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September 13, 2013

—Via Electronic Filing—

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

RE: SELECTION REPORT-SECOND SUPPLEMENT
RENEWABLE DEVELOPMENT FUND - CYCLE 4
DOCKET NO. E002/M-12-1278

Dear Dr. Haar:

On July 29, 2013 Northern States Power Company, doing business as Xcel Energy, submitted its Selection Report for the Renewable Development Fund – Grant Awarding Cycle 4, and supplemented the report on August 9, 2013. On September 3, the Minnesota Public Utilities Commission issued a Notice of Extended Comment Period and Informational Meeting. In the notice the Commission required this additional supplement.

This report contains information marked as trade secret pursuant to Minn. Stat. § 13.37, subd. 1(b). In particular, the information designated as Trade Secret derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

We have electronically filed this document, and served copies of the public version on the parties on the attached service lists.

If you have any questions regarding this filing please contact me at (612) 330-7529 or paul.lehman@xcelenergy.com.

Sincerely,

/s/

PAUL J LEHMAN
MANAGER, REGULATORY COMPLIANCE AND FILINGS

Enclosures
cc: Service List
Applicants

XCEL ENERGY RENEWABLE DEVELOPMENT FUND

SECOND SUPPLEMENT TO
PROJECT SELECTION REPORT
CYCLE 4

PREPARED BY
XCEL ENERGY

Docket No. E002/M-12-1278
September 13, 2013

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this Second Supplement to its Renewable Development Fund (RDF) Selection Report for Cycle 4. The Selection Report was filed on July 29, 2013. A First Supplement to the Selection Report was filed on August 9, 2013 to provide additional information on the Independent Evaluator's scoring of proposals and evaluations of proposals performed by the advisory group and the Company. Specifically, these comments are intended to provide additional context to the Cycle 4 selection process, address the scoring errors made by our third-party evaluator, Sargent & Lundy, address comments received in this proceeding to date, supplement the record with respect to several projects, and provide our initial reactions to the question of what lessons have been learned so far based on these proceedings.

II. BACKGROUND

We would like to provide some context to our selection methodology that led to the projects we are recommending for funding. There were a large amount of bids received, totaling over $125 million in funding requests.[1] With only $30 million in available funding it was inevitable that many worthy projects would not receive funding. Consequently, difficult choices needed to be made that balanced available funding with identifying a mix of projects that would support the mission of the RDF.

Our selection report was significantly informed by two things: (1) the requirements for our selection process as provided in the RDF Statute, the Commission' February 6, 2013 Order in this Docket and our February 15, 2013 Request for Proposals (RFP) and (2) the number and types of requests for funding we received in Cycle 4 which were significantly different than our past experience. We discuss each below.

A. Selection Criteria

1. Statutory Requirements

Minnesota Statute Section 116C.779 provides the legislative authority for the RDF. Subdivision 1, section (f) provides for the management of the Fund and the Legislature's direction for project selection. Specifically, Minn. Stat. § 116C.779, subd. 1(f) provides, in part:

[1] As noted in our selection report, the Company received approximately $133.5 million in proposals; however four of these proposals were determined to not be eligible for funding.

> The advisory group must be consulted with respect to … evaluating projects submitted in response to a request for proposals. In addition to consulting with the advisory group, the public utility must utilize an independent third-party expert to evaluate proposals submitted in response to a request for proposal, including all proposals made by the public utility…The utility should attempt to reach agreement with the advisory group after consulting with it but the utility has full and sole authority to determine which expenditures shall be submitted to the commission for commission approval. [Emphasis added.]

We believe our selection methodology complies with both the spirit and letter of the statute, especially our agreement with the advisory group's recommendations. The advisory group is made up of disparate members representing the various stakeholders of the RDF, including ratepayers, environmental groups, the Prairie Island Indian Community and the Company.[2] We seek consensus among these different stakeholders to help ensure that our management of the Fund is consistent with its purpose. For Cycle 4, we sought every opportunity for the Company and the advisory group to reach consensus on project selection. Our only deviation from the advisory group's collective recommendations on project selection was the tiered nature of our recommended reserve projects and in which tiers recommended projects were placed. Every project recommended for funding by the Company was also recommended for funding by the advisory group. Consensus among and with the advisory group was a main driver of our project selection process.

2. February 6 Order

Order Point 6 of the Commission's February 6, 2013 Order in this Docket provided detailed requirements for our selection process and are consistent with the RDF Statute. With respect to project selection, Order Point 6 provides, in part:

> c. With input from the Advisory Group, Xcel oversees the project selection process and makes a final project selection recommendation to the Commission.

[2] Tami Gunderzik**,** Xcel Energy
Ben Gerber**,** Minnesota Chamber of Commerce
Eric Jensen, The Izaak Walton League
Kevin Schwain, Xcel Energy
Linda Taylor, Representing the Environmental Community
Lise Trudeau, Minnesota Office of Energy Security
Heather Westra, The Prairie Island Indian Community

> d. Xcel utilizes an independent third-party expert to evaluate project proposals for EP and RD Projects…
>
> e. … The final selection report shall include a detailed explanation of any deviations from the rankings for EP, RD and institutions of higher education projects provided by an independent third-party evaluator or other evaluator.

We believe our selection process was consistent with the Commission's Order. We sought input from the advisory group and our independent third-party evaluator, Sargent & Lundy. Where we deviated from Sargent & Lundy's scores, we documented this in our Selection Report and our First Supplement. We also believe our selection methodology was sufficiently robust as it reflected the input of our third-party evaluator and our stakeholders through the advisory group.

3. RFP

Our RFP reflects a balance between an interest in an objective scoring mechanism to ensure projects are evaluated on a level playing field with the need to perform a subjective review of projects to ensure they reflect the interest of the RDF stakeholders and our customers. While the RFP provides considerable detail with respect to information required to score a project, it also notifies bidders that the objective scoring is just one component of our selection process. The RFP makes clear that "[w]hile Xcel Energy has a desire to fund a diverse mix or resource types, it is not obligated to select projects solely on the basis of project rankings and it is not obligated to fund projects within every technology proposed."[3] We also informed bidders that:

> While these evaluations [*i.e.*, technical scores] will inform the proposal selection process, final selection will be based on both these evaluations and subjective recommendations from the advisory group. This process will ensure that the final portfolio of projects contains a mix of technologies, risk levels, and market penetration time frames, consistent with overall funding availability and requirements for sufficient return on RD investments.[4]

This is consistent with our need to balance technical scoring, which helps us compare projects, with the interests of our stakeholders. While the objective scoring criteria utilized a methodology to compare a wide variety of projects, some subjective review

[3] RFP at p. 33.
[4] *Id.* (emphasis added).

will always be required to ensure that the details of any proposal are appropriate for the RDF. We understood this need and our RFP reflected it.

B. Historic Trends

Cycle 4 represented an evolution in the projects proposed for RDF funding. For this cycle we received significantly more EP projects as a percentage of requests than in any other cycle. Further, we received the highest percentage of bids seeking funding for a single resource, solar, than in any other cycle. Figures 1 and 2 identify these trends.

FIGURE 1: Historic Trends in Project Types (EP & RD)

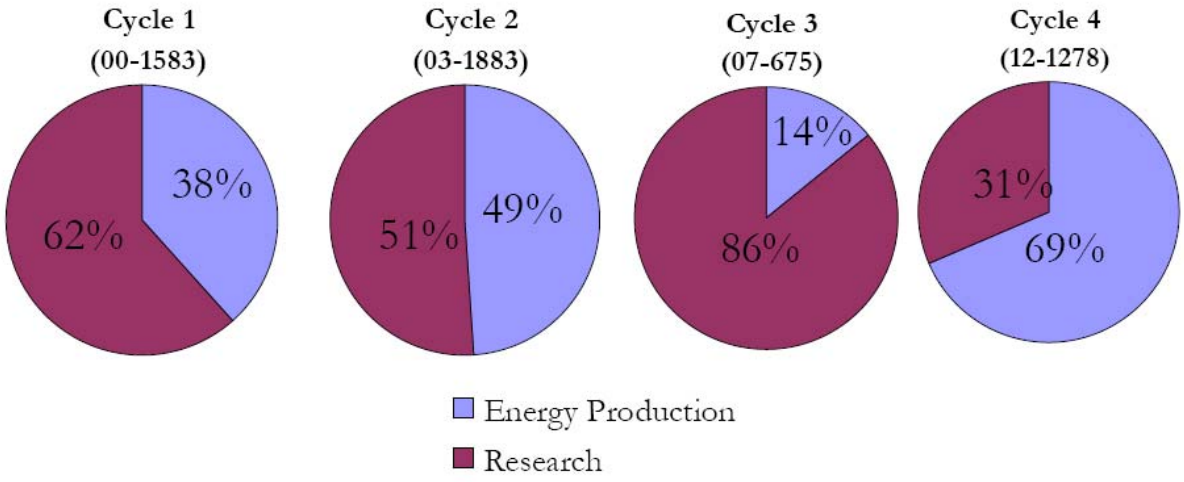
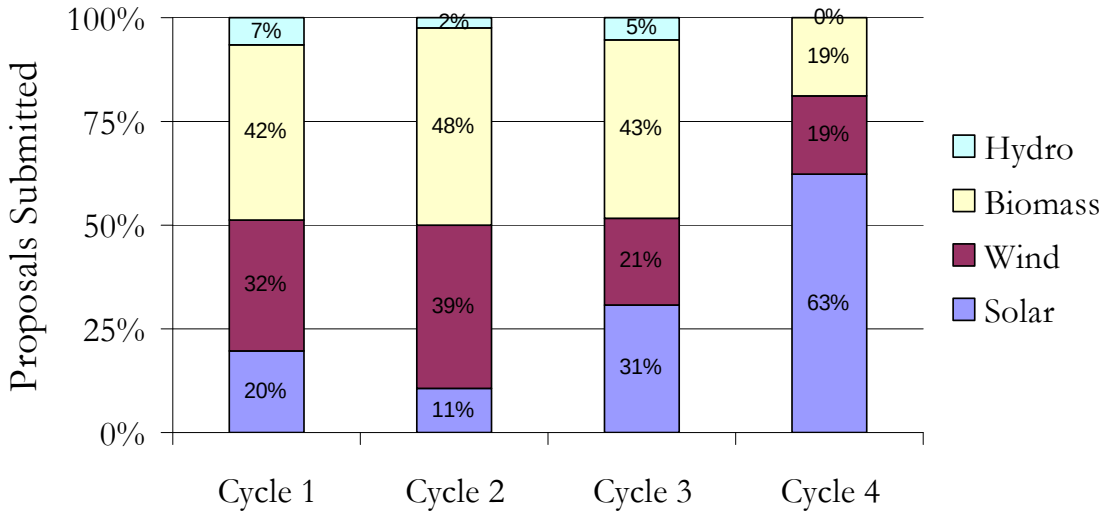


FIGURE 2: Historic Trends in Project Types (by resource)



While we were surprised at the amount of solar installation bids we received, we attribute this to the vast interest in solar development in Minnesota and new legislative mandates for that resource. We believe the concentration of bids for a single type of project – construction of solar panels in a given location – argues for utilizing a more subjective review to account for innovativeness, location, and type of entity gaining solar experience. Further, to ensure that a mix of resources receive funding, deviation from the objective scoring was also required. Our ultimate funding recommendations reflect this fact.

We did not believe that past practice of mitigating the overwhelming requests for funding of one particular resource was appropriate for Cycle 4. Wind was not an allowable technology for energy production proposals in Cycle 3 because the advisory group felt that there were already sufficient incentives for wind (i.e. REPI, federal tax credits, etc) and, therefore, incentives should be directed to other technologies.

For Cycle 4, considering a desire to increase the penetration of solar and with the new legislative mandates for this resource, we believe that a healthy mix of solar production projects is appropriate for Cycle 4. We believe our recommended projects meet the goals of funding a mix of solar projects with ensuring an appropriate mix of other resources are also funded.

III. Sargent & Lundy's Scoring Errors

A. Summary of Errors

Six projects were impacted by Sargent & Lundy's scoring errors along with two projects that were incorrectly scored, but the errors did not impact the resultant score for the project. The following table lists these projects and the scoring error that occurred.

Table 1
RDF Cycle 4 Modified Project Scoring

Project No.	Project Name	Rescoring Action
EP4-22	MN Park and Recreation Board Solar	Project was incorrectly scored regarding the local government sponsor, but they had already maxed out their bonus points so their overall scores were not impacted.
EP4-41	City of Hutchinson Solar	Project was incorrectly scored regarding the local government sponsor bonus; this aspect was not scored correctly and should have received bonus points. They also requested lump payment after *project construction*. Lump sum bonus scoring was only awarded bonus points to proposals that stated they would receive the lump sum as a single payment after *project completion*. The overall score increased by 18.97 to 145.47 and moved from "category 2 " to "category 1" on the independent evaluator list.
EP4-44	Region Five Regional Schools Solar	Project was incorrectly scored regarding the local government sponsor bonus and missed out on the resulting bonus points. The overall score increased by 20 to 158.5 and moved from "category 2 " to "category 1" on the independent evaluator list.
EP4-45	City of Roger Solar	Project was incorrectly scored regarding the local government sponsor, but they had already maxed out their bonus points so their overall scores were not impacted.
RD4-1	University of Minnesota Biomass	Bonus Criteria for the Project being in the Energy Innovation Corridor was not awarded. The overall score increased by 14.79 to 113.37 and moved from "category 2 " to "category 1" on the independent evaluator list.
RD4-12	University of Minnesota Wind Turbine Generated Sound	Bonus Criteria for the Project being in the Energy Innovation Corridor was not awarded. The overall score increased by 19.04 to 145.95 and stayed within "category 1" on the independent evaluator list.
RD4-13	University of Minnesota Virtual Wind Simulator	Bonus Criteria for the Project being in the Energy Innovation Corridor was not awarded. The overall score increased by 20.00 to 155.08 and stayed within "category 1" on the independent evaluator list.
RD4-16	University of Minnesota Large Wind Plant Maintenance Strategies	Bonus Criteria for the Project being in the Energy Innovation Corridor was not awarded. The overall score increased by 10.17 to 78.01 and stayed within "category 3" on the independent evaluator list.

Xcel Energy appreciates the various comments that brought to our attention these errors in scoring. We have since received Sargent & Lundy's revised scoring report and reviewed it with the advisory group. The redline and clean versions of the revised scoring report are included as Attachment A1 and Attachment A2.

We have analyzed the potential impact that the scoring errors may have had on our final selection report. We have also met with a quorum of the advisory group on September 5, 2013 and September 10, 2013 to obtain input on the potential impact the scoring errors may have had on their review and analysis of the projects under the methodology we describe in our First Supplement. We will describe the review efforts of the advisory group later in these comments; however the impact of these scoring errors is discussed here.

With respect to the scoring errors for the City of Rodgers and the Minneapolis Park and Recreation Board Solar projects (EP4-45 and EP4-22), our analysis of Sargent & Lundy's revised scoring report indicates that these two projects did not receive bonus points for being proposed by a local unit of government. However, because both of these projects had already received the maximum allowable bonus amounts due to other aspects of their proposals, these scoring errors did not impact their final technical score. The advisory group has agreed with our analysis.

With respect to the City of Hutchinson project (EP4-41), correcting for the scoring error would have moved the City of Hutchinson project higher in the Sargent & Lundy ranking order from Category 2 to Category 1. As described in our Selection Report and First Supplement and under the advisory group's selection methodology discussed in our First Supplement, the advisory group had already raised this project from its original Category 2 position for additional discussion. Under this approach, the advisory group undertook further, significant discussion of this project and it was ultimately recommended as a reserve project. Neither the Company nor the advisory group believes that if the project had been scored higher it would have received significantly different treatment.

With respect to the Region Five Solar project (EP4-44), correcting for the scoring error would have raised this project from a Sargent & Lundy Category 2 project to a Category 1 project. Under the advisory group's selection methodology, if the project had been scored in the Category 1 group, it would have received discussion as a Category 1 project unless the advisory group would have agreed at the start to remove it from discussion. Conversely, because is was originally listed as a Category 2 project, it only would have had detailed discussion by the advisory group if at least one advisory group member had advocated for it being raised up for further discussion. The advisory group informs us that since this project was not raised from Category 2 for discussion by either of its reviewers, it is unlikely that it would have been selected for funding. However, as a Category 1 project it may have had a better opportunity to be selected as a reserve project. Xcel Energy agrees that this is a reasonable analysis of the impact of the scoring error and continues to work with the advisory group to reach consensus as to the disposition of this project.

With respect to the University of Minnesota Biomass project (RD4-1), correcting for the scoring error would have moved this project higher in the Sargent & Lundy ranking order from Category 2 to Category 1. As such, this project would have been in the same situation as the Region Five project in that it would have been more likely that this project would have received detailed discussion from the advisory group by virtue of being listed as a Category 1 project instead of a Category 2 project. Once again the advisory group informs us that since this project was not raised from Category 2 for discussion by either of its reviewers, it is unlikely that it would have been selected for funding. However, as a Category 1 project it may have had a better opportunity to be selected as a reserve project. Xcel Energy agrees that this also is a reasonable analysis of the impact of the scoring error and continues to work with the advisory group to reach consensus as to the disposition of this project.

With respect to the University of Minnesota Wind projects (RD4-12 and RD4-13), correcting for the scoring errors would have moved these project higher up the Sargent & Lundy list for Category 1 projects. However, even with the incorrect lower scores originally awarded these projects; the advisory group recommended them for funding (subject to working through certain issues identified in our initial selection report filing). Therefore, no further review of these projects is needed at this time.

With respect to the remaining University of Minnesota Wind project (RD4-16), correcting for the scoring error would not have moved this project out of the Sargent & Lundy Category 3 for RD projects. Again because no advisory group member had advocated for it being moved up from Category 3 during the selection meeting, it did not receive a detail discussion. The advisory group informs us that because this project remains a Category 3 project after rescoring it is unlikely that they would have raised it to a higher category for detail discussion and thus the change in scoring would not have changed the selection review outcome for this project. That being to not fund it nor to place it on the reserve list.

Based on the work to date, the advisory group has recommended to us that the scoring errors from the work of the independent evaluator do not impact the projects they have recommended for funding (as mentioned previously, additional information on the advisory group evaluation is provided later in this supplement).

However, the corrections to the scoring of a few of the projects may impact the advisory group's recommendations with respect to projects they recommend be placed on the reserve list. After these discussions and further review, Xcel Energy agrees with and supports the advisory group's recommendation. We will continue our discussions with the advisory group and propose any changes to our recommended reserve project selections after the advisory group has completed their deliberations.

B. Advisory Group Evaluation of Scoring Errors

A quorum of the advisory group met on September 5, 2013 and September 10, 2013 to review the revised Sargent & Lundy scoring report and discuss the potential impact of scoring errors on the six projects that were affected by the revised scores. The advisory group initially discussed whether the revised scoring would have impacted the list of recommended projects. The advisory group reaffirmed its selection of EP and RD projects for funding and determined that it would request no changes to the list provided in the Selection Report. The advisory group reached this conclusion by first affirming that each project they originally placed on the list for funding was still appropriate to keep on the list. This combined with a well publicized limit of $30 million of available award funds results in the list of projects to be funded remaining the same.

The advisory group then turned to the list of projects for reserve funding to determine if any revisions were appropriate given the revised scoring. After a detailed discussion of each of the remaining four proposals (two of the eight were not discussed as they were already recommended for funding; the other two were not discussed because the scoring error did not impact the project's score), the advisory group reached a consensus that it was appropriate to add the Region Five Development project (EP4-44) and the University of Minnesota Large Wind Plant Maintenance project (RD4-1) to the EP and RD reserve funding lists, respectively. With this opportunity to revisit the list of reserve projects, the advisory group also reiterated its view that the projects on the reserve list be only one categorization of projects for reserve funding (no separation into Tier 1 and Tier 2 as the Company recommends). As a final step, the advisory group provided the Company their recommendations as to where on the reserve projects list the Region Five and U of M Wind proposals should fall. While there was some difference in views amongst advisory group members, as a whole the advisory group ranked both projects at or near the bottom of the list in terms of priority for funding.

IV. RESPONSE TO COMMENTS

As of the review period of this Second Supplement,[5] several comments have been received by the Commission with respect to our Selection Report and First Supplement. We take this opportunity to briefly respond to these comments so that the parties may be fully informed for the remainder of the comment period. As

[5] The Company has reviewed and is providing these initial responses to comments received through September 12, 2013. The Company is aware that additional comments have been submitted after that date, but the Company has not had sufficient time to review and reply to these comments.

additional comments are submitted to the record, we will provide more detailed responses in any reply comments we may file.

A. PowerWorks Wind Turbines (EP4-33)

We appreciate PowerWorks' comments. We believe that a fair balance between technical scoring and more subjective factors was undertaken by the advisory group and the Company and do not believe that our selection process was improper.

Due to limited supply of grant funds, we were not able to recommend all worthy projects. As described in our First Supplement to the Selection Report, EP4-33 was not recommended for funding due to the advisory group's determination that PowerWorks' proposal to install refurbished wind turbines was not promoting the utilization of new technologies and therefore not significantly unique to support with RDF funding. Notwithstanding PowerWorks' relatively high technical score, the advisory group determined that another wind project utilizing "small wind" turbines were more appropriately supported by the RDF as an emerging technology. We believe that this is consistent with the four competing legislative criteria of the RDF Statute.

As discussed in Section II of this Second Supplement, Xcel Energy believes that is has complied with both the legislative requirements and the Commission's requirements for project selection. Further, we have fully discussed the reasons why each project we recommended for funding was selected in our Selection Report and why certain higher scored projects were not recommended for funding in our First Supplement. Our Selection Report and First Supplement also provide full disclosure of the advisory group's recommendations and the Company support or deviations from such recommendations.

B. Oak Leaf Energy Partners (EP4-48)

We believe that this was a strong proposal and was placed on the reserve list so that if additional funds became available we could be able to do so. However, we do not believe the proposal was sufficiently more innovative or visible as compared to other solar initiatives. We discussed this concern in our Selection Report and First Supplement.

Of the ten solar projects recommended for funding, eight accepted the standard grant contract form. These included several proposals that would have utilized a third party developer at a host site, much like EP4-48. Of the two recommended solar projects that did not accept the standard grant contract form, we believe that they will be more

visible based on location or their sponsors' marketing capabilities and proposed strategy to communicate the project to the public.

As noted in the comments of the Metropolitan Council for this project, we did advise potential bidders that we welcome all bids and were willing to work with bidders on their contracting issues. However, we have stated a preference for utilizing the standard form grant contract for a variety of reasons. This was a stated as a lesson learned from Cycle 3 in our petition to the Commission. We also notified all bidders that "Xcel Energy prefers that all sponsors of selected projects enter into the attached Standard Grant Contract Terms and Conditions" in our RFP. We believe that a project should have significant other advantages to overcome this preference. Given that eighty percent of the solar projects recommended for funding accepted the standard grant contract, we believe we have adhered to this preference. The advisory group's analysis, which we support, identified only two solar projects whose features outweighed our preference for no contract amendments. While we believe that EP4-48 is a worthy project, due to limited funds it was not recommended for funding and instead recommended as a reserve project.

C. DragonFly Solar (EP4-29)

We thank DragonFly for their comments as they identified errors in our Selection Report and First Supplement that we wish to correct. Much like EP4-48, we believe that EP4-29 is a strong proposal and have recommended it as a reserve project for that reason.

By way of background, Dragonfly sponsored two projects that bid into the Cycle 4 RFP: EP4-29 and EP4-30. We had accidently mislabeled an electronic version of DragonFly's EP4-30 proposal when distributed to the advisory group and other participants. DragonFly did not provide an electronic version for EP4-29. This led to some confusion when the projects were being discussed. Given DragonFly's comments, we wanted to ensure that we had not accidently reviewed the project with erroneous information. At the advisory group's September 10, 2013 meeting, we discussed this issue with the advisory group. Every member of the advisory group and Company representatives present at the selection meeting reviewed DragonFly's proposal and determined that while there was confusion at the selection meeting, that confusion had been cleared up prior to discussion of the respective proposals and that the EP4-29 was recommended as a reserve project based on its actual merits. However, when preparing the Selection Report First Supplement, the original labeling error issue continued into the meeting notes which resulted in an incorrect documentation in the Selection Report First Supplement of the advisory group's discussion of EP4-29's merits. We apologize for the confusion and are working on better tracking procedures to mitigate this issue in the future.

Based on the proposal, we believe that EP4-29 was sufficiently strong to warrant being recommended as a reserve project. However, the project did not garner unanimous support from the advisory group and was, therefore, not ultimately recommended for initial funding.

D. AF Energy Corporation (RD4-6)

As discussed in this Second Supplement, we received significantly more energy production proposals than research proposals. However, available funds for research projects still outstripped available funding. Consequently, not all proposals could be funded.

The concept to increase efficiency of small vertical axis wind turbines did not garner significant support from the advisory group. As described in our Selection Report First Supplement, this proposal did not sufficiently justify its grant request above the recommended $1 million amount which was a major omission given the other aspects of this proposal as viewed by the advisory group. The advisory group did not believe that the proposal was advancing research sufficiently superior to other proposals to justify a significant share of the RDF funds available for research. As noted in our selection report, we believe that many of the research proposals we recommended for funding are consistent with the needs and interests of the RDF's stakeholders.

We further believe that it would be inappropriate to provide bidders an opportunity to amend their proposals in light of our funding recommendations and Selection Report and First Supplement. This would not provide any closure to the selection process.

E. City of Hutchinson (EP4-41)

As noted, we appreciate the City bringing Sargent & Lundy's scoring errors to our attention. We note that the City and all interested parties will have an opportunity to come before the Commission as it makes its decision on our funding recommendations.

F. Region Five Development Commission (EP4-44)

As discussed we also appreciate the Development Commission bringing Sargent & Lundy's scoring errors to our attention. In response to their comments, we wish to note that the Commission retains the authority to order the Company to award grant funding based solely on the technical scoring if it believes that is appropriate. However, we believe that our recommendations provide an appropriate mix of projects to encourage the penetration of renewable resources in Minnesota. Proposals

were evaluated and selected through a robust and stringent process that included evaluation and recommendations from the independent RDF advisory group.

V. ADDITIONAL INFORMATION

As part of this Second Supplement, we would also like to provide some clarification to some of the information presented in our First Supplement to ensure a complete record is developed with respect to our selection methodology.

A. Natural System Utilities/Michael Foods (EP4-37)

In our First Supplement we noted that the overall costs associated with this proposal was quite high. We wish to further add that we recommended for funding a different, but higher cost with equivalent technical score, biomass proposal submitted by Mondovi Energy Systems (EP4-9) because it was somewhat more innovative and complete than EP4-37. Specifically, EP4-9 proposed a more community-wide concept to use a variety of feed stocks that ranged from waste products from commercial processing, the food industry, and agricultural manures.

B. City of Hopkins (EP4-2)/City of Rogers (EP4-45)

Both of these projects proposed to install solar arrays on the roofs for several buildings; 475 kW on four buildings and 631 kW on four buildings, respectively. In our First Supplement we explained that these proposals were not selected, in part, because they were not sufficiently different from solar proposals with higher scores. We wish to further add that we believe that lower scored projects that were recommended for placement on the reserve list did have unique attributes that differentiated them from EP4-2 and EP4-45. For example, the City of Hutchinson (EP4-41) proposed a solar installation at a unique location, a capped landfill, which posed novel technical issues and utilized a vacant area with minimal development potential that appeared worthy of funding. As another example, Oak Leaf (EP4-48) proposed a significantly large, behind-the-meter facility which would utilize unique feeder methodologies. On balance, we believe that the Hopkins and Rogers proposals did not overcome their similarity to other roof-mounted proposals while some lower scored proposals better demonstrated unique attributes.

C. Xcel Energy Proposals

To ensure a complete record in this proceeding, we wish to note that both of the projects proposed by Xcel Energy were subject to the same selection process outlined in the RFP as all other projects and neither of the Company sponsored projects were recommended for funding. Instead, one project (RD4-4) was recommended as a

reserve research project. This is in contrast to the considerable grant the Company received in Cycle 3.

As discussed in our Selection Report First Supplement, care was taken to not assign review of any proposals to advisory group members (including the Company's advisory group members) for which there might be a perceived conflict of interest.

V. LESSONS LEARNED

Although we usually provided lessons learned after the completion of a selection cycle, we believe that the current process has been sufficiently instructive to inform the record with some preliminary lessons learned with respect to the selection process. We look forward to comments and further input from interested parties through this proceeding on how to improve future funding cycles. The Company is still evaluating the lessons learned from this RDF cycle, and we anticipate providing more lessons learned in future filings.

A. Narrower RFP

Given that this Cycle has shifted the RDF's funding further toward energy production projects, it may make sense to have more frequent and smaller funding cycles with more narrowly tailored RFPs. This would allow us, with the advice of the advisory group, to better tailor technical scoring criteria to evaluate a narrow range of similar projects instead of the more broad technical scoring criteria used in Cycle 4 that were intended to be used to compare a broad range of disparate projects.

B. Scoring Accuracy

In light of the scoring errors that have occurred, consideration should be given to including an internal review step with respect to the independent evaluator's technical scoring results. This was not able to take place in the Cycle 4 evaluation process because of the compressed time schedule involved, but this step may have improved the scoring accuracy.

C. Documentation of Bonus Criteria/Bidder Self Scoring

Applicants should document and demonstrate that their proposal qualifies for any bonus points that may be available. In all cycles this has been a requirement to received bonus points for sponsorship from the Prairie Island Indian Community. The expansion of this requirement to all bonus criteria would prevent the misinterpretation by the evaluators or the explanation being buried deep within a proposal.

Further, providing bidders with the ability to self score their proposals would give greater insight to the evaluators of how a proposal was responsive to the scoring matrix. The independent evaluator would still need to evaluate the proposal on its merits, but may have less need to interpret certain aspects of the proposals.

VI. CONCLUSION

As demonstrated in this Second Supplement, the Cycle 4 selection process reflected the statutory and Commission ordered processes for project selection; was driven by the unique pool of proposals evaluated; and, was sufficiently robust to overcome errors made in the scoring process. Through this process, the projects selected by the Company to be funded and the projects to be held in reserve for funding are well suited for use of the RDF fund and meet the objectives of the program.

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SUMMARY

Sargent & Lundy, L.L.C. (Sargent & Lundy) conducted an evaluation of the proposals that were submitted to Xcel Energy seeking funding from Xcel Energy's Renewable Development Fund (RDF) in the 4th funding cycle. We developed an evaluation approach based on a framework developed by Xcel Energy, performed numerical scoring of each of the Energy Production (EP) and Research and Development (RD) proposals, and ranked the proposals. The following report describes the tasks performed to complete our evaluation.

Approach

The following broad tasks were conducted during the evaluation process of the EP and RD proposals:

- Task 1: Prepare Scoring and Evaluation Methodology
- Task 2: Technical Evaluation and Scoring of Proposals
- Task 3: Ranking of Proposals
- Task 4: Recommendation of Proposals

TASK 1: PREPARE SCORING AND EVALUATION METHODOLOGY

Based on the evaluation metrics and scoring framework found in the RDF Program's 4th Cycle Request for Proposals (RFP) issued February 15, 2013, Sargent & Lundy developed a set of objective scoring interpretations that focused on proposal completeness, technical feasibility and completeness, project technical and financial risk, and benefits to Xcel Energy ratepayers. The following core criteria areas and maximum point values are shown in Table 1. More details on the metrics that make up each core criteria and bonuses are found in Xcel Energy's RFP.

Table 1 — Core Criteria and Point System

Core Criteria	Maximum Possible Points	
	RD Projects	EP Projects
Project Method, Scope, and Deliverables	20.00	20.00
Technical Requirements	70.00	70.00
Management Team, Schedule, and Cost	30.00	30.00

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Core Criteria	Maximum Possible Points	
	RD Projects	EP Projects
Potential Benefits to Minnesota and Ratepayers	80.00	20.00
Total Resource Cost per kWh (EP only)	0.00	60.00
Core Criteria Score	**200**	**200**
Maximum Bonus Points Allowed	30	30
Overall Total	**230**	**230**

Xcel Energy provided numerical scoring ranges, point value descriptions, and weighting factors for each metric. The following figure shows the point value descriptions used to evaluate each metric.

Figure 1 — Description of Metric Ratings and Points

Metric Ratings	Evaluation Definitions	Points Awarded
Superior	Demonstrates exceptional level of performance and provides something extra or innovative	4
Excellent	Effective response that can achieve all requirements. No obvious risks or issues.	3
Good	Response minimally supports the requirement, some issues exist that may impact results.	2
Fair	Contains weakness that will limit achievement of requirement or poor plan to mitigate risk.	1
Unsatisfactory	Cannot be achieved due to a critical issue or no response.	0

The Sargent & Lundy project team reviewed and discussed the ratings prior to scoring to establish a common understanding; for example, we used the rating of "excellent" for evaluation criteria that had no issues or risks; this rating served as our 'starting point'. For any evaluation criteria in which we identified flaws or critiques, we assigned a rating (and respective points) of "good", "fair", or "unsatisfactory" depending on the risk significance and/or lack of response. We decided to use ratings of "superior" on responses that were above expectations and/or contained extra levels of detail. To simplify the granularity of scoring, only whole number points were awarded during evaluation. These rating decisions were

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adopted by the Sargent & Lundy evaluation team so as to evaluate using a high level of objectivity and consistency. All but two of the metrics were evaluated on a proposal-by-proposal basis (i.e. the awarded points did not depend on the outcome of the other proposals). The cost sharing metric and total resource cost (on a $/kWh basis for EP proposals) were evaluated as a group of either EP or RD proposals (discussed further in the following pages).

Several metrics required a different type of scoring system. For these cases, supplemental definitions of each rating were developed in order for consistent evaluation across technologies and evaluators. For example, the metric that covers "the extent to which the proposed project financing is based on sources of debt and equity" was given the following supplemental rating definitions shown in the following table:

Figure 2 — Sample of Supplemental Rating Definitions for Project Financing Risk

Points Awarded	Description
4	Complete lump sum RDF grant disbursement at end of project completion
3	Grant amount is disbursed throughout the project after demonstrated project milestone completions, and percentage of payment is reasonable with the milestone completed.
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The metrics for cost sharing and total resource cost (TRC) were appraised as a group (either within EP or RD) on a quantitative basis. The comparison of cost sharing and TRC of the entire group gave the resulting distinction between the awarded points for these metrics.

Cost sharing, as a percentage of total project (construction and equipment) cost funded by sources other than the RDF grant, was evaluated where higher cost sharing resulted in higher awarded points (i.e. 0% cost sharing was awarded 0 points and higher percentages of cost sharing were awarded from 1 up to 4 points). More details on the point breakdown are found in the Task 3 Section of this write-up.

Total resource cost, as a measure of the levelized cost of energy on a $/kWh basis over the project development, construction and operation, was calculated for each EP proposal. The contributors to the TRC are: development, construction, and equipment costs; PPA costs (measured as the difference between PPA price and market energy price); emissions costs (for biomass proposals); and operations and

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maintenance costs. A discount rate of [redacted] and a marginal energy price of [redacted] per MWh were used as directed by Xcel Energy. A 15 year evaluation period was used because nearly all of the proposals requested 15 year PPAs. Several proposals requested shorter PPA durations, but the maximum allowed PPA under this evaluation was 15 years.

The difference between the requested PPA energy price and the marginal energy price was evaluated based on the generation of the project and percentage of energy sold to Xcel Energy. Operating costs, when included in a proposal, were levelized over the PPA duration. When operating costs were not included in a proposal, O&M costs as shown in Table 2 were assumed for a project and applied over the PPA duration. The O&M costs shown in Table 1 are from publicly available studies/reports and were inflated to 2013 dollars based on the Gross Domestic Product Implicit Price Deflator.[1] Emissions costs (for biomass proposals) were evaluated based on the submitted emissions rates (lb/kWh) found in the grant application and the emissions costs ($/ton) found in Table A of the Xcel Energy RFP.

Table 2 — O&M Costs by Technology Type

Technology Type	Fixed O&M (2013$/kW-yr)	Variable O&M (2013$/MWh)	Source
Biomass		98.58	(1)
Solar	24.73		(2)
Wind	20.54		(3)

1. USDA. October 2007. An Analysis of Energy Production Costs from Anaerobic Digestion Systems on U.S. Livestock Production Facilities
2. U.S. Department of Energy. February 2012. SunShot Vision Study.
3. American Wind Energy Association. 2011 U.S. Small Wind Turbine Market Report.

All components of the TRC were levelized, summed, and evaluated over the amount of generation expected during the PPA. A resulting TRC per kWh allows for comparison amongst all EP proposals.

Each of the five bonus criteria (worth 20 points each) were evaluated and given either a “yes” or “no”. The total bonus score was summed according to the RFP where a proposal could receive a maximum score that was lesser of 15% of the core criteria score or the sum of the bonuses.

[1] Gross Domestic Product: Implicit Price Deflator. U.S. Department of Commerce: Bureau of Economic Analysis. May 30, 2013

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TASK 2: TECHNICAL EVALUATION AND PRELIMINARY SCORING

All proposals were evaluated and scored by the Sargent & Lundy team using the evaluation methodology described in Task 1. The six members of the Sargent & Lundy project team are all degreed engineers, most of who are also licensed Professional Engineers (in Illinois). The biomass and wind proposals were evaluated by our biomass expert and wind expert, respectively. The remaining solar proposals were split amongst the team. Daily discussions and periodic internal meetings were held during the several week evaluation period to fine-tune the scoring methodology to achieve consistency in the evaluations. To further ensure objectivity and quality of work, one of the Sargent & Lundy team members independently evaluated and scored several proposals that had already been scored. All evaluation scores and comments were tracked in a common model so all evaluators could view completed proposal evaluations and compare the individual metric scores. Final scoring that includes the impact of cost sharing and total resource cost is discussed in Task 3.

TASK 3: FINAL SCORING AND RANKING OF PROPOSALS

We compiled the level of cost sharing and total resource cost of all of the proposals into a database and evaluated these criteria by sorting and ranking them. The cost sharing and total resource cost metrics were awarded points based on where they fell in the distribution of the values.

The cost sharing metric for EP proposals was awarded points according to the following breakdowns in Table 3. The breakdowns were based on reasonable groupings of proposals in the cost sharing ranges as shown.

Table 3 — Scoring of Cost Sharing for EP Proposals

Cost Sharing Range	Points Awarded	Number of Proposals
70% or greater cost sharing	4	6
45% – 70%	3	21
25% – 45%	2	9
10% – 25%	1	4
0% – 10%	0	6

The cost sharing metric for RD proposals was awarded points according to the following breakdowns in Table 4. The breakdowns were based on reasonable groupings of proposals in the cost sharing ranges as shown.

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Table 4 – Scoring of Cost Sharing for RD Proposals

Cost Sharing Range	Points Awarded	Number of Proposals
70% or greater cost sharing	4	1
45% – 70%	3	2
15% – 45%	2	3
1% – 15%	1	2
0% – 1%	0	10

The total resource cost metric for EP proposals was awarded points on the difference between the respective proposal's TRC and the average TRC of the group. The points were awarded based on standard deviations from the average as shown in Table 5. The average (excluding several outliers) TRC for the EP proposals was $0.187 per kWh.

Table 5 — Scoring of Total Resource Cost for EP Proposals

Total Resource Cost Range ($ / kWh)	Standard Deviation Range	Points Awarded	Number of Proposals
0 – 0.137	-2 to -1	4	4
0.138 – 0.188	-1 to 0	3	21
0.189 – 0.246	0 to 1	2	8
0.247 – 0.298	1 to 2	1	6
0.299+	2+	0	7

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The final TRC values from lowest to highest are shown in the following table with the awarded point score.

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Table 6 — Total Resource Cost Results

Points Awarded	TRC ($/kWh)
4	0.089
4	0.121
4	0.127
4	0.128
4	0.128
4	0.133
3	0.138
3	0.142
3	0.146
3	0.149
3	0.152
3	0.154
3	0.156
3	0.157
3	0.160
3	0.164
3	0.166
3	0.168
3	0.169
3	0.171
3	0.174
3	0.180
3	0.180
3	0.186
2	0.189
2	0.193
2	0.195
2	0.197
2	0.198
2	0.198
2	0.196
2	0.225
2	0.232
2	0.247
1	0.252
1	0.260
1	0.271
1	0.277
1	0.286
0	0.299
0	0.341
0	0.504
0	0.563
0	0.966
0	3.064
0	3.775

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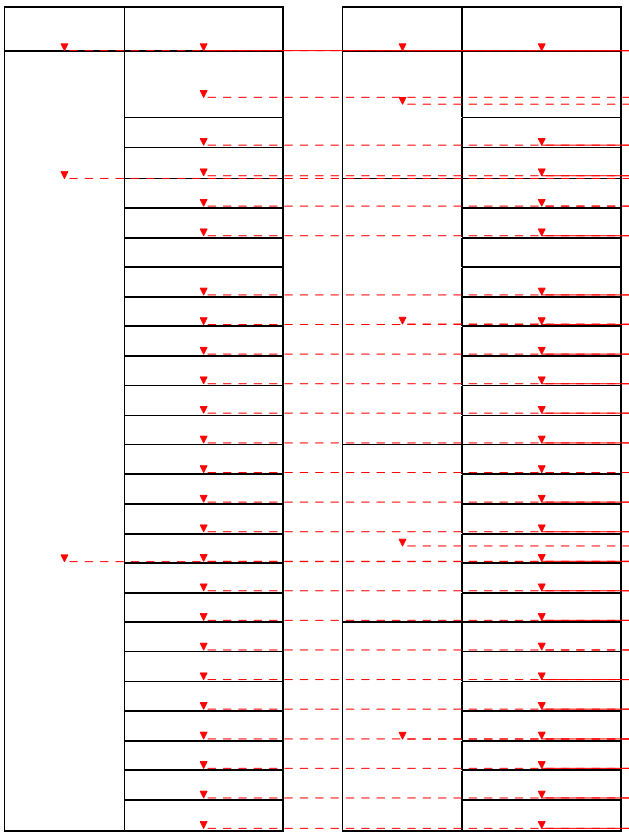

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Once we completed the scoring, we ranked the EP and RD proposals by overall score. The final scoring distributions for EP and RD proposals are shown in Figure 3 and Figure 4, respectively.

Figure 3 — Final Scoring Distribution for EP Proposals

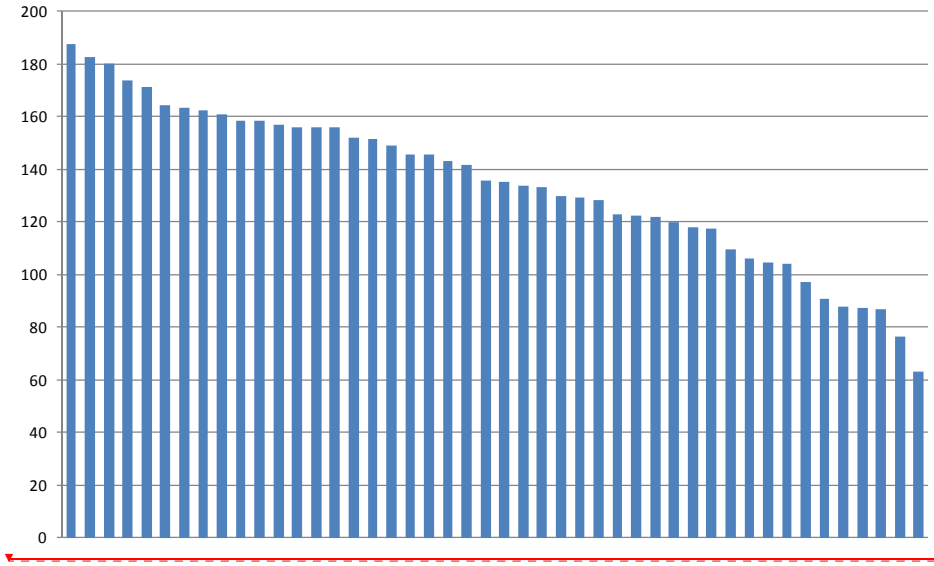
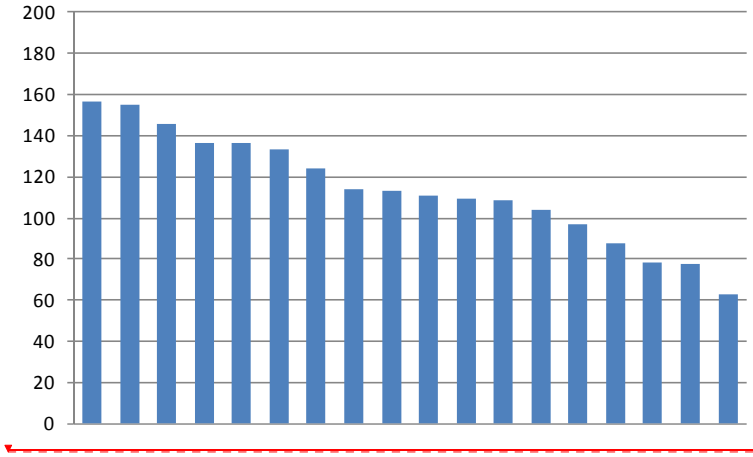


Figure 4 — Final Scoring Distribution for RD Proposals



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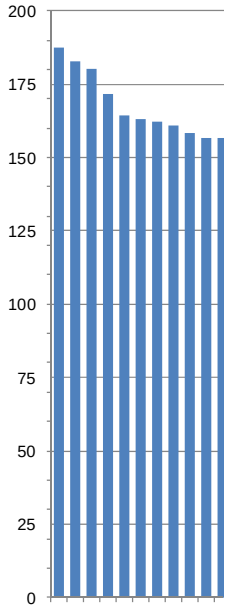

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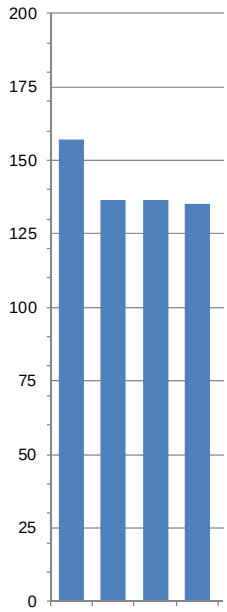

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TASK 4: RECOMMENDATION OF PROPOSALS

The overall scores provide an objective means to rank the proposals. We also categorized the proposals as "top tier" and "lower tier". The top tier list includes proposals that Sargent & Lundy believed to be reasonably complete in project scope and definition, technically sound, financially viable, and consistent with the RDF program goals and requirements. The lower tier list includes proposals that scored poorly. The most common causes of poor scores were: uncompetitive pricing; low portion of cost sharing; and poorly defined project approach, scope, or deliverables.

Sargent & Lundy ensured that the order of final proposal ranking also was consistent with the our recommendations (i.e., the final proposal ranking order from largest score to smallest score also lined up with the order from "top tier" to "lower tier").

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Points Awarded

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TRC
($ / kWh)

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SUMMARY

Sargent & Lundy, L.L.C. (Sargent & Lundy) conducted an evaluation of the proposals that were submitted to Xcel Energy seeking funding from Xcel Energy's Renewable Development Fund (RDF) in the 4th funding cycle. We developed an evaluation approach based on a framework developed by Xcel Energy, performed numerical scoring of each of the Energy Production (EP) and Research and Development (RD) proposals, and ranked the proposals. The following report describes the tasks performed to complete our evaluation.

Approach

The following broad tasks were conducted during the evaluation process of the EP and RD proposals:

- Task 1: Prepare Scoring and Evaluation Methodology
- Task 2: Technical Evaluation and Scoring of Proposals
- Task 3: Ranking of Proposals
- Task 4: Recommendation of Proposals

TASK 1: PREPARE SCORING AND EVALUATION METHODOLOGY

Based on the evaluation metrics and scoring framework found in the RDF Program's 4th Cycle Request for Proposals (RFP) issued February 15, 2013, Sargent & Lundy developed a set of objective scoring interpretations that focused on proposal completeness, technical feasibility and completeness, project technical and financial risk, and benefits to Xcel Energy ratepayers. The following core criteria areas and maximum point values are shown in Table 1. More details on the metrics that make up each core criteria and bonuses are found in Xcel Energy's RFP.

Table 1 — Core Criteria and Point System

Core Criteria	Maximum Possible Points	
	RD Projects	EP Projects
Project Method, Scope, and Deliverables	20.00	20.00
Technical Requirements	70.00	70.00
Management Team, Schedule, and Cost	30.00	30.00

Core Criteria	Maximum Possible Points	
	RD Projects	EP Projects
Potential Benefits to Minnesota and Ratepayers	80.00	20.00
Total Resource Cost per kWh (EP only)	0.00	60.00
Core Criteria Score	**200**	**200**
Maximum Bonus Points Allowed	30	30
Overall Total	**230**	**230**

Xcel Energy provided numerical scoring ranges, point value descriptions, and weighting factors for each metric. The following figure shows the point value descriptions used to evaluate each metric.

Figure 1 — Description of Metric Ratings and Points

Metric Ratings	Evaluation Definitions	Points Awarded
Superior	Demonstrates exceptional level of performance and provides something extra or innovative	4
Excellent	Effective response that can achieve all requirements. No obvious risks or issues.	3
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maintenance costs. A discount rate of [redacted] and a marginal energy price of [redacted] per MWh were used as directed by Xcel Energy. A 15 year evaluation period was used because nearly all of the proposals requested 15 year PPAs. Several proposals requested shorter PPA durations, but the maximum allowed PPA under this evaluation was 15 years.

The difference between the requested PPA energy price and the marginal energy price was evaluated based on the generation of the project and percentage of energy sold to Xcel Energy. Operating costs, when included in a proposal, were levelized over the PPA duration. When operating costs were not included in a proposal, O&M costs as shown in Table 2 were assumed for a project and applied over the PPA duration. The O&M costs shown in Table 1 are from publicly available studies/reports and were inflated to 2013 dollars based on the Gross Domestic Product Implicit Price Deflator.[1] Emissions costs (for biomass proposals) were evaluated based on the submitted emissions rates (lb/kWh) found in the grant application and the emissions costs ($/ton) found in Table A of the Xcel Energy RFP.

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3. American Wind Energy Association. 2011 U.S. Small Wind Turbine Market Report.

All components of the TRC were levelized, summed, and evaluated over the amount of generation expected during the PPA. A resulting TRC per kWh allows for comparison amongst all EP proposals.

Each of the five bonus criteria (worth 20 points each) were evaluated and given either a “yes” or “no”. The total bonus score was summed according to the RFP where a proposal could receive a maximum score that was lesser of 15% of the core criteria score or the sum of the bonuses.

[1] Gross Domestic Product: Implicit Price Deflator. U.S. Department of Commerce: Bureau of Economic Analysis. May 30, 2013

TASK 2: TECHNICAL EVALUATION AND PRELIMINARY SCORING

All proposals were evaluated and scored by the Sargent & Lundy team using the evaluation methodology described in Task 1. The six members of the Sargent & Lundy project team are all degreed engineers, most of who are also licensed Professional Engineers (in Illinois). The biomass and wind proposals were evaluated by our biomass expert and wind expert, respectively. The remaining solar proposals were split amongst the team. Daily discussions and periodic internal meetings were held during the several week evaluation period to fine-tune the scoring methodology to achieve consistency in the evaluations. To further ensure objectivity and quality of work, one of the Sargent & Lundy team members independently evaluated and scored several proposals that had already been scored. All evaluation scores and comments were tracked in a common model so all evaluators could view completed proposal evaluations and compare the individual metric scores. Final scoring that includes the impact of cost sharing and total resource cost is discussed in Task 3.

TASK 3: FINAL SCORING AND RANKING OF PROPOSALS

We compiled the level of cost sharing and total resource cost of all of the proposals into a database and evaluated these criteria by sorting and ranking them. The cost sharing and total resource cost metrics were awarded points based on where they fell in the distribution of the values.

The cost sharing metric for EP proposals was awarded points according to the following breakdowns in Table 3. The breakdowns were based on reasonable groupings of proposals in the cost sharing ranges as shown.

Table 3 — Scoring of Cost Sharing for EP Proposals

Cost Sharing Range	Points Awarded	Number of Proposals
70% or greater cost sharing	4	6
45% – 70%	3	21
25% – 45%	2	9
10% – 25%	1	4
0% – 10%	0	6

The cost sharing metric for RD proposals was awarded points according to the following breakdowns in Table 4. The breakdowns were based on reasonable groupings of proposals in the cost sharing ranges as shown.

Table 4 – Scoring of Cost Sharing for RD Proposals

Cost Sharing Range	Points Awarded	Number of Proposals
70% or greater cost sharing	4	1
45% – 70%	3	2
15% – 45%	2	3
1% – 15%	1	2
0% – 1%	0	10

The total resource cost metric for EP proposals was awarded points on the difference between the respective proposal's TRC and the average TRC of the group. The points were awarded based on standard deviations from the average as shown in Table 5. The average (excluding several outliers) TRC for the EP proposals was $0.187 per kWh.

Table 5 — Scoring of Total Resource Cost for EP Proposals

Total Resource Cost Range ($ / kWh)	Standard Deviation Range	Points Awarded	Number of Proposals
0 – 0.137	-2 to -1	4	4
0.138 – 0.188	-1 to 0	3	21
0.189 – 0.246	0 to 1	2	8
0.247 – 0.298	1 to 2	1	6
0.299+	2+	0	7

The final TRC values from lowest to highest are shown in the following table with the awarded point score.

PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED
*Black rectangle indicates Trade Secret Data.

Table 6 — Total Resource Cost Results

Points Awarded	TRC ($/kWh)
4	0.089
4	0.121
4	0.127
4	0.128
4	0.128
4	0.133
3	0.138
3	0.142
3	0.146
3	0.149
3	0.152
3	0.154
3	0.156
3	0.157
3	0.160
3	0.164
3	0.166
3	0.168
3	0.169
3	0.171
3	0.174
3	0.180
3	0.180
3	0.186
2	0.189
2	0.193
2	0.195
2	0.197
2	0.198
2	0.198
2	0.196
2	0.225
2	0.232
2	0.247
1	0.252
1	0.260
1	0.271
1	0.277
1	0.286
0	0.299
0	0.341
0	0.504
0	0.563
0	0.966
0	3.064
0	3.775

Once we completed the scoring, we ranked the EP and RD proposals by overall score. The final scoring distributions for EP and RD proposals are shown in Figure 3 and Figure 4, respectively.

Figure 3 — Final Scoring Distribution for EP Proposals

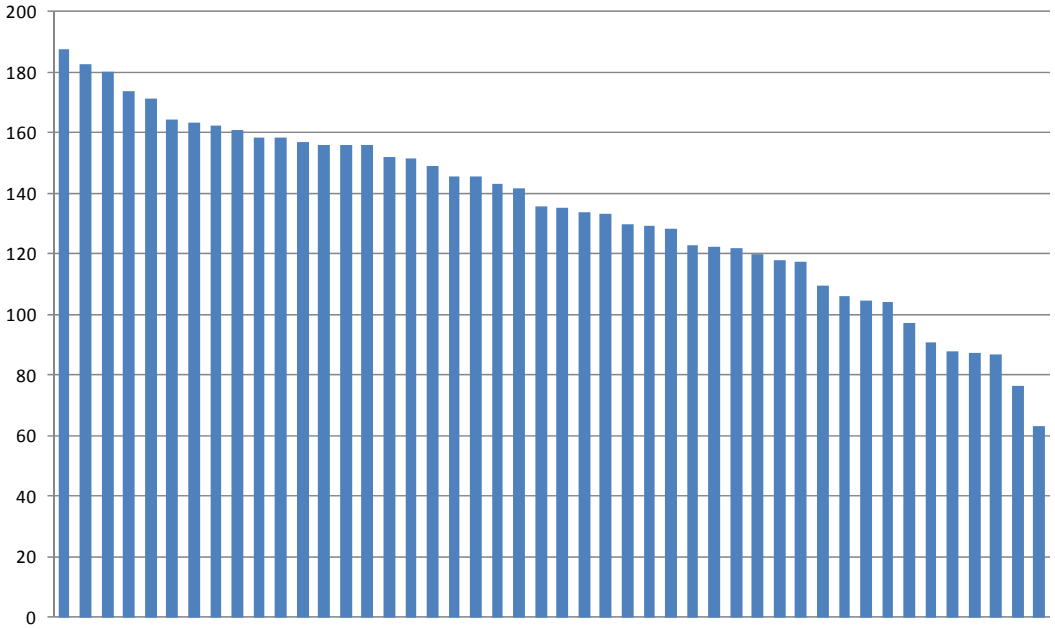
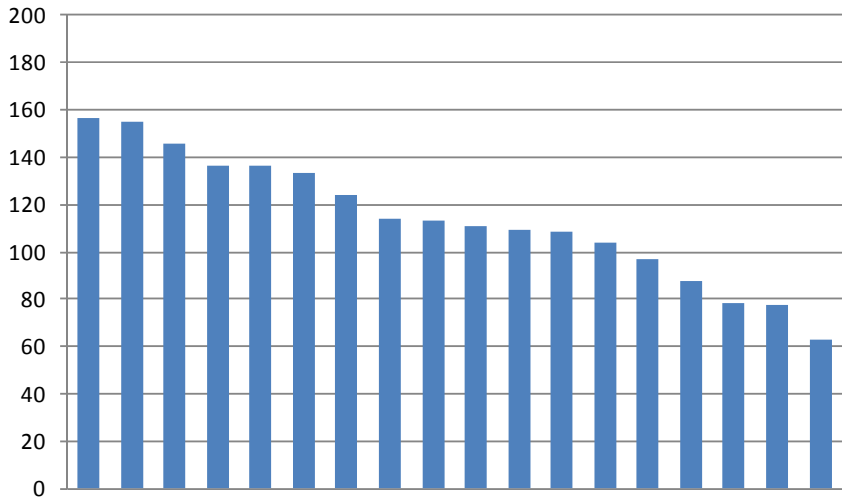


Figure 4 — Final Scoring Distribution for RD Proposals



TASK 4: RECOMMENDATION OF PROPOSALS

The overall scores provide an objective means to rank the proposals. We also categorized the proposals as "top tier" and "lower tier". The top tier list includes proposals that Sargent & Lundy believed to be reasonably complete in project scope and definition, technically sound, financially viable, and consistent with the RDF program goals and requirements. The lower tier list includes proposals that scored poorly. The most common causes of poor scores were: uncompetitive pricing; low portion of cost sharing; and poorly defined project approach, scope, or deliverables.

Sargent & Lundy ensured that the order of final proposal ranking also was consistent with the our recommendations (i.e., the final proposal ranking order from largest score to smallest score also lined up with the order from "top tier" to "lower tier").

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-12-1278 and
Special Service List-4th Cycle List

Dated this 13th day of September 2013

/s/

SaGonna Thompson
Records Analyst

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