

March 6, 2015

Via electronic mail and U.S. mail

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

Re: **Answer of Calpine Corporation**

In the Matter of the Petition Northern States Power Company for Approval of Competitive Resource Acquisition Proposal and Certificate of Need

Docket Nos.: E-002/CN-12-1240, E-002/M-14-788 and E-002/M-14-789

Dear Mr. Wolf:

Pursuant to the Minn. R. 7829.3000, Calpine Corporation and its affiliate Mankato Energy Center, LLC (“Calpine”) hereby submit their Answer to the Minnesota Department of Commerce’s (“Department”) Request for Clarification or Reconsideration (“Department Request”) and Invenergy Thermal Development LLC’s (“Invenergy”) Petition for Rehearing and Reconsideration (“Invenergy Petition”) in the above-captioned proceedings.

Thank you for your attention to this matter.

Sincerely,

STINSON LEONARD STREET LLP

Brian Meloy

Brian M. Meloy

BMM/cw
Attachments

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

<i>In the Matter of the Petition</i>)	
<i>Northern States Power Company</i>)	MPUC Docket Nos.: E-002/CN-12-1240
<i>for Approval of Competitive</i>)	E-002/M-14-788
<i>Resource Acquisition Proposal</i>)	E-002/M-14-789
<i>and Certificate of Need</i>)	

ANSWER OF CALPINE CORPORATION

Pursuant to the Minn. R. 7829.3000, Calpine Corporation and its affiliate Mankato Energy Center, LLC (“Calpine”) hereby submit their Answer to the Minnesota Department of Commerce’s (“Department”) Request for Clarification or Reconsideration (“Department Petition”) and Invenergy Thermal Development LLC’s (“Invenergy”) Petition for Rehearing and Reconsideration (“Invenergy Petition”) in the above-captioned proceedings. As discussed below, the arguments raised by the Department and Invenergy in seeking reconsideration of the Minnesota Public Utilities Commission’s (“Commission”) February 5, 2015 Order have been fully evaluated and appropriately rejected by the Commission. Accordingly, Calpine respectfully requests that the Commission deny the Petitions.¹ Moreover, Calpine respectfully requests that the Commission rule on these matters as quickly as practicable, in order to remove any uncertainty and ensure that Calpine and Xcel Energy Inc. (“Xcel”) are able to implement the terms of their approved Power Purchase Agreement (“PPA”) in a timely manner.

¹ Calpine’s decision not to respond to the Xcel Large Industrials’ Petition for Reconsideration should not be viewed as acquiescence or agreement with the arguments raised. Similar to the arguments raised by the Department and Invenergy, XLI’s arguments were appropriately considered and rejected by the Commission.

I.
ANSWER

In their Petitions, the Department and Invenergy raise concerns regarding the Commission's acceptance of Calpine's PPA with Xcel. The Department and Invenergy generally object to the Commission's acceptance of (1) a Dispatchability Payment in the PPA; and (2) Xcel's assumption of responsibility for interconnection costs. While the Department and Invenergy take very different approaches in raising these issues, neither provides a legitimate basis for the Commission to revisit its decisions in its February 5, 2015 Order.

A. Dispatchability Payment

In their Petitions, both the Department and Invenergy raise issues related to the inclusion of the Dispatchability Payment in the Calpine PPA with Xcel. Invenergy asserts that the inclusion of a Dispatchability Payment runs contrary to the Commission's directive that "Calpine, Geronimo, Invenergy, and Xcel shall be held to the prices and terms used to evaluate each bid for the purpose of cost recovery from Xcel ratepayers."² The Department suggests that allowing the inclusion of a Dispatchability Payment in the PPA, when such a payment was not included in Calpine's original bid, has the potential to undermine the competitive acquisition process.³ Invenergy and the Department's arguments fail to recognize the full context under which the Dispatchability Payment was included in the Calpine PPA.⁴

Initially, Calpine agrees, and in fact strongly promoted the principle, that bidders in a competitive process should be held to the terms and conditions of their bids. In the present case,

² Invenergy Petition at p. 7 (citing the Commission's May 23, 2014 Order Directing Xcel to Negotiate Draft Agreements with Selected Parties ("May 2014 Order")).

³ Department Petition at p. 3.

⁴ Despite its claims that original bids are sacrosanct, Invenergy conveniently ignores the fact that it bid in a 178 MW facility and negotiated a PPA for 209 MW facility because "it committed that generator to another project." See February 5 Order at p. 4.

however, the Commission appropriately recognized that such a requirement cannot be viewed in a vacuum and should not be interpreted so strictly as to preclude the opportunity to capture additional ratepayer benefits during good faith negotiations. Indeed, the Calpine PPA reflects additional ratepayer *benefits* that were not part of Calpine’s original bid. The Commission appropriately considered the overall *net* costs of the Calpine PPA, evaluated in context, rather than basing its decision on one discrete change. As the Commission concluded in its February 5 Order:

Calpine’s proposed dispatchability payments, in isolation, would shift costs to ratepayers. However, the magnitude of these costs is not unknown; it is reasonably clear and quantified. Moreover, when these payments are evaluated not in isolation, but within the context of the larger agreement, they are eminently reasonable. According to Calpine and Xcel, these payments are 1) common in the industry, 2) small in proportion to other considerations, 3) motivated by a desire to coordinate the operations of both halves of the Mankato Energy Center, creating economies of scale and the potential to generate offsetting revenues, and 4) offset by other concessions. *Thus the Commission finds that the net costs of these terms, evaluated in context, are reasonable and consistent with Calpine’s overall proposal.*^{5]}

In reaching this determination, the Commission recognized that PPA negotiations necessarily involve give and take. While Calpine’s original bid did not include a Dispatchability Payment, the record clearly shows that the negotiations resulted in other changes that result in Calpine taking on greater commercial risk than was contemplated in its initial bid.⁶ In this respect, Invenergy’s claim that the Dispatchability Payment shifts additional costs to ratepayers, and the Department’s focus on one isolated aspect of the PPA, ignores the *benefits* ratepayers received in the negotiation process. For

⁵ February 5 Order at p. 20. Emphasis added.

⁶ The Calpine PPA makes clear that Calpine has agreed to allow Xcel to delay the commercial operation date (“COD”) of the Expansion and even terminate the PPA early upon notice in certain circumstances. *See* Sections 2.3 and 2.4. In addition, Calpine’s bid assumed that Xcel would take on all emission related risks. However, the Calpine PPA places only the risk of carbon dioxide regulation directly on Xcel, while other changes in law related to emissions require that Xcel and Calpine cooperate to find a mutually agreeable response and mitigation measures. *See* Section 20.2. The Calpine PPA also requires that Calpine meet a date-certain COD for the Expansion – regardless of whether the Expansion’s capacity is fully accredited by MISO at that time. *See* Section 4.2. Since the PPA terms (*i.e.*, contract payments) do not commence until the Expansion is fully accredited, Calpine has effectively agreed to make a significant capital investment to build the Expansion prior to full capacity accreditation.

the reasons articulated in the February 5 Order, capturing these ratepayer benefits in this manner neither threatens the integrity of this proceeding nor future resource acquisitions proceedings.

B. Interconnection Costs

In their Petitions, both Invenergy and the Department raise issues related to Xcel's assumption of responsibility for interconnection costs under the Calpine PPA. According to the Department, it may not be reasonable for ratepayers to assume "unknown transmission" cost risk where the Department only attributed interconnection costs of \$1.5 million in its economic modeling.⁷ The Commission, however, correctly concluded that interconnection costs are not "unbounded" and that "[t]here is nothing inherently unreasonable with Xcel bearing a portion of a generator's interconnection costs as part of a power purchase agreement, especially when the agreement has a cancelation clause."⁸

Furthermore, the Department's reference to the treatment of interconnection costs in other Commission decisions⁹ fails to reflect that the Commission made its determination in *this case* based on *this record* and the unique circumstances presented herein.¹⁰ Indeed, while the Department and Invenergy cite the Commission's admonition in its May 2014 Order that "the Commission is not likely to regard as reasonable any terms that shift risk or unknown costs to ratepayers,"¹¹ in this case the Commission understood that such risk is reasonable and that costs, while not precisely known, are not likely to be substantially different than presented and, in any event, are not unbounded. Calpine believes the record shows that such risks are manageable by Xcel, and similar to the Dispatchability

⁷ Department Petition at p. 4.

⁸ February 5 Order at p. 20.

⁹ See Department Petition at pp. 3-4.

¹⁰ As the Commission found, "Calpine and Xcel are sophisticated, competing parties negotiating an arm's length transaction. . . . Consequently the Commission finds insufficient reason to second-guess their transmission interconnection terms at this time." February 5 Order at p. 20.

¹¹ See e.g., Invenergy Petition at p. 35; Department Petition at p. 2.

Payment, reflect a reasonable allocation of risk between the parties based on the overall net costs and benefits of the PPA.

Invenergy further incorrectly asserts that allocation of interconnection costs to Xcel “deviated from the terms included in the Calpine bid.”¹² Calpine’s April 2013 bid, however, clearly allocated interconnection costs to Xcel. Invenergy also incorrectly suggests that the magnitude of the interconnection costs “may have increased dramatically since the submission of the PPA.”¹³ Invenergy does not, and cannot, substantiate this claim.

Indeed, Invenergy’s allegation is purely theoretical and based upon actions that Invenergy itself has taken. Invenergy is now attempting to undermine the Commission’s approval of the Calpine Expansion at the Federal Energy Regulatory Commission (“FERC”), where, through a January 30, 2015 Motion to Intervene and Protest, Invenergy is attempting to block FERC approval of Calpine’s Amended and Restated Generator Interconnection Agreement (“GIA”).¹⁴ In other words, Invenergy relies on little more than its own actions at FERC to suggest that ratepayers may be exposed to increased interconnection costs.

Moreover, in its Petition, Invenergy is highly selective with respect to the information it has provided to the Commission. Invenergy is correct that FERC issued a Deficiency Letter requesting additional information from Midcontinent Independent System Operator, Inc. (“MISO”) regarding MISO’s application for FERC approval of the Calpine GIA. Such requests, however, are not uncommon. While Invenergy included a copy of that Deficiency Letter (as well as its Protest) with its Petition, Invenergy neglected to advise the Commission that MISO filed a detailed response to the FERC Deficiency Letter, and an even more comprehensive response to Invenergy’s Protest – each of

¹² Invenergy Petition at p. 6.

¹³ *Id.* at p. 4.

¹⁴ *Id.*

which were in the public record prior to the filing deadline for Invenergy's Petition. In order to provide a more complete view of this issue to the Commission, Calpine appends hereto MISO's January 9, 2015 response to FERC's Deficiency Letter as Exhibit A and MISO's February 18, 2015 Answer to the Invenergy Protest as Exhibit B.

As is apparent from those filings, MISO thoroughly demonstrates that there is "no basis" for Invenergy's "suggestions that MISO did not act in accordance with the [MISO Generator Interconnection Procedures] GIP, and/or that it has not treated all customers in an even-handed, consistent manner."¹⁵ MISO's responses demonstrate that MISO followed its interconnection procedures in a manner consistent with its tariff, and that the challenges to the Calpine GIA are without merit.

In its Answer, MISO also appropriately recognized that the relief requested in Invenergy's protest is "troubling" particularly in light of its competition with Calpine, stating:

Invenergy's request is particularly troubling because it asks [FERC] to provide it with information regarding the commercial plans of a competitor's project in which it has no direct interest. The Commission should not allow Invenergy to use the comment and protest process to circumvent clear Tariff protections regarding non-public information pertaining to competitor projects. Yielding to Invenergy's inappropriate discovery attempt will only encourage similar demands in the future and will undermine the Commission-approved confidentiality protections in the MISO GIP and the pro forma GIA, and ultimately competition for generation projects.^[16]

In making this statement, MISO specifically cites these Commission proceedings, noting that "[t]he Minnesota Public Utility Commission recently approved a power purchase agreement between Mankato and Xcel Energy, but rejected a proposal by Invenergy."¹⁷ This Commission should similarly be troubled by these tactics.

¹⁵ See the Motion for Leave to Answer and Answer of the Midcontinent Independent System Operator, Inc., Docket Nos. ER14-104-000 and -001 at p. 4 (February 18, 2015) ("MISO Answer").

¹⁶ MISO Answer at p. 10.

¹⁷ *Id.* at FN 28.

As demonstrated by the *complete* record at FERC, MISO has demonstrated that it acted appropriately in this matter, and the record shows that Calpine adhered to the interconnection requirements as directed by MISO, including funding restudies and meeting other milestones to maintain its queue position.¹⁸ In this respect, Invenergy can only speculate about the outcome of the FERC proceeding and, therefore, cannot support its allegation that Mankato interconnection costs will be materially different than the estimate used in the Department's analysis. Moreover, as noted above, irrespective of the outcome of the FERC proceeding, Xcel and its ratepayers are protected from "unbounded" interconnection costs by the cancellation provisions Calpine agreed to in its PPA. Nonetheless, given the importance of this matter Calpine will inform the Commission when FERC acts on MISO's request for approval of the Calpine GIA, including the disposition of Invenergy's Protest in that matter.

II. CONCLUSION

For the foregoing reasons, Calpine respectfully requests that the Commission reject the Petitions seeking reconsideration and rehearing of its February 5 Order. The February 5 Order reflects reasoned and reasonable decision-making and nothing in the filed Petitions raise issues or arguments that were not fully considered in the issuance of the Order.

Dated: March 6, 2015

Respectfully submitted,

/s/ Brian M. Meloy

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¹⁸ Calpine's March 2, 2015 Request for Leave to File Comments and Comments responding to the Invenergy Protest at FERC is appended hereto as Exhibit C.

EXHIBIT A

MISO's January 9, 2015 Response to FERC Deficiency Letter (without attachment) FERC Docket No. ER15-104-000



Jacob Krouse
Attorney
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January 9, 2015

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Midcontinent Independent System Operator, Inc.
FERC Docket No. ER15-104-000
Response to Letter Requiring Additional Information

Dear Secretary Bose:

The Midcontinent Independent System Operator, Inc. ("MISO") hereby responds to the December 12, 2014 letter ("December 12 Letter") of the Federal Energy Regulatory Commission's ("Commission") Office of Energy Market Regulation ("OEMR") seeking additional information concerning the executed Amended and Restated Generator Interconnection Agreement ("GIA") filed by MISO on October 15, 2014 ("October 15 Filing").

I. The October 15 Filing

In the October 15 Filing, MISO submitted an executed GIA among Mankato Energy Center, LLC ("Interconnection Customer"), Northern States Power Company, a Minnesota corporation ("Transmission Owner"), and MISO ("Transmission Provider") (collectively, the "Parties"). The October 15 filing amends the Original Agreement to reflect that the Interconnection Customer is completing the originally planned build out of the Large Generating Facility which requires installation of Network Upgrades on the Transmission Owner's Transmission System.

II. Commission Request for Additional Information

In the December 12 Letter, OEMR noted that MISO did not explain the amendments made to various appendices of the GIA. Specifically, OEMR directed MISO to:

With respect to the proposed new Commercial Operation Date of Phase 2 of the project, please provide an explanation for why the proposed extension of 11 years (June 1, 2007 to June 1, 2018) is appropriate under MISO's Generation Interconnection Procedures and this agreement. In your response, please explain all factors that MISO took into consideration in reaching its conclusion that the proposed extension is appropriate.

The Honorable Kimberly D. Bose

January 9, 2015

Page 2

III. MISO Response

MISO notes that discussions with interconnection customers regarding their projects are confidential under MISO's Generator Interconnection Procedures ("GIP").¹ However, with the permission of the Interconnection Customer, MISO discussed this issue with Great River Energy ("GRE"), who had moved to intervene in this docket and comment on the issue raised in the December 12 Letter. On December 8, 2014, GRE withdrew its Motion to Intervene Out-of-Time in this docket, indicating that its discussions with MISO had resolved its concerns. MISO has coordinated with the Interconnection Customer in preparing this response and the Interconnection Customer agrees that the instant response addresses the Commission's concern regarding the extension of the Commercial Operation Date for this GIA without disclosing Confidential Information of the Parties.

The GIA included in the October 15 Filing was originally filed in 2004 and contemplated the project would be built in two phases. Phase I has been built and is in operation, and is not in question in the instant proceeding. Phase II had an initial Commercial Operation Date of June 1, 2007. Pursuant to Section 5.16 of the GIA, the Interconnection Customer had three years of suspension rights. This effectively extended the Commercial Operation Date from 2007 to 2010. Thereafter, pursuant to Section 2.3.1 of the GIA, MISO would wait an additional three consecutive years (until June 1, 2013) from the planned Commercial Operation Date (2010) before considering whether to file to terminate Phase II of the GIA for failing to reach Commercial Operation had the Interconnection Customer not advanced the project.

During this period (between June 1, 2010 and June 1, 2013), the Interconnection Customer informed MISO that it was ready to proceed with Phase II. Relying on Commission precedent,² MISO informed the Interconnection Customer that the GIA was subject to restudy before recommencing the interconnection process. MISO then performed the restudies needed to determine what transmission upgrades would be needed to accommodate Phase II of the Interconnection Customer's GIA. The October 15 Filing is a result of those restudies.

The 2018 Commercial Operation Date is based on MISO's recent restudies and the time when Phase II can reliably enter Commercial Operation due to the timing of other projects that must be in-service for Phase II to proceed. As with all projects, MISO does not require a project to achieve Commercial Operation prior to the In-Service Dates of the full required Network Upgrades and Contingent Facilities for the project. While an interconnection customer may voluntarily choose to utilize MISO's limited operations provisions in order to begin operations prior to the completion of other projects' Network Upgrades (often with long-term In-Service

¹ MISO Tariff, Attachment X (GIP), Section 13.1.

² See *Midwest Independent Transmission System Operator, Inc.*, 116 FERC ¶ 61,252 at P 39-42 (2006) (rejecting proposed revisions to add specific post-suspension procedures in the Appendices of an LGIA, but noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with sections 6.4, 7.6, and 8.5 of the then-effective LGIP); *Midwest Independent Transmission System Operator, Inc.*, 144 FERC ¶ 61,033 at P 77 (2013) (after a suspension period, the Commission noted that it was appropriate to "take into account the existing interconnection queue.").

The Honorable Kimberly D. Bose

January 9, 2015

Page 3

Dates), MISO does not require interconnection customers to do so. As noted in Exhibit A10 of the GIA, the restudies found that Phase II of the project is conditional upon MISO Multi-Value Projects being completed. These projects have In-Service Dates in 2018. Consequently, the Interconnection Customer requested a 2018 Commercial Operation Date for the Phase II portion of the GIA, and MISO was agreeable with that date.

IV. Notice and Service

MISO notes that it has served a copy of this filing electronically upon all Tariff Customers under the Tariff, MISO Members, Member representatives of Transmission Owners and Non-Transmission Owners, MISO Advisory Committee participants, as well as all state commissions within the Region. The filing has been posted electronically on MISO's website at <https://www.misoenergy.org/Library/FERCFilingsOrders/Pages/FERCFilings.aspx> for other interested parties in this matter. In addition, MISO has served a copy of this filing electronically on all parties to this agreement.

V. Conclusion

Because MISO's actions with respect to the GIA are consistent with MISO's Tariff, MISO's Generation Interconnection Procedures, Commission precedent, and the GIA itself, MISO respectfully requests that the Commission accept this response to the December 12 Letter, accept the GIA, and grant the October 16, 2014 effective date as requested in MISO's October 15 Filing.

Respectfully submitted,

/s/ Jacob T. Krouse

Jacob T. Krouse
Attorney for the Midcontinent Independent
System Operator, Inc.

cc: All Parties
Nicholas Snyder (Nicholas.Snyder@ferc.gov)

EXHIBIT B

MISO's February 18, 2015 Answer

to Invenergy Protest

FERC Docket No. ER15-104-000

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Midcontinent Independent System Operator, Inc.))	Docket Nos. ER15-104-000 and ER15-104-001
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**MOTION FOR LEAVE TO ANSWER AND ANSWER
OF THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.**

The Midcontinent Independent System Operator, Inc. (“MISO”) submits this Motion for Leave to Answer and Answer under Rules 212 and 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or the “Commission”), 18 C.F.R. §§ 385.212 and 213 (2014).

I. MOTION FOR LEAVE TO ANSWER

While MISO recognizes that Rule 213 does not generally provide for answers to protests and comments, the Commission often permits such pleadings where, as here, it will aid the Commission’s decision making process by creating a more complete record.¹ Good cause exists to waive Rule 213(a)(2)’s prohibition on answers to protests and comments in this case because this response will clarify the issues that Invenergy Thermal Development LLC and Invenergy Wind Development LLC (collectively, “Invenergy”) raised in their Intervention and Protest (“Invenergy Protest”), and also

¹ See, e.g., *PJM Interconnection, L.L.C.*, 117 FERC ¶ 61,168 at P 29 (2006) (accepting an answer to a protest because it provided information that assisted the Commission in its decision-making process); *Midwest Indep. Transmission Sys. Operator, Inc.*, 108 FERC ¶ 61,027 at P 16 (2004) (accepting MISO’s answer to protests and comments filed concerning proposed Attachment X to the MISO Tariff on the basis that the answer provided information that assisted the Commission in its decision-making process); *Morgan Stanley Capital Group, Inc. v. New York Indep. Sys. Operator, Inc.*, 93 FERC ¶ 61,017 at 61,036 (2000) (accepting an answer as helpful in the development of the record).

addresses the comments (“AWEA/WOW Comments”) filed by the American Wind Energy Association (“AWEA”) and Wind on the Wires (“WOW”).

II. BACKGROUND

On December 16, 2004, MISO filed the original interconnection agreement (“Original Agreement”) among Mankato Energy Center, LLC (“Interconnection Customer” or “Mankato”), Northern States Power Company, a Minnesota corporation (“Northern States” or “Transmission Owner”), and MISO (“Transmission Provider”) (collectively, the “Parties”) in Docket No. ER05-344-000. Under the Original Agreement, Mankato’s Large Generating Facility would be developed in two phases: Phase I, which was scheduled to commence commercial operations in 2006, and Phase II, which was scheduled to commence commercial operations in 2007. The Commission accepted the Original Agreement by letter order issued on January 21, 2005.

On October 15, 2014, MISO submitted an executed Amended and Restated Generator Interconnection Agreement (“GIA”) among Mankato, Northern States, and MISO (“October 15 Filing”). The GIA amended the Original Agreement to reflect the results of a restudy and additional Network Upgrades required for Mankato to complete the original planned build out of Phase II of the Large Generating Facility, which modified the Commercial Operation Date (“COD”) for Phase II to June 1, 2018.

On December 12, 2014, FERC’s Office of Energy Market Regulation (“OEMR”) issued a letter requesting additional information from MISO (“December 12 Letter”). Specifically, OEMR directed MISO to:

With respect to the proposed new Commercial Operation Date of Phase 2 of the project, please provide an explanation for why the proposed extension of 11 years (June 1, 2007 to June 1, 2018) is appropriate under MISO’s Generation Interconnection Procedures and this agreement. In

your response, please explain all factors that MISO took into consideration in reaching its conclusion that the proposed extension is appropriate.

On January 9, 2015, MISO filed its response (“January 9 Response”) to the December 12 Letter, explaining that Mankato’s three years of suspension rights under Section 5.16 of the Original Agreement had effectively extended the COD from June 2007 to June 2010. MISO also explained that, pursuant to Section 2.3.1 of the GIA, MISO would not file to terminate Phase II of the GIA for a period of three consecutive years from the extended COD date, or June 2013. Prior to June 2013, Mankato informed MISO that it was ready to proceed with Phase II, and as a result, MISO initiated a restudy. The GIA reflects the results of that restudy.

On January 30, 2015, Invenenergy filed its Protest, while Calpine Corporation, Mankato’s parent company, filed comments in support of MISO’s January 9 Response. AWEA and WOW filed a doc-less intervention on January 30, 2015, and their comments supporting Invenenergy’s Protest on February 3, 2015.

III. MISO ANSWER

In its Protest, Invenenergy acknowledges that “there is no absolute bar in the Original GIA or in MISO’s Generator Interconnection Procedures (“GIP”) to an extension of the COD for eleven years”² Nonetheless, Invenenergy and AWEA/WOW suggest that MISO acted improperly in its treatment of the Mankato GIA. MISO strongly disagrees that its actions here did not comply with the GIP and GIA, or that it acted in an unduly discriminatory manner. As explained in the January 9 Response and herein, MISO’s actions complied with the Original Agreement, the GIP, and the GIA.

² Invenenergy Protest at 2.

Accordingly, the Commission should reject Invenergy's request for information regarding confidential communications regarding a competitor's project in the MISO interconnection process, and accept the GIA effective October 16, 2014, as requested in the October 15 Filing.

A. MISO appropriately applied the terms of its GIP and GIA.

As discussed in more detail below, Invenergy, AWEA, and WOW have requested information regarding the procedures used by MISO to process the GIA, which is confidential under the MISO Tariff. Although MISO objects to attempts to obtain such information, particularly regarding competing projects, Mankato has authorized MISO to include the following information, which otherwise may be considered Confidential Information under the GIP and/or GIA. As discussed below, there is no basis for Invenergy's, AWEA's, and WOW's suggestions that MISO did not act in accordance with the GIP, and/or that it has not treated all customers in an even-handed, consistent manner.

First, as explained in the January 9 Response, Mankato was put into suspension under Section 5.16 of the Original Agreement, which permitted Mankato to extend the COD for Phase II until June 1, 2010.³ Although Invenergy does not disagree that Mankato had such suspension rights, it suggests that MISO should have sought to terminate the Original Agreement after such time.⁴ As explained in the January 9 Response, however, because Mankato's Phase II was considered suspended from 2007 to

³ January 9 Response at 2.

⁴ See Invenergy Protest at 11-13.

2010, MISO would not have sought to terminate the GIA with respect to Phase II until three years later, as called for in Section 2.3.1 of the GIA.⁵

Pointing to MISO's Order No. 2003 compliance filing, Invenenergy suggests that Section 2.3.1 only applies in circumstances where "a project has gone into commercial operation but subsequently gone out of service. . . ."⁶ In its Order No. 2003 compliance filing, however, MISO was speaking generally about concerns regarding the hoarding of capacity, which apply not only to projects that enter and then cease Commercial Operation, but also to those that never reach Commercial Operation. Since that time, MISO has further clarified its intent regarding the applicability of Section 2.3.1, and the *pro forma* GIA now expressly states that the provision applies "***if the Generating Facility or a portion of the Generating Facility fails to achieve Commercial Operation for three (3) consecutive years following the Commercial Operation Date***, or has ceased Commercial Operation for three (3) consecutive years, beginning with the last date of Commercial Operation for the Generating Facility"⁷ In this case, the COD for Phase II of Mankato's project was extended to June 1, 2010 as a result of the suspension, and MISO would therefore have properly waited until June 1, 2013, before seeking to terminate the GIA with respect to Phase II. This is the same, consistent treatment that MISO has applied to other customers: MISO has recently filed to terminate GIAs for failure to reach Commercial Operation when no milestone has been breached under Section 2.3.1, and the Commission has accepted one such termination.⁸

⁵ January 9 Response at 2-3.

⁶ Invenenergy Protest at 11.

⁷ Tariff, Attachment X, Appendix 6 (*pro forma* GIA), Section 2.3.1 (emphasis added).

⁸ Although most termination notices filed by MISO are triggered by breaches and defaults (*e.g.*, missed milestone payments), MISO has recently filed notices of termination based

Second, AWEA/WOW have incorrectly asserted that MISO unduly discriminated against customers based on the fuel-type of their projects, and improperly permitted Mankato's Phase II to proceed while moving to terminate the GIAs of recent wind projects.⁹ But even a cursory review of the facts readily demonstrates that there was no undue discrimination in this case. The Original Agreement was negotiated in 2004, significantly prior to MISO's and the Commission's efforts to address concerns regarding projects in the queue that were not proceeding to Commercial Operation and that were delaying MISO's processing of interconnection requests.¹⁰ Accordingly, consistent with some other interconnection agreements negotiated around that time, the Original Agreement did not contain specific milestones or payments for Phase II.¹¹ Instead, the Original Agreement only set forth the COD for Phase II. However, as discussed above, due to the suspension rights under Section 5.16 and the termination provisions under Section 2.3.1, MISO would not have sought to terminate the Original GIA because the COD was not met until June 1, 2013. But Mankato ultimately notified MISO prior to June 2013 that it was ready to proceed with Phase II, before it faced the risk of termination under Section 2.3.1 of its GIA. At that time, MISO restudied the project as

on Section 2.3.1 of the *pro forma* GIA. See filings in Docket Nos. ER14-254 (letter order issued Jan. 27, 2015, accepting notice of termination based on failure to achieve Commercial Operation) and ER15-954 (filed on Jan. 30, 2015) (filing notice of termination for a project that never achieved Commercial Operation).

⁹ See AWEA/WOW Comments at 2.

¹⁰ See, e.g., *Interconnection Queuing Practices*, 122 FERC ¶ 61,252 at P 3 (2008) (noting surging volumes of new generation that were taxing queue management in 2008); *Midwest Indep. Transmission Sys. Operator, Inc.*, 124 FERC ¶ 61,183 at PP 4, 17 & 105-111 (2008) (responding to FERC's concern by replacing a "first-come, first-served" methodology with a "first-ready, first-served" emphasis and accepting limitations on suspension under new GIAs) ("*Queue Reform I Order*").

¹¹ See October 15 Filing, GIA (redline) at App. A & B.

required by Commission precedent.¹² As a result of this restudy, MISO found the operation of Phase II to be dependent on several other projects (listed in Exhibit A10 of the GIA) that would not be in operation until 2018. Mankato would have been subject to limited operation if it chose to operate prior to the completion of other upgrades in 2018. Because Mankato did not elect to proceed with limited operation, a June 2018 COD is appropriately reflected in the GIA (and Mankato will be required to construct upgrades for Phase II).¹³ MISO also notes that its treatment of interconnection agreements is non-discriminatory and neutral as to fuel types. The recent MISO filings to terminate GIAs for failure to reach Commercial Operation pursuant to Section 2.3.1 were for wind projects. In both instances, MISO waited the required three years before filing to terminate those GIAs. This is the same treatment accorded the Mankato project. Allegations of discrimination are thus unpersuasive.

By contrast, MISO's current process requires that readiness milestones be included in more recent GIAs. Failure to meet these milestones or other payment milestones has been the basis for the recent GIA termination filings identified by AWEA and WOW. This is particularly true because revisions to the *pro forma* GIA also now limit suspension rights to situations where "a Force Majeure event occurs."¹⁴ However,

¹² See *Midwest Indep. Transmission Sys. Operator, Inc.*, 116 FERC ¶ 61,252 at PP 39-42 (2006) (rejecting proposed revisions to add specific post-suspension procedures in the Appendices of an LGIA, but noting that a Transmission Owner may reasonably find that developing a new schedule after suspension requires restudy consistent with Sections 6.4, 7.6, and 8.5 of the then-effective LGIP); *Midwest Indep. Transmission Sys. Operator, Inc.*, 144 FERC ¶ 61,033 at P 77 (2013) (after a suspension period, "we find it appropriate that MISO must consider configurations consistent with a "but for" analysis and which take into account the existing interconnection queue.").

¹³ See January 9 Response at 2-3.

¹⁴ Tariff, Attachment X, Appendix 6 (*pro forma* GIA), Section 5.16.1.

the Commission specifically found that Mankato would not be subject to the new GIP,¹⁵ meaning that these new required milestones did not apply to Mankato and Mankato also retained its suspension rights under the Original GIA. Accordingly, the differing treatment of Mankato and customers whose GIAs have been terminated is not due to any kind of undue discrimination, but is instead simply the result of the fact that Mankato's Phase II was not similarly situated to other projects in the queue due to its vintage (2004) and the lack of milestones in the Original GIA.¹⁶

Third, Invenenergy raises the concern that MISO did not perform adequate analysis to determine whether the change in the COD for Phase II was a Material Modification.¹⁷ However, MISO followed its process to restudy the project taking into account the state of the queue at the time.¹⁸ Because the project had missed the deadline for the August 2012 group study and was being restudied due to its effectively coming out of suspension (having been considered suspended from 2007 to 2010, followed by a period where MISO did not have grounds to proceed with any potential termination of unused capacity), MISO restudied the project separately, but in accordance with its usual Definitive Planning Phase process, including all study deposit and entry milestone

¹⁵ See *Midwest Indep. Transmission Sys. Operator, Inc.*, 138 FERC ¶ 61,233 (2012) (“*Queue Reform III Order*”), order on reh'g and compliance filing, 139 FERC ¶ 61,253 at P 36 (2012) (“*June 27 Rehearing Order*”) (specifically discussing Mankato and finding that Mankato did not meet the criteria to transition to the new GIP, but that a restudy would be performed under Section 8.7 of the GIP).

¹⁶ See, e.g., *Cal. Indep. Sys. Operator Corp.*, 119 FERC ¶ 61,076 at P 369 (2007) (“the [Federal Power Act] does not prohibit all discrimination, only undue discrimination. In general, discrimination is ‘undue’ when there is a difference of rates, terms or conditions among similarly situated customers. The Commission has broad discretion in determining when discrimination is undue.”) (internal citations omitted).

¹⁷ Invenenergy Protest at 2, 9, and 13.

¹⁸ See notes 12 & 15, *supra*.

payments.¹⁹ Since that time, a restudy of Mankato’s project was required under the GIP, and such restudy was completed in November 2014.²⁰ As noted above, and as a result of the subsequent study, Mankato will be required to construct upgrades for Phase II.

Finally, Invenergy requests that the Commission provide clarification regarding Section 3.3.1 of the GIP.²¹ However, as Invenergy acknowledges, Section 3.3.1 “by its own terms applies only to the COD requested at the application stage.”²² Accordingly, that provision is irrelevant in this proceeding, which involves modifications to the Original Agreement. To the extent that Invenergy has general questions about the MISO Tariff, Invenergy should raise those questions with MISO or in the MISO stakeholder process, rather than in this customer-specific proceeding before the Commission.

B. The Commission should dismiss Invenergy’s inappropriate discovery.

In its Protest, Invenergy asks the Commission to request more information from MISO and lists ten questions, many of which implicate non-public information related to the commercial details of the Mankato project and MISO’s communications with Mankato.²³ The provisions of MISO’s GIP²⁴ and the GIA under consideration here²⁵ bar

¹⁹ The study is publicly available on the MISO website at the following hyperlink: https://www.misoenergy.org/_layouts/MISO/ECM/Redirect.aspx?ID=160555

²⁰ The study is publicly available on the MISO website at the following hyperlink: <https://www.misoenergy.org/Library/Repository/Study/Generator%20Interconnection/GI-DPP-2012-MN-G261-SIS%20Expansion%20Restudy%20141110.pdf>.

²¹ See Invenergy Protest at 13-14; AWEA/WOW Comments at 3.

²² Invenergy Protest at 10.

²³ *Id.* at 8-10.

²⁴ MISO Tariff, Attachment X (GIP), Section 13.1.

²⁵ See October 15 Filing, GIA, Section 1 (defining “Confidential Information”); *id.* at Section 22 (explaining that “Confidential Information shall include, without limitation, all information relating to a Party’s technology, research and development, business

MISO from sharing Confidential Information.²⁶ Nonetheless, with Mankato's express consent, MISO has now provided the Commission with ample information regarding the procedures MISO applied with respect to the Mankato GIA. The Commission should deny Invenergy's request essentially to conduct additional discovery.²⁷

Invenergy's request is particularly troubling because it asks the Commission to provide it with information regarding the commercial plans of a competitor's project in which it has no direct interest.²⁸ The Commission should not allow Invenergy to use the comment and protest process to circumvent clear Tariff protections regarding non-public information pertaining to competitor projects. Yielding to Invenergy's inappropriate discovery attempt will only encourage similar demands in the future and will undermine the Commission-approved confidentiality protections in the MISO GIP and the *pro forma* GIA, and ultimately competition for generation projects.

affairs, and pricing, and any information supplied by a Party to another Party prior to the execution of this LGIA.”).

²⁶ The October 15 Filing included Critical Energy Infrastructure Information (“CEII”) that was marked as protected. Invenergy now suggests that MISO’s standard Protective Agreement for CEII could be updated to allow Invenergy to have responses to its questions. *See* Invenergy Protest at 7 n.13. However, this ignores the fact that the GIP bars MISO from unilaterally disclosing Confidential Information.

²⁷ The Commission does not have to provide discovery in a matter that is not set for hearing or to inquire into every contention raised by a prospective intervener. 18 C.F.R. § 385.401 (2014); *see also, e.g., Entergy Services, Inc. v. FERC*, 319 F.3d 536, 545 (D.C. Cir. 2003) (finding that FERC did not abuse its discretion in not ordering an evidentiary hearing when the parties had the opportunity to present their views.).

²⁸ The Minnesota Public Utility Commission recently approved a power purchase agreement between Mankato and Xcel Energy, but rejected a proposal by Invenergy. *See 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. E-002/CN-12-1240, *et al.* (Feb. 5, 2015) (Order Approving Power Purchase Agreement with Calpine, Approving Power Purchase Agreement with Geronimo, and Approving Price Terms with Xcel).

IV. CONCLUSION

WHEREFORE, MISO respectfully requests that the Commission accept this Answer and accept the GIA effective October 16, 2014, as requested in MISO's October 15 Filing.

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DATED: February 18, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Carmel, IN, this 18th day of February, 2015.

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Document Content(s)

ER15-104- 02-18-15 Final MISO Answer.PDF.....1-12

EXHIBIT C

Calpine March 2, 2015 Comments

FERC Docket No. ER15-104-000

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Midcontinent Independent System
Operator, Inc.**)

**Docket Nos. ER15-104-000
ER15-104-001**

**REQUEST FOR LEAVE TO FILE COMMENTS AND
COMMENTS OF CALPINE CORPORATION**

Pursuant to Rules 212 and 213 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (the “Commission”),¹ Calpine Corporation (“Calpine”), on behalf of its subsidiary, Mankato Energy Center, LLC (“Mankato”), hereby respectfully requests leave to file these comments addressing the answer of the Midcontinent Independent System Operator, Inc. (“MISO”)² filed on February 18, 2015, in the above-captioned proceeding.³ As explained herein, the Commission should reject attempts by certain intervenors, including a competitor of Mankato, to hijack this proceeding and promptly accept the Amended and Restated Standard Large Generator Interconnection Agreement (the “Amended GIA”) among Mankato, Northern States Power Company (“NSP”), and MISO, that was filed on October 15, 2014.⁴

¹ 18 C.F.R. §§ 385.212, 385.213 (2014).

² Motion for Leave to Answer and Answer of the Midcontinent Independent System Operator, Inc., Docket Nos. ER15-104-000, *et al.* (filed Feb. 18, 2015) (the “February 18 Answer”).

³ Although the Commission’s rules do not provide for responses to answers as a matter of right, the Commission regularly accepts otherwise impermissible filings that assist its decision-making process. *See, e.g., PJM Interconnection, L.L.C.*, 150 FERC ¶ 61,046 at P 25 (2015); *Midcontinent Indep. Sys. Operator, Inc.*, 150 FERC ¶ 61,045 at P 27 (2015); *Duke Energy Carolinas, LLC*, 150 FERC ¶ 61,044 at P 29 (2015); *Southwest Power Pool, Inc.*, 150 FERC ¶ 61,047 at P 22 (2015).

⁴ Midcontinent Independent System Operator, Inc., Filing of Amended and Restated Generator Interconnection Agreement, Docket No. ER15-104-000 (filed Oct. 15, 2014) (the “October 15 Filing”).

I.

COMMENTS

On January 9, 2015, MISO made a filing⁵ in this proceeding that responded to questions posed by the Commission’s Office of Energy Market Regulation regarding the extension of the Commercial Operation Date for Phase II of the generating project being developed by Mankato (the “Project”) from June 1, 2007 to June 1, 2018.⁶ In that filing, MISO explained that the Commercial Operation Date extension for Phase II was processed consistent with the terms of the Standard Large Generator Interconnection Agreement among Mankato, NSP, and MISO’s predecessor, the Midwest Independent Transmission System Operator, Inc., dated November 17, 2004 (the “Original GIA”), MISO’s Generator Interconnection Procedures (“GIP”) as set forth in MISO’s Open Access Transmission, Energy and Operating Reserve Markets Tariff (the “MISO Tariff”), and Commission precedent. Nonetheless, Invenergy Thermal Development LLC and Invenergy Wind Development LLC (together, “Invenergy”),⁷ and subsequently, the American Wind Energy Association (“AWEA”) and Wind on the Wires (“WOW”),⁸ suggested that MISO acted improperly and/or granted Mankato unduly preferential treatment while discriminating against developers of wind-powered facilities.

In its February 18 Answer, MISO has, yet again, explained that it acted properly in processing the Mankato interconnection request, and did so in accordance with the Original GIA

⁵ See Midcontinent Independent System Operator, Inc., Response to Letter Requiring Additional Information, Docket No. ER15-104-001 (filed Jan. 9, 2015) (the “January 9 Filing”).

⁶ See *Midcontinent Independent System Operator, Inc.*, Docket No. ER15-104-000 (issued Dec. 12, 2014) (unreported).

⁷ Motion to Intervene and Protest of Invenergy Thermal Development LLC and Invenergy Wind Development LLC, Docket No. ER15-104-000 (filed Jan. 30, 2015).

⁸ Comments of American Wind Energy Association and Wind on the Wires, Docket Nos. ER15-104-000, *et al.* (filed Feb. 3, 2015).

and the GIP. Moreover, MISO has also provided a fulsome explanation addressing Invenergy's and AWEA/WOW's allegations of supposedly unduly preferential treatment. Among other things, MISO explained that, because the Original GIA was entered into in 2004, and because of changes in the GIP and MISO's *pro forma* GIA since that time, Mankato had suspension rights that permitted it to extend the Commercial Operation Date for Phase II for three years — *i.e.*, until June 1, 2010 — that are not available to later-queued interconnection customers.⁹ Accordingly, any difference in treatment between Mankato and other customers has been “simply the result of the fact that Mankato's Phase II was not similarly situated to other projects in the queue due to its vintage (2004) and the lack of milestones in the Original GIA.”¹⁰ MISO further stated that, when faced with failures to reach Commercial Operation, MISO has treated generators in an even-handed manner by “wait[ing] the required three years before filing to terminate those GIAs” under Section 2.3.1 of the respective GIAs.¹¹

Calpine also vigorously disagrees with Invenergy's and AWEA/WOW's suggestions that Mankato was the beneficiary of any kind of unduly preferential treatment. As MISO has explained, Mankato had the right under Section 5.16 of the Original GIA to suspend the Commercial Operation Date for Phase II, which Mankato validly exercised. At the time of the suspension, Mankato was in full compliance with the terms of the Original GIA, including having already funded over 95 percent of the facilities required to accommodate the full output of both phases of the Mankato Project under the Original GIA.

⁹ See February 18 Answer at 7-8.

¹⁰ *Id.* at 8.

¹¹ *Id.* at 7.

When MISO proposed modifications to the GIP and its *pro forma* GIA, Calpine specifically sought clarification from the Commission that such modifications would not apply to Mankato, since the Original GIA had been filed with, and accepted by, the Commission.¹² The Commission found that Mankato would not be required to transition to the new GIP, but made clear that a restudy could be required by MISO.¹³ Calpine and Mankato were nonetheless aware that MISO could seek to terminate the Original GIA under Section 2.3.1 to the extent that Mankato had not proceeded with Phase II by June 2013. Accordingly, as indicated in Calpine's ER12-309 Protest, Mankato continued to actively seek opportunities that would permit it to move ahead with Phase II of the Project,¹⁴ and Mankato notified MISO in August 2012 that it was ready to proceed with Phase II. At that time, MISO informed Mankato that a restudy was required, and Mankato has complied with MISO's instructions, and has taken all steps required under the GIP, with respect to such restudy.

Given Mankato's compliance with the terms of the Original GIA and with all of MISO's directives, Calpine is deeply troubled by Invenergy's and, to a lesser extent, AWEA/WOW's, attempts to turn this proceeding into some kind of witch-hunt with respect to MISO's interconnection procedures. As an initial matter, and as MISO has correctly pointed out, this proceeding is clearly not the time nor place for MISO or the Commission to address broader questions regarding the interpretation and applicability of various provisions of the MISO Tariff

¹² See generally Protest of Calpine Corporation, Docket No. ER12-309-000 (filed Feb. 21, 2012) (the "ER12-309 Protest"); Request for Clarification of Calpine Corporation, Docket No. ER12-309-001 (filed Apr. 30, 2012).

¹³ See *Midwest Indep. Transmission Sys. Operator, Inc.*, 139 FERC ¶ 61,253 at P 36 (2012), *on clarification*, 150 FERC ¶ 61,035 (2015).

¹⁴ See ER12-309 Protest at 3, 7.

that are not even at issue in this case.¹⁵ MISO's stakeholder process provides an adequate forum for all interested parties to address issues surrounding MISO's tariff and interconnection procedures.

More fundamentally, however, Calpine is concerned that Invenenergy's objections regarding MISO's actions and questions regarding MISO's procedures appear designed to delay or impede the Commission's acceptance of the Amended GIA. As Calpine explained in its previous comments in this proceeding, on December 15, 2014, the Minnesota Public Utilities Commission (the "PUC") voted unanimously to authorize execution of a power purchase agreement ("PPA") between Xcel Energy and Mankato for Phase II of the Project, which the PUC found is a required capacity addition to ensure reliability for Xcel and its customers.¹⁶ This PPA was the result of an open, competitive procurement proceeding that was conducted before the PUC, where Mankato and Invenenergy were direct competitors. In fact, in its February 5, 2015 order in that proceeding, the PUC specifically "[d]ecline[d] Invenenergy's proposal on the grounds that it does not meet Xcel's needs as efficiently as Calpine's and Xcel's."¹⁷

Invenenergy has now sought rehearing of the PUC Order, arguing, among other things, that "the overall risk associated with Calpine's interconnection may have increased dramatically

¹⁵ See February 18 Answer at 9 (explaining that Invenenergy's questions regarding Section 3.3.1 of the GIP are irrelevant in this proceeding).

¹⁶ See Supporting Comments of Calpine Corporation at 4, Docket No. ER15-104-000 (filed Jan. 30, 2015).

¹⁷ *In the Matter of the Petition of Northern States Power Co. d/b/a Xcel Energy for Approval of Competitive Res. Acquisition Proposal and Certificate of Need*, Order Approving Power Purchase Agreement with Calpine, Approving Power Purchase Agreement with Geronimo, and Approving Price Terms with Xcel at 4, Docket Nos. E-002/CN-12-1240, *et al.* (Feb. 5, 2015) (the "PUC Order"), available at <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={57CCD693-1BB9-4FED-9428-5BA43B0DF875}&documentTitle=20152-107070-01>. See also *id.* at 14 ("when the Department identified the least-cost package of generators to meet Xcel's forecasted need, Invenenergy's proposal was not part of the package"); *id.* at 21 (same).

since the submission of the PPA.”¹⁸ Invenergy also states that the PUC “should be aware that the issue of interconnection risk associated with the Calpine project is not trivial or hypothetical, but real and potentially significant.”¹⁹ However, the “risk” referenced by Invenergy is largely of its own making. Put simply, Invenergy appears to be trying to exploit this proceeding by manufacturing questions regarding MISO’s treatment of the Amended GIA in an effort to interfere with the development of Phase II so that Invenergy may gain a competitive edge over Mankato with respect to the PUC procurement process. Indeed, Invenergy chose to raise concerns regarding MISO’s treatment of the Amended GIA only after it learned that it was not the winning bidder in the PUC procurement process. The Commission should reject these types of underhanded tactics.

MISO has now provided the Commission with ample information showing that it properly processed the Amended GIA. Calpine is eager to have any uncertainty regarding the Amended GIA lifted as soon as possible, so that Mankato may continue moving forward with the development of Phase II of the Project. The Commission should therefore promptly accept the Amended GIA effective October 16, 2015, as requested by MISO.

¹⁸ *In the Matter of the Petition of Northern States Power Co. d/b/a Xcel Energy for Approval of Competitive Res. Acquisition Proposal and Certificate of Need*, Petition for Rehearing and Reconsideration at 4, Docket No. E-002/CN-12-1240 (filed Feb. 25, 2015), available at <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={425A0EAB-0489-4B6C-959B-4702EDF9D80A}&documentTitle=20152-107674-02>.

¹⁹ *Id.*

II.

CONCLUSION

WHEREFORE, Calpine respectfully requests that the Commission accept these comments as part of the record in this proceeding and accept the Amended GIA, effective October 16, 2014.

Respectfully submitted,

CALPINE CORPORATION

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Dated: March 2, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

Dated at Washington D.C., this 2nd day of March, 2015.

/s/
Stephanie S. Lim

Document Content(s)

ER15-104 Comments.PDF.....1-8

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

<i>In the Matter of the Petition of</i>)	Docket Nos.: E-002/CN-12-1240
<i>Northern States Power Company to</i>)	E-002/M-14-788
<i>Initiate a Competitive Resource</i>)	E-002/M-14-789
<i>Acquisition Process</i>)	
)	<u>CERTIFICATE OF SERVICE</u>

Catherine M. Wood, certifies that on March 6, 2015 she served true and correct copies of the **Answer of Calpine Corporation** upon the following parties in the attached list via e-filing and/or U.S. Mail.

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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