



Alliant Energy Corporate Services
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Paula N. Johnson
Senior Attorney – Regulatory

August 14, 2013

Dr. Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Interstate Power and Light Company
Docket No. E999/CI-13-542
Comments

Dear Dr. Haar:

Enclosed for e-Filing with the Minnesota Public Utilities Commission, please find Interstate Power and Light Company's Comments in the above-referenced docket.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Office of Attorney General - Residential and Small Business Utilities Division and the attached service list.

Respectfully submitted,

/s/ Paula N. Johnson
Paula N. Johnson
Senior Attorney – Regulatory

PNJ/tao
Enclosures

cc: Service List

Interstate Power and Light Co.
An Alliant Energy Company

Alliant Tower
200 First Street SE
P.O. Box 351
Cedar Rapids, IA 52406-0351

Office: 1.800.822.4348
www.alliantenergy.com

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
J. Dennis O'Brien
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE IMPLEMENTATION
OF SOLAR ENERGY STANDARDS
PURSUANT TO 2013 AMENDMENTS TO
MINNESOTA STATUES, SECTION 216B.1691

DOCKET NO. E999/CI-13-542

AFFIDAVIT OF SERVICE

STATE OF IOWA)
) ss.
COUNTY OF LINN)

Tonya A. O'Rourke, being first duly sworn on oath, deposes and states:

That on the 14th day of August, 2013, copies of the foregoing Affidavit of Service, together with Interstate Power and Light Company's Comments, were served upon the parties on the attached service list, by e-filing, overnight delivery, electronic mail, and/or first-class mail, proper postage prepaid from Cedar Rapids, Iowa.

/s/ Tonya A. O'Rourke
Tonya A. O'Rourke

Subscribed and Sworn to Before Me
this 14th day of August, 2013.

/s/ Kathleen J. Faine
Kathleen J. Faine
Notary Public
My Commission Expires on February 20, 2015

STATE OF MINNESOTA

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IN THE MATTER OF THE IMPLEMENTATION
OF SOLAR ENERGY STANDARDS PURSUANT
TO 2013 AMENDMENTS TO MINNESOTA
STATUTES, SECTION 216B.1691

DOCKET NO. E999/CI-13-542

Statement Providing Justification for Trade Secret Information

Interstate Power and Light Company (IPL) is providing a non-public version of the table of IPL customers to be excluded from SES obligations associated with six specific customers contained in its Comments submitted to the Minnesota Public Utilities Commission (Commission) in the above captioned docket.

The non-public version of the filing contains trade secret information, as defined by section 13.37 subd. 1(b), of the Minnesota Statutes in that the data is the subject of efforts by IPL that are reasonable under the circumstances to maintain its non-disclosure, and derives independent economic value, actual or potential from not being generally known to, and being readily ascertainable by proper means by, other person who can obtain economic value from its disclosure or use. IPL has marked the information pursuant to the Commission's Revised Procedures for handling Trade Secret and Privileged Data. Minn. Rule, pt. 7829.0500.

Specifically, IPL respectfully requests that information in this table, which reflects specifics about six customer's kWh and kW usage in 2012, be treated as trade secret information. Public release of this information would harm IPL and its customers by inappropriately revealing customer-specific information. Because disclosure of the information would compromise IPL's ability to protect customer-specific information, the harm of public disclosure outweighs the benefits of such disclosure.

Accordingly, IPL believes the marked information contained in IPL's filing meets the definition of trade secret under Minn. Stat. § 13.37.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ross	Abbey	abbey@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220 St. Paul, MN 55102-1125	Paper Service	No	SPL_SL_13- 542_Interested Parties
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	SPL_SL_13- 542_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_13- 542_Interested Parties
John	Aune	johna@bluehorizonsolar.com	Blue Horizon Energy	7246 Washington Ave S Eden Prairie, MN 55344	Paper Service	No	SPL_SL_13- 542_Interested Parties
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Paper Service	No	SPL_SL_13- 542_Interested Parties
Thor	Bjork	Thor.S.Bjork@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Paper Service	No	SPL_SL_13- 542_Interested Parties
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Michael J.	Bull	N/A	Center for Energy and Environment	212 Third Avenue North, Suite 560 Minneapolis, MN 55401	Paper Service	No	SPL_SL_13- 542_Interested Parties
Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joel	Cannon	jcannon@tenksolar.com	Tenk Solar, Inc.	9549 Penn Avenue S Bloomington, MN 55431	Electronic Service	No	SPL_SL_13- 542_Interested Parties
John J.	Carroll	jcarroll@newportpartners.com	Newport Partners, LLC	9 Cushing, Suite 200 Irvine, California 92618	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Aakash	Chandarana	Aakash.Chandara@xcenergy.com	Xcel Energy Services Inc.	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Paper Service	No	SPL_SL_13- 542_Interested Parties
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 Southeast 10th St. Bentonville, AZ 72716-5530	Paper Service	No	SPL_SL_13- 542_Interested Parties
Steve	Coleman	scoleman@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S Minneapolis, MN 55406	Paper Service	No	SPL_SL_13- 542_Interested Parties
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Avenue Minneapolis, MN 55403	Paper Service	No	SPL_SL_13- 542_Interested Parties
Chris	Davis	christopher.davis@state.mn.us	Department of Commerce	Suite 500 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	SPL_SL_13- 542_Interested Parties
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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	Yes	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Bill	Droessler	N/A	Izaak Walton League of America-MWO	1619 Dayton Ave Ste 202 Saint Paul, MN 55104	Paper Service	No	SPL_SL_13-542_Interested Parties
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Paper Service	No	SPL_SL_13-542_Interested Parties
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Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Paper Service	No	SPL_SL_13-542_Interested Parties
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Jan	Hubbard	Jan@AppliedEnergyInnovations.org	Applied Energy Innovations, LLC	4000 Minnehaha Avenue South Minneapolis, MN 55406	Paper Service	No	SPL_SL_13-542_Interested Parties
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Ralph	Jacobson	N/A	Innovative Power Systems, Inc.	1413 Hunting Valley Rd Ste 1 Saint Paul, MN 55109-1555	Paper Service	No	SPL_SL_13-542_Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Charlie	Pickard	cpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Donna	Pickard	dpickard@aladdinsolar.com	Aladdin Solar	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	SPL_SL_13- 542_Interested Parties
Gayle	Prest	gayle.prest@minneapolismn.gov	City of Mpls Sustainability	350 South 5th St, #315 Minneapolis, MN 55415	Paper Service	No	SPL_SL_13- 542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kent	Ragsdale	kentagsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_13-542_Interested Parties
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Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue Minneapolis, MN 554061024	Paper Service	No	SPL_SL_13-542_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Paper Service	No	SPL_SL_13-542_Interested Parties
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Kevin	Schwain	Kevin.D.Schwain@xcelenergy.com	Xcel Energy	404 Nicollet Mall Minneapolis, MN 55401	Paper Service	No	SPL_SL_13-542_Interested Parties
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Gary	Shaver	N/A	Silicon Energy	3506 124th St NE Marysville, WA 98271	Paper Service	No	SPL_SL_13-542_Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Avenue South Minneapolis, MN 55408	Paper Service	No	SPL_SL_13-542_Interested Parties
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Erin	Stojan Ruccolo		Fresh Energy	408 Saint Peter St Ste 220 Saint Paul, MN 55102-1125	Paper Service	No	SPL_SL_13-542_Interested Parties
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_13-542_Interested Parties
Deb	Sundin	deb.sundin@xcelenergy.com	Xcel Energy	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	SPL_SL_13-542_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_13-542_Interested Parties
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_13-542_Interested Parties
Jason	Willett	N/A	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Paper Service	No	SPL_SL_13-542_Interested Parties
Daniel	Williams	N/A	Powerfully Green	11451 Oregon Avenue N Champlin, MN 55316	Paper Service	No	SPL_SL_13-542_Interested Parties
Steven	Wishart		Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Paper Service	No	SPL_SL_13-542_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
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Betsy Wergin

Chair
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IN THE MATTER OF THE IMPLEMENTATION
OF SOLAR ENERGY STANDARDS PURSUANT
TO 2013 AMENDMENTS TO MINNESOTA
STATUTES, SECTION 216B.1691

DOCKET NO. E999/CI-13-542

INTERSTATE POWER AND LIGHT COMPANY'S
INITIAL COMMENTS

COMES NOW, Interstate Power and Light Company (IPL), and hereby submits to the Minnesota Public Utilities Commission (Commission) its Initial Comments in the above-referenced docket.

I. INTRODUCTION

On July 25, 2013, the Commission issued, in this Docket, its *Notice of Request for Filings from the Electric Utilities on Customers Excluded from the Solar Standard and Opportunity to Comment on Filings* (Notice). This Notice requires Xcel Energy, Minnesota Power, Otter Tail Power and IPL report certain information with regard to the newly adopted Solar Energy Standards (SES) by August 15, 2013. Specifically, the Commission Notice, at page 1, requested that the Minnesota investor-owned electric utilities submit the following:

1. Minnesota retail electric sales in kWh by major customer classes and in total for 2012. (If the total sales differ from those reported in E-999/PR-13-186, explain the difference.)

2. Calculation of 1.5% of retail electric sales, and 10% of the 1.5% goal, based on 2012 sales.
3. A list of current customers the utility believes will be excluded from their Solar [SES] obligations under 216B.1691, subd. 2f(d)(1) and (2). For each customer, identify the statutory category (i.e., paper mill, saw mill), the customer class, total kWh consumed in 2012, and maximum kW demand; also provide total customer and kWh numbers by class and overall.
4. Description of how the customers to be excluded were identified.
5. Calculation of 1.5% of retail electric sales, and 10% of the 1.5% goal, based on 2012 sales after customer exclusions.
6. An estimate of 1.5% retail sales, and 10% of the 1.5% goal, for 2012, without and with customer exclusions.

IPL provides the following Initial Comments to address the specific information delineated by the Commission's Notice.

II. INITIAL COMMENTS

1. **Minnesota retail electric sales in kWh by major customer classes and in total for 2012. (If the total sales differ from those reported in E-999/PR-13-186, explain the difference.)**

Response

Please see Table 1 below for a breakdown of IPL's Minnesota electric sales as requested. This information does not differ from the sales reported in Docket No. E-999/PR-13-186.

Table 1: Minnesota Retail Electric Sales

Major Customer Class	2012 Actual (kWh)
Residential	319,718,073
Commercial	160,595,824
Industrial	337,508,224
Other*	21,643,836
Total Retail Sales	839,465,957

* streetlights and sales to public authorities

2. Calculation of 1.5% of retail electric sales, and 10% of the 1.5% goal, based on 2012 sales.

RESPONSE

Please see Table 2 below, which shows the requested calculation.

Table 2: 1.5% of Retail Electric Sales and 10% of 1.5% Goal

2012 Retail Electric Sales (kWh)	839,465,957
1.5% requirement (kWh)	12,591,989
10% of 1.5% goal (kWh)	1,259,199

3. A list of current customers the utility believes will be excluded from their [SES] obligations under 216B.1691, subd. 2f(d)(1) and (2). For each customer, identify the statutory category (i.e. paper mill, saw mill), the customer class, total kWh consumed in 2012, and maximum kW demand; also provide total customer and kWh numbers by class and overall.

RESPONSE

Please see Trade Secret Table 3 below, which provides the requested information.

Table 3: IPL Customers to be Excluded from SES Obligations

Customer	Statutory Category	Customer Class	2012 Consumption (kWh)	2012 Maximum Demand (kW)
[TRADE SECRET DATA BEGINS]				

[TRADE SECRET DATA BEGINS]

TRADE SECRET DATA ENDS]

4. Description of how the customers to be excluded were identified.

RESPONSE

These customers were identified by IPL's Minnesota Account Management team and Operations Management personnel, as well as through a search of IPL's customer information database (iAvenue).

5. Calculation of 1.5% of retail electric sales, and 10% of the 1.5% goal, based on 2012 sales after customer exclusions.

RESPONSE

Please see Table 4 below, which shows the requested calculation.

Table 4: 1.5% of Retail Electric Sales with Customer Exclusions

	Before Exclusions	After Exclusions
2012 Retail Electric Sales (kWh)	839,465,957	828,035,797
1.5% requirement (kWh)	12,591,989	12,420,537
10% of 1.5% goal (kWh)	1,259,199	1,242,054

6. An estimate of 1.5% retail sales, and 10% of the 1.5% goal, for 2020, without and with customer exclusions.

RESPONSE

Please see Table 5 below, which provides the requested information. For the 2020 estimate, IPL has increased retail sales values by a proxy 0.8% per year for eight years.

Table 5: 1.5% of Retail Sales in 2020 with Customer Exclusions

	Before Exclusions	After Exclusions
Estimated 2020 Retail Electric Sales (kWh)	901,264,000	888,992,000
1.5% requirement (kWh)	13,518,960	13,334,880
10% of 1.5% goal (kWh)	1,351,896	1,333,488

III. CONCLUSION

IPL respectfully requests the Commission give IPL's Initial Comments due consideration.

DATED this 14th day of August 2013.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

By: /s/ Paula N. Johnson

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