

January 13, 2020

Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Docket No. E-002/M-19-704 In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities

Dear Mr. Barlow:

The City of Minneapolis (“Minneapolis”) thanks the PUC for the opportunity to provide initial comments on this proceeding. Minneapolis agrees that self-committing and self-scheduling are topics of interest as these practices may both displace cleaner renewable generation resources and result in higher costs for customers.

After reviewing the planned process and scope in the Commission’s November 13, 2019 Order within Docket 18-373, the City of Minneapolis supports the Commission’s plan.

As a clarification under Order Point 9, it could be helpful for utilities to itemize planned infrastructure maintenance and/or upgrades as part of the self-commitment and self-scheduling analyses, including cost estimates of these planned investments. For any scheduled maintenance or upgrade, an assessment of whether there is an opportunity to defer or avoid the expense by avoiding self-scheduling and -committing would be appreciated.

Minneapolis requests that parties have on the order of three to four months to review and respond to the utilities’ seasonal dispatch and strategic economic commitment compliance filings due March 1, 2020. Having this time will allow for adequate time given the various other overlapping open dockets with the Commission.

Thank you for your consideration.

Sincerely,



Mr. Kim W. Havey, LEED AP, AICP
Division of Sustainability

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No
Ryan	Barlow	ryan.barlow@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101214	Electronic Service	Yes
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	No
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No
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