

Minnesota Public Utilities Commission
Staff Briefing Papers

Meeting Date: February 5, 2015Agenda Item #2

Company: Great River Energy

Docket No. **ET2/RP-14-813**

In the Matter of GRE's 2015-2029 Resource Plan

Issue: What action should the Commission take on Al-Corn's Petition to Intervene?

Staff: Michelle Rebholz 651-201-2206

Relevant Documents

Al-Corn, *Petition to Intervene* December 2, 2014
GRE, *Objection to Petition to Intervene* December 11, 2014
Al-Corn, *Initial Comments* January 12, 2015
Department of Commerce, *Reply Comments* January 14, 2015
Al-Corn, *Reply Comments* January 22, 2015
GRE, *Reply Comments* January 22, 2015
Minnesota Center for Environmental Advocacy, *Reply Comments* January 22, 2015

The attached materials are workpapers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

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Statement of the issue

What action should the Commission take on Al-Corn's Petition to Intervene?

Background

On October 31, 2014, GRE filed its Integrated Resource Plan (IRP, resource plan, or plan).

On December 2, 2014, Al-Corn Clean Fuel and Heartland Corn Products (Al-Corn or Petitioners) filed a petition to intervene, and on December 11, 2014, GRE objected to the petition.

Petition to Intervene

Staff has included the highlights of the petition here.

Al-Corn stated that the Commission's review and consideration of GRE's IRP would significantly affect their business interests, which are not shared by the public at large or others involved in this matter. The Petitioners state they are substantial consumers of GRE's load, and seek to participate so that GRE is meeting its obligations to its industrial members to deliver reliable services "at-cost," consistent with Minnesota law. The outcome of these proceedings will have a significant impact on the Petitioners' ability to deliver much needed products to its consumers in Minnesota and around the country.

Al-Corn also stated that it was an active participant in GRE's prior plan and involved in the ultimate disposition of those proceedings. The Petitioners' participation again will aid the Commission in its ultimate consideration of the current plan.

Objection

GRE objected to the Petition, stating that Al-Corn did not demonstrate that: 1) their interest in "at-cost" service is unique compared to other ratepayers; and 2) the outcome of the IRP proceeding will impact them relative to the costs they pay for electric service.

Minn. Rule 7829.0800, subpart 2 states that one of four conditions for interventions must be met:

- 1) Petitioner is specifically deemed by the statute to be interested in the particular type of matter involved;
- 2) Petitioner is specifically declared by statute to be an interested party;
- 3) The outcome of the proceeding will bind or affect petitioners with respect to an interest peculiar to petitioner as distinguished from an interest common to the public or taxpayers in general; or
- 4) Petitioners' interests are not adequately represented by one or more parties participating in the case.

GRE points out that the Petitioners fail to show that they will be bound or affected by the outcome of this proceeding with respect to the costs they pay for their electricity. The costs paid by the Petitioners are not an issue in this proceeding, nor are the Petitioners a customer of GRE. Their rates are set by their respective distribution cooperatives who are among the 28 members that comprise GRE.

Even if the Commission were to determine that the outcome of this planning proceeding would affect or bind them, the Petitioners' alleged interest is not a peculiar one that supports intervention. The interest in the delivery of reliable services "at cost" is not peculiar to Al-Corn; they must demonstrate that their interests "are different from the interests of other ratepayers or the interests of the general public."¹

GRE also suggests that the Petitioners have failed to demonstrate that their interests will not be adequately represented by the Department. The Commission has previously recognized that concerns "common to the general ratepayers...are properly represented by the Department."²

GRE concludes its objection by stating:

Petitioners have come to the wrong forum. This is not a rate case, Petitioners are not customers of GRE, and their rates are set by the distribution cooperatives who are members of GRE. Those rates are not regulated by the Commission, as discussed in GRE's IRP filing. Petitioners' concerns about rates do not belong in this resource planning proceeding. Al-Corn and Heartland are seeking a replay of GRE's last resource planning case. In that proceeding, Al-Corn was an intervener. Over time, the Commission came to recognize that Al-Corn's main concern was with electricity rates and the Commission then pointed out that Al-Corn should address its concerns about rates with Steele-Waseca, the distribution cooperative that provided electric service to Al-Corn. [citation omitted] There is no reason to believe that Al-Corn's or Heartland's interest is different in this case. [footnote omitted]³

Initial Comments

Al-Corn filed initial comments in response to the Commission's Notice. Noting that objections to intervention are very rare, Al-Corn stated that GRE's objection is the result of the Petitioners' participation in GRE's last plan which was rejected by the Commission, and Petitioners' continuing concerns with GRE's filing in this docket. Petitioners' concerns are not general concerns, but rather the unique interests and concerns of GRE's large industrial end users that are

¹ See GRE objection at 3, citing to *Matter of Proposed Merger of Minnegasco, Inc. with Arkla, Inc.* Docket No. G008/PA-90-604, 1990 WL 600808 (Minn. PUC 1990).

² GRE objection at 3, citing to *MCI Communications Corp.*, Docket P443, 3012/PA-97-1532, WL 307947 (Minn. PUC 1998).

³ GRE objection at 4.

not represented by any other party to this proceeding. Petitioners will be able to provide relevant information and an independent perspective, all of which will assist the Commission in its consideration of this matter. Furthermore, Petitioners' participation will not disadvantage or burden any other party to this proceeding.

Citing to the Commission rule on interventions, Al-Corn goes on to point out that the Commission's review of GRE's plan will significantly affect their peculiar interests. Because Petitioners are large ethanol plants that have constant, high demand, unlike most ratepayers' demand, which is influenced by seasonal and time-of-day fluctuations, they have interests distinct from those of the public or general ratepayers. And contrary to GRE's position, Al-Corn does not believe the Department has taken the position that it will or can represent the interests of Petitioners. While the Department may be representing the interests of general ratepayers, it is not representing the peculiar interests of Petitioners, or high demand industrial customers.

Al-Corn also disagreed with GRE's contention that Al-Corn is not bound or affected by the outcome of this proceeding. Not only does the Commission have the authority to review and rule on a resource plan pursuant to statute, but by Commission Rule, resource plans are evaluated on their ability to "keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints." See Minn. Rule 7843.0500, subp.3. Petitioners believe that GRE has failed to comply with this rule, as well as other resource plan rules. GRE's failure to adequately provide reliable services "at cost" uniquely affects Petitioners.

Finally, Al-Corn pointed out that the Commission regularly allows large industrial customers to participate in resource plan proceedings. Citing to a 1992 Order relating to the Commission's Rules of Practice and Procedure, Al-Corn noted that the Commission generally takes an inclusive approach to intervention. Al-Corn concluded by pointing out that GRE did not object to Al-Corn's intervention in the previous resource plan proceeding.

Replies

The Department of Commerce, Al-Corn, GRE, and the Minnesota Center for Environmental Advocacy (MCEA) filed reply comments.

Department

The Department took no position on Al-Corn's request to intervene but provided a clarification regarding the Department's role in resource planning, since it was a point of discussion in Al-Corn's and GRE's previous comments.

While the Commission's role is advisory, the Department stated it conducts its analysis with the understanding that the Commission's eventual Order will have significant bearing on GRE's future regulatory proceedings, such as certificate of need. In that role, the Department does

examine the most cost-effective ways for GRE's resource plan to ensure reliable service over the planning period, along with other regulatory requirements for resource plans.

The Department stated its analysis of the GRE resource plan would focus on:

- Whether GRE's overall planning approach is reasonable;
- Whether GRE's energy and demand forecasts are reasonable and replicable;
- The extent to which demand-side management can fulfill GRE's load requirements;
- Whether GRE has resource needs, and if so, the optimal resource additions;
- Whether GRE is expected to meet Minnesota's renewable energy standards; and
- Whether and how compliance with pending state and national environmental legislation may impact GRE's operations.

The Department further stated that while the Department's analysis will consider both reliability and the overall cost-effectiveness of GRE's plan, Al-Corn seeks to ensure that services to industrial customers are provided "at cost," which appears to be a request concerning rate design. Specifically, providing service "at cost" to a customer class means the apportionment of revenue responsibility must be set at cost, a key rate design matter. The Department stated that since GRE is not rate-regulated by the Commission, that part of its request would go beyond the scope of issues to be decided in GRE's plan.

To the extent Al-Corn seeks rate-design decisions, the Department stated that the Commission's May 28, 2013 Order in GRE's 2012 IRP provided some guidance:

Finally, to the extent that Al-Corn wishes to pursue the type of information sought in its information requests [the rate consequences of employee compensation packages, and historical operating investments], its better course is to pursue its rights as a member of Steele-Waseca, and the governance processes of the cooperative to which it belongs. It is Steele-Waseca's board of directors that is charged with setting the electric rates about which Al-Corn inquires, and it is to Steele Waseca, at least in the first instance, that it must turn for the information that it seeks.⁴

The Department concluded its comments by repeating its comment that it takes no position on the intervention petition, that its intent was to outline the Department's role in the proceeding, and if the Commission concludes that Petitioners are not adequately represented by the Department's participation and analysis, the Commission could approve the Petitioner's request to intervene or take other action as appropriate.

Al-Corn

Al-Corn quoted to the Commission's intervention rule:

⁴ Department comments at 3, quoting ORDER DENYING REQUEST FOR TIME EXTENSION, Docket ET2/RP-12-1114, Issued May 28, 2013 at 4.

[The petition] must be granted upon a showing that: the person is specifically considered by statute to be interested in the particular type of matter at issue; the person is specifically declared by statute to be an interested party; or the outcome of the proceeding will bind or affect the person with respect to an interest peculiar to that person, as distinguished from an interest common to the public or other ratepayers in general, or the person's interests are not adequately represented by one or more other parties participating in the case.⁵

Al-Corn stated that they possess unique interests and concerns that are not being adequately represented in this docket. Al-Corn's interpretation of the Department's reply comments was the Department is not representing Al-Corn's interests. There is not another participant in this proceeding that can, or is attempting to, represent Petitioners' interests.

The Commission's resource planning rules state that resource plans be evaluated on their ability to "keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints..."⁶ Al-Corn believes that as a result, GRE's efforts and strategy to keep customers' bills as low as possible is squarely before the Commission as part of the resource planning process.

In Al-Corn's view, GRE's claim that Petitioners' intervention is improper and they should address their concerns through GRE's governance process is disingenuous at best. While GRE claims that it is willing to meet to address Petitioners' concerns, in reality GRE has expressly threatened both Petitioners and their counsel with legal action and harsh sanctions simply because Petitioners dared to raise their concerns within the cooperative distribution network. (See Exhibit A to Petitioners' initial comments.) Simply because the governance process is available does not mean it is the only avenue.

GRE

GRE reiterates its objection in reply comments. GRE cites to the Department's reply comments observing that rate design issues are beyond the scope of resource planning. GRE also cites to the letter attached to Petitioners' January 12, 2015 comments, in which GRE agrees to meet with the Petitioners.

GRE points out that intervention as a party "is not a standardless affair," even if it is rare for an intervention petition to be denied. Citing to at least three (3) Commission decisions rejecting intervention, GRE points out that if the stated interest is not directly affected by the proceeding's outcome or would be better addressed in an alternative forum, the petition should be denied.

In GRE's view, the argument that Petitioners intervened in GRE's 2012 plan is curious given that the Commission denied Petitioners' request for a time extension and declined to require

⁵ Minn. Rules part 7829.0800, subpart 2.

⁶ Minn. Rules 7843.0500, subpart 3(b).

GRE to respond to a number of their discovery requests. GRE also cites to the same Commission Order language that the Department quoted regarding rate design issues being more appropriately addressed at the distribution cooperative level.

MCEA

MCEA filed comments supporting Al-Corn's intervention. MCEA observed that large industrial customers of utilities are routinely allowed to intervene in other Commission dockets, including resource plan dockets. The Commission is free to weigh the comments of the various parties as appropriate.

Staff Analysis

GRE validly points out that resource plans and rate cases examine two different subject areas and therefore may involve different types of intervenors. In GRE's 2012 resource plan, the Commission rejected Al-Corn's request to extend the comment time period, not only for timing reasons, but because it believed Al-Corn was attempting to review issues that were outside the scope of a resource plan:

Nor does the Commission find it in the public interest to delay these proceedings to allow Al-Corn to further pursue its broad inquiry into matters such as GRE's past policies, the rate consequences of employee compensation packages, and historical operating investments. As GRE has indicated that its current resource plan assumes no additional resources in the 2013-2024 time period [parentheticals omitted] opening the door to what could potentially be a long and disputed discovery process into matters at largely beyond the scope of this proceeding is unwarranted.

...[T]o the extent that Al-Corn wishes to pursue the type of information sought in its information requests, its better course is to pursue its rights as a member of Steele-Waseca, and the governance processes of the cooperative to which it belongs. It is Steele-Waseca's board of directors that is charged with setting the electric rates about which Al-Corn inquires...⁷

However, Al-Corn also makes supportable arguments in its filings. As Al-Corn and MCEA point out, it is common for large business customers to intervene in resource plans. While it is more common for large customers to intervene in the resource plans of investor-owned utilities, the Commission has never, to staff's knowledge, prohibited a large customer from participating in a resource plan. Staff agrees with Al-Corn that its participation in the 2012 resource plan

⁷ ORDER DENYING REQUEST FOR TIME EXTENSION, Docket ET2/RP-12-1114, Issued May 28, 2013, page 4.

provided a different perspective and insight for the Commission's consideration of the plan. Large customers have energy needs different from other customer classes and may highlight issues that otherwise may not receive attention. And while staff finds the Department's analyses in resource plans invaluable, hearing from a range of stakeholders can enhance the resource plan process, as long as the input is on topic and within the scope of a resource plan. These arguments could support a finding under the Commission's intervention rule, should the Commission choose to interpret it in that manner.

Staff offers one option for resolving this dispute, which is to treat the matter as it was treated in the 2012 resource plan: approve Al-Corn's petition to intervene, but on the condition that its participation remain within the boundaries of resource plan issues. The Commission's decisions in the 2012 IRP can provide guidance to the parties.

Al-Corn has issued Information Requests in this proceeding. Staff has attached copies of some of Al-Corn's IRs from the GRE 2012 resource plan, and its IRs issued in the current plan. At first glance, the IRs filed in the current proceeding appear to be more closely tied to resource planning than the 2012 discovery requests. The Commission or parties may want to consider whether the IRs help inform their understanding of Al-Corn's intended role in this resource plan.

Change in Comment Periods

When the Commission issued its Notice of comment period on this intervention dispute, the notice also asked whether the initial or reply comment periods on the merits of the plan needed to be adjusted—if the petition were granted. Initial comments are currently due March 2, 2015 and replies are due May 1, 2015. No party commented on this issue, so staff assumes that the current comment periods do not need to be extended.

Decision Options

- 1) Grant Al-Corn's petition to intervene in the current proceeding.
- 2) Deny Al-Corn's petition for intervention.

April 12, 2013

Joseph M. Windler
Direct Dial: (612) 604-6646
Direct Fax: (612) 604-6846
jwindler@winthrop.com

VIA E-FILING & U.S. MAIL

Mr. Stan Selander
Great River Energy
12300 Elm Creek Blvd.
Maple Grove, MN 55369

Re: ***In re the Matter of Great River Energy's 2012 Integrated Resource Plan***
MPUC Docket No. ET2/RP-12-1114

Dear Mr. Selander:

Enclosed please find AI-Corn Clean Fuel's Information Requests Numbers 1-17 for Great River Energy in the above-referenced docket. The document has been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Joseph M. Windler

Joseph M. Windler

JMW/gy

Enclosures

7830577v1

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
1	Please provide all of your articles of incorporation, bylaws, governing documents, and membership agreements.

Response By:
Title:

7824433v1

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
3	Please provide any and all meeting minutes of your board of directors or any other committee since 2008.

Response By:
Title:

7823423v1

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114

Date of Request: April 12, 2013

Requested From: Great River Energy

Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
4	Please identify all sources of compensation and benefits for each of your officers and directors since 2003. As part of your response, please provide an itemization of the amount of each source of compensation and the value of each benefit.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
5	Please provide any and all cost projections and demand forecasts, by year from 2003 to the present, that you developed, or that were developed on your behalf, in connection with your decision to build the Spiritwood facility.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
7	Please provide the projected energy sales and demand forecasts for each of your 28 distribution customers from 2013-2027.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
8	Please provide the year by year monthly system peak loads for the period 2003-2013 in Excel spreadsheet form.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
9	Please provide a listing of each expenditure of over \$100,000 incurred by you or any related entity since 2006, including a justification for each expenditure.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
11	Identify any and all management services that you have contracted with a third-party to provide to you since 2003, including the amount paid for each service.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
12	Please identify all plant additions and upgrades that cost \$500,000 or more in all generation, transmission, and distribution plants since 2003.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114

Date of Request: April 12, 2013

Requested From: Great River Energy

Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
13	Please identify any cancelled or abandoned projects in which you expended in excess of \$50,000, since 2003, in furtherance of such projects prior to cancellation or abandonment.

Response By:

Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013
Requested From: Great River Energy Response Due: April 22, 2013
Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
15	Identify any and all wind turbine projects you have built, purchased, installed, or invested in since 2003, the total cost of each such project or investment, and whether the project is currently operational.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
16	Identify any and all non-energy related investments or business ventures you have engaged or invested in since 1995.

Response By:
Title:

7824385v1

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-12-1114 Date of Request: April 12, 2013

Requested From: Great River Energy Response Due: April 22, 2013

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
17	Please identify and provide all investment returns you have earned since 2003.

Response By:
 Title:



January 22, 2015

David M. Aafedt
Direct Dial: (612) 604-6447
Direct Fax: (612) 604-6847
daafedt@winthrop.com

VIA E-FILING

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: In the Matter of Great River Energy's 2014 Integrated Resource Plan (IRP)
MPUC Docket No. ET2/RP-14-813

Dear Mr. Wolf:

Enclosed please find Al-Corn Clean Fuel's Information Requests Nos. 1-15 in the above-referenced docket. These documents have been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ David M. Aafedt

David M. Aafedt

DMA/rmt
Enclosures

cc: Service List

9940320v1

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
4	Please identify any input you received from your distribution cooperative members and end-users related to your resource planning process, as referenced on pages 16, 23, and 29 of your IRP, and produce all documents related thereto.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
5	Please explain how the GRE “board of directors determines the overall strategy for” GRE and produce all documents related to such a determination to the extent that the same relate to the IRP process, as stated on p. 16 of your IRP.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
7	Please provide a detailed, itemized calculation of the total cost of the solar PV array described on page 30 of your IRP, as well as any analysis you conducted related to how the solar PV array is in your members’ best interest, assists you in providing energy to your members “at-cost,” maintaining your ability to maintain or improve the adequacy and reliability of your service, keeping your customers’ bills and your rates as low as practicable given regulatory and other constraints, minimizing adverse socioeconomic effects and adverse effects upon the environment, enhancing your ability to respond to changes in the financial, social, and technological factors affecting your operations, and limiting the risk of adverse effects you and your customers from financial, social, and technological factors that you cannot control.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
8	Please provide a detailed, itemized calculation of the total cost of the Dakota Spirit AgEnergy project described on page 33 of your IRP, as well as any analysis you conducted related to how this project is in your members' best interest, assists you in providing energy to your members "at-cost," maintaining your ability to maintain or improve the adequacy and reliability of your service, keeping your customers' bills and your rates as low as practicable given regulatory and other constraints, minimizing adverse socioeconomic effects and adverse effects upon the environment, enhancing your ability to respond to changes in the financial, social, and technological factors affecting your operations, and limiting the risk of adverse effects you and your customers from financial, social, and technological factors that you cannot control.

Response By:
Title:

AL-CORN CLEAN FUEL’S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

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Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
9	Please provide a detailed, itemized calculation of the total cost of the “Market Transformation of Efficient Technologies End Use Member Investment Choices” as described on pages 62-63 of your IRP, as well as any analysis you conducted related to how these choices are in your members’ best interest, assist you in providing energy to your members “at-cost,” maintaining your ability to maintain or improve the adequacy and reliability of your service, keeping your customers’ bills and your rates as low as practicable given regulatory and other constraints, minimizing adverse socioeconomic effects and adverse effects upon the environment, enhancing your ability to respond to changes in the financial, social, and technological factors affecting your operations, and limiting the risk of adverse effects you and your customers from financial, social, and technological factors that you cannot control.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500,
Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
..... Engineering Forecasting Conservation
..... Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
11	Please explain in detail why you did not model hydro generation as a potential capital investment. As part of your answer, please provide all cost analysis performed by or for you related to your decision.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813

Date of Request: January 22, 2015

Requested From: Great River Energy

Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
13	Please provide all documents related to your "Five Year Action Plan," as described on page 131 of your IRP.

Response By:
 Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
 Engineering Forecasting Conservation
 Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
14	Please identify whether the wholesale rates charged to distribution members take into account that certain large, industrial end users have consistent, flat usage.

Response By:
Title:

AL-CORN CLEAN FUEL'S INFORMATION REQUEST

Docket Number: ET2/RP-14-813 Date of Request: January 22, 2015

Requested From: Great River Energy Response Due: February 2, 2015

Requesting By: David M. Aafedt, Winthrop & Weinstine, P.A., 225 S. 6th St., Suite 3500, Minneapolis, MN 55402

Type of Inquiry: Financial Rate of Return Rate Design
.....Engineering Forecasting Conservation
.....Cost of Service CIP Other:

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	
15	Please identify and produce any proposed rates or recommended markups you provide your distribution members.

Response By:
Title: