



Minneapolis
City of Lakes

Cam Gordon

City Council Member
Second Ward

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November 21, 2013

Attention: The Honorable Eric L. Lipman
Office of Administrative Hearings
600 North Robert Street
St. Paul, MN 55164-0620

RE: Letter of Support for Geronimo's Aurora Solar Project
Public Utilities Commission (PUC) Docket Number: E-002/CN-12-1240
Office of Administrative Hearings (OAH) Docket Number: 8-2500-30760

I would like to offer support for Geronimo's Aurora Solar Project currently being considered for Xcel Energy's Competitive Resource Acquisition Proposal.

The City of Minneapolis recently adopted a Climate Action Plan (hereafter referred to as the Plan) to meet our climate protection goals. The Plan includes very aggressive goals for energy efficiency, renewable energy deployment, and other strategies to reduce the climate impacts of our energy supply. Engaging our energy utilities and state government are key strategies identified in the Plan. Xcel Energy recently committed in writing to helping the City achieve these goals, which include reducing citywide greenhouse gas emissions 15% by 2015 and 30% by 2025. These goals are consistent with those adopted by the State Legislature in the Next Generation Energy Act of 2007.

Electricity consumption in the city accounts for over 42 percent of greenhouse gases attributable to Minneapolis. Greenhouse gas emissions within the City of Minneapolis geographic area have declined by over 12 percent between 2006 and 2010. Nearly 40 percent of this reduction is due to reductions in the carbon intensity of electricity provided by Xcel, from increased use of natural gas and wind power. However, when Xcel Energy's greenhouse gas intensity increased by 4 percent in 2011, greenhouse gas emissions in Minneapolis rose by 5 percent that year, despite the fact that less electricity was consumed in the city. Thus, improvements made locally in the energy efficiency of our city's buildings can easily be overwhelmed by even small changes in the greenhouse gas intensity of electricity delivered by Xcel.

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Affirmative Action Employer

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<http://secondward.blogspot.com>

As our electricity grid is regional in nature, generation decisions made throughout the state impact Minneapolis' climate goals. Setting a precedent that solar can be competitive with fossil fuel-based generation is therefore extremely important to the City.

I support this proposed project because:

- Solar generation meets Minnesota laws and policy goals. Specifically, solar meets the 216B.2422 renewable preference, which states that “[t]he commission shall not approve a new... nonrenewable energy facility... unless the utility has demonstrated that a renewable energy facility is not in the public interest.” Since the solar generation proposed in this docket helps the utility meet the state’s newly enacted solar energy standard, and the 80% greenhouse gas reduction target enacted as part of the Next Generation Energy Act, the utility must clear a very high bar to demonstrate this solar project is not in the public interest. Building new gas plants ignores those laws and will only serve to delay progress toward meeting our greenhouse gas emissions reduction goals.
- Solar is distributed, which allows the Xcel to avoid costs associated with large, central station fossil fuel plants. Costs avoided include transmission costs, line losses and deferred distribution capacity upgrades. The legislature recognized this when they mandated a rate for solar facilities under 1MW that reflects all of these values. While Geronimo’s project is larger than 1 MW, the value it provides is the same, *and on a larger scale*. Common sense argues that these values should be recognized when comparing alternatives in the docket.
- Solar is cost competitive, and provides a fixed and known cost today. All of the costs associated with the gas plants are predicated on low natural gas prices, which are unpredictable and have spiked significantly higher in the past. The cost of solar energy proposed in this docket will not change over the next two decades. The same cannot be said of natural gas prices.

I urge consideration of the solar project. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Cam Gordon". The signature is fluid and cursive, with a large initial "C" and "G".

Cam Gordon
Council Member, Minneapolis Ward 2

CERTIFICATE OF SERVICE

I, Gregory Sautter, hereby certify that I have this day, caused to be served a true and correct copy of the following documents to all persons at the addresses indicated below or on the attached list by electronic filings, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.

Re: Letter of Support for Geronimo's Aurora Solar Project Public Utilities Commission (PUC) Docket Number: E-002/CN-12-1240 Office of Administrative Hearings (OAH) Docket Number: 8-2500-30760

Dated this 21st Day of November, 2013.

s/GregoryPSautter
Gregory P. Sautter
Assistant City Attorney
612 673-2683

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Service List Member Information

Electronic Service Member(s)

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Church	Kodi	kchurch@briggs.com	Briggs & Morgan	Electronic Service	No
Denniston	James	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	Yes
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Thompson	SaGonna	Regulatory.Records@xcelenergy.com	Xcel Energy	Electronic Service	No

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