



414 Nicollet Mall  
Minneapolis, MN 55401

June 1, 2020

**—VIA ELECTRONIC FILING—  
PUBLIC DOCUMENT  
NOT PUBLIC INFORMATION EXCISED**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: RENEWABLE ENERGY OBLIGATION (REO)-RENEWABLE ENERGY STANDARD  
(RES) COMPLIANCE REPORT

COMMISSION CONSIDERATION AND DETERMINATION ON COMPLIANCE WITH  
RENEWABLE ENERGY STANDARDS  
DOCKET NO. E999/M -20-283

RENEWABLE ENERGY CERTIFICATE RETIREMENT AND REPORTING FOR  
COMPLIANCE YEAR 2019  
DOCKET NO. E999/PR-20-12

GREEN PRICING VERIFICATION FILING PROCESS  
DOCKET NO. E999/PR-02-1240

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the attached compliance report to fulfill the verification and filing requirements for the Renewable Energy Standards (RES), Renewable Energy Credit (REC) retirement and Green Pricing REC retirement, along with the RES biennial filing obligations required by Minn. Stat. § 216B.1691, Subd. 3.

This filing is made pursuant to the Minnesota Public Utilities Commission's April 17, 2014 NOTICE OF BIENNIAL FILING OBLIGATIONS, which established Docket No. E999/M-14-237. We have provided the required information in the attached Excel spreadsheet templates. Attachment A contains REC retirements, biennial reporting obligations, and REC sales and purchases.

## **REC Retirement**

By May 1, 2020, the Company retired approximately 7.3 million RECs, representing 25 percent of annual retail sales for calendar year 2019, using the Midwest Renewable Energy Tracking System (M-RETS). The Company is therefore in compliance with the Minnesota RES requirements identified in Minn. Stat. § 216B.1691 subd. 2(a) and the Commission's March 19, 2010 Order in Docket No. E999/CI-03-869.

In addition, by May 1, 2020, the Company retired over 510,000 RECs for our Green Pricing Programs. Approximately 327,000 RECs were retired for the Windsource Program, approximately 173,000 RECs were retired for Renewable\* Connect, and approximately 10,000 RECs were retired for the Renewable\* Connect Government Program. Details of the Company's Green Pricing Program REC retirements are included in Attachment A.

The required information specified in the Commission's April 17, 2014 NOTICE and the May 28, 2013 ORDER FINDING UTILITIES IN COMPLIANCE WITH MINN. STAT. § 216B.1691 AND MODIFYING BIENNIAL REPORTING PROCEDURES in Docket No. E999/M-12-958, including the RES calculations, the RECs retired and the names of the M-RETS retirement sub-accounts, is provided in Attachment A.

As noted in Attachment A.6, we sold 523,899 RECs allocated to the Company's Minnesota jurisdictional share throughout the 2018-2019 calendar year. The Company also purchased 260,260 RECs for our Windsource program and has included those quantities in Attachment A.6.

## **Biennial REO-RES Compliance**

This report provides the Company's forecasted retail sales data for 2020 – 2023, projected generation data for this reporting period, other state RES or Objectives to which the utility is subject, actions taken to address the RES requirements, and a discussion of potential obstacles to meeting our requirements and solutions to the same.

## **Certified Renewable Percentage**

The Company began offering the Certified Renewable Percentage (CRP) to our customers in 2019 for calendar year 2018. With the CRP, we retire sufficient RECs on behalf of all our retail customers such that the total RECs retired annually reflects the portion of delivered energy that is renewable. This allows all retail customers to claim the percentage of renewable energy on the system as the starting point towards their sustainability goals.

During the Commission meeting on October 3, 2019, commissioners raised questions on the CRP methodology around two issues.

First, the Commission sought clarification on the CRP's relationship to the RES, specifically to ensure the Company is not double-counting RECs. As described in the CRP methodology (Attachment B), the CRP includes RECs retired for RES compliance, but this does not represent double-counting. RECs retired for RES compliance represent electricity that was delivered to all retail customers, which is what the CRP seeks to clarify. To the extent that an amount of renewable energy greater than the RES is delivered to customers, additional RECs will be retired in accordance with the CRP methodology. The CRP represents RECs retired for RES compliance plus any additional RECs retired on behalf of all retail customers.

Each year, the Company will calculate the CRP for the preceding year, after all program participation, REC sales, REC retirements for the RES, trade margin sales, and all other data points that affect the CRP are available. After the annual CRP is calculated, the Company will then retire the additional RECs to match the amount of renewable energy delivered to customers.

The Commission also sought clarification around the CRP's treatment of electricity purchased from the MISO market, and whether the renewability of this electricity is accounted for within CRP calculations. When the Company buys or sells energy in the MISO market, those transactions do not include RECs, regardless of whether the energy comes from a renewable generator. Therefore, when the Company buys energy in the wholesale market that was generated by a renewable resource, we are unable to account for its renewable attributes. On the other hand, when the Company sells energy that was generated by a renewable resource, we retain the RECs associated with the energy.

The numerator of the CRP is based on all RECs issued to or transferred to the Company with a vintage of the calendar year of the calculation. To account for the Company's interaction with the market, we make a "trade margin adjustment" to the numerator on a "slice of the system" basis to roughly estimate the portion of RECs held by the Company that should be attributed to the Company's interaction with wholesale market through trade margin sales. More information on trade margin sales and the CRP can be located in Attachment B, Section 4.

In addition, detailed methodology for the CRP is provided in Attachment B, as well as further details on REC retirements for the 2018 CRP and preliminary data on the 2019 CRP.

The security and privacy of customer data, including energy usage data, is a key concern for the Company. As a matter of course, the Company generally does not publicly disclose energy usage data related to an individual customer.

In previous years of the REO/RES REC filing, the customer participating in the Renewable\*Connect Government Program has requested certain information related to its energy usage be considered Non-Public, but the Department of Commerce has requested the information be submitted publicly. In advance of this year's 2020 Compliance filing, the Company reached out to this customer asking if the information that it normally considers Non-Public could be submitted publicly for this year's 2020 REO/RES REC filing. The customer consented to the Company submitting the information as Public information. Notwithstanding this one-time consent, the Company reserves the right to submit similar information as Non-Public in the future.

In addition to data related to the Renewable\*Connect Government Program, Attachment A contains certain portions that have been designated as Trade Secret information pursuant to Minnesota Statute § 13.37, subd. 1(b). In particular, the information designated as Trade Secret comprises proprietary forecasts and information protected by contractual confidentiality clauses that derive 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.

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. If you have any questions about this information, please contact me at [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or (612) 330-6064, or Pamela Gibbs at [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or (612) 330-2889.

Sincerely,

/s/

BRIA E. SHEA  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Attachments  
c: Service Lists

## 1. Description

The Certified Renewable Percentage (CRP) is a voluntary Renewable Energy Certificate (REC)<sup>1</sup> accounting protocol that is intended to give Xcel Energy retail electric customers clarity regarding renewable energy claims associated with standard electrical service.

## 2. The Certified Renewable Percentage Formula

The formula for calculating the Certified Renewable Percentage in Minnesota is:

Certified Renewable Percentage (Minnesota) =

$$\frac{\text{Total RE generation attributable to MN (MWh)} - \text{Trade margin adjustment} - (\text{REC sales} + \text{WindsorSource}^{\circledR} \text{ RECs} + \text{Renewable*Connect RECs} + \text{Wholesale REC transfers}) + \text{Purchased RECs}}{\text{Total MN retail sales (MWh)} - (\text{WindsorSource}^{\circledR} \text{ sales} + \text{Renewable*Connect sales}) + (\text{Solar*Rewards generation})}$$

This methodology is designed to attribute the appropriate number of RECs to retail customers and retire these RECs on their behalf. All of the inputs in the above equation reflect the calendar year of the CRP calculation.

## 3. Interactions with the Minnesota Renewable Energy Standard (RES)

Under Minn. Stat. § 216B.1691 electric utilities are required to retire RECs to demonstrate compliance with the requirement to generate or procure a specified percent of total retail electric sales from eligible energy technologies. RECs retired for compliance with the RES are included in the CRP. Consistent with the December 18, 2007 Commission *Order Establishing Initial Protocols for Trading Renewable Energy Credits*, RECs can be used during the year of generation and during the four years following the year of generation toward RES compliance. The Company will continue to retire RECs within this range of vintages toward RES compliance.

Given the adjustments in the CRP equation, it is possible for the CRP to be less than, equal to, or greater than the RES requirement. If the CRP is less than or equal to the RES requirement, RECs will be retired consistent with compliance requirements, and the CRP that is reported will represent the percentage of electrical usage that retail

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<sup>1</sup> One REC is issued for every one MWh of electricity generated and delivered to the electric grid from a renewable energy resource.

customers can claim as renewable. Over time, as Xcel Energy continues to add renewable energy to its portfolio beyond RES requirements, it is likely the CRP will be greater than the RES requirement. In that case, additional RECs will be retired above and beyond those required for RES compliance such that total REC retirements reflect the CRP. The additional RECs that are retired will be of current-year vintage (e.g., for the 2018 CRP, any additional RECs retired on behalf of all customers in excess of the RES requirement will be of 2018 vintage).

#### 4. Definitions

In applying the formula presented in Section 2, we employ the following definitions:

**Total RE generation attributable to MN (MWh)** – The portion of renewable energy (as defined in Minn. Stat. § 216B.2422, subd. 1(c)) generation for which Northern States Power (NSP) receives RECs and that is allocated to Minnesota.

**Trade margin adjustment** – Total renewable energy generation attributable to MN (MWh) multiplied by the ratio of NSP trade margin sales over Total NSP electricity sales (MWh). This adjustment is included in the CRP to withhold RECs proportional to trade margin sales as a fraction of total sales in order to avoid preferentially assigning fossil generation to the wholesale market. Trade margin sales generally represent energy trades into the wholesale markets outside of an existing long-term contract. Trade margin sales do not include any sales to retail customers whether residential, commercial or industrial, nor sales under long-term agreements to wholesale requirements customers. They are tracked as “Sales for Resale” under Account 447 in the Federal Energy Regulatory Commission’s Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act. This account includes the net billing for electricity supplied to other electric utilities or to public authorities for resale purposes.

The trade margin adjustment is expressed as:

Trade margin adjustment = Total MN RE generation \* (NSP Trade margin sales / Total NSP electric sales)

**REC sales** – Sales of any bundled or unbundled RECs on a spot basis.

**Windsor® and Renewable\*Connect RECs** – RECs retired specifically on behalf of customers participating in Windsor or Renewable\*Connect. These are customer choice programs that retire RECs on behalf of specific groups of customers who participate in these programs. The RECs associated with these programs cannot

be attributed to all customers and are therefore subtracted from the numerator of the CRP calculation. This term also includes any RECs that are purchased from outside the NSP system—and subsequently retired—in support of these programs.

**Wholesale REC transfers** – RECs that are transferred as part of long-term agreements to wholesale requirements customers and therefore cannot be attributed to retail customers.<sup>2</sup>

**Purchased RECs** – While Windsource and Renewable\*Connect are designed to be supported by specific resources, there are times when a portion of the program is supported by RECs purchased from outside of the NSP system. For example, in the proposed new offerings of Renewable\*Connect, there is a “R\*C Bridge” that allows customers to have RECs purchased and retired on their behalf during a limited period of time when new resources are under construction. These purchased RECs are added to the numerator but are also subtracted out as part of the “Windsource and Renewable\*Connect RECs” term described above.

**Total Minnesota retail sales** – “Total retail electric sales,” as defined in Minn. Stat. § 216B.1691, subd. 1, made by NSP to Minnesota retail customers. REC retirements under the CRP substantiate a claim regarding the delivery or end use of renewable electricity, so the denominator of the CRP is structured around retail sales of electricity. This framework aligns with the Minnesota RES and voluntary renewable accounting. The Minnesota RES requirement is defined as a percentage of retail sales, and any customers voluntarily procuring renewable energy (or standalone RECs) make that procurement relative to their total usage.

**Windsource and Renewable\*Connect sales** – Sales of energy specifically made to customers of Windsource and Renewable\*Connect. Just as RECs retired with these voluntary renewable energy programs are subtracted from the CRP numerator, these sales are subtracted from the denominator.

**Solar\*Rewards Generation** – Generation from Solar\*Rewards participants in Minnesota for which RECs are owned by NSP. Solar\*Rewards participants receive an incentive to designate NSP as the owner of the RECs from the participating generating unit(s), and they are allowed to net meter their generation. Therefore, to

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<sup>2</sup> Currently, there are no wholesale contracts that would fall into this category, but we include this term in the methodology to reflect how wholesale REC transfers would be accounted for in the event this situation arises in the future.

accurately count their contribution toward the CRP, the net metered generation should be added back into the denominator.

## **5. Changes to the CRP Methodology**

The CRP Methodology will be available publicly on the Xcel Energy website. This methodology applies to programs and treatment of RECs as they exist today. The need for changes to the methodology may arise as new programs are put into place, if the treatment of RECs in existing programs changes in the future, and as consensus around industry best practices develops. Any changes to the methodology will be reflected in publicly-available materials and will be described in annual reporting on the CRP.

The CRP is provided by the Company on a voluntary basis. In the event of modifications to existing policies, the enactment of new policies related to renewable energy generation, or other circumstances that would impact our ability to offer the CRP, the Company may modify the CRP or stop providing the CRP in order to best position the Company for compliance.

## **6. Third-Party Verification**

To provide assurance to customers and stakeholders that the CRP Methodology has been applied correctly and that the stated number of RECs have been retired, the Company will engage an external verifier to audit REC retirements and associated documentation. This third party will provide a verification report and an assurance statement that the Company will share publicly.

The Company will work with Lloyd's Register Quality Assurance, Inc. (LRQA) as the third-party verifier for at least the first year of the CRP. LRQA currently provides other verification services for Xcel Energy related to emissions reporting and has a well-established industry track record of providing verification services. The Company may work with different verifiers in the future.

## **7. Relation to other Xcel Energy Renewable Energy Programs**

The CRP is designed to report the renewable energy percentage of the standard system mix of energy distributed to customers. For a customer who does not participate in any voluntary programs, the CRP is the percentage of their energy usage that they can claim is renewable. For customers wishing to go farther than the CRP,

Xcel Energy is proud to offer customers a variety of ways to take voluntary action using renewable energy.

Incorporation of the CRP into a customer's renewable energy claims is optional, and their decision to do so may depend upon how their goals are structured. Customers can still participate in Xcel Energy voluntary renewable programs to offset 100 percent of their energy usage with RECs if they choose to do so. However, for customers who wish to incorporate the CRP toward their renewable energy achievements, general guidance is provided below.

### **Renewable\*Connect and Windsource®**

Renewable\*Connect and Windsource are both implemented by providing credits for fuel costs and capacity and by charging a price per kWh for participating in the program. Customers participating in Renewable\*Connect and Windsource also pay base rates and other riders, including the RES rider, associated with the full amount of their electric usage. At a high level, this pricing structure is designed to clearly attribute the energy generation from specific renewable resources to participating customers, while also reflecting that the customer still relies on the overall system mix for the reliable delivery of electricity. Given this structure, we provide guidance on how the CRP complements a voluntary renewable program subscription (should the customer choose to apply the CRP toward their goals).

For the purpose of combining Renewable\*Connect or Windsource with the CRP, the CRP is divided into two components described below.

- 1) *Renewable generation with costs recovered through base rates and the RES Rider:*  
Renewable\*Connect and Windsource participants pay these costs associated with their full usage. Therefore, that component of the CRP applies to 100% of the customer's usage and is additive with a voluntary program subscription.
- 2) *Renewable generation with costs recovered through the Fuel Clause Adjustment Rider:*  
Voluntary renewable program participants are credited for the Fuel Clause Adjustment Rider. That component of the CRP applies only to the unsubscribed portion of a voluntary renewable program participant's usage.

As summarized in Table 1, in 2018 the total CRP is 26.6 percent with 10.7 percent in the first category described above and 15.9 percent in the second. Therefore, a

customer could be 100 percent renewable with a voluntary program subscription for 89.4 percent of their usage (REC's for 100 percent renewable = 89.4 percent voluntary + 10.6 percent system generation). Figure 1, below, provides an example of how the CRP complements various levels of participation in a voluntary renewable program.

**Table 1**

Total generation from company owned wind resources for which costs are recovered through base rates or the RES rider for 2018 (as reported in Docket No. E002/M-17-818).

2018	Number of RECs	CRP
Renewable generation for which costs are recovered through base rates and RES Rider	3,221,200	10.7%
Renewable generation for which costs are recovered through the Fuel Clause Adjustment Rider	4,807,020	15.9%
Total Certified Renewable Percentage	8,028,220	26.6%

**Figure 1**

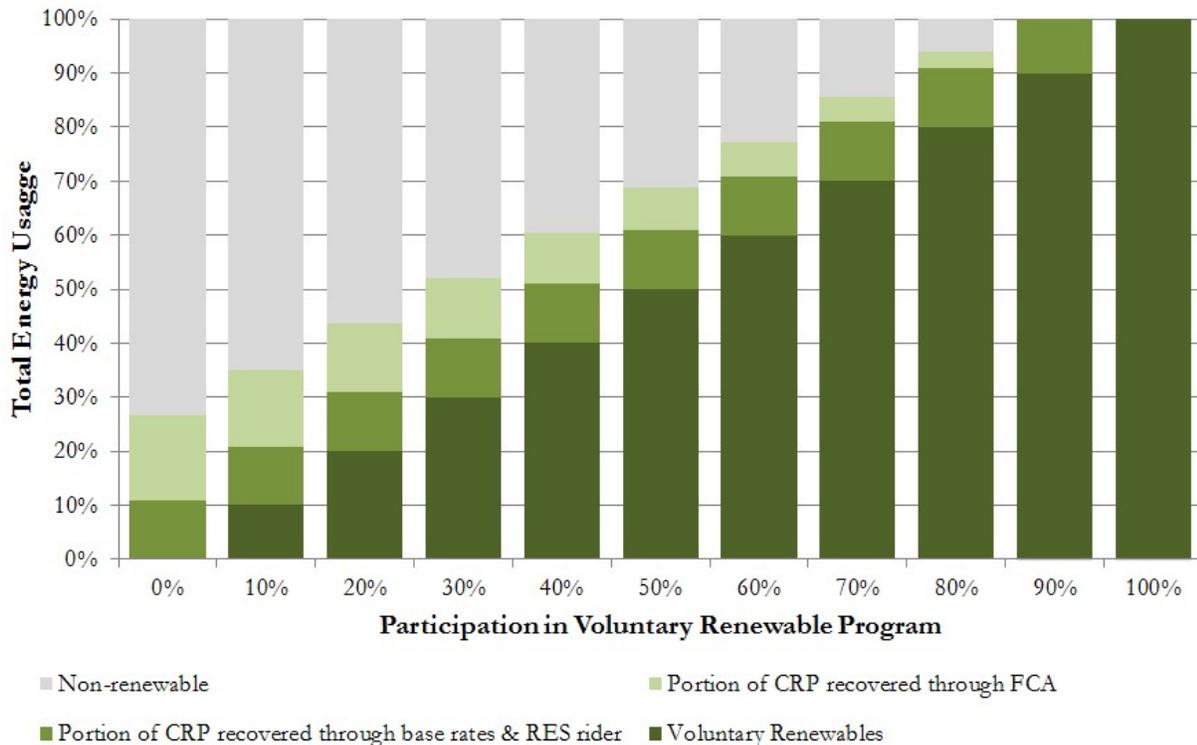


Figure 1: This chart shows the total renewable percentage a customer can claim combining a voluntary renewable program subscription with the CRP. This chart uses the preliminary 2018 CRP of 26.6 percent and renewable generation with costs recovered through base rates or the RES rider as a percentage of retail sales of 10.7 percent.

### **Solar\*Rewards**

Participants in Solar\*Rewards receive an incentive payment to designate Xcel Energy as the owner of the RECs associated with their solar generation. Xcel Energy then manages these RECs on behalf of all retail customers. As a Solar\*Rewards participant, a customer acts as a renewable generator, but they cannot accurately claim to be using the renewable energy they generate and deliver to the grid. Doing so would risk double-counting the value of the RECs associated with this generation.

Solar\*Rewards participants can, however, claim the CRP as the portion of their usage that is renewable by being an Xcel Energy customer. They can also participate in voluntary renewable energy programs if they wish to achieve a higher percentage of renewable energy usage.

### **Solar\*Rewards Community**

Like Solar\*Rewards, a portion of the bill credit received by Solar\*Rewards Community subscribers is an incentive payment for the RECs associated with the generation from the solar garden. Xcel Energy receives those RECs and manages them on behalf of all retail customers. Solar\*Rewards Community subscribers are participants in renewable generation through their subscription to a community solar garden, but they cannot accurately claim to be using the renewable energy the solar garden generates and delivers to the grid.

However, Solar\*Rewards Community participants can claim the CRP as the portion of their usage that is renewable by being an Xcel Energy customer, and they can participate in voluntary renewable energy programs if they wish to achieve a higher percentage of renewable energy usage.

## Net Metering

Customers who own their own solar generation system and net meter without participating in Solar\*Rewards can claim the RECs associated with their generation. These customers can claim the entire amount of their consumption that is offset by their solar generation as 100 percent renewable. If their generation is less than their total consumption, then the CRP applies to the portion of system energy that the customers rely on to make up the difference.

It is the responsibility of the generation owner to register their generation with a REC tracking system or otherwise claim and retire the RECs associated with their generation in order to properly account for and claim the renewable energy as part of their usage, consistent with guidance from the FCC Green Guides<sup>3</sup>.

Table 2, below, summarizes REC attribution for various renewable energy options.

**Table 2**

<b>Generation Source</b>	<b>RECs owned by Xcel Energy and managed on behalf of all customers</b>	<b>RECs retired on behalf of or retained by specific customers</b>
Windsorce		x
Solar*Rewards	X	
Solar*Rewards Community	X	
Net Metering		x
Renewable* Connect		x

## 8. My Renewable Mix Calculator Tool

The Company provides a calculator tool, My Renewable Mix, to help customers understand the interactions between the CRP and the renewable energy programs described above. Customers enter their total energy usage and their participation in various renewable energy programs. The tool then calculates that customer's individual overall renewable percentage, taking into account the CRP and any other

<sup>3</sup> <https://www.ftc.gov/news-events/media-resources/truth-advertising/green-guides>

voluntary actions they may take. The My Renewable Mix tool help customers explore possible scenarios in future benchmark years to assist in planning.

## **9. Annual Reporting**

The Company may provide an update on the status of the Certified Renewable Percentage in the annual RES compliance filing<sup>4</sup>. In the current filing, the Company is providing a preliminary CRP for 2018. The 2018 CRP is currently undergoing third party verification and the final 2018 CRP will be confirmed publicly on the Xcel Energy website. In subsequent RES compliance filings, the Company may provide the CRP from prior years along with the third-party verification status. The Company may also provide updates on any modifications to the CRP methodology. The Company will release information pertaining to the CRP throughout the year on the Xcel Energy website.

## **10. The 2018 Certified Renewable Percentage**

Table 3 below provides the details of the CRP calculation for 2018. This calculation and the REC retirements are currently undergoing third party verification, with final confirmation of this 2018 CRP in mid-2020.

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<sup>4</sup> Renewable Energy Obligation (REO) - Renewable Energy Standard (RES) Compliance Report Docket Nos. E999/M-16-83, E999-PR-16-12, E999/PR-02-1240

**Table 3**  
**Summary of the preliminary CRP calculation for 2018**

[values in MWh unless otherwise noted]	
<b>2018</b>	
<b>Minnesota</b>	
MN Retail Sales (A)	30,442,386
<b>RECs Allocated to MN in 2018</b>	
Total MN Renewable Generation (B)	9,632,760
MN Solar*Rewards RECs/Generation (also included in total above) (C)	32,053
<b>Adjustments</b>	
Trade Margin Adjustment (D)	1,344,157
Wholesale REC transfers (E)	0
REC Sales (F)	23,617
Purchased RECs (for Windsource) (G)	103,000
<b>REC Retirements and Attribution</b>	
RES Obligation %	25%
SES Obligation %	0%
RECs retired for RES/SES compliance	7,610,597
Renewable*Connect RECs/generation and sales (H)	150,339
Total Windsource sales (includes purchased RECs and system RECs) (I)	189,427
CRP Numerator = (B-D) – (H+I+E+F) + G	8,028,220
CRP Denominator = A – (H+I) + C	30,134,673
<b>Certified Renewable Percentage</b>	<b>26.6%</b>
Additional RECs to be retired for CRP	417,623

On March 13, 2020, NSP voluntarily retired 417,623 RECs as part of the 2018 MN Certified Renewable Percentage. As noted in Section 3 of this document, these retirements are in addition to the 7.6MM RECs retired to satisfy 2018 RES Compliance and are limited to current-year (2018) vintage.

NSP retired the RECs using the Midwest Renewable Tracking System (M-RETS). A summary of the retired RECs can be found below in Table 4.

**Table 4**  
**Summary of REC retirements for 2018 CRP**

<b>Total RECs Retired</b>				<b>417,623</b>
<b>M-RETS ID</b>	<b>Generator Facility Name</b>	<b>Generator Fuel Type</b>	<b>Vintage</b>	<b>RECs retired for Certified Renewable Percentage</b>
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	10/1/2018	18,767
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	9/1/2018	26,634
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	8/1/2018	29,433
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	7/1/2018	28,764
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	6/1/2018	25,350
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	5/1/2018	30,408
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	4/1/2018	19,924
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	3/1/2018	21,253
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	2/1/2018	15,591
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	1/1/2018	17,377
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	10/1/2018	3,787
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	9/1/2018	6,499
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	8/1/2018	8,413
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	7/1/2018	8,440
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	6/1/2018	7,319
160C2D62-F1ED	Long Spruce - Long Spruce	H2O	5/1/2018	8,457
160C2D62-F1ED	Limestone - Limestone	H2O	12/1/2018	22,407
160C2D62-F1ED	Limestone - Limestone	H2O	11/1/2018	22,642
160C2D62-F1ED	Limestone - Limestone	H2O	3/1/2018	617
160C2D62-F1ED	Limestone - Limestone	H2O	2/1/2018	19,406
160C2D62-F1ED	Limestone - Limestone	H2O	1/1/2018	21,771
160C2D62-F1ED	Limestone - Limestone	H2O	10/1/2018	4,787

160C2D62-F1ED	Limestone - Limestone	H2O	9/1/2018	8,289
160C2D62-F1ED	Limestone - Limestone	H2O	8/1/2018	10,640
160C2D62-F1ED	Limestone - Limestone	H2O	7/1/2018	10,721
160C2D62-F1ED	Limestone - Limestone	H2O	6/1/2018	9,285
160C2D62-F1ED	Limestone - Limestone	H2O	5/1/2018	10,642

## 11. The 2019 Certified Renewable Percentage

Table 5 below provides the details of the preliminary CRP calculation for 2019. We plan to engage LRQA to verify the 2019 CRP in mid to late 2020, after verification of the 2018 CRP is complete, with a final confirmation of the 2019 CRP this year.

**Table 5**  
**Preliminary 2019 CRP Calculations**

[values in MWh unless otherwise noted]	<b>2019</b>
MN Retail Sales (A)	29,161,074
<b>RECs Allocated to MN in 2019</b>	
Total MN Renewable Generation (including Solar*Rewards) (B)	9,669,997
MN Solar*Rewards RECs/Generation (C)	37,288
<b>Adjustments</b>	
Trade Margin Adjustment (D)	1,797,749
Wholesale REC transfers (E)	
REC Sales (F)	
Purchased RECs (for Windsource) (G)	86,756
<b>REC Retirements and Attribution</b>	
RES Obligation %	25.0%
SES Obligation %	
RECs retired for RES/SES compliance	7,290,269
Renewable*Connect RECs/generation and sales (H)	183,055
Total Windsource sales (includes purchased RECs and system RECs) (I)	326,796
<b>Outputs</b>	
CRP Numerator = (B-D) – (H+I+E+F) + G	7,449,153
CRP Denominator = A – (H+I) + C	28,688,511
<b>Certified Renewable Percentage</b>	
	<b>26.0%</b>
Additional RECs to be retired for CRP	158,884

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries 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/PR-02-1240  
E999/PR-20-12  
E999/PR-20-283**

Dated this 1st day of June 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Dennis	Eisenbraun	deisenbraun@mpsutility.com	Moorhead Public Service Dept. (E)	500 Center Ave PO Box 779 Moorhead, MN 56561-0779	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
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_2-1240_OFF_SL_2-1240_02-1240
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350  St. Paul, MN 551012147	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240

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_20-12_PR-20-12
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way  Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY  PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-12_PR-20-12
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-12_PR-20-12
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_20-12_PR-20-12
Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_20-12_PR-20-12
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-12_PR-20-12
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_20-12_PR-20-12
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Krambeer	bkrամbeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200  Minneapolis, MN 55420	Electronic Service	No	OFF_SL_20-12_PR-20-12
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-12_PR-20-12
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-12_PR-20-12
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_20-12_PR-20-12
Generic Notice	Residential Utilities Division	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_20-12_PR-20-12
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St.  Grantsburg, WI 54840	Electronic Service	No	OFF_SL_20-12_PR-20-12
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_20-12_PR-20-12
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-12_PR-20-12
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-12_PR-20-12

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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-12_PR-20-12
Audra	Skalet	askalet@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-12_PR-20-12
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-12_PR-20-12
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-12_PR-20-12
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-12_PR-20-12

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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_20-283_Official
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way  Rushford, MN 55971	Electronic Service	No	OFF_SL_20-283_Official
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY  PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_20-283_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-283_Official
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-283_Official
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_20-283_Official
Ronald J.	Franz	ronald.franz@dairylandpower.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_20-283_Official
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_20-283_Official
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_20-283_Official
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-283_Official

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Brian	Krambeer	bkrամբեեր@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_20-283_Official
Scott	Magnuson	smagnuson@bpu.org	Brainerd Public Utilities	8027 Highland Scenic Rd  Baxter, MN 56425	Electronic Service	No	OFF_SL_20-283_Official
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200  Minneapolis, MN 55420	Electronic Service	No	OFF_SL_20-283_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-283_Official
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_20-283_Official
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_20-283_Official
Generic Notice	Residential Utilities Division	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_20-283_Official
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St.  Grantsburg, WI 54840	Electronic Service	No	OFF_SL_20-283_Official
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_20-283_Official
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_20-283_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_20-283_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-283_Official
Audra	Skalet	askalet@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_20-283_Official
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-283_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-283_Official
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-283_Official
Todd	Wicklund	twicklund@bpu.org	Brainerd Public Utilities	8027 Highland Scenic Road PO Box 373 Brainerd, MN 56401	Electronic Service	No	OFF_SL_20-283_Official