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March 29, 2018

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

In the Matter of a Commission Inquiry into Standby Service Tariffs – Docket No. E-999/CI-15-115

RE: Fresh Energy position on Xcel Energy's proposed Standby Service Rider

Dear Mr. Wolf,

Fresh Energy submits this letter stating our support for the proposed Standby Service Rider filed by Xcel Energy in the abovementioned docket on March 20, 2018. We appreciate the work done by Xcel Energy, Flint Hills Resources, the Department of Commerce, and the Midwest Cogeneration Association to find the common ground reflected in the March 20 tariff filing.

Fresh Energy has argued for fair, efficient, and transparent standby rates in numerous filings throughout this docket and through engagement with stakeholders broadly over the last several years. Due to schedule constraints we were unable to participate directly in the final discussions that led to the March 20 tariff filing so were, appropriately, not listed with the groups that reached the filed agreement.¹ However, Fresh Energy believes the proposed March 20 tariff encompasses many of the best practices we have argued for in this docket and supports decision option four in the Staff Briefing Papers filed on March 28, 2018, to adopt the proposed Standby Service Rider.

Please contact me at the information below with any questions.

Sincerely,

/s/ Will Nissen

Will Nissen

Director, Energy Performance

Fresh Energy

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¹ Xcel Energy. Update Standby Service Tariffs Filing. Docket No. E999/CI-15-115. Filed March 20, 2018. Page 1.