

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

*CITIZENS ENERGY TASK FORCE INFORMATION REQUEST*

Docket Number: MPUC No. E002, ET2/CN-06-1115; OAH No. 15-2500-19350-2  
Requested From: Midwest ISO  
Date of Request: May 16, 2008  
Response Due: June 5, 2008 and ongoing

Requested by Paula Maccabee, *Counsel for CETF*

**REQUEST NUMBER: 1**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

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Please provide electronic copies of all information requests and all responses made by the Midwest ISO (“MISO”) and/or its offices to parties or participants other than Citizens Energy Task Force (“CETF”) to date and in the future throughout this entire proceeding.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**REQUEST NUMBER: 2**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

In its Petition to Intervene MISO stated that the Midwest ISO “has a direct and substantial interest in the matters and issues presented in this docket.” Please specifically describe the nature of each interest that MISO has in this CapX 2020 docket.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**REQUEST NUMBER: 3**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

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Please state whether MISO to any degree challenges Minnesota laws or Public Utilities Commission (“PUC”) jurisdiction in this matter pertaining to the following:

- A. Providing that no large energy facility shall be certified unless the applicant shows that demand cannot be met more cost effectively through energy conservation and load-management measures;
- B. Providing that no large energy facility that transmits electric power generated by means of a nonrenewable energy source shall be certified unless the applicant demonstrates that the alternative selected is less expensive, including environmental costs, than power generated by a renewable energy source;
- C. Providing that utilities subject to Minnesota jurisdiction must comply with renewable energy standard statutes;
- D. Providing that utilities subject to Minnesota jurisdiction must comply with statutes requiring energy conservation;
- E. Providing that, in Minnesota proceedings, costs for environmental externalities and for the regulatory risk for carbon dioxide emissions are included in the costs of energy generation irrespective of the location of that generation.

F. For any challenge of law or jurisdiction described in Parts A through E above, please describe every statute, rule or legal precedent asserted to support MISO's authority to challenge that jurisdiction.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**REQUEST NUMBER: 4**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

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Please explain whether MISO has taken a position that the development of a market-based system for bulk power transfer throughout the Midwest region should be made through ratepayer financing of transmission expansions rather than through private market investments by utilities and other entities.

If MISO has taken such a position,

- A. Please explain the nature, substance and reasoning for this position;
  - B. Please provide copies of any documents reasonably available to MISO that reflect the nature and substance of the position described in Part A;
  - C. Please describe any legal authority that supports MISO's preference for ratepayer financing of bulk power transmission facilities and provide any citations that establish that authority
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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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Requested by Paula Maccabee, *Counsel for CETF*

**REQUEST NUMBER: 5**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

Please state whether MISO's commitment to "working with all stakeholders to create the best, most cost-effective, and innovative solutions for the evolving electric industry" includes taking any position regarding the role of conservation, energy efficiency and/or load management in meeting demand.

If MISO has taken such a position;

- A) Please explain the nature of the position taken by MISO, including any recommended standards or goals;
- B) Please describe any models which MISO uses or recommends to evaluate conservation, energy efficiency and load management as compared to other alternatives;
- C) Please provide copies of any documents reasonably available to MISO that reflect the nature and substance of any position described in Part A or model described in Part B.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**REQUEST NUMBER: 6**

*If you feel that your responses are trade secret or privileged, please indicate this in your responses.*

Please state whether MISO's commitment to "working with all stakeholders to create the best, most cost-effective, and innovative solutions for the evolving electric industry" includes taking any position regarding the role of distributed, dispersed or community based energy development in meeting demand or using existing transmission cost-effectively.

If MISO has taken such a position;

- A. Please explain the nature of the position taken by MISO, including any recommended standards or goals;
- B. Please describe any models which MISO uses or recommends to evaluate the costs or benefits of distributed, dispersed or community based energy generation.
- C. Please provide copies of any documents reasonably available to MISO that reflect the nature and substance of any position described in Part A or model described in Part B.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_