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E L E C T R I C

A Touchstone Energy® Cooperative 

May 29, 2014

Dr. Burl W. Haar, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of Renewable Energy Certificate Retirement and Reporting for Compliance
Year 2013 - Docket No. E-999/PR-14-12

In the Matter of Commission Consideration and Determination on Compliance with
Renewable Energy Standards – Docket No. E-999/M-14-237

In the Matter of Green Pricing Verification Filing Process - Docket No. E-999/PR-02-
1240

Dear Dr. Haar:

East River Electric Power Cooperative, Inc. (East River) is the wholesale power provider for three Minnesota distribution cooperatives (Lyon-Lincoln Electric Cooperative, Traverse Electric Cooperative, and Renville-Sibley Cooperative Power Association) and the supplemental power provider for four Minnesota distribution cooperatives (Agralite Electric Cooperative, Meeker Cooperative Light and Power Association, Redwood Electric Cooperative, and South Central Electric Association).

On their behalf and in compliance with the above-referenced Dockets, East River hereby submits the following:

- Attachment A, REC Retirements and Biennial Compliance Reporting
- Attachment B, REC Sales and Purchases

Should you have any questions regarding this filing, please call me at 605-256-4536.

Respectfully submitted,



Robert K. Sahr
General Counsel

RS/sl

Enc.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF MINNESOTA

CERTIFICATE OF SERVICE

In the Matter of a Renewable Energy) Certificate Retirement and Reporting for) Compliance Year 2013))	DOCKET NO. E-999/ PR-14-12
In the Matter of Commission Consideration) and Determination on Compliance with) Renewable Energy Standards))	DOCKET NO. E-999/ M-14-237
In the Matter of Green Pricing Verification) Filing Process)	DOCKET NO. E-999/ 02-1240

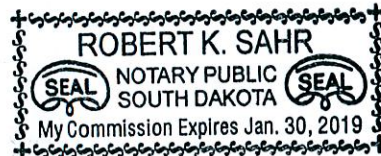
I hereby certify that the responses to the Minnesota Public Utilities Commission's notice dated April 17, 2014, for East River Electric Power Cooperative, Inc., was served upon all of the parties listed on the attached Service List on the 29th day of May, 2014, either electronically or by mailing a true and correct copy thereof to them by first class mail, postage prepared, at their last known mailing or email addresses.

EAST RIVER ELECTRIC POWER COOPERATIVE, INC.

By: *Sandra Leighton*
Sandra Leighton
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Sworn to before me this 29th day of May, 2014.

Robert K. Sahr
Notary Public
State of South Dakota
My Commission Expires: _____



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Instructions

Minnesota Public Utilities Commission
DOCKET NO. E999/PR-14-12
DOCKET NO. E999/PR-14-237

Minnesota Department of Commerce
DOCKET NO. E999/PR-02-1240

Renewable Energy Certificate Retirement Report for
RENEWABLE ENERGY STANDARDS and GREEN PRICING PROGRAMS
Attachment A: REC Retirements & Biennial Compliance Reporting

For the Reporting Period:
January 1, 2013 - December 31, 2013

Instructions

note: items in red indicate changes in reporting from previous year

Due: June 1st, 2014

Complete the following worksheets and e-file in **Excel (XLS or XLSX)** format:

- Worksheet A.1, Utility Info
- Worksheet A.2, Renewable Energy Standard Retail Sales
- Worksheet A.3, Green Pricing Program Retail Sales
- Worksheet A.4, RES & Green Pricing REC Retirements
- Worksheet A.5, Biennial Compliance Reporting**

To e-file, login, or register, at: <https://www.edockets.state.mn.us/EFiling/home.jsp>

for directions on how to e-file, see: <http://www.commerce.state.mn.us/eDocFile/eFilingHelp.html>

For questions about Renewable Energy Certificate retirement or compliance with Renewable Energy Standards, contact Susan Mackenzie at 651-201-2241 or at susan.mackenzie@state.mn.us .

For questions about Green Pricing or about filling out this spreadsheet, send an email to:

DG.Energy@state.mn.us.

For questions about e-filing, contact Karen Santori at 651-539-1530 or at karen.santori@state.mn.us .

Yellow cells - Information provided by utility

Pink cells - Calculated data

Green cells - Headers and instructions

Blue cells - Lists of codes

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 2025

4.B. & 5.I. Projected compliance for the current plus three (3) upcoming years.

Year	actual/projected MN retail sales (MWhs)	RES Req. (%)	RES Req. (MWhs)	Projected Resources (MWhs)	Projected Surplus/ (Deficit) (MWhs)	
2013	412,148	12	49,567	126,692	77,125	Represents East River share of RECs generated by Basin Electric Power Cooperative resources
2014	347,215	12	41,666	208,383	166,717	Represents East River share of RECs generated by Basin Electric Power Cooperative resources
2015	358,174	12	42,981	353,696	310,715	Represents East River share of RECs generated by Basin Electric Power Cooperative resources, before retirements in SD
2016	369,384	17	62,795	492,730	429,935	Represents East River share of RECs generated by Basin Electric Power Cooperative resources, before retirements in SD

East River share of Basin Electric Power Cooperative supply

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.

State	RES Req.	Apportionment of renewable energy
2013 SD	0%	0
2014 SD	0%	0
2015 SD	10%	250,293
2016 SD	10%	254,826

apportionment of renewable energy should reflect each state's percentage of total system sales.

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

East River, as a member-owner of Basin Electric Power Cooperative, projects adequate renewable energy resources to meet the current (12%) and future (17%, 20%, 25%) Minnesota renewable energy standards.

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

East River, through its supplemental power supplier, Basin Electric Power Cooperative, since 2001 has participated in the development of over 700 MW of wind resources to supply member load. Basin Electric Power Cooperative has executed purchased power contracts for an additional 376 MWs of wind resources to be operational by 2016.

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

The obstacles to deploying renewable energy resources include: a lack of consistent federal tax incentives for renewables, limited federal tax incentives for entities with non-profit or cooperative business models, and challenges siting and building new transmission facilities and utility infrastructure. Due to the intermittent nature of renewables and national/state policies limiting generation options for utilities, utilities are forced to rely more and more on natural gas-fired generation, and this over-reliance on one fuel source, which is heavily utilized in other sectors, could have a serious impact on consumers if natural gas supply becomes scarce or prices rise.

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

Potential solutions include a revision of federal tax incentives for renewable energy generation, common sense national and state policies that not only protect the environment but also protect consumers from adverse rate impacts of such policies, recognition of waste heat and large hydroelectric facilities as eligible renewable energy resources to meet the Minnesota standard, and state and federal policy that support infrastructure development as well as increased collaborative efforts such as the successful CapX 2020 projects.

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

Facility Name	type	Capacity (MW)	Cap. Factor (%)	Expected Comm'l Operation Date

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.

The expected growth of distributed generation raises serious policy issues regarding how consumers pay for utility infrastructure. Higher-income and commercial consumers are more likely to avail themselves of distributed generation opportunities than lower-income and residential customers. Under most DG scenarios, the utility will still be expected to provide supplemental power and/or buy the output of the DG. This will require utility infrastructure to be in place. If public policy or rate structures fail to adequately recognize the costs of this infrastructure as well as other related costs and fail to properly assign those costs, then the remaining customers will unfairly bear additional costs related to another customer's DG project. While this would be inequitable to any customer, the financial impact will be most acute for consumers who are lower-income, fixed-income, or renting their homes. While East River supports renewable energy and distributed generation, the movement to spur such projects must be done in a manner that does not unfairly shift costs to other consumers.

East River's previously stated concern about the increasing reliance on natural-gas fired generation creates serious issues for ratepayers particularly if supply becomes scarce or prices rise.

Instructions

Minnesota Public Utilities Commission
DOCKET NO. E999/PR-14-12
DOCKET NO. E999/PR-14-237

Minnesota Department of Commerce
DOCKET NO. E999/PR-02-1240

Renewable Energy Certificate Retirement Report for
RENEWABLE ENERGY STANDARDS and GREEN PRICING PROGRAMS
Attachement B: REC Sales and Purchases

For the Reporting Period:
January 1, 2012 - December 31, 2013

Instructions

note: items in red indicate changes in reporting from previous year

Due: June 1st, 2014

Complete the following worksheets and e-file in **Excel (XLS or XLSX)** format:

Worksheet B.1, Utility Info

Worksheet B.2, RECs Bought and Sold During the Reporting Period

To e-file, login, or register, at: <https://www.edockets.state.mn.us/EFiling/home.jsp>
for directions on how to e-file, see: <http://www.commerce.state.mn.us/eDocFile/eFilingHelp.html>

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