.S.Fredregill@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_16-83_Interested Parties
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	SPL_SL_16-83_Interested Parties
Bryan	Gower	bgower@apx.com	APX, Inc.	N/A	Electronic Service	No	SPL_SL_16-83_Interested Parties
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_16-83_Interested Parties
John	Helmrs	helmrs.john@co.olmsted.mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE Rochester, MN 55904-4744	Electronic Service	No	SPL_SL_16-83_Interested Parties
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_16-83_Interested Parties
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_16-83_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_16-83_Interested Parties
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200 Lakeville, MN 55044	Paper Service	No	SPL_SL_16-83_Interested Parties
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	SPL_SL_16-83_Interested Parties
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_16-83_Interested Parties
Deborah Fohr	Levchak	N/A	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 585030564	Paper Service	No	SPL_SL_16-83_Interested Parties
John	Lindell	john.lindell@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_16-83_Interested Parties
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_16-83_Interested Parties
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_16-83_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ben	Nelson		CMMPA	459 South Grove Street Blue Earth, MN 56013	Paper Service	No	SPL_SL_16-83_Interested Parties
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	SPL_SL_16-83_Interested Parties
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Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_16-83_Interested Parties
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