



414 Nicollet Mall  
Minneapolis, Minnesota 55401

March 10, 2017

**—VIA ELECTRONIC FILING—**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

RE: COMPLIANCE FILING ON RENEWABLE ENERGY STANDARDS AND RENEWABLE  
ENERGY CERTIFICATE RETIREMENT AND REPORTING  
DOCKET NOS. E999/M-16-83, E002/M-15-985, E002/M-13-603,  
E002/M-13-716 AND E002/M-14-162

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Compliance Filing in the above-referenced dockets. This filing responds to the Commission's February 27, 2017 Order Approving Pilot Programs and Requiring Filings in the above-referenced dockets and provides information related to how the pilot programs affect the Company's ability to comply with the 2020 Renewable Energy Standard (RES).

The Biennial RES filing covers the time period of 2015 - 2018. Please see Attachment A for the updated information for this time period. Pages 1 thru 3 contain the projected information through 2018 as filed on June 1, 2016 in the Biennial RES docket (E999/M-16-83). Pages 3 thru 6 contain projected information through 2018 as updated on March 8, 2017. The sections that were updated have been highlighted in red. The next Biennial RES filing will be submitted in 2018 and will contain projected information through 2020.

As noted on attachment A, page 4, the impact of the Renewable Connect pilot programs in the 2018 RES would be a slight reduction in the Projected Surplus and therefore has no significant impact. We note that our June 1 filing, Section 5.G (Att A, page 3) incorrectly references the MN Solar I project (24.75 MW). This resource

had been removed from all related analyses, as the contract had terminated in May 2016.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on all parties on the attached service list.

Please contact me at (612) 330-2889 or [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

PAMELA K. GIBBS  
REGULATORY CASE SPECIALIST

c: Service List

Renewable Energy Certificate Retirement Report for  
 RENEWABLE ENERGY STANDARDS and GREEN PRICING PROGRAMS

**DOCKET NO. E999/PR-16-12**  
**DOCKET NO. E999/PR-16-83**  
**DOCKET NO. E999/PR-02-1240**

**Attachment A.5**

**Biennial Compliance reporting**

Please report the following items in compliance with the PUC May 28, 2013 Order in Docket No. E999/M-12-958

Ordering Point

**4.A. & 5.H. the year through which the utility can maintain compliance with its current renewable portfolio\*** 2024  
*Note: Banked REC inventory was included in this calculation, MN only*

**4.B. & 5.I. Projected compliance for the current plus three (3) upcoming years. \*include banked RECs.**

Year	actual/projected MN retail sales (MWh)	RES Req. (%)	RES Req. (MWh)	Projected Resources (MWh)	Projected Surplus/ (Deficit) (MWh)
2015	30,300,578	18%	5,454,105	6,475,202	1,021,097
2016	30,663,824	25%	7,665,956	7,009,874	(656,082)
2017	30,659,784	25%	7,664,946	8,409,036	744,090
2018	30,524,726	25%	7,631,181	8,321,426	690,244

*Note: Project Resources are MN allocation only. REC bank will be used to cover 2016 production deficit*

**5.E.2 & 5.F. Identify other State Renewable Standards or Objectives to which the utility is subject, and the percentage of renewable energy allocated to meet the renewable requirements.**

*Note: Response shown below identifies 2015 requirements.*

State	RES Req. (MWh)	RES Req. (%)	Percent of utility's total system renewable generation apportioned to this state (%)*
ND	10%/ Voluntary	10%/ Voluntary	5.50%
SD	10%/ Voluntary	10%/ Voluntary	4.95%
WI	12.89%	12.89%	15.50%
MI	10%	10%	0.32%

\*apportionment of renewable energy should reflect each state's percentage of the utility's total system sales.

**5.E.3 (i) The status of the utility's renewable energy mix relative to the objective & standards.**

When all of the energy from the resources listed on tab A.4 is tallied, renewable energy allocated to Minnesota for the RES accounted for approximately 21.4% of the energy provided to our customers in 2015.  
 We forecast that approximately 22.9% of the energy we provide our customers will come from RES/REO eligible renewable resources and accrued renewable energy credits (RECs) in 2016. With our REC bank and our early actions to add renewable generation to our portfolio, we are well ahead of all of our renewable energy targets.

**5.E.3(ii) Efforts taken to meet the objective and standards**

The Company issued an Request for Proposals (RFP) for additional wind resources on February 15, 2013. The RFP generated proposals for 57 projects. The Company selected four projects totaling 750 MW. The projects are a combination of power purchase agreement (PPAs) and build-to-own agreements. Two of the projects began delivering energy to the Company in December 2015, the remaining two wind projects are expected to deliver energy sometime in late 2016. In addition, the company has PPAs for three utility-scale solar projects, with commercial operations dates in 2016, for a total of 262 MW.

**5.E.3(iii) Obstacles encountered or anticipated in meeting the objective or standards**

Renewable Energy Certificate Retirement Report for  
RENEWABLE ENERGY STANDARDS and GREEN PRICING PROGRAMS

Although we believe that we own or have under contract sufficient renewable resources for RES compliance through at least 2023, as well as complying with the renewable energy requirements of other states in which we have service territory, we are paying close attention to a number of issues that may affect renewable energy development in our region. These issues include:

- Cost-effectiveness of wind energy. Natural gas prices and, correspondingly, market energy prices, have continued to stay low, and are projected to continue at a lower level for a number of years to come. With those lower long-term price expectations, wind energy may not be as cost-effective as its likely alternative, natural gas generation, if the Production Tax Credit (PTC) or Investment Tax Credit (ITC) expires.
- Wind integration and baseload cycling. As the percentage of wind energy on our system and in the Midcontinent Independent System Operator (MISO) region continues to increase, we remain concerned about the cost and possible effects on reliability of integrating wind with our other resources. The Company continues to monitor the MISO ancillary services market costs as wind penetration levels increase in proportion to the statutory requirements of the Minnesota Renewable Energy Standard.
- Transmission Construction Lead Time. The best wind resource areas within and adjacent to our service territory do not currently have the necessary transmission infrastructure to support the level of wind generation needed to meet RES compliance deadlines. CapX and other transmission initiatives will substantially improve transmission from those areas into our primary load center in the Twin Cities. Furthermore the transmission infrastructure between the Twin Cities and other parts of the MISO footprint appears inadequate to accommodate the ebb and flow of expected 2020 wind generation. It will be important to coordinate the planning of wind resources with the transmission necessary to integrate it into the electrical system. The Company is working with MISO and other stakeholders on these challenges.
- MISO Interconnection Queue. MISO has reformed its interconnection queue process over the past several years, which has resulted in substantially reducing the lag time between making an interconnection request and executing a signed interconnection agreement. These changes appear to have resolved the problem of having thousands of MW of projects ready for development, but waiting years for interconnection studies. However, there has also been a lull in wind project development due to uncertainty about extension of the Federal PTC, which has dampened interconnection request activity. The Company will continue to monitor the interconnection queue process, and its effect on the aforementioned lag time, as more is known about PTC extension.

**5.E.3(iv) Potential solutions to the obstacles**

See part 5.E.3(iii) for detailed descriptions of potential obstacles in meeting the Renewable Energy Standard, and proposed strategies to monitor and address these obstacles.

Renewable Energy Certificate Retirement Report for  
RENEWABLE ENERGY STANDARDS and GREEN PRICING PROGRAMS

**5.G. List any renewable generation facilities expected to become operational during the upcoming year**

*Note: Solar projects below will contribute to compliance with the Solar Energy Standard .*

Facility Name	Type	Capacity (MW)	Cap. Factor (%)	Expected Comm'l Operation Date
Odell Wind	Wind	200	37%	08/08/2016
Courtenay Wind	Wind	200	39%	12/31/2016
Aurora Solar	Solar	100	23%	12/31/2016
Marshall Solar	Solar	62	23%	12/06/2016
Minnesota Solar 1	Solar	25	23%	12/31/2017
North Star Solar	Solar	100	23%	10/31/2016

**5.K. Identify efforts taken to adequately protect against undesirable economic impacts on ratepayers, including, but not limited to keeping customer's bills and the utility's rates as low as practicable, given regulatory and other constraints.**

In an effort to acquire low-cost wind energy, the Company issued an RFP in early 2013. The timing of the RFP permitted the projects to qualify for the PTC tax benefits. The Company will continue to take advantage of market opportunities, as these are identified as beneficial to the rate payer.

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**4.B. & 5.I. Projected compliance for the current plus three (3) upcoming years. \*include banked RECs.**

Year	Actual/Projected MN retail sales (MWh)	RES Req.(%)	RES Req. (MWh)	Projected Resources (MWh)	WindSource (WS) Resources (MWh)	Renewable Connect (RC) Resources (MWh)	Projected Surplus/ (Deficit), adjusted for WS and RC (MWh)
2015	30,300,578	18%	5,454,104	6,475,202	143,938	0	877,160
2016	30,663,824	25%	7,665,956	7,009,874	143,058	0	(799,140)
2017	30,659,784	25%	7,664,946	8,409,036	138,740	89,000	516,349
2018	30,524,726	25%	7,631,181	8,321,426	135,530	178,000	376,715

*Note: Project Resources are MN allocation only.REC bank will be used to cover 2016 production deficit*

*Note: Renewable Connect and WindSource Resource generation based on sales forecast for respective products.*

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Marshall Solar	Solar	62	23%	12/06/2016
Minnesota Solar 1	Solar	25	23%	12/31/2017
North Star Solar (1)	Solar	100	23%	10/31/2016

*Note (1) - The Renewable Connect product will utilize 50 MW of Odell Wind and 25 MW of North Star Solar.*

**5.K. Identify efforts taken to adequately protect against undesirable economic impacts on ratepayers, including, but not limited to keeping customer's bills and the utility's rates as low as practicable, given regulatory and other constraints.**

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## CERTIFICATE OF SERVICE

I, Jim Erickson, 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 Nos. E999/M-16-83, E002/M-15-985, E002/M-14-162, E002/M-13-716  
AND E002/M-13-603**

Dated this 10<sup>th</sup> day of March 2017

/s/

---

Jim Erickson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	SPL_SL_16-83_Interested Parties
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Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_16-83_Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	Yes	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_16-83_Interested Parties
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_16-83_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_16-83_Interested Parties
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Ste 200  Lakeville, MN 55044	Paper Service	No	SPL_SL_16-83_Interested Parties
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	SPL_SL_16-83_Interested Parties
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollect Mall  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_16-83_Interested Parties
John	Lindell	john.lindell@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_16-83_Interested Parties
Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_16-83_Interested Parties
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_16-83_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	SPL_SL_16-83_Interested Parties
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	SPL_SL_16-83_Interested Parties
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_16-83_Interested Parties
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	SPL_SL_16-83_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	SPL_SL_16-83_Interested Parties
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	SPL_SL_16-83_Interested Parties
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South  Minneapolis, MN 55406	Paper Service	No	SPL_SL_16-83_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	SPL_SL_16-83_Interested Parties
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_16-83_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	SPL_SL_16-83_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	SPL_SL_16-83_Interested Parties
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL_16-83_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457  Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_16-83_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_16-83_Interested Parties
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_16-83_Interested Parties

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Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	SPL_SL_16-83_Interested Parties
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