

November 10, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Sue 350  
St. Paul, Minnesota 55101-2147

RE: **Supplemental Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E001, E140, E105, E139, E124, E126, E145, E132, E114, E6521, E-142, E-135/PA-14-322

Dear Dr. Haar:

Attached are the Supplemental Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

A Request for Approval of the Assets Purchase and Sale Agreement between Interstate Power and Light Company and Southern Minnesota Electric Cooperative.

The petition was filed on April 15, 2014 by:

Erik C. Madsen  
Director, Regulatory Affairs  
Interstate Power and Light Company  
PO Box 351  
Cedar Rapids, IA 52406

Brian Krambeer  
President  
Southern Minnesota Electric Cooperative  
c/o Tri County Electric Cooperative  
PO Box 626  
Rushford, MN 55971-0626

The Department recommends **approval of the petition with conditions**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JK/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

SUPPLEMENTAL REPLY COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET No. E001, E140, E105, E139, E124, E126, E145, E132, E114,  
E6521, E-142, E-135/PA-14-322

**I. INTRODUCTION**

On April 15, 2014, Interstate Power and Light Company (IPL) and Southern Minnesota Electric Cooperative (SMEC) (the Companies or Applicants) filed a petition with the Minnesota Public Utilities Commission (Commission) for approval of the sale of IPL's Minnesota electric distribution system and assets, and transfer of IPL's service rights and obligations in Minnesota to SMEC (Petition).

On May 9, 2014, the Minnesota Department of Commerce (Department), the Minnesota Office of Attorney General Antitrust and Utilities Division (OAG-AUD), and the Minnesota Municipal Utilities Association (MMUA) filed comments regarding the procedural and scoping aspects of this proceeding.

On May 23, 2014, IPL and SMEC filed reply comments pursuant to the procedural and scoping issues.

On June 30, 2014, the Commission issued its Order Requiring Additional Record Development.

On July 14, 2014, the Commission issued additional questions for the joint petitioners.

On August 1, 2014, the Applicants provided their responses to the Commission's additional questions for joint petitioners.

On September 4, 2014, the Applicants submitted their Supplemental Responsive Comments.

On October 6, 2014, the Department, the OAG-AUD and the MMUA filed Reply Comments.

On October 10, 2014, the Commission issued a notice of additional comment period with comments due on November 10, 2014 and Reply Comments due November 24, 2014. The October 10 notice also included a list of eleven topics the Commission defined as being open for comment.

- Whether the proposed transaction is consistent with the public interest.
- Are the terms and conditions of the Asset Sale reasonable?
- Is the Wholesale Power Agreement reasonable?
- Are there operational concerns that could result from the transaction?
- What will the rate impact be on current IPL customers?
- What are the benefits of the transaction?
- Are there reliability, service quality, or safety concerns that could result from the transaction?
- What entity will be responsible for filing integrated resource plans under Minn. Stat. §216B.2422?
- Will IPL or SMEC be responsible for SMEC members meeting their renewable energy standards obligation, pursuant to Minn. Stat. §216B.1691, and how will that information be reported?
- What plans, if any, are there for the development of community solar gardens in the SMEC members' service territories?
- How will the Commission's authority over the provision of service to current IPL customers change?
- Any other issues parties consider appropriate.

The Department addresses the Commission's topics in order, except for the question of the transaction's benefits. The Department will address that topic in its subsequent comments on November 24, 2014.

## II. ANALYSIS

### A. *CONSISTENCY WITH THE PUBLIC INTEREST*

The Department's standard analytical approach to this type of transaction is to develop a cost/benefit analysis as a starting point. IPL and SMEC included a cost/benefit analysis that compared the costs and benefits associated with the proposed transaction in the Petition for the time period from 2014 through 2017. That analysis identified \$28.3 million in benefits that would accrue to IPL's current Minnesota ratepayers if the proposed transaction were approved.

The Department developed its own cost/benefit analysis in its comments filed October 6, 2014. The Department's analysis developed the costs and benefits associated with the

transaction from 2015 through 2017 and identified a benefit to ratepayers if \$11.8 million<sup>1</sup> based on the information in the Petition. The OAG-AUD developed a cost benefit analysis that considered the costs and benefits associated with the asset purchase portion of the proposed transaction in its comments dated October 6, 2014. This analysis identified a positive cost/benefit of \$3.7 million even after the OAG-AUD modified the analysis to recognize certain costs.<sup>2,3</sup> As noted in the OAG-AUD's comments, that analysis did not include the effects of the costs associated with the Wholesale Power Agreement portion of the proposed transaction. It also apparently did not consider the effects of a decrease in the Conservation Improvement Program (CIP) Conservation Cost Recovery Adjustment or SMEC's proposed \$2.00 per megawatt hour distribution credit that would be in place for the first three years of the transaction.

On November 6, 2014, the Commission reviewed the Department's analysis in Docket No. G001, 001/PA-14-107, pertaining to the proposal by IPL Gas to sell its natural gas distribution facilities to Minnesota Energy Resources Corporation (MERC). Because IPL Gas had not filed a general rate case since 1996, it was necessary in that proceeding to make assumptions about the expected level of IPL Gas rates, if IPL Gas had filed a more recent general rate case. During the Commission's discussion, at least two of the Commissioners expressed concerns about the assumption that the Commission would approve 100 percent of IPL's requested revenue requirements in a rate case proceeding.

While the facts in this proceeding are different since IPL Electric filed a more recent general rate case in 2010, the Department developed an additional scenario to approximate the level at which the proposed transaction's benefits are greater than its costs in this proceeding. This scenario used the following identical assumptions to those the Department used in the cost benefit analysis it included in its comments dated October 6, 2014.

- The proposed transaction is completed by December 31, 2014.
- IPL's revenues are set equal to the projected 2014 revenue requirements.
- IPL will file rate cases annually from 2015 through 2017.
- SMEC's annual revenues are identical to those provided in IPL's analysis for the period from 2015 through 2017.

The Department estimates that if the Commission were to approve 46.5 percent on average of IPL's incremental requested revenue requirements in each of the annual rate cases the proposed transaction would have a positive benefit. Since this level appears to be a fairly

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<sup>1</sup> IPL's estimate was in nominal dollars. The Department's estimate was in 2014 dollars (discounted). Both IPL and the Department's analyses included the effect of the change of jurisdiction from the MPUC to FERC.

<sup>2</sup> OAG-AUD comments filed on October 6, 2014 at page 7. The Department notes that OAG-AUD's analysis did not incorporate the increase in IPL's approved return on equity if jurisdiction for its generation-related assets moves from the Commission's to FERC's jurisdiction.

<sup>3</sup> IPL/SMEC's analysis of the asset transfer portion of the proposed transaction included in the same OAG-AUD comments identified a cost/benefit of \$42.4 million over a ten-year period. The annual benefits in that analysis were not discounted.

low threshold for IPL to overcome, these results lead the Department to conclude that the proposed transaction is in the public interest, with these assumptions. Therefore, with conditions discussed below, the Department recommends that the Commission approve the Petition.

For example, the Department recommends that the Commission condition approval of the proposed transaction to protect IPL's current ratepayers from significant deviations in the forecasted costs that IPL and SMEC provided in their Petition. Both the benefits and the costs in all the scenarios discussed to date are forecasted. Thus, those estimated costs and benefits are inherently uncertain. The Department is particularly sensitive to the risk associated with these estimates given IPL's inability to correctly forecast the costs and benefits associated with the sale of its transmission assets to the Independent Transmission Company (ITC) in Docket No. E001/PA-07-540.

Thus, the Department recommends that the Commission condition the sale to require that SMEC provide actual weather normalized annual revenue requirements for IPL's former service territory annually for the first three years following the proposed transaction's effective date; and provide a bill credit to IPL's former ratepayers if the actual weather normalized annual revenue requirement in any year exceeds the forecasted annual revenue requirement by more than 2 percent.

The proposed condition would help ensure that the facts on which the Petition is based are reasonably accurate in practice. This condition applies to the proposed transaction; it does not assign financial responsibility for any such credit between IPL and SMEC since that assignment should be decided by the Applicants. Procedurally the Department anticipates that the Commission would require SMEC to file the information listed annually and include a proposed true-up factor if needed.

In addition, the Department continues to support the two recommendations included in our October 6, 2014 Comments. Those two conditions were:

- 1) SMEC be recognized as the sole entity responsible for fulfilling any and all regulatory requirements related to the Commission; and
- 2) the SMEC Member Cooperative provide reliability information to the Commission for IPL's former service territory annually for five years.

**B. REASONABLENESS OF THE ASSET PURCHASE AGREEMENT**

**C. REASONABLENESS OF THE WHOLESALE POWER AGREEMENT**

Regarding the Asset Purchase Agreement (APA), the MMUA expressed concerns regarding the premium above book value that IPL would receive for its electric distribution assets. The OAG-AUD also shared MMUA's concerns on this issue. In addition, MMUA is concerned that a number of the terms and components in the APA do not have a basis in a calculated value. MMUA also expressed a more general concern that the proposed transaction was not the result of a more formal process that included a request for proposals, a narrowing of

finalists and a final agreement with one purchaser. Rather, it was simply the result of arms-length negotiations. MMUA suggested that the Commission may want to complete an analysis of the transaction using one or more of the three valuation methodologies identified in Minnesota statute.

The Department notes that consolidations of this type have occurred in service territories served by electric cooperatives and investor-owned utilities in several other states, most recently Michigan. The Department also reviewed distribution service quality and reliability information for both IPL and the SMEC Member Cooperatives. Our conclusion was that current IPL ratepayers' distribution service quality and reliability would at least remain constant and could possibly improve as a result of the proposed transaction. (The Department discusses below the issue of generation reliability.) Further, as noted above, the Department developed its own cost/benefit analysis to determine the extent of any potential costs or benefits to IPL's current ratepayers.

The Department did not identify any condition or value that it could identify as unreasonable in the proposed transaction, other than needing to hold the Applicants accountable to a reasonable level of costs, given those estimated costs in this proceeding and ensuring that reliable generation service is provided for the period identified in the proposed transition period.

#### *D. OPERATIONAL ISSUES*

The Department noted in its comments filed October 6, 2014 that it doesn't anticipate any operational issues associated with the proposed transaction. The DOC has not identified any information in the interim that would require it to modify that statement.

#### *E. RATE IMPACTS ON IPL CUSTOMERS*

The Department estimated high and low class revenue requirements for IPL for the three major customer classes by year. The IPL high estimate used information included in Attachment I of the petition and assumed that the Commission approved 100 percent of IPL's forecasted revenue requirements for 2015 through 2017.

The Department developed the IPL low estimate using the same assumptions except using only 46.5 percent of IPL's forecasted revenue requirements.<sup>4</sup>

The SMEC estimate used information included in Attachment I of the Petition for the years 2015 through 2017.

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<sup>4</sup> The Department determined that this was the minimum annual percentage that Commission could approve and have the proposed transaction have a positive net present value.

**Table 1: – Residential Estimated Annual Increases in Class Revenue Requirements, 2015 -2017**

Scenario	Year		
	2015	2016	2017
IPL Max	10.75%	4.20%	7.49%
IPL Min	5.00%	4.61%	6.02%
SMEC	3.21%	3.97%	4.54%

**Table 2: – Small Commercial Estimated Annual Increases in Class Revenue Requirements, 2015 -2017**

Scenario	Year		
	2015	2016	2017
IPL Max	11.89%	4.60%	8.17%
IPL Min	5.53%	5.07%	6.59%
SMEC	3.55%	4.38%	4.99%

**Table 3: – Large Commercial Estimated Annual Increases in Class Revenue Requirements, 2015 -2017**

Scenario	Year		
	2015	2016	2017
IPL Max	15.40%	5.78%	10.14%
IPL Min	7.16%	6.47%	8.30%
SMEC	4.60%	5.62%	6.32%

Table 4 provides the average annual percentage increase for the three year period by class.

**Table 4: – Average Annual Estimated Increase in Class Revenues, 2015-2017**

Scenario	Class		
	<i>Residential</i>	<i>Small Commercial</i>	<i>Large Commercial</i>
IPL Maximum	7.48%	8.22%	10.44%
IPL Minimum	5.21%	5.73%	7.31%
SMEC	3.91%	4.31%	5.51%

The information in Table 4 suggests that SMEC’s annual increases will be lower on average for all three major classes if the Commission approved on average 46.5 percent or more of IPL’s incremental revenue requirements given the assumptions listed above.

**F. RELIABILITY, SERVICE QUALITY, OR SAFETY CONCERNS**

The Department concluded in its comments filed October 6, 2014 that distribution service reliability and quality will likely remain constant or improve for IPL’s current ratepayers if the transaction is approved. In those same comments, the Department concluded that safety-

related concerns for the provision of electric service should not increase if the transaction is approved.

*G. ENTITY RESPONSIBLE FOR FILING INTEGRATED RESOURCE PLANS UNDER MINN. STAT. §216B.1691*

The Department recommended in its comments filed October 6, 2014 that that the Commission condition the transaction such that SMEC is clearly recognized as being the sole entity responsible for fulfilling any and all regulatory requirements related to the Commission, even though IPL should work with SMEC regarding resource planning. Given this recommendation, SMEC would be the entity responsible for filing integrated resource plans under Minnesota Statute.

*H. ENTITY RESPONSIBLE FOR SMEC MEMBERS MEETING THEIR RENEWABLE ENERGY STANDARDS OBLIGATION PURSUANT TO MINN. STAT. §216B.1691*

The Department asked that SMEC discuss in its reply comments how it intends to report on renewable energy under Minn. Stat. §216B.1691 if the transaction is approved in its comments filed October 6, 2014. The Department will review IPL/SMEC's response and provide a reply if needed in its comments that will be filed on November 24, 2014. Those comments will also address the question of how that information will be reported.

*I. DEVELOPMENT OF COMMUNITY SOLAR GARDENS IN THE SMEC MEMBER SERVICE TERRITORIES*

In DOC Information Request No. 39 dated July 23, 2014, the Department asked the SMEC Member Cooperatives to provide a narrative that discussed their respective efforts to develop Community Solar Gardens in their service territories. The SMEC Member Cooperatives responded on August 4, 2014. In general, the SMEC Member Cooperatives appear to be pursuing solar generation to a limited extent. Tri-County Electric Cooperative (TEC) has been the most successful of the SMEC Member Cooperatives in this regard. TEC has installed a 20 kW community solar project and has sold subscriptions equal to 63 percent of the facilities' output. The Department has included the response to DOC Information Request No. 39 as Attachment A.

*J. CHANGES TO COMMISSION AUTHORITY OVER THE PROVISION OF SERVICE TO CURRENT IPL CUSTOMERS*

The Department identified the following changes to Commission authority over the provision of services to IPL's ratepayers in its comments filed October 6, 2014.

- 1) The responsibility for economically regulating IPL's generation assets, the prudence of expenses related to transmission and fuel and purchased power will shift from the Commission to FERC if the transaction is approved.



- 2) The responsibility for economically regulating IPL's distribution assets will shift from the Commission to SMEC Member Cooperative's Boards of Directors if the transaction is approved.
- 3) The Commission will continue to oversee the integrated resource planning function for IPL's current service territory.
- 4) The Commission will also continue to have limited oversight regarding rate design for the rates charged in the former IPL service territories for five years if the transaction is approved.
- 5) The Commission will retain a limited amount of oversight regarding customer complaints at the SMEC Member Cooperatives.

The Department will continue to review this issue as well as the comments provided in this proceeding to determine if additional changes should be included.

#### *K. CONSERVATION IMPROVEMENT PROGRAMS*

The Department noted in its comments filed on October 6, 2014 that it had not completed its review of IPL and SMEC's proposed transfer of IPL's CIP to the SMEC Member Cooperatives. The Department provides the following update as to its analysis of the CIP component of the proposed transaction.

The Department's review indicated that SMEC will pay IPL the Recoverable Tracker balance as part of the APA. The Recoverable Tracker balance is defined as:

- 1) The prior year-end CIP tracker balance plus;
- 2) The financial incentives awarded by the MPUC (or successor agency) not reflected in the prior year-end balance plus;
- 3) The current year CIP program expenditures at their approved and/or budgeted level minus;
- 4) The current CIP recovery through base rates as estimated based on Seller's budgeted retail sales.

The methodology described appears to be correct. SMEC estimates that the Conservation Cost Recovery Adjustment (CCRA) will decline from \$0.00269/kWh to \$0.00140/kWh as a result of the proposed transaction.

The Department still has questions regarding the timing of the inclusion of the financial incentive in the Recoverable Tracker balance. For example, the Commission will not likely approve IPL's 2014 financial incentive until third-quarter 2015. Assuming that the proposed transaction were to close in the first quarter of 2015, SMEC might be at risk if the Commission did not award IPL the amount of the incentive it claimed in 2014. It is the Department's understanding that IPL and SMEC are in discussions regarding this topic and additional information will be provided to interested parties in the near future.

The Department's review of IPL's and SMEC's CIP offerings suggest that there should not be a significant decline in CIP activity as a result of the proposed transaction. The Department is generally in agreement with SMECs Member Cooperatives' plan to use CIP staff and expertise from its Member Cooperatives' traditional cooperative generation and transmission providers – Great River Energy and Dairyland to support CIP offerings in the former IPL service territories.

The Department is also satisfied that the SMEC Member Cooperatives' reporting proposal is adequate.

### **III. CONCLUSIONS AND RECOMMENDATIONS**

Based on its review and analysis of the Petition and the information available at this time, the Department recommends that the Commission condition any approval of the Petition on the requirement that SMEC:

- Provide actual weather normalized annual revenue requirements for IPL's former service territory annually for the first three years following the proposed transaction's effective date; and
- Provide a bill credit to IPL's former ratepayers if the actual weather normalized annual revenue requirement in any year exceeds the forecasted annual revenue requirement by more than 2 percent.
- Be clearly recognized as the sole entity responsible for fulfilling any and all regulatory requirements related to the Commission;
- Provide reliability information to the Commission for IPL's former service territory annually for five years.

The Department will review IPL/SMEC's response and provide a reply if needed in its comments that will be filed on November 24, 2014.

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Confidential/Trade Secret

**Response of  
Interstate Power and Light Company and  
Southern Minnesota Energy Cooperative  
to  
Minnesota Department of Commerce,  
Division of Energy Resources  
Information Request No. 39**

Docket No.: E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132,  
E-114, E-6521, E-142, E-135/PA-14-322

Date of Request: July 23, 2014  
Response Due: August 4, 2014  
Information Requested By: John Kundert  
Date Responded: August 15, 2014  
Author: Dennis R. Eicher  
Author's Title: President, D.R. Eicher Consulting, Inc.  
Author's Telephone No.: (612) 868-0852  
Subject:  
Reference:

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**Information Request No. 39**

For each SMEC Member Cooperative, please provide a narrative that discusses their efforts to develop community Solar Gardens in their respective service territories.

**Response:**

All of the SMEC Member Cooperatives are actively engaged in researching the viability and best ways to implement a local solar project. Freeborn-Mower, People's and Tri-County are partners in a 517 kW project located in Oronoco, MN. BENCO, Brown County, Nobles and Steele-Waseca are working with their G&T supplier, Great River Energy, and expect to have a solar project up and running in 2015. See Attachment DOC-39A for additional information for each CBED Program Cooperative.

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**Response of  
Interstate Power and Light Company and  
Southern Minnesota Energy Cooperative  
to  
Minnesota Department of Commerce,  
Division of Energy Resources  
Information Request No. 39**

Docket No.: E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132,  
E-114, E-6521, E-142, E-135/PA-14-322

Date of Request: July 23, 2014  
Response Due: August 4, 2014  
Information Requested By: John Kundert  
Date Responded:  
Author: Dave Sunderman  
Author's Title: Member Services Manager  
Author's Telephone No.: 507-387-7963  
Subject: Solar Program  
Reference: BENCO Electric Cooperative

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**Information Request No. 39**

For each SMEC Member Cooperative, please provide a narrative that discusses their efforts to develop community Solar Gardens in their respective service territories.

**Response:**

We have researched and attended many meetings about solar energy. Our wholesale power supplier, Great River Energy (GRE) that is our Generation and Transmission (G&T) company is taking a lead in the research and deployment of solar energy. BENCO is scheduled for a solar array in 2015.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Author: Marcia Solie  
Author's Title: Member Services Manager  
Author's Telephone No.: 507-794-3331  
Subject: Solar Program  
Reference: Brown County Rural Electric Association

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**Response:**

Brown County REA will host a 20 kW solar array, owned by its wholesale power supplier Great River Energy, at its rural Sleepy Eye headquarters which will allow members to learn more about solar generation.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
E-6521, E-142, E-135/PA-14-322  
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Confidential/Trade Secret

Author: Richard G. Burud  
Author's Title: General Manager, Federated Rural Electric Association  
Author's Telephone No.: 507-847-3520  
Subject: Solar Program  
Reference: Federated Rural Electric Association

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**Response:**

This year Federated began investigating options for offering a solar garden. In addition, Federated surveyed its members in 2013 about solar.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
E-6521, E-142, E-135/PA-14-322  
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Author: Jim Krueger  
Author's Title: President/CEO  
Author's Telephone No.: (507) 373-6421  
Subject: Meter Reading  
Reference: Freeborn-Mower Cooperative Services

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**Response:**

To date, these efforts have been confined to the board room and at a high level. Freeborn-Mower is currently a 1/3 owner of a 517 KW solar project located in Oronoco, MN. Discussions will continue with the board of directors on possibly starting a community solar project in the future.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Author: Rod Nikula  
Author's Title: Vice President-Power Supply  
Author's Telephone No.: (952)-492-8262  
Subject: Solar Program  
Reference: Minnesota Valley Electric Cooperative

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**Response:**

MVEC conducted a Solar Workshop on June 30, 2014 for the BOD, management, and key staff. This included discussion about community Solar Gardens. MVEC would develop a Solar Garden proposal if the MVEC members requested this.



Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Confidential/Trade Secret

Author: Richard G. Burud  
Author's Title: General Manager, Nobles Cooperative Electric  
Author's Telephone No.: 507-372-7331  
Subject: Solar  
Reference: Nobles Cooperative Electric

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**Response:**

Nobles Cooperative Electric is working with Great River Energy on developing a community solar garden that will work within our power purchase agreement under our all-requirements contract with them. Nobles Cooperative Electric owns, operates and supplies renewable wind power from a 2.1 MW wind turbine near Brewster, Minnesota. We will begin construction on an 18 kW solar array located at the Worthington office in the next two months.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
E-6521, E-142, E-135/PA-14-322  
Information Request No. 39  
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Confidential/Trade Secret

Author: Susan Keith  
Author's Title: Executive Assistant  
Author's Telephone No.: (507) 367-7018  
Subject: Solar Program  
Reference: People's Energy Cooperative

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**Response:**

People's Energy Cooperative is in the beginning stages of planning and developing a community solar plant. People's plans to use the professional resources at NRCO to assist in developing the financial information, size, etc. We are working with area communities to identify and partner on a location. In addition, People's Energy Cooperative partnered with Tri-County Electric and Freeborn Mower Electric to build a 517 kW solar plant. All power is sold to Dairyland Power Cooperative, our wholesale power provider.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Confidential/Trade Secret

Author: Chad Nelsen  
Author's Title: Operations Manager  
Author's Telephone No.: (888) 251-5100  
Subject: Solar Program  
Reference: Redwood Electric Cooperative

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**Response:**

Redwood Electric is currently researching a Community Solar project. Information is being gathered through the monthly newsletter and on our website; we will continue researching renewable projects. We are also working with our G&T's on a possible large solar array.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Author: Ted Smith  
Author's Title: Director of Engineering and Operations  
Author's Telephone No.: 605-256-1608  
Subject: Solar Program  
Reference: Sioux Valley Energy

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**Response:**

Sioux Valley Energy hasn't taken on a project like this at this time. We are, however, currently evaluating our options in this area and it we will look at the possibility of doing a community solar garden sometime in the future.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Author: Jim Haler - South Central Electric

Author's Title: Member Services Manager

Author's Telephone No.: 507-375-3164

Subject: Solar Program

Reference: South Central Electric Cooperative

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**Response:**

South Central Electric has begun the task of gauging the interest among its members in regard to a community solar project. Members received a bill stuffer in July with FAQs and a coupon to return if they were interested in participating in such a project.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
E-6521, E-142, E-135/PA-14-322  
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Confidential/Trade Secret

Author: Kristi Robinson  
Author's Title: Distribution System Engineer  
Author's Telephone No.: 507-446-4235  
Subject: Solar Program  
Reference: Steele-Waseca Cooperative Electric

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**Response:**

Since third quarter of 2013 SWCE has been involved with a DOE SunShot grant regarding community solar that was awarded to Rocky Mountain Institute. The portion of this grant project SWCE, along with Dakota Electric Association and Great River Energy, are involved with focuses on identifying the best practices and emerging program designs for cooperative utilities to follow to create a fairly priced, technically beneficial, and sustainable community solar program to offer the cooperative membership. SWCE is entering the design phase of this project and currently is in the process of creating a community solar program that will be presented the Cooperative's Board of Directors this fall for 2015 budgeting.

Docket No. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114,  
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Author: Ted Kjos  
Author's Title: Vice President-Marketing and External Relations  
Author's Telephone No.:  
Subject: Solar Program  
Reference: Tri-County Electric Cooperative

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**Response:**

The TEC Board of Directors approved the development, installation and implementation of a 40kW Community Solar Project in July of 2013. Due to excellent member response, the project was expanded to 73.8 kW in January 2014. Construction began and was completed in July, 2014. There are 180 units available for purchase by active TEC members. Participating members will receive an energy credit in kWh monthly for twenty (20) years based on the total production of the system allocated by how many units of production each member purchased (\$1,400 per unit). As of 07/31/14 114 units have been sold to TEC members.

## **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  
Supplemental Reply Comments**

**Docket No. E001, 140,105,139,124,126,145,132,114,6521,142,135/PA-14-322**

**Dated this 10<sup>th</sup> day of November 2014**

**/s/Sharon Ferguson**



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