

July 2, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E999/PR-21-12

Dear Mr. Seuffert:

On April 14, 2021, the Minnesota Public Utilities Commission a *Notice of Renewable Energy Certificate (REC) Retirement for Renewable Energy Standards and Green Pricing Programs*. The Notice required utilities subject to 216B.1691 (RES Statute) to file a report detailing their compliance with the 2020 RES requirements by June 1, 2021.

Minn. Stat. §216B.1691, subd. 2(a) requires utilities other than Xcel Energy to obtain at least 20 percent of their Minnesota retail sales from renewable energy in 2020. Minn. Stat. §216B.1691, subd. 2(b) requires Xcel Energy to obtain 30 percent of its Minnesota retail sales from renewables.

The following utilities have filed their 2020 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),

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The Minnesota Department of Commerce, Division of Energy Resources (Department) has reviewed these filings and verified that utilities have complied with the RES requirement. A summary of utility compliance is attached. In total, utilities retired RECs representing 24.6 percent of their Minnesota retail sales.

Sincerely,

Susan L. Peirce  
Rate Analyst Coordinator

SLP/ar  
Attachment

## Minnesota RES Compliance - 2020

Utility	2020 MN Retail Sales MWhs	RES Req. %	RES Req. MWhs	RECs Retired
Basin	843,146	20%	168,629	168,629
CMMPA	368,425	20%	73,685	73,685
Dairyland Power	872,977	20%	174,595	174,597
East River Electric	555,692	20%	111,138	111,191
GRE	10,492,967	20%	2,098,593	2,101,988
Heartland	239,374	20%	47,875	54,546
L&O Power Coop	266,592	20%	53,318	53,320
Minnesota Power	8,436,203	20%	1,687,241	1,687,241
Minnkota	1,535,559	20%	307,112	307,112
MMPA	1,803,107	20%	360,621	360,622
Missouri River Energy Service:	1,664,360	20%	332,872	332,872
NW Wisconsin**	592	20%	118	**
Otter Tail Power	2,564,650	20%	512,930	512,930
SMEC	708,943	20%	141,789	141,792
SMMPA	2,829,745	20%	565,949	565,949
Xcel	28,134,437	30%	8,440,331	8,440,332
Total	61,316,769			15,086,806

REC Retirements as a Percentage of MN Retail sales

24.6%

\*\*NW Wisconsin serves approximately 98 Minnesota customers with 2020 sales of 592 MWhs.

The Minnesota Commission permits NWECC to comply with its MN RES requirements with the submission of its Wisconsin RPS compliance report. The Company retired 25,268 RECs or 14.48% of its 3-year average Wisconsin retail sales of 174,501 MWhs. NWECC generated 36,026 MWh of renewable energy in 2020.

## **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-21-12**

**Dated this 2<sup>nd</sup> day of July 2021**

**/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_21-12_PR-21-12
Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way  Rushford, MN 55971	Electronic Service	No	OFF_SL_21-12_PR-21-12
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY  PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_21-12_PR-21-12
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_21-12_PR-21-12
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_21-12_PR-21-12
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_21-12_PR-21-12
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_21-12_PR-21-12
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_21-12_PR-21-12
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_21-12_PR-21-12
Ted	Kjos	tkjos@mienergy.coop	MiEnergy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_21-12_PR-21-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Krambeer	bkrambear@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_21-12_PR-21-12
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200  Minneapolis, MN 55420	Electronic Service	No	OFF_SL_21-12_PR-21-12
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-12_PR-21-12
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_21-12_PR-21-12
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_21-12_PR-21-12
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_21-12_PR-21-12
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St.  Grantsburg, WI 54840	Electronic Service	No	OFF_SL_21-12_PR-21-12
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_21-12_PR-21-12
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_21-12_PR-21-12
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_21-12_PR-21-12

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-12_PR-21-12
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-12_PR-21-12
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-12_PR-21-12
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-12_PR-21-12