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September 27, 2013

**PUBLIC DOCUMENT**

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce,  
Division of Energy Resources**  
Docket No. E002/M-12-1278

Dear Dr. Haar:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Xcel Energy's Petition for Approval of the Renewable Development Fund-Cycle 4 Selection Report.

The initial petition was filed on July 29, 2013, a supplemental report was filed on August 9, 2013, and a second supplemental report was filed on September 13, 2013. The petitioner is:

Paul J. Lehman  
Manager, Regulatory Compliance and Filings  
Northern States Power Company d/b/a Xcel Energy  
414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

The Department requests further information from Xcel Energy to ensure that the Commission has a reasonably accurate record. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SAMIR OUANES  
Rates Analyst

SO/ja  
Attachment



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BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

PUBLIC COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE,  
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/M-12-1278

**I. SUMMARY**

On July 29, 2013, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed the Selection Report (Report) for the fourth funding cycle of the Renewable Development Fund (RDF).

In that filing, the Company requested that the Minnesota Public Utilities Commission (Commission) approve:

- Xcel's proposed Cycle 4 grant awards for energy production (EP) projects and research and development (RD) projects as identified in the Report;
- Xcel's proposed Cycle 4 Tier I and Tier II Reserve Projects as identified in the Report;
- Xcel's authority to terminate contract negotiations that the Company reasonably believes have reached an impasse and move forward with a project on the Tier I and Tier II Reserve Projects list; and
- Xcel's recommended awards for the higher education block grants, subject to the amounts and limitations detailed in the Report.

On July 29, 2013, the Division of Energy Resources of the Minnesota Department of Commerce (Department) noted that the Report did not "include a detailed explanation of any deviations from the rankings for EP, RD and institutions of higher education projects provided by an independent third-party evaluator or other evaluator" as required by the February 6, 2013 Order of the Minnesota Public Utilities Commission in this proceeding. Therefore, in a July 29, 2013

email to Xcel, the Department noted that the Company's filing was not complete without this required information and requested that the Company complete the record through a supplemental filing with the required information described above, as soon as possible.<sup>1</sup>

On August 9, 2013, the Company filed a Supplemental Report (Supplemental).

On August 13, 2013, the Commission issued a *Notice of Comment Period on RDF Selection Report*.

On August 19, 2013, the City of Hutchinson filed a letter indicating that the scoring of EP4-41 did not include the additional bonuses to reflect the preference for both "Projects that are structured to receive a lump-sum grant payment upon project completion" and "Sponsored by a K-12 school or local unit of government to construct solar photovoltaic facility."

On August 19, 2013, the Department contacted Xcel over the phone and asked the Company to identify and address this scoring issue as soon as possible. The Department also stressed the need for Xcel to review the scoring process to ensure that there are no other outstanding scoring issues.

On August 26, 2013, the Region Five Economic Development Commission filed a letter also indicating that the scoring of EP4-44 did not include the additional bonuses discussed above.

On August 27, 2013, the Department contacted the Company by email and recommended that Xcel file a revised filing, including an explanation of all of the scoring issue(s), as soon as possible.<sup>2</sup>

On September 3, 2013, the Commission issued a *Notice of Extended Comment Period and Informational Meeting on RDF Selection Report*. In that Notice, the Commission stated:

On August 22, 2013, Xcel informed the Commission of a scoring oversight. Xcel therefore will repeat the scoring process and file another supplement by September 13, 2013. The Commission will extend the comment period in this docket to allow parties to comment on the corrected scoring and other topics as noted above.

On September 13, 2013, Xcel filed a Second Supplemental Report (2<sup>nd</sup> Supplemental).

The Department submits these comments in response to the Commission's September 3, 2013 *Notice of Extended Comment Period and Informational Meeting on RDF Selection Report*.

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<sup>1</sup> See Attachment 1.

<sup>2</sup> See Attachment 2.

## **II. BACKGROUND**

Xcel's Renewable Development Fund program was established to satisfy its obligations under Minnesota Statutes Section 116C.779. The statute directs the owner(s) of the Prairie Island and Monticello nuclear power plants—Xcel—to fund a renewable development account in connection with the dry-cask storage of spent nuclear fuel at those facilities. According to Xcel's initial filing, the RDF Program's previous three funding cycles granted approximately \$78 million to renewable energy research and production projects since 2001.

The renewable development fund statute was amended in 2012. Among other changes, the statute now provides more detailed guidance for use of the funds, clarifies the Commission's authority in the funding process, codifies the use of an advisory group, and requires that the utility administering the fund must "strongly consider, where reasonable, potential benefit to Minnesota citizens and businesses and the utility's ratepayers."

Under Minnesota Statute Section 116C.779, subdivision 1(d), funds in the RDF account may be expended only for any of the following purposes:

- 1) to increase the market penetration within the state of renewable electric energy resources at reasonable costs;
- 2) to promote the start-up, expansion, and attraction of renewable electric energy projects and companies within the state;
- 3) to stimulate research and development within the state into renewable electric energy technologies; and
- 4) to develop near-commercial and demonstration scale renewable electric projects or near-commercial and demonstration scale electric infrastructure delivery projects if those delivery projects enhance the delivery of renewable electric energy.

Under Minnesota Statute Section 116C.779, subdivision 1(f), the RDF account:

. . . shall be managed by the public utility [Xcel] but the public utility must consult about account expenditures with an advisory group that includes, among others, representatives of its ratepayers. The commission may require that other interests be represented on the advisory group. The advisory group must be consulted with respect to the general scope of expenditures in designing a request for proposal and in evaluating projects submitted in response to a request for proposals. In addition to consulting with the advisory group, the public utility must utilize an independent third-party expert to evaluate proposals submitted in response to a request for proposal, including all proposals made by the public utility. A request for proposal for research and development under paragraph

(d), clause (3), may be limited to or include a request to higher education institutions located in Minnesota for multiple projects authorized under paragraph (d), clause (3). The request for multiple projects may include a provision that exempts the projects from the third-party expert review and instead provides for project evaluation and selection by a merit peer review grant system. The utility should attempt to reach agreement with the advisory group after consulting with it but the utility has full and sole authority to determine which expenditures shall be submitted to the commission for commission approval. In the process of determining request for proposal scope and subject and in evaluating responses to request for proposals, the public utility must strongly consider, where reasonable, potential benefit to Minnesota citizens and businesses and the utility's ratepayers.

On November 29, 2012, Xcel filed a notice of intent to proceed with the fourth funding cycle of the RDF Program with the Commission.

The Company proposed to issue two RFPs, the first for projects related to energy production and research and development, and the second soliciting projects from Minnesota institutions of higher education for renewable energy research and development. Xcel's proposal sets forth selection criteria, a selection process, and proposed standard contracts that Xcel contends reflect the 2012 statutory changes and previous Commission orders.

In its December 21, 2012 comments and January 22, 2013 reply comments, the Department raised concerns about the level of clarity in Xcel's approach to scoring RFP responses, and contended that the scoring system did not provide an adequate level of transparency for the Commission to meaningfully assess program funding decisions.

The Department stated that the scoring process used must be as transparent as possible for the following three reasons. First, a clearly specified scoring approach should allow for a larger participation. Second, an unspecified scoring approach may preclude any independent third party expert, hired to evaluate the submitted proposals, from providing an objective ranking of the projects. This opacity would add an unnecessary layer of subjectivity to the selection process. Last but not least, an unspecified scoring approach may also preclude the Commission from being able to assess the reasonableness of the final selection to be proposed by the Company. At a minimum, the RFPs should include the same level of clarity for the scoring approach as was provided for the third RDF cycle selection.

At the January 31, 2013 Commission meeting on this matter, Xcel argued that a scoring system with too much detail could discourage proposals, and reduce the creative diversity of the proposals that would be submitted.

In its February 6, 2013 Order (2013 Order), the Commission concluded that:

Xcel's proposal, as modified in its reply comments, establishes a reasonable process for soliciting and selecting RDF fund recipients under Minn. Stat. § 116C.779, with the following modifications.

The Commission shares the Department's commitment to greater transparency in the selection process. Ultimately, the Commission must approve selections made as a result of the RFP process; objective information about the relative merit of the proposals will aid the Commission's decision. The Commission believes there is room for the scoring system to provide more detail without meaningfully diminishing participation or proposal creativity.

Accordingly, the Commission will require Xcel to provide a scoring approach with a similar level of scoring clarity as in RDF Cycle 3, and that it include more direction on how preference criteria will be counted for both proposed RFPs. This requirement is not intended to limit the preference criteria or scoring, only to ensure that the detail in the RFP scoring and selection process is sufficient to be meaningfully reviewed by the Commission, the Department, and other stakeholders.

Having considered the parties' expressed interest in getting this funding cycle underway, and their agreement at the meeting that Xcel would adopt an approach that synthesized the scoring system of Cycle 3 with new criteria and concepts proposed by Xcel for Cycle 4, the Commission will approve Xcel's proposal as modified below, with the understanding that the revised RFP scoring system will be submitted in a compliance filing as soon as is practicable.

On February 13, 2013, Xcel filed a compliance filing and a revised compliance filing.

On February 14, 2013, the Department filed a letter stating that the February 13, 2013 revised compliance filing was in compliance with the 2013 Order.

On February 15, 2013, Xcel issued the two Commission-approved RFPs. One RFP was for the solicitation of Energy Production and Research Development proposals. The other was a solicitation to Minnesota institutes of higher education for renewable electric energy research programs.

The Summary Section of these comments, above, provides the rest of the procedural history to date, starting with Xcel's July 29, 2013 selection report.

### III. DEPARTMENT ANALYSIS

The Commission concluded in its 2013 Order that Xcel's proposal, as modified in its reply comments, establishes a reasonable process for soliciting and selecting RDF fund recipients under Minn. Stat. § 116C.779, with the scoring approach modification discussed above. As a result, the Department's analysis of the reasonableness of the RDF recipient selection is based on whether the selection process followed as closely as practical the process approved by the Commission and outlined by Xcel in its February 13, 2013 revised compliance filing.

The Department and Xcel agree that the 2012 changes to the Minn. Stat. §116C.779, subd. 1(f) give Xcel "full and sole authority to determine which expenditures shall be submitted to the commission for commission approval" and require Xcel to "attempt to reach agreement with the advisory group after consulting with it." Thus, the only issue the Department considers in its review is whether Xcel's scoring process is reasonably transparent and accurate as implemented in this proceeding to allow the Commission a reasonable basis to reach its decisions. Ultimately, it will be up to the Commission to make that call, but the Department provides its assessment below.

#### A. *COMMISSION-APPROVED EP AND RD PROJECTS SELECTION PROCESS*

The following excerpt from Xcel's revised compliance filing (Attachment A-Final at 26, and 32-33) describes the selection process approved by the Commission:

To assist the [sic] Xcel Energy with the evaluation of 4<sup>th</sup> Cycle RDF proposals, an independent evaluator will review all eligible proposals. Projects will be reviewed and evaluated based on how well a proposal fulfills several weighted criteria and how they comport to the preferences discussed in this RFP. These criteria will be used to guide the independent evaluator's review of proposed projects. After completing the evaluation, findings and recommendations for funding will be presented to Xcel Energy, including all rationale, scoring forms and written comments for each proposal. In making its funding decisions, Xcel Energy will utilize these results, together with its own judgment and input from the advisory group concerning the mix of projects within the 4<sup>th</sup> Cycle funding portfolio.

...

RD and EP proposals will be scored through a two-step process. Proposals that have met the eligibility screening criteria described in Section IV will first receive a Core Criteria Score. Each of the sub-criterion will be evaluated according to how well that criterion met the evaluation definition. A Core Criteria Score will be

calculated as a sum of the weighted individual core criterion scores. A Combined Core Criteria Score will be calculated by the summation of the five Core Criteria Scores.

Next, Bonus Preferences will be applied to those projects that meet certain preference criteria as described in Section IV. Each preference has the same preference multiplier of 10% the maximum Combined Core Criteria Score. Bonus Preference Scores are limited to 15% of the maximum Combined Core Criteria Score. The Total Bonus Preference Score will be calculated by combining all Bonus Preference Scores with a limit not to exceed 15% of the maximum Combined Core Criteria Score.

The total Project Score will be calculated by summing the Combined Core Criteria Score and the Total Bonus Preference Score.

Evaluations will take into consideration project preferences described in this RFP. While these evaluations will inform the proposal selection process, final selection will be based on both these evaluations, and subjective recommendations from the advisory group. This process will ensure that the final portfolio of projects contains a mix of technologies, risk levels, and market penetration time frames, consistent with overall funding availability and requirements for sufficient return on RD investments.

To facilitate development of a balanced portfolio of projects, Xcel Energy will request that the independent evaluator rank proposals in descending order against all proposals as a single group, and then again within each resource type. For instance, after ranking all projects in a single list, biomass projects will be grouped and then ranked against other biomass projects; solar projects will be grouped and then ranked against other solar projects, and so forth. The advisory group will recommend how far down the ranked list of proposals it proposes to make awards. While Xcel Energy has a desire to fund a diverse mix of resource types, it is not obligated to select projects solely on the basis of project rankings and it is not obligated to fund projects within every technology proposed. When selecting proposals, Xcel Energy will choose a number of alternate proposals to have available as an alternative selection list. In the event a bidder decides to withdraw a proposal, has proposed modifications that were not identified on the Proposed Contract



Modification Form, does not timely complete its due diligence and execute a grant contract, or is unable to timely agree to terms for a power purchase agreement with Xcel Energy, Xcel Energy reserves the right to rescind that RDF award, subject to MPUC approval as necessary, and quickly begin work with an alternate proposal, if needed.

*B. SCORING ACCURACY*

Overall, based on the record to date, the Department cannot conclude at this time whether or not Xcel followed the process approved by the Commission for the EP and RD project selection. The Department provides the following information so the Commission can determine reasonable steps forward.

The Department reviewed Tables 5 and 6 in Xcel's August 9, 2013 Supplemental Filing, Xcel's discussion of the scoring errors raised by several parties in this proceeding, and Xcel's successive explanations for the deviations from the independent evaluator ranking.

Xcel's Table 5 provides the initial independent evaluator's ranking of Energy Production proposals in descending order against all proposals as a single group. It also indirectly provides the independent evaluator's ranking of Energy Production proposals in descending order within each resource type.

Table 6 provides the initial independent evaluator's ranking of Research & Development proposals in descending order against all proposals as a single group. It also indirectly provides the independent evaluator's ranking of Research & Development proposals in descending order within each resource type.

The Company's September 13, 2013 second supplemental comments identified eight projects that were impacted by the independent evaluator scoring errors: EP4-22, EP4-41, EP4-44, EP4-45, RD4-1, RD4-12, RD4-13 and RD4-16. The scoring errors consisted of the omission of bonus points under the bonus criteria.

Two of these projects, EP4-22 and EP4-45, already received the maximum amount of bonus points allowed. As a result, their overall score was not impacted by these scoring errors.

Two of these projects, RD4-12 and RD4-13, were not affected by the scoring errors as they were both recommended for funding.

Xcel's second supplemental comments appear to have corrected the scoring errors identified by parties in this proceeding. However, the Company did not explain whether a separate and independent process, even an internal review as the one suggested by Xcel (for future RDF

funding cycles), was added to verify that they were no other scoring errors besides the bonus scoring issues identified by other parties.

Xcel's lack of verification of the accuracy of the work by the independent evaluator selected by Xcel, Sargent & Lundy, is troubling, given the discussion early in this filing of the importance of scoring in this proceeding. It should not have been necessary for Xcel to state that a "lesson learned" in this proceeding is that they need to check the accuracy of scoring; that should have been clear to the Company all along.

As to steps forward in this proceeding, it still is not clear whether Xcel or the advisory group checked the entire report by Sargent and Lundy for accuracy. Xcel should explain in reply comments what accuracy review was done when, as stated in Xcel's September 13 filing, Xcel has "received Sargent & Lundy's revised scoring report and reviewed it with the advisory group." That information will help the Commission determine whether it is satisfied with that review of the report.

The Department also notes that Xcel did not provide revised Table 5 and Table 6, including the independent evaluator's revised numerical ranking of EP and RD proposals. For clarity of the record in this proceeding, the Department recommends that Xcel provide in reply comments the corrected Tables 5 and 6.

In addition, the Department recommends that Xcel also provide in reply comments the independent evaluator's revised ranking of EP and RD proposals in descending order within each resource type. These summary tables would allow a meaningful review of Xcel's explanation of any deviations from the numerical rankings for EP and RD proposals by the Commission and other stakeholders.

Thus, regarding the issue of scoring accuracy, the Department recommends that the Commission review the information requested above from Xcel and determine whether the Commission is satisfied that the scoring is accurate. If the Commission is sufficiently concerned about the integrity of the scoring and selection process, then the Commission could consider requiring Xcel to hire an independent outside auditor to verify Sargent & Lundy's calculations and procedures, with Sargent & Lundy paying for this work.<sup>3</sup>

### *C. XCEL'S EXPLANATIONS FOR DEVIATIONS FROM SCORING*

Considering the independent evaluator's ranking, the advisory board's input, and its own judgment, Xcel selected the RDF recipients. As noted above, Xcel is allowed to do so by law. However, since it took Xcel several tries to explain the deviations in their selections from the independent evaluator ranking, the record for the selection process is spread among three

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<sup>3</sup> A similar process was used by Xcel following scoring errors made by the independent evaluator in the 2nd cycle RDF selection report in Docket No. E002/M-03-1883.

different filings with changes to the numerical ranking discussed in the third filing. Thus, to allow for a more efficient review of the record by the Commission, the Department recommends that Xcel provide in reply comments a complete set of the selections, with updated explanations of any deviations from the revised numerical rankings for EP and RD proposals.

The approval of Xcel's selection of projects is largely a policy call. The Department's role in these proceedings is to help ensure that the process is as fair and transparent as possible. Unless there is a major question or concern, the Department does not weigh in on the selection of projects. In this proceeding, there is only one selection, discussed below, where the Department has concerns. Otherwise, the Department recommends that the Commission assess whether Xcel's explanations allow for a meaningful review by the Commission of the selection results.

The Department notes that it appears that Xcel did not adequately consider the interests of ratepayers in one selection in the biomass category. Specifically, Xcel selected the following two biomass EP projects:

- EP-09, Mondovi Energy Systems, 135.03 total score, ranked number two among five biomass EP proposals; and
- EP4-04, SGE Partners LLC, 129.09 total score, ranked number five among five biomass EP proposals.

Xcel provided the following explanation for why EP4-37, ranked number four, was not selected:

Natural Systems Utilities, LLC/Michael Foods: Anaerobic Digester Project (EP4-37)

This project proposes an anaerobic digester to treat Michael Foods, Inc.'s Chaska, Minnesota facility's (potato processing plant) wastewater and produce electricity for its operations. The project's combined heat and power system is estimated to generate 13,000 kWh/d or 3,445,000 kWh/yr. The renewable energy generated would be consumed on site, replacing power that is currently being purchased from the grid.

The overall cost associated with this proposal was quite high, as noted by Sargent & Lundy in its review. Additionally, the project is not within the Xcel Energy service territory and there were some technical aspects that were not fully developed. The advisory group determined that the project was similar to other biomass projects proposed and had higher costs compared to other proposals. Given that it was not significantly different than other biomass proposals that scored higher and to provide a balance and

mix of project types by avoiding duplicative projects, the advisory group decided not to pursue this proposal further.  
Source: Supplemental at 13-14.

In its 2<sup>nd</sup> Supplemental filing, Xcel added that the Company selected EP4-09 instead of EP4-37 “because it was somewhat more innovative and complete than EP4-37. Specifically, EP4-09 proposed a more community-wide concept to use a variety of feed stocks that ranged from waste products from commercial processing, the food industry, and agricultural manures.”

The Department notes, from a ratepayer perspective, that the “somewhat more innovative” aspect that may exist doesn’t justify exposing Xcel’s ratepayers to the high costs of the purchased power agreement (PPA) that is part of the bid. EP4-37 was ranked number four among the five biomass EP projects with a total score of 133.30, and requested a grant amount of \$2,000,000, with no PPA needed. The only selected biomass EP project that scored higher, EP4-09, ranked number two with only a slightly larger total score of 135.03, and the same grant amount requested of \$2,000,000, but with a bid price of **[TRADE SECRET DATA HAS BEEN EXCISED]**.

It is not clear why “to provide a balance and mix of project types by avoiding duplicating projects, the advisory group decided not to pursue this proposal further,” given that “it was not significantly different than other biomass proposals that scored higher.” Nor is it clear why the Company would select a biomass proposal that requires a bid price as noted above over another biomass proposal that does not require a PPA, given that “it was not significantly different than other biomass proposals that scored higher.”

Based on the discussion above, the Department recommends that Xcel complete the record in reply comments with further explanation regarding why the biomass proposal EP4-37 was not selected and EP4-09 was selected, given the concerns noted above.

#### *D. SELECTION OF RESERVE PROPOSALS*

The Department recommends that Xcel provide in reply comments a discussion clearly explaining the process the Company will use to select the reserve proposal “to be awarded funding should any of the projects on the recommended list not proceed.”

#### *E. AUTHORITY TO TERMINATE CONTRACT NEGOTIATIONS*

The Department notes that Xcel’s request for authority to terminate contract negotiations that the Company reasonably believes have reached an impasse and move forward with a project on the Tier I and Tier II Reserve Projects list is consistent with the following language in Xcel’s revised compliance filing (Attachment A at 33):

In the event a bidder decides to withdraw a proposal, has proposed modifications that were not identified on the Proposed Contract Modification Form, does not timely complete its due diligence and execute a grant contract, or is unable to timely agree to terms for a power purchase agreement with Xcel Energy, Xcel Energy reserves the right to rescind that RDF award, subject to MPUC approval as necessary, and quickly begin work with an alternate proposal, if needed.

The Department also notes that Xcel's request is consistent with the RDF 3<sup>rd</sup> Cycle process as discussed below:<sup>4</sup>

In the event a grant recipient withdraws or fails to complete negotiations, or does not reach agreement on terms of a power purchase agreement (PPA), Xcel will begin grant contract discussions with a project from the reserved list.

Finally, the Department is not aware of any issue raised regarding the implementation of this request in the past. For all these reasons, the Department does not object to this request.

*F. COMMISSION-APPROVED HIGHER EDUCATION SELECTION PROCESS*

The following excerpt from Xcel's revised compliance filing (Attachment B-Final at 4-5 and 8) describes the selection process approved by the Commission:

Xcel Energy anticipates providing block grants up to \$10 million depending on the availability of funds and the viability of proposals submitted for the 4<sup>th</sup> funding cycle. Xcel Energy may deviate from this target allocation if warranted. Depending upon the availability of funds, block grant awards may be reduced, or increased, incrementally to achieve an appropriate balance of RDF funding initiatives that support the RDF mission and that add value by supporting a different mix of programs. If there are [sic] an insufficient number of qualified programs to meet the target allocation, funds may be deferred to future years or other RDF initiatives. Further, Xcel Energy may revise these targets after the evaluation proposals submitted in response to this RFP.

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<sup>4</sup> Source: March 13, 2008 Staff Briefing Papers at 9, Docket No. E002/M-07-675.

Block grants will be made for a fixed term of up to three years. Renewed funding to continue a research program established, or supported, by this RFP is dependant [sic] upon program performance, availability of future funding, best use of RDF funds, and Minnesota Public Utilities Commission (“MPUC”) approval.

The MPUC must approve all programs selected for funding by Xcel Energy, with the advice of the RDF advisory group. Xcel Energy reserves its right to exercise all of its rights and remedies, including taking no action, in the event the MPUC does not approve a selected program. Xcel Energy further reserves the right to withdraw this RFP or select no projects for funding or adjust amounts available for block grants during this funding cycle. There is no maximum grant amount but proposals that include cost sharing are encouraged.

...

Proposals will be reviewed by the advisory group, who will assess the proposals and provide recommendations to Xcel Energy. Xcel Energy will make the final selection and determination of funding levels. Xcel Energy may retain an outside independent consultant to assist in the review and selection process. Selections for block grants will be submitted to the Commission for final approval.

...

Higher Education proposals will be scored through a one-step process. Each of the sub-criterion will be evaluated according to how well that criterion met the evaluation definition. An Evaluation Criteria Score will be calculated as a sum of the individual weighted criterion scores. A Total Score will be calculated by the summation of the four Evaluation Criteria Scores.

Xcel Energy reserves the right to request that applicants provide additional materials and/or an oral presentation to describe their proposed concept for establishing a research program. Xcel Energy also reserves the right to select to [sic] proposals bid into this RFP for funding.

Xcel proposes an RDF grant award in the full amount (\$5.5 million) requested by the Minnesota State Colleges and Universities (MNSCU). MNSCU achieved the highest score with 145.01 points, the University of St. Thomas was second with 120 points and the University of Minnesota was third with 117.96.

The Company proposes to “hold in abeyance an amount of about \$3.5 million available for block grants to the University of St Thomas and the University of Minnesota.” Xcel wishes to work with both institutions to address the concerns of the RDF advisory group.

The Department concludes that the awards for the higher education block grants followed the process approved by the Commission and outlined in Section E above, based on the selection process described in the Report at 30-34 and 37.

#### **IV. DEPARTMENT’S RECOMMENDATION**

To allow a meaningful and efficient review by the Commission and other stakeholders of Xcel’s explanation of any deviations from the numerical rankings for EP and RD proposals, the Department recommends that Xcel provide in reply comments:

- revised Tables 5 and 6, including the independent evaluator’s revised numerical ranking of EP and RD proposals;
- the independent evaluator’s revised ranking of EP and RD proposals in descending order within each resource type;
- a complete set of the selections, with updated explanations of any deviations from the revised numerical rankings for EP and RD proposals;
- further explanation regarding why the biomass proposal EP4-37 was not selected and EP4-09 was selected, given the concerns noted above; and
- a discussion clearly explaining the process the Company will use to select the reserve proposal “to be awarded funding should any of the projects on the recommended list not proceed.”

The Department recommends that the Commission assess this record once the information is filed to determine whether Xcel’s explanations allow for a meaningful review by the Commission of the selection results.

The Department also recommends that Xcel explain in reply comments what accuracy review was done when, as stated in the Company’s September 13 filing, Xcel has “received Sargent & Lundy’s revised scoring report and reviewed it with the advisory group.” That information will help the Commission determine whether it is satisfied with that review of the report.

Thus, regarding the issue of scoring accuracy, the Department recommends that the Commission review the information requested above from Xcel and determine whether the Commission is satisfied that the scoring is accurate. If the Commission is sufficiently concerned about the integrity of the scoring and selection process, then the Commission could consider requiring Xcel to hire an independent outside auditor to verify Sargent & Lundy's calculations and procedures, with Sargent & Lundy paying for this work.

At this time, the Department concludes that:

- Xcel's request for authority to terminate contract negotiations that the Company reasonably believes have reached an impasse and move forward with a project on the Tier I and Tier II Reserve Projects list is consistent with the process approved by the Commission; and
- the awards for the higher education block grants followed the process approved by the Commission.

/ja



## Attachment 1

## Ouanes, Samir (COMM)

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**From:** Ouanes, Samir (COMM)  
**Sent:** Monday, July 29, 2013 5:40 PM  
**To:** Timothy Edman (timothy.j.edman@xcelenergy.com)  
**Cc:** Mackenzie, Susan (PUC); O'Connell, Kate (COMM)  
**Subject:** FW: RDF Cycle 4 Press Release

Tim,  
I wanted to clarify that Xcel's July 29, 2013 filing in 12-1278 is not complete without the information discussed below since it does not comply with the Commission's Order.  
Samir

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**From:** Ouanes, Samir (COMM)  
**Sent:** Monday, July 29, 2013 5:23 PM  
**To:** 'Edman, Timothy J'; Mackenzie, Susan (PUC)  
**Cc:** Gonzalez, Janet (PUC)  
**Subject:** RE: RDF Cycle 4 Press Release

Thanks Tim for providing at your earliest convenience a live electronic copy of Attachment C (page 58 of 128) and Attachment D (page 59 of 128) of Xcel's July 29, 2013 Selection Report in Docket No. E002/M-12-1278.

The final selection report does not appear to "include a detailed explanation of any deviations from the rankings for EP, RD and institutions of higher education projects provided by an independent third-party evaluator or other evaluator" as required by the February 6, 2013 Order in 12-1278 (and April 1, 2008 Order in 07-675).

Please identify the Report's pages where the above-required information was provided or explain why it is irrelevant (for example, if no deviations from the independent rankings). If not, please complete the record, through a supplemental filing with the required information described above, as soon as possible.

Thanks,  
Samir

Samir Ouanes  
Rates Analyst  
Division of Energy Resources  
Minnesota Department of Commerce  
(651) 539-1831

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**From:** Edman, Timothy J [<mailto:Timothy.J.Edman@xcelenergy.com>]  
**Sent:** Monday, July 29, 2013 4:11 PM  
**To:** Mackenzie, Susan (PUC); Ouanes, Samir (COMM)  
**Cc:** Gonzalez, Janet (PUC)  
**Subject:** RDF Cycle 4 Press Release

Greetings,

I am pleased to report the RDF cycle 4 selection report was filed this afternoon and the attached press release was just issued. Please let me know if you have any questions.

Thank you.

Timothy J. Edman  
Xcel Energy | Regulatory Administration

414 Nicollet Mall, 7 Minneapolis, MN 55401  
P: 612.330.2952 C: 612.207.2080 F: 612.215.7601  
E: [Timothy.J.Edman@xcelenergy.com](mailto:Timothy.J.Edman@xcelenergy.com)

## Attachment 2

## Ouanes, Samir (COMM)

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**From:** Ouanes, Samir (COMM)  
**Sent:** Tuesday, August 27, 2013 1:44 PM  
**To:** 'Lehman, Paul J'  
**Cc:** Mackenzie, Susan (PUC); Timothy Edman (timothy.j.edman@xcelenergy.com); Ritter, Mark G (Mark.G.Ritter@xcelenergy.com)  
**Subject:** RE: RDF Q/A meeting, 9:30 am, Tuesday, Sept. 10

Paul,

Thank you for organizing a Q/A session on the RDF 4<sup>th</sup> Cycle selection report with the Commission and other interested parties on September 10, 2013.

Given the scoring issues raised by the City of Hutchinson on August 19, 2013 and by the Region Five Economic Development Commission on August 26, 2013, and as a follow-up to discussions I had with Tim last week, I also strongly recommend that Xcel file as soon as possible, preferably before the Q/A meeting if possible, an explanation of the scoring issue(s) at hand, how they happened, what additional steps Xcel will take to alleviate this issue in the future (in light of similar issues during the RDF 2<sup>nd</sup> Cycle selection review), and provide and justify any revision (or no revision) to its initial selection proposal.

Thanks.  
Samir

Samir Ouanes  
Rates Analyst  
Division of Energy Resources  
Minnesota Department of Commerce  
(651) 539-1831

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**From:** Lehman, Paul J [<mailto:paul.lehman@xcelenergy.com>]  
**Sent:** Wednesday, August 14, 2013 3:56 PM  
**To:** Mackenzie, Susan (PUC); Edman, Timothy J; Ritter, Mark G  
**Cc:** Ouanes, Samir (COMM)  
**Subject:** RE: RDF Q/A meeting, 9:30 am, Tuesday, Sept. 10

Great. Thanks.

Paul J Lehman  
**Xcel Energy**  
Manager Compliance & Filings

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**From:** Mackenzie, Susan (PUC) [<mailto:susan.mackenzie@state.mn.us>]  
**Sent:** Wednesday, August 14, 2013 3:55 PM  
**To:** Lehman, Paul J; Edman, Timothy J; Ritter, Mark G  
**Cc:** Ouanes, Samir (COMM)  
**Subject:** RE: RDF Q/A meeting, 9:30 am, Tuesday, Sept. 10

Hi,

I don't have answers to any of these questions. However, someone should be there that can answers questions on all the selected projects. The questions probably won't be in great depth like last time when LeRoy wanted the project

people, who ended up doing an excellent job. However, if the project people are available, that would be great. I will talk to commissioners the week before and see if there are specific projects they have questions on or what concerns might be.

I will think about this more and let you know...

Best,  
Susan

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**From:** Lehman, Paul J [<mailto:paul.lehman@xcelenergy.com>]  
**Sent:** Wednesday, August 14, 2013 3:19 PM  
**To:** Mackenzie, Susan (PUC); Edman, Timothy J; Ritter, Mark G  
**Cc:** Ouanes, Samir (COMM)  
**Subject:** RE: RDF Q/A meeting, 9:30 am, Tuesday, Sept. 10

Susan,

Thanks for the alert for the date and time. I believe given the amount of advance notice we have, this should work out.

As a start at getting geared up for this, do you have a handle on what the Commissioners are expecting? Beyond how much time are they looking at and any advance questions that you are following up on, who should be involved beyond those of us from the Company? Advisory group members? Some/all/select bidders? Independent evaluator?

Paul

Paul J Lehman  
**Xcel Energy**  
Manager Compliance & Filings

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**From:** Mackenzie, Susan (PUC) [<mailto:susan.mackenzie@state.mn.us>]  
**Sent:** Wednesday, August 14, 2013 2:31 PM  
**To:** Edman, Timothy J; Ritter, Mark G; Lehman, Paul J  
**Cc:** Ouanes, Samir (COMM)  
**Subject:** RDF Q/A meeting, 9:30 am, Tuesday, Sept. 10

Hi.

Burl just emailed that commissioners want to hold the Q/A meeting on the selected RDF projects (to start at 9:30 am) on September 10. We scheduled this prior to the comment filing date so that the questions could be specific to the projects, what they are and why they were selected.

We can talk further about outline for the Q/A and presentation. I would think a short explanation of each project and then give commissioners opportunity to ask questions.....I'm not sure how much time is scheduled but will find out. Also, I will find out ahead if commissioners have specific questions. At this point, I don't know how much they will dig in and have questions or just want the opportunity for questions.

Best,  
Susan

Stay tuned and let me know your thoughts for how to structure so that it goes well and is useful for all!

## **CERTIFICATE OF SERVICE**

I, Jan Mottaz, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, 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.

**Comments** of the Minnesota Department of Commerce, **Division of Energy Resources**

**Docket No.** E002/M-12-1278

**Dated this 27th day of September 2013**

**/s/Jan Mottaz**

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Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1278_Official
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