

November 3, 2014

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

Re: ***Geronimo Energy's Reply Comments***
In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy
for Approval of Competitive Resource Acquisition Proposal and In the Matter of a
Draft Power Purchase Agreement with Geronimo Wind Energy, LLC d/b/a
Geronimo Energy
MPUC Docket Nos. E002/CN-12-1240 and M-14-788
OAH Docket No. 8-2500-307-60

Dear Dr. Haar:

Geronimo Wind Energy, LLC d/b/a Geronimo Energy ("Geronimo") has reviewed the comments submitted by other parties, including the Minnesota Department of Commerce, Division of Energy Resources ("DOC-DER"). Geronimo agrees with DOC-DER's analysis that the terms of the draft power purchase agreement for the Aurora Project (the "Aurora PPA") are in the public interest. Geronimo submits the additional comments below to address the DOC-DER's request for additional information regarding the risk that Northern States Power Company d/b/a Xcel Energy ("Xcel") may incur compensable curtailments under the Aurora PPA.

As DOC-DER noted, Section 8.2 of the Aurora PPA provides for payments for curtailments directed by Xcel. Section 8.2(D) further provides that curtailments for certain reasons will be non-compensable, including emergencies declared by Xcel. These provisions, are fairly standard PPA provisions, and provide commercial balance to the PPA. Geronimo does not expect any significant curtailment of the Aurora Project – whether compensable or non-compensable. Further, given the distributed nature of the project where each facility will have a separate and distinct physical interconnection at up to 24 different locations throughout the distribution system, it is extremely unlikely that the entire Aurora Project would be subject to curtailment at the same time or that any curtailment would last for an extended period of time. Geronimo believes that under these circumstances, it would be relatively rare for Xcel to incur compensable curtailments under the PPA.

Attorneys & Advisors
main 612.492.7000
fax 612.492.7077
www.fredlaw.com

Fredrikson & Byron, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, Minnesota
55402-1425

November 3, 2014

Page 2

In addition, Geronimo notes that similar curtailment provisions were part of its Distributed Solar Proposal. See App. J. at Sections 7.4 and 8.2. Specifically, Section 7.4 provided Xcel with a right to curtail. Section 8.2 set forth the curtailment energy payment rate and also provided circumstances under which curtailment would be non-compensable.

Accordingly, Geronimo believes that the Aurora PPA is in the public interest and renews its request for Commission approval of both the PPA and the full cost recovery thereof.

Sincerely,

/s/ Christina K. Brusven

Christina K. Brusven

Attorney at Law

Direct Dial: 612.492.7412

Email: cbrusven@fredlaw.com

51844568

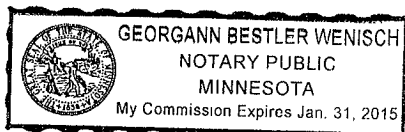
***In the Matter of the Petition of Northern States Power
Company d/b/a Xcel Energy for Approval of a Competitive
Resource Acquisition Process***

MPUC Docket No. E002/CN-12-1240 and M-14-788
OAH Docket No. 8-2500-307-60

Kristen A. Swenson, of Minneapolis, County of Hennepin, in the State of Minnesota, being duly sworn, says that on the 3rd day of November, 2014, she e-filed with the Minnesota Public Utilities Commission the following:

- A copy has also been served in accordance with the attached service list of record.

Gargana Dethlefsen
Notary Public



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1240_Official CC Service List
Thomas	Bailey	tbailey@briggs.com	Briggs And Morgan	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Kodi	Church	kchurch@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_12-1240_Official CC Service List
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_12-1240_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1240_Official CC Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1240_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_12-1240_Official CC Service List
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Brian	Meloy	brian.meloy@stinsonleond.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Ryan	Norrell	bademailrnnorrell@nd.gov	North Dakota Public Service Commission	600 E. Boulevard Avenue State Capital, 12 th Floor Dept 408 Bismarck, ND 58505-0480	Paper Service	No	OFF_SL_12-1240_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Donna	Stephenson	dstephenson@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1240_Official CC Service List
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-1240_Official CC Service List

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-788_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-788_Official
John	Doll	john@johndollsd40.org		10918 Southview Drive Burnsville, MN 55337	Paper Service	No	OFF_SL_14-788_Official
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy	7650 Edinborough Way Suite 725 Edina, MN 55435	Electronic Service	No	OFF_SL_14-788_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-788_Official
John	Flumerfelt	jflumerfelt@calpine.com	Calpine Corporation	500 Delaware Ave. Wilmington, DE 19801	Electronic Service	No	OFF_SL_14-788_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-788_Official
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_14-788_Official
Craig	Gordon	cgordon@invenenergyllc.com	Invenenergy LLC	One South Wacker Dr Suite 1900 Chicago, IL 60606	Electronic Service	No	OFF_SL_14-788_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-788_Official
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_14-788_Official
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_14-788_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_14-788_Official
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-788_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_14-788_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_14-788_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-788_Official
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_14-788_Official
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_14-788_Official
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-788_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-788_Official
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_14-788_Official
Brian	Meloy	brian.meloy@stinsonleond.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Darrell	Nitschke	dnitschk@nd.gov	North Dakota Public Service Commission	600 E. Boulevard Avenue State Capital, 12th Floor, Dept 408 Bismarck, ND 585050480	Electronic Service	No	OFF_SL_14-788_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Norrell	bademailrnnorrell@nd.gov	North Dakota Public Service Commission	600 E. Boulevard Avenue State Capital, 12 th Floor Dept 408 Bismarck, ND 58505-0480	Paper Service	No	OFF_SL_14-788_Official
Bryan	Nowicki	bnowicki@reinhartlaw.com	Reinhart Boerner Van Deuren s.c.	22 E Mifflin St Ste 600 Madison, WI 53703-4225	Electronic Service	No	OFF_SL_14-788_Official
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_14-788_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_14-788_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-788_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Fwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_14-788_Official
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official
Donna	Stephenson	dstephenson@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-788_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-788_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-788_Official
James	Talcott	jim.talcott@nngco.com	Northern Natural Gas Company	1111 South 103rd Street Omaha, Nebraska 68124	Electronic Service	No	OFF_SL_14-788_Official
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-788_Official
Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-788_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-788_Official