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Xcel Energy

Docket No.: E002, ET2/CN-06-1115

Response To: Steve Rakow Information Request No. 39 First Supp.  
MN Department of Commerce

Date Received: December 18, 2007

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Original Question:

Please provide the information requested in the attached tables for each utility system that was used in determining the need for the proposed transmission lines. Please provide your response in Excel format.

Original Response:

The forecast data relied upon in determining the need for the facilities is the forecasts for the systems of the utilities serving retail load in Minnesota and the surrounding region. A description of the data is contained in the Application. See Section 6.2 and Appendix A-1, Section 1. A list of those utilities follows:

Dairyland Power Cooperative  
Great River Energy  
Minnesota Power  
Otter Tail Power Company  
Rochester Public Utilities  
Minnkota Power Cooperative  
Central Minnesota Municipal Power Agency  
Wisconsin Public Power, Inc.  
Missouri River Energy Services  
Southern Minnesota Municipal Power Agency  
Xcel Energy  
Hutchinson Utilities Commission  
New Ulm Public Utilities Commission  
Willmar Municipal Utilities  
Minnesota Municipal Power Agency  
Interstate Power and Light Company

To respond to this request, Applicants obtained data from each of the CapX2020 sponsoring utilities. For the remaining utilities, Applicants collected data from the May 1, 2007 Mid-Continent Area Power Pool Load and Capability Report which includes generation data and purchase and sale data through 2016. For Interstate Power and Light, Applicants used public data from the report submitted by the company in compliance with Minnesota Rules Chapter 7610 (and public information regarding the Duane Arnold Energy Center).

Two Excel spreadsheets, purchases and owned resources, are attached. Please note that, with the exception of Minnesota Power, each utility wind resource is shown at nameplate regardless of whether is a purchased or owned resource.

### FIRST SUPPLEMENTAL RESPONSE:

#### Supplemental Excel Spreadsheets

Attached to this first supplemental response are the following new Excel spreadsheets as requested by the Department of Commerce Office of Energy Security (“OES”).

- seasonal firm purchases
- seasonal firm sales
- participation purchases
- seasonal participation sales
- load and generation capacity,

In addition, a spreadsheet providing renewable energy purchases is included. Renewable purchases are not reported as firm or participation purchases in the Mid-Continent Area Power Pool (“MAPP”) submittals from the utilities.

Applicants note that with respect to data provided for Wisconsin Public Power Inc. (“WPPI”), part of WPPI load is subject MAPP Generation Reserve Sharing Pool (“GRSP”) requirements and part is subject to Mid-American Interconnected Network (“MAIN”) requirements. WPPI assembles separate load and capability reports for each region. Firmness in MAPP and MAIN are basically similar in nature.

#### Revised Excel Spreadsheets

In addition to the supplemental Excel spreadsheets identified above, Applicants are producing amended “Firm Purchases” and/or “Owned Generation” spreadsheets to provide additional information that either clarifies or corrects certain differences

between information provided in their prior response to OES Information Request No. 39 and information provided in the 2007 MAPP Load and Capability Report. The below-listed amended spreadsheets are attached for the following utilities:

- Dairyland Power Cooperative (“Dairyland”): amended “Owned Generation” spreadsheet and amended “Firm Purchases” spreadsheet.
- Southern Minnesota Municipal Power Agency (“SMMPA”): amended “Owned Generation” spreadsheet and amended “Firm Purchases” spreadsheet.
- Missouri River Energy Services (“MRES”): amended “Owned Generation” spreadsheet.
- Interstate Power and Light (“IPL”): amended “Owned Generation” spreadsheet.
- Xcel Energy: amended “Firm Purchases” spreadsheet only.

The changes that have been made to these spreadsheets, except for Dairyland’s amended “Firm Purchases” spreadsheet, are highlighted. Further explanation of differences, if any, between the purchases and generation resources that are listed in response to OES Information Request No. 39 and the purchases and generation listed by the utilities in the 2007 MAPP Load and Capability Report is provided below.

### FIRM PURCHASES

The differences between the firm purchases listed in the 2007 MAPP Load and Capability Report and in response to OES Information Request No. 39 are described in this section.

#### Great River Energy:

The Great River Energy summer capacity purchase from NSP (Dynergy) is shown in the 2007 MAPP Load and Capability Report in the monthly load and capability data (pages II-52 and II-54) but is not shown in the seasonal load and capability data (page III-36). Great River Energy inadvertently omitted the NSP (Dynergy) purchase in the seasonal load and capability data, resulting in the discrepancy.

The purchase from Basin Electric Power Cooperative (“BEPC”) in the MAPP seasonal load and capability data is shown as “All Fixing Members Growth” in Great River Energy’s response to OES Information Request No. 39. The megawatt

difference is the result of updated estimates of future supply to “fixed” member distribution cooperatives served by BEPC.

MOLK in the 2007 MAPP Load and Capability Report is shown as “Moose Lake Municipal” in the “Firm Purchases” response to OES Information Request No. 39.

Great River Energy does not show wind generation as purchases for MAPP reporting. The wind facilities are shown as Great River Energy generation.

#### SMMPA:

The Manitoba Hydro purchases were provided in response to OES Information Request No. 39 but are not included in the 2007 MAPP Load and Capability Report, which shows data from 2006, because SMMPA’s Manitoba Hydro contract was not completed and signed at that time. In the 2008 MAPP filing (in process and covering 2007 data) the Manitoba Hydro is included. With regard to the OWEF purchase, it was not listed on the 2007 MAPP Load and Capability Report and was inadvertently omitted from the 2008 (current) MAPP filing. SMMPA has provided the corrected tables for the 2008 MAPP filing and the current MAPP Load and Capability Report will have those included. The data added is consistent with the OWEF purchase listed in SMMPA’s amended “Firm Purchases” spreadsheet attached hereto.

#### Otter Tail Power Company (“OTP”):

With respect to the GRE unit and Xcel unit information that OTP provided in response to OES Information Request No. 39 on its “Firm Purchases” spreadsheet, these purchases were made after the publication of the 2007 MAPP Load and Capability Report and, therefore, were not included in that Report.

See OTP’s response in the below “Owned Generation” section regarding OTP’s inclusion of the following generation units on the “Firm Purchases” spreadsheet in response to OES’s Information Request No. 39 and the exclusion of these units on the 2007 MAPP Load and Capability Report: Fleet Farm Diesel, Kindred School, State Auto Insurance, Perham Incinerator, Stevens Community, Dakota Magic, and Valley Queen Cheese.

#### Dairyland:

The wind and landfill purchases that Dairyland listed in response to OES Information Request No. 39 are existing projects or projects that have ongoing negotiations. The projects listed in the planned new generation section of the 2007 MAPP Load and Capability Report includes those projects identified in response to OES Information

Request No. 39 as well as projects that are more speculative in nature and, therefore, were not included in response to OES Information Request No. 39.

Rochester Public Utilities (“RPU”):

RPU is a partial requirements member of SMMPA, which provides RPU with 216 MW of capacity and reserve share to serve RPU load up to 216 MW. RPU is then responsible for either generating or buying capacity on the MISO market to serve the portion of RPU load above 216 MW. RPU’s information in the 2007 MAPP Load and Capability Report reflects only the load and purchases for RPU’s load above 216 MW, therefore the SMMPA purchase was not included in the 2007 MAPP Load and Capability Report. The Olmsted County purchases is a behind-the-meter program and is not accredited, therefore these would not be listed in the 2007 MAPP Load and Capability Report.

Minnesota Power:

The following purchases were provided in response to OES Information Request No. 39 but do not appear as such in the 2007 MAPP Load and Capability Report for the following reasons: Oliver 1 is the same as the FPL purchases which were listed on the MAPP Report; Oliver 2 came on-line in late 2007, after publication of the MAPP Report; Wing River came on-line in August 2007, after publication of the MAPP Report, the Laurentian PPA was executed after the 2007 MAPP Report; OPG (Ontario Power Generation) was not reported on MAPP because it is sourced from a different market; and RFP Wind is a potential future purchase, but not yet executed or approved by the Minnesota Public Utilities Commission (“Commission”).

No information regarding the Williams purchases after 2007 is provided in response to Information Request No. 39 because Williams was a 2007 summer capacity deal that ended in October 2007.

Information regarding the WPS purchase is provided through 2010 in the response to Information Request No. 39 because this PPA currently only goes through 2010.

Minnkota Power Company (“Minnkota”):

The Langdon Wind purchase listed in response to OES Information Request No. 39 was not included in the 2007 MAPP Load and Capability Report because the Langdon Wind project was not operational until December 2007, after the MAPP Report was published, and transmission study work was still being done to determine whether and when the Langdon Wind project would go on-line.

### WPPI:

All of the purchases reported in response to OES Information Request No. 39 were WPPI purchases. In the 2007 MAPP Load and Capability reporting process WPPI did not report any of these specific purchases to MAPP; instead, WPPI recorded a transfer of capacity from WPPI-MAIN to MAPP. The WPPI-MAIN resource is not a specific resource, instead it is a composite of resources that WPPI has in MAIN.

### Central Minnesota Municipal Power Agency (“CMMPA”):

The following CMMPA purchases were not listed in the 2007 MAPP Load and Capability Report for the following reasons: Glencoe’s Landfill unit was not online in 2007. The Hancock and Wolf wind was sold into the MISO RT market and is not accredited. Blue Breezes is located behind-the-meter and is also not accredited. No information is provided for the Ameren purchases listed in response to OES Information Request No. 39, because the contract ends December 31, 2009.

### Xcel Energy:

The following purchases were not listed in the 2007 MAPP Load and Capability Report for the following reasons: The “Non-Utility Group” is an aggregate of purchases from small IPPs including Byllesby, Chippewa Reserve, HERC, LP/Flying Cloud, LP/Pine Bend, MN Methane, Neshonoc, Rapidan, and St Cloud Hydro. Short Term purchases is an aggregate. Generic PPA is not yet determined. Laurentian, FibroMinn, and MMP(A) were inadvertently omitted. Manitoba Hydro Baseload was not under consideration when the MAPP Report was filed. Minnkota is shown on the MAPP Report as Minnkota Power Coop. Wind is shown as owned generation per MAPP GRSP rules.

The Ameren and Dynegy purchases on the 2007 MAPP Load and Capability Report were not included in Xcel Energy’s response to OES Information Request No. 39 because these were purchases that were resold to other utilities and, thus, had no impact on Xcel Energy. MAPP, however, tracks all ins and outs if a member is involved.

The capacity values associated with the following purchases was inadvertently omitted from Xcel Energy’s “Firm Purchases” spreadsheet provided in response to OES Information Request No. 39: L.S. Power, St. Paul, Calpine Mankato, Manitoba Hydro (500), Cyprus, Constellation, and Minnkota. (Calpine and Mankato refer to the same purchase and should not appear as different purchases.) The difference in megawatts between Xcel Energy’s response to OES Information Request No. 39 and the 2007

MAPP Load and Capability Report is due to changes in URGE ratings. An amended “Firm Purchases” spreadsheet for Xcel Energy is attached hereto.

### OWNED GENERATION RESOURCES

The differences between generation resources listed on the 2007 MAPP L&C (or in the case of IPL, its 2005 Integrated Resource Plan) and in the response to OES Information Request No. 39 are described in this section. A chart listing those differences is attached.

#### Minnesota Power:

For Minnesota Power, with respect to the Clay Boswell D4 unit representing 1 MW of nameplate capacity provided in the 2007 MAPP Load and Capability Report, that 1 MW is included within the Boswell Energy Center information provided in response to the OES Information Request No. 39. The remaining generating units that Minnesota Power listed in the 2007 MAPP Load and Capability Report (but did not list in response to Information Request No. 39) are under the category of pool-within-pool or non-utility generators, also referred to as coincident net load. Minnesota Power, as part of MAPP, has the right to call on these generators during peak times. OES Information Request No. 39 only asked for utility-owned and utility firm purchases, and the units listed in the 2007 MAPP Load and Capability Report, but not listed in response to OES Information Request No. 39, do not meet that definition.

#### SMMPA:

For SMMPA, the Austin DT units, owned existing generation resources, and the Austin SW units, retired generation resources, all of which are listed in the 2007 MAPP Load and Capability Report, were inadvertently omitted from the “Owned Generation” spreadsheet provided in response to OES Information Request No. 39. Blooming Prairie Units 3 and 4 are no longer under contract and therefore were not and should not be included in response to OES Information Request No. 39. The output from the OWEF facility, which was listed in response to OES Information Request No. 39 in the “Owned Generation” spreadsheet but not included in the 2007 MAPP Load and Capability Report, is contracted to SMMPA, but the unit is owned by Olmsted County. Therefore it would have been more appropriate to list the OWEF facility in the “Firm Purchases Summer” spreadsheet provided in response to OES Information Request No. 39.

An amended “Owned Generation” spreadsheet including the Austin DT units and the Austin SW units and omitting the OWEF facility is attached. An amended “Firm Purchases” spreadsheet including the OWEF facility is attached.

### Great River Energy:

For Great River Energy, the Stanton Diesel was listed in response to OES Information Request No. 39 and was reported to MAPP on forms reporting the results of the annual URGE test. The Stanton Diesel has a capacity of 1 MW. In the 2007 MAPP Load and Capability Report, the Stanton Station is reported as having a capacity rating of 187.7 MW for the steam generator. The Lakefield Diesel, which is listed in response to the Department's Information Request No. 39, is listed as "Lakefield 7 (DFO)" on page IV-16 of the 2007 MAPP Load and Capability Report.

### CMMPA:

For CMMPA, the following generator units were not listed in response to OES Information Request No. 39 for the following reasons. Glencoe 5 and 6 were retired in late 2007. Sleepy Eye 3 was retired in late 2007. Mt. Lake Wind's turbine was not running in summer 2007, and because OES Information Request No. 39 responses were based on summer season generating capacity, this wind turbine was not included in the response.

### MRES:

For MRES, Exira Station 3 was listed in the 2007 MAPP Load and Capability Report under Planned New Generators. Moorhead 8 and 9 were submitted to be included in the 2007 MAPP Load and Capability Report, however, because these are wind units that MRES does not own and do not accredit, MAPP chose not to publish them in the Load and Capability Report. With respect to Rock Rapids, this facility was inadvertently omitted from MRES's response to OES Information Request No. 39. A revised "Owned Generation" spreadsheet is attached.

### OTP:

For OTP, the differences between the information provided in the 2007 MAPP Load and Capability Report and in response to the OES Information Request No. 39 relate to timing and the manner in which the OES asked the question. The 2007 MAPP Load and Capability data was submitted months before the report was publicly due. At that point in time the Langdon Wind Energy Center development, which was listed in response to OES Information Request No. 39, had not yet been finalized from a contractual perspective. It was not included in the MAPP data because the project had not yet been committed to or was even in the firm planning stages.

The rest of the discrepancies are because of the manner in which the OES requested data. The first spreadsheet requested "Firm Purchases." This terminology has a specific definition within MAPP. It is used to designate transactions where the seller

provides reserves. It is handled differently than other transactions. The 2007 MAPP Load and Capability Report lists Fleet Farm Diesel, Kindred School, State Auto Insurance, Perham Incinerator, Stevens Community, Dakota Magic, and Valley Queen Cheese as units. These are in reality “Participation Purchases” where the seller does not provide reserves. OTP listed these purchases in the “Firm Purchases” spreadsheet attached to the response to OES Information Request No. 39, so the data was present. These are not listed as transactions in the MAPP data, because the ratings change annually in accordance with accreditation testing procedures. The MAPP processes for transactions were not sufficient to handle these units, so they are listed as OTP units with MAPP. The data was provided on these facilities.

The other OES spreadsheet attached to OES Information Request No. 39 asked for “Owned Facilities” and the rest of the missing facilities were not owned by OTP and could not be quantified as a firm or participation purchase. These facilities include the Hendricks Wind I (0.900 MW nameplate) and the Borderline Wind I (0.900 MW nameplate). The Borderline Wind I unit is not included in the MAPP Report, because at the time the data was submitted for the report the accredited level for this facility was determined after-the-fact. OTP did not include the 19.5 MW FPL Energy Langdon Wind Energy Center purchase, again because it is not a company owned facility and is neither a participation or firm purchase. It was not included in the MAPP data either because the project status had not yet been determined.

OTP has other facilities from which it receives energy in limited amounts or only occasionally. These facilities are not accredited in MAPP either because of small size or because the owner used some or most of the energy on-site and the remaining deliveries to OTP are not sufficient to justify firm transmission for capacity accreditation. These would include the EMS wind turbine (90 kW nameplate), Lac Qui Parle Valley School wind turbine (220 kW nameplate), UM-Morris Wind (1.65 MW nameplate), Trautman Wind (50 kW nameplate), Tuel Wind (39.5 kW nameplate), Southwest MN Community and Technical College wind (35 kW), and Spirit Lake Casino wind (100 kW).

#### RPU:

For RPU, “Lake Zumbro Hydro” listed in response to OES Information Request No. 39 refers to the same facility as “Rochester Hydro #1 & 2” listed in the 2007 MAPP Load and Capability Report; different names were inadvertently used to refer to the same hydro facility.

Dairyland:

The generator facilities listed below were not listed in response to OES Information Request No. 39 as owned generation because they are owned by municipals that are served by Dairyland. The municipals own the generator, provide their own capacity and purchase their energy from Dairyland. Dairyland also accredits the municipal capacity as its own for use as planning reserves.

Arcadia 1-9  
Argyle HYD  
Argyle 4  
Cashton 3,5-6  
Cumberland 1-8  
Elroy 1,2,5  
Fennimore 1-5  
Forest City 1-6  
La Farge 1  
Lanesboro 1,4-5  
Merrillan 1,2  
New Lisbon 2, 5-7  
Viola

The following projects are found in the “Firm Purchases” spreadsheet provided by Dairyland in response to OES Information Request No. 39: Adams Wind Farm, Timberline Trail 1-4, and Central Disposal 1-6.

The 2007 MAPP Load and Capability Report contains the following planned generator additions, which were not listed as such in Dairyland’s response to OES Information Request No. 39:

Sorona Landfill  
McNeilus Wind Farm 3  
Iowa Coal  
DPC CT 1-3  
Wind Farm 4-6  
Timberline Trail Landfill 5-6  
Seven Mile Creek 4-6  
Sorona Landfill 4-5  
Meth Digester 6-23

A number of the above-listed facilities are included in Dairyland’s response to the OES Information Request No. 39 with a different title than those used in the 2007

MAPP Report. In addition, there are several projects that were inadvertently omitted from Dairyland's response to OES Information Request No. 39 such as the Iowa Coal, DPC CT 1-3 and the Methane Digesters. The "Firm Purchases" and the "Owned Generation" spreadsheets provided by Dairyland in response to Information Request No. 39 have been updated to reflect the projects found in the 2007 MAPP Load and Capability Report and are attached hereto.

#### Xcel Energy:

For Xcel Energy, the small hydro facilities at Hayward and Riverdale, which were included in response to OES Information Request No. 39, were inadvertently omitted from the 2007 MAPP Load & Capability Report. The Hastings hydro-electric generation is owned by the City of Hastings. Xcel Energy contracts for the output of the facility. Under MAPP reporting requirements, however, this run-of-river hydro facility is reported as owned generation instead of a purchased power transaction.

Xcel Energy inadvertently listed the High Bridge retirement twice on its "Owned Generation" spreadsheet in its original response to this information request. The response to the OES's Information Request No. 39 should be limited to 271 MW retired with respect to High Bridge. Also, the correct capacity addition for Riverside is 508 MW and not 439 MW.

#### WPPI

WPPI reports load in both MAIN and MAPP for planning reserve purposes. MAPP load makes up less than 10 percent of WPPI's total load. The response to the OES Information Request No. 39 contained resources that are used for both MAIN and MAPP planning reserve purposes. Neither Island Street nor South Fond du Lac are generation resources used for MAPP planning reserves purposes.

River Falls 5-7-9-10 have been historically reported to MAPP as generation units. The units are owned by the Rivers Falls municipal and WPPI has a purchase contract with River Falls for the capacity associated with the units. In response to OES Information Request No. 39, WPPI did not report the River Falls units as owned since WPPI does not own the units. Also, WPPI did not report the units as a purchase since they have been historically shown in the MAPP Load and Capability Reports as generation and not as purchases.

#### IPL:

For IPL, Centerville Diesel units 2 and 3 were inadvertently omitted from IPL's response to OES Information Request No. 39. What is identified as "Fox Lake 4" on the attached list of variations for IPL is listed as "Fox Lake Gas Turbine" in response

to OES Information Request No. 39. An amended “Owned Generation” spreadsheet including the Centerville Diesel units 2 and 3 and reflecting the accurate name of “Fox Lake Gas Turbine” as “Fox Lake Combustion Turbine” is attached hereto. Also, please note that the information provided in response to OES Information Request No. 39 was from IPL’s 2007 submission, and not its 2005 submission, to the OES as part of the Minn. R. ch. 7610 requirement. This fact does not change the units that were listed in response to OES Information Request No. 39 but some of the megawatt values for the units are different because of different reporting years.

Minnkota:

For Minnkota, the following generation units listed in response to OES Information Request No. 39 were inadvertently omitted from the 2007 MAPP Load and Capability Report: Grand Forks 1, 10; Arthur 1-2; Butler 1; Reed 1-6; Shanley 1; Oxbow 1-2; Valley City; and Petersburg. Minnkota will ensure the inclusion of these generation units in future MAPP reportings.

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FIRST SUPPLEMENTAL RESPONSE

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