

June 20, 2019

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. 999/PR-19-12

Dear Mr. Wolf:

On April 26, 2018, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Renewable Energy Certificate (REC) Retirement Process for Renewable Energy Standards, Biennial Reporting Obligations, and Green Pricing Programs*. The Notice required entities subject to Minn. Stat. §216B.1691 (RES Statute) to file a report detailing their compliance with the RES Statute for the year 2017 by June 1, 2018.

Minn. Stat. §216B.1691, subd. 2 requires utilities other than Xcel Energy to obtain at least 17 percent of their Minnesota 2018 retail sales from renewable energy sources. Minn. Stat. §216B.1691, subd. 2 (b) requires Xcel Energy to obtain 25 percent of its 2018 retail sales from renewable energy sources.

The following utilities have filed their 2019 compliance reports:

- Basin Electric Cooperative (Basin),
- Central Minnesota Municipal Power Agency (CMMPA),
- Dairyland Power Cooperative,
- East River Electric Power Cooperative (East River),
- Great River Energy (GRE),
- Heartland Consumers Power District,
- L&O Power Cooperative,
- Minnesota Municipal Power Agency (MMPA),
- Minnesota Power (MP),
- Minnkota Power Cooperative,
- Missouri River Energy Services,
- Northern States Power. d/b/a Xcel Energy (Xcel),
- Northwestern Wisconsin Electric Company.
- Otter Tail Power Company (OTP),
- Southern Minnesota Energy Cooperative (SMEC); and
- Southern Minnesota Municipal Power Agency (SMMPA),

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed these filings and verified that utilities have complied with the 2018 RES requirement. In total, utilities retired RECs representing 21.0 percent of total Minnesota retail sales in 2018 towards RES compliance. Attached to this letter is a table summarizing each utility's compliance with the RES Statute.

The Department is available to answer any questions the Commission may have.

Sincerely,

/S/ Susan L. Peirce
Public Utility Rates Coordinator

/ar
Attachment

2019 RES Compliance

Utility	2018 MN Retail Sales MWhs	RES Req. %	RES Req. MWhs	RECs Retired
Basin	905,764	17%	153,980	153,980
CMPMA	355,193	17%	60,383	60,383
Dairyland Power	784,002	17%	133,280	133,281
East River Electric	573,747	17%	97,537	97,575
GRE*	11,018,236	17%	1,873,100	1,873,105
Heartland	573,747	17%	97,537	97,575
L&O Power Coop	296,548	17%	50,413	50,414
Minnesota Power	9,789,332	17%	1,664,186	11,664,187
Minnkota	1,583,160	17%	269,137	269,137
MMPA	1,588,504	17%	270,046	270,046
Missouri River Energy Services	1,730,075	17%	294,113	294,113
NW Wisconsin**		17%	-	
Otter Tail Power	2,688,771	17%	457,091	457,091
SMEC	867,140	17%	147,414	147,418
SMMPA	2,933,788	17%	498,744	498,745
Xcel	30,442,386	25%	7,610,597	7,610,597
Total				

**NW Wisconsin serves approximately 90 Minnesota customers with 2018 sales of 618 MWhs.

The Company retired 24,175 RECs or 14.48% of its 3-year average Wisconsin retail sales of 166,952 MWhs.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E999/PR-19-12

Dated this 20th day of June 2019

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_19-12_PR-19-12
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-12_PR-19-12
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-12_PR-19-12
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-12_PR-19-12
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-12_PR-19-12
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-12_PR-19-12
Ronald J.	Franz	rjf@dairynet.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_19-12_PR-19-12
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-12_PR-19-12
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_19-12_PR-19-12
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Paper Service	No	OFF_SL_19-12_PR-19-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200 Minneapolis, MN 55420	Electronic Service	No	OFF_SL_19-12_PR-19-12
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-12_PR-19-12
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_19-12_PR-19-12
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-12_PR-19-12
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St. Grantsburg, WI 54840	Electronic Service	No	OFF_SL_19-12_PR-19-12
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-12_PR-19-12
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-12_PR-19-12
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-12_PR-19-12
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-12_PR-19-12
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-12_PR-19-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-12_PR-19-12
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-12_PR-19-12