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Minneapolis, Minnesota 55401

October 10, 2014

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

—VIA E-MAIL—

RE: RESPONSES TO MPUC INFORMATION REQUEST NOS. 6, 7 AND 8
DRAFT PURCHASE POWER AGREEMENT WITH GERONIMO ENERGY
DRAFT PURCHASE POWER AGREEMENTS WITH CALPINE CORPORATION AND
INVENERGY THERMAL DEVELOPMENT AND PROPOSED PRICE TERMS FOR BLACK
DOG UNIT 6
APPROVAL FOR A COMPETITIVE ACQUISITION PROPOSAL
DOCKET NOS. E002/M-14-788, E002/M-14-789 & E002/CN-12-1240

Dear Dr. Haar:

Enclosed please find our responses to the referenced Minnesota Public Utilities Commission information requests in the above-noted dockets.

Please call me at (612) 337-2268 if you have any questions regarding this submission.

Sincerely,

/s/

AMBER R. HEDLUND
REGULATORY CASE SPECIALIST

Enclosures

- ☐ Non Public Document – Contains Trade Secret Data
☐ Public Document – Trade Secret Data Excised
☒ Public Document

Xcel Energy

Docket No.: E002/M-14-788, E002/M-14-789 & E002/CN-12-1240

Response To: Public Utilities Commission Information Request No. 6

Requestor: Sean Stalpes

Date Received: September 26, 2014

Question:

The Table on page 9 shows Xcel's September 2014 Need Assessment Summary under the median peak.

Please provide an additional table with 75th percentile peak demand and 90th percentile peak demand.

Response:

The table below provides the 75th percentile peak demand and 90th percentile peak demand from the August 2014 forecast.

August 2014 Forecast
Peak Demand
(MW)

	2017	2018	2019	2020	2021	2022	2023	2024
75%	9,932	10,043	10,134	10,213	10,273	10,390	10,426	10,421
90%	10,340	10,481	10,626	10,720	10,812	10,952	11,020	11,054

When looking at peak demand forecasts at levels other than the 50 percentile level, it is not appropriate to compare to the UCAP generation value which would be lower due to adjustment for effective forced outage rate. Variation around the median is accounted for in MISO's statistical approach to capacity adequacy calculations. At higher peak levels it is more informative to shift to an "operating" view which reflects maximum dependable generation capability. From an operations perspective, we take a look at the actual maximum dependable generation at each unit rather than making statistical adjustments. The sum of our demand response and our anticipated maximum dependable generation levels are presented below.

Resource Capacity (MW)

	2017	2018	2019	2020	2021	2022	2023	2024
Generation (ICAP)	9,558	9,481	9,447	9,448	9,606	9,593	9,552	9,126
Demand Response	1,021	1,033	1,044	1,056	1,067	1,078	1,090	1,101
Available Resources	10,580	10,513	10,492	10,504	10,673	10,671	10,641	10,227

Note: Generation resources include Blue Lake 1-4 through 2023, and Manitoba Hydro through 2020. Wind and Solar resources are included at accredited capacity value, not nameplate value.

Preparer: Jannell Marks / Mary Morrison
Title: Director, / Resource Planning Analyst
Department: Sales, Energy and Demand Forecasting / Resource Planning and Bidding
Telephone: 303-571-6254 / 612-330-5862
Date: October 10, 2014

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Xcel Energy

Docket No.: E002/M-14-788, E002/M-14-789 & E002/CN-12-1240

Response To: Public Utilities Commission Information Request No. 7

Requestor: Sean Stalpes

Date Received: September 26, 2014

Question:

The September 2014 Need Assessment Summary table on page 5 provided the difference between 2013 and 2014 median peak forecast. Please explain in detail which factor(s) contributed to the reduced average growth rate of 0.60 percent.

Response:

The demand and demand growth rates referenced on page 5 of our September 23, 2014 filing are lower than the forecast demand growth rates presented in September 2013 because the energy growth rates are now lower. The energy growth rates are now lower because the key economic indicator growth rates discussed below are lower. For the 2017-2022 time period, the August 2014 system energy forecast is projected to increase at an average annual rate of 0.3 percent, compared to the projected growth of 0.6 percent for the same time period for the September 2013 system energy forecast. The driver of growth in the system energy forecast is the economic forecast, specifically Real Gross Metropolitan Product, Total Employment, Real Personal Income and Households for the Minneapolis-St. Paul area. The forecasts for each of these economic indicators are provided as MPUC-7 Attachment A.

The information provided in MPUC-7 Attachment A shows that the projected rate of growth for the 2017-2022 time period for both Total Employment and Real Personal Income is lower in the 2014 forecast than in the 2013 forecast and the projected rate of growth for Real Gross Metropolitan product is the same between the two forecasts. Only the Households forecast, which is the predictor variable for Residential customer counts, shows a stronger projected rate of growth in the 2014 forecast. While the Households variable projects stronger growth, this stronger growth is more than offset by the weaker growth forecasts for Total Employment and Real Personal Income.

Preparer: Jannell Marks
Title: Director
Department: Sales, Energy and Demand Forecasting
Telephone: 303-571-6254
Date: October 10, 2014

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Xcel Energy

Docket No.: E002/M-14-788, E002/M-14-789 & E002/CN-12-1240

Response To: Public Utilities Commission Information Request No. 8

Requestor: Sean Stalpes

Date Received: September 26, 2014

Question:

Please provide the status of MISO's interconnection study for each PPA and the Black Dog project. If a MISO interconnection study is not required for any of the above mentioned projects, please provide information that can assure reliability of the distribution and transmission grid after the respective project is online.

Response:

Under the current MISO generator interconnection and resource adequacy requirements, generators with conditional Generator Interconnection Agreement (GIA) will not be eligible for capacity accreditation until all upgrades required under the project's GIA are complete and in-service. Over the past several years GIAs for projects located in the Minnesota area have been conditional upon the completion of various MISO Multi-Value Projects including the North LaCrosse to Madison 345 kV line¹. This means that generating projects with conditional GIAs will not be eligible to qualify as capacity resources until the 2019/2020 planning year assuming the North LaCrosse to Madison line is completed as presently scheduled for the end of 2018². MISO is aware of this concern and is working with its stakeholder to identify ways for conditional GIAs to qualify as capacity resources prior to the 2019/2020 planning year.

The status of MISO Interconnection Studies for the above referenced projects are:

Calpine Mankato Energy Center Expansion Project

Calpine has two interconnection requests for the Mankato Energy Center (MEC) Expansion project. MISO Project G261 is a request for 667 MW of Network Resource Interconnection Service and MISO project J299 is a request for 73 MW of Energy Resource Interconnection Service.

¹ The Minnesota area GIAs are also conditional on MVP and other transmission facilities, however the North Lacrosse to Madison line is believed to be the last one scheduled to go into service.

² In-service date based on MISO 2013 MTEP report.

A GIA for G261 was executed on November 17, 2004 for a three unit combined cycle plant that would be constructed in two phases. The first phase included installing the first combustion turbine generator and the steam generator. The second phase would install the second combustion turbine generator. Xcel Energy and Calpine signed a power purchase agreement for the first phase of the MEC project on March 11, 2004 and the project went into service on January 1, 2006. MISO has commenced a restudy for the second phase of the MEC project because of the long time period between the first and second phases. MISO has indicated that the G261 restudy will be completed in early November 2014³. Calpine executed an amended and re-stated conditional GIA which included the second phase in September 2014. The GIA may be required to be amended again depending on the results of the ongoing restudy.

Calpine's Capacity Acquisition Process proposal indicated that they would provide 720 MW of total winter capacity. The J299 interconnection request is required to allow MEC to inject the full 720 MW. J299 has not entered the MISO DPP study process.

Invernergy Cannon Falls

Invernergy has submitted an interconnection request for 207 MW of Network Resource Interconnection Service for the Cannon Falls expansion project and was assigned MISO project number J280. J280 is part of the MISO August 2014 Study Cycle which is presently on hold pending completion of the MISO February 2013 and August 2013 DPP Study Cycles. The J280 studies should begin in December of 2014⁴ and Invernergy has indicated that they will be able to execute a GIA in late 2015.

Black Dog Unit 6

The Company is planning on utilizing the existing Interconnection Rights assigned to Black Dog Units 3 and 4 for Black Dog Unit 6. The Company will be submitting an Attachment Y Notification for decommissioning and retirement of Black Dog Units 3 and 4 to MISO effective April of 2015. The Company will also submit a MISO Attachment X Generator Interconnection Request for Black Dog Unit 6 along with the Attachment Y Notification. Submitting the Attachment X request and Attachment Y notifications together will, in accordance with Section 38.2.7 of the MISO Tariff, allow the Company to retain the Black Dog interconnection rights upon successful completion of the interconnection procedures in Attachment X. The Company believes that we will be able to execute what should be an unconditional GIA early in 2016 following completion of all studies.

³ Generator Interconnection DPP Studies Update from September 25, 2014 MISO Interconnection Process Task Force Meeting.

<https://www.misoenergy.org/Library/Repository/Meeting%20Material/Stakeholder/IPTF/2014/20140925/20140925%20IPTF%20Item%2002%20DPP%20Study%20Updates.pdf>

⁴ Generator Interconnection DPP Studies Update from September 25, 2014 MISO Interconnection Process Task Force Meeting.

<https://www.misoenergy.org/Library/Repository/Meeting%20Material/Stakeholder/IPTF/2014/20140925/20140925%20IPTF%20Item%2002%20DPP%20Study%20Updates.pdf>

Preparer: Randall Oye, P.E.
Title: Transmission Analyst
Department: Market Operations
Telephone: 612.330.2886
Date: October 10, 2014

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached list of persons.

xx by depositing a true and correct copy or summary thereof,
properly enveloped with postage paid in the United States
mail at Minneapolis, Minnesota; or

xx via electronic filing

Docket Nos. E002/CN-12-1240
 E002/M-14-788
 E002/M-14-789

Dated this 10th day of October 2014

/s/

SaGonna Thompson
Regulatory Administrator

[illegible]

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