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March 9, 2015

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: ANSWER TO PETITIONS FOR RECONSIDERATION, REHEARING, AND/OR
CLARIFICATION
COMPETITIVE RESOURCE ACQUISITION
DOCKET NOS. E002/CN-12-1240, E002/M-14-788, E002/M-14-789

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Answer to the Petition for Reconsideration of the Xcel Large Industrials, the Petition for Rehearing and Reconsideration of Invenergy Thermal Development LLC, and the Request for Clarification or Reconsideration of the Department of Commerce of the Minnesota Public Utilities Commission's February 5, 2015 Order in the above-referenced matter.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please feel free to contact me at Aakash.chandarana@xcelenergy.com or 612-215-4663 if you have any questions regarding this filing.

Sincerely,

/s/

AAKASH CHANDARANA
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
D/B/A XCEL ENERGY FOR APPROVAL OF
COMPETITIVE RESOURCE ACQUISITION
PROPOSAL AND CERTIFICATE OF NEED

DOCKET NO. E002/CN-12-1240

IN THE MATTER OF A DRAFT PURCHASE
POWER AGREEMENT WITH GERONIMO
WIND ENERGY, LLC, D/B/A GERONIMO
ENERGY, LLC

DOCKET NO. E002/M-14-788

IN THE MATTER OF DRAFT PURCHASE
POWER AGREEMENTS WITH CALPINE
CORPORATION AND INVENERGY
THERMAL DEVELOPMENT, AND
PROPOSED PRICE TERMS FOR BLACK
DOG UNIT 6

DOCKET NO. E002/M-14-789

**ANSWER TO PETITIONS FOR
RECONSIDERATION, REHEARING,
AND/OR CLARIFICATION**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Answer to the Petition for Reconsideration of the Xcel Large Industrials (XLI), the Petition for Rehearing and Reconsideration of Invenergy Thermal Development LLC, and the Request for Clarification or Reconsideration of the Department of Commerce of the Minnesota Public Utilities Commission's February 5, 2015 Order (Feb 5 Order) in the above-referenced matter.

These three petitions raise issues the Commission has already considered, and they do not point to any new evidence that warrants the Commission's reconsideration of its Order.¹ There are two issues, however, that warrant brief discussion:

- The rationale for the Commission's need determination, and the Company's concurrence with the rationale based on the record in this case; and
- The implications of the deficiency notice that the Federal Energy Regulatory Commission (FERC) issued to Midcontinent Independent System Operator, Inc., (MISO) with respect to the amended and restated Generation Interconnection Agreement (GIA) for the Calpine Power Purchase Agreement (PPA).

We address both these issues below.

ANSWER

A. Reasonableness of Commission's Need Determination

In its Petition, XLI characterizes the record as showing that the various updates of the Company's need from the Company's Resource Plan docket and this proceeding all point in a single direction- downward.² Based on this, XLI concludes that the Commission's decision not to revise its 150-500 MW need determination in its March 5, 2013 Resource Plan Order is unreasonable, and that the Commission should lower its need determination in this case to an unspecified "zone of reasonableness based on the record evidence."³

We believe XLI's argument ignores the overall uncertainty attendant in all resource need forecasting, which in this case did not uniformly trend downward as XLI claims. Rather the need shifted back and forth over time depending on changes in our demand forecast and MISO reserve requirements calculations, among other things.⁴

Based on this uncertainty, the Commission chose a conservative approach of ensuring reliability in all reasonably possible outcomes, finding that "the Commission's goal is not to forecast the precise level of need – a task rife with the potential for error – but

¹ The Commission's findings and conclusions with respect to the costs of the resources selected, and the transmission cost and dispatchability payment terms of the Calpine PPA, are fully discussed in the Feb 5 2015 Order and well supported by the record. *See* Feb 5 Order at 19-21.

² XLI Petition at 2, 3.

³ XLI Petition at 8.

⁴ *See, e.g.*, Department's October 23, 2014 Comments at 10, Figure 5.

to identify the resource mix that will best manage forecasting error.”⁵ As a result, the Commission concluded that if it errs at all in its need determination, it:

...will err on the side of ensuring that Xcel has enough capacity to meet the needs of its customers. The future will always be uncertain, but the Commission must proceed to make the necessary choices on the basis of a rigorous analysis of the data that *is* in the record.⁶

We concur. We generally take a conservative approach to evaluating resource needs to ensure we have adequate resources to satisfy our obligation to serve under all reasonable circumstances. Forecast demand fluctuates over time, sometimes significantly, based on small changes in economic indicators. Because resource decisions are made in the midst of fluctuating circumstances, it is important to balance the cost of new generation against the risk of falling short or exposing our customers to market risk.

In reaching that balance, we believe it is appropriate to plan for a range of outcomes. While this may sometimes mean that available capacity will exceed the identified need for a period of time, this is preferable to incurring a shortfall of capacity. Further, this conservative planning approach insulates our customers from the risks associated with MISO’s capacity market due to routine variations in the availability of system resources.

B. Implications of FERC Deficiency Letter

Invenergy’s Petition suggests that the Commission should reconsider its selection of the Calpine PPA as not being in the public interest because of the risk of increased transmission costs. In making this claim, Invenergy points to a pending FERC decision regarding the ability of Calpine’s new combined cycle (CC) facility at its Mankato Energy Center (MEC) to interconnect to our system pursuant to an amendment of Calpine’s current GIA with the Company for its existing CC facility at MEC.⁷

If FERC concludes that Calpine’s new CC facility must interconnect to our system pursuant to a new GIA separate from Calpine’s current MEC GIA, the interconnection process would typically take another 18 months or longer. And the new transmission studies conducted during that process could potentially identify

⁵ Feb 5 Order at 8.

⁶ Feb 5 Order at 9 (citation omitted; emphasis in original).

⁷ Invenergy Petition, Ex. A- FERC Deficiency Letter.

additional network transmission upgrades as necessary before the facility can interconnect, the costs of which would pass through to our customers.

It is important to note, however, that MISO has vigorously defended its decision to allow Calpine to interconnect its new CC facility to our system pursuant to an amendment and restatement of Calpine's current MEC GIA, and has provided FERC a detailed explanation of how it is wholly consistent with MISO tariff and practice. Calpine included MISO's responses to FERC's deficiency letter and Invenergy's motion to intervene in that case as attachments to its March 6, 2015 Answer in this proceeding, which provide the Commission additional context from which to assess the scope of the risk that FERC will rule against MISO on this issue.

We also understand that FERC's Order resolving whether or not MISO may amend and restate MEC's current GIA to include the interconnection of Calpine's new CC facility will be issued by mid-March 2015. Given the impending timing, we believe that it would be in the best interests of the parties and the Commission to wait to take any action with respect to this issue until after FERC issues its Order. In the event that FERC does not approve Calpine's amended and restated GIA, the Company proposes making a filing that explains the anticipated consequences of such a decision on the in-service date and costs of the Calpine PPA for the Commission to evaluate before the Company proceeds further with the Calpine PPA.

CONCLUSION

The reconsideration Petitions filed by XLI, Invenergy, and the Department do not raise any new issue or point to any new evidence that warrants the Commission's reconsideration of its Feb 5 Order. The Commission should therefore deny the Petitions. The Commission can take up on its own motion any issues that may arise out of FERC's resolution of the question of whether Calpine's new CC facility at MEC may interconnect to the transmission grid through an amended/restated or new GIA.

Dated: March 9, 2015

Northern States Power Company

CERTIFICATE OF SERVICE

I, Tiffany Hughes, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

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

Dated this 9th day of March 2015

/s/

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Records Analyst

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dan	Donkers	N/A	Saint Paul - Ramsey County Public Health	Environmental Health Section 2785 White Bear Ave., Suite 350 Maplewood, MN 55109	Paper Service	No	OFF_SL_14-788_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_14-789_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_14-789_Official
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_14-789_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-789_Official