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Austin, Texas 78701

May 15, 2015

Via electronic mail

William Grant
Deputy Commissioner of Energy and Telecommunications
Minnesota Department Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: *Comments on the Draft Combined Heat and Power Action Plan*

Dear Commissioner Grant,

NRG Energy, Inc. (NRG) appreciates the opportunity to provide comments on the Department's Draft Combined Heat and Power Action Plan ("the Action Plan"). NRG dGen, our distributed generation team, is one of the largest third-party steam and chilled water providers in the U.S., supporting districts with thermal energy nationwide. NRG Energy Center Minneapolis provides energy-efficient and environmentally sound district heating and/or cooling services to more than 100 buildings in downtown Minneapolis. We also operate a separate district heating system that serves Augsburg College and the University of Minnesota Medical Center, Fairview campus. NRG dGen also provides customized district energy services in Harrisburg PA; Omaha NE; Phoenix AZ; Pittsburgh PA; San Diego CA; and San Francisco CA.

NRG dGen also has a large network of CHP facilities, serving customers including Arizona State University, Kraft Foods (Dover DE), Procter & Gamble (Dover DE), University Medical Center of Princeton at Plainsboro (NJ) and a number of buildings in downtown Tucson AZ, including the Tucson Convention Center, the Midtown Police Station and other police and fire buildings.

We have reviewed the Action Plan with interest and find it to be timely assessment of CHP development needs in Minnesota. The Action Plan appropriately captures the key issues in the future development of CHP in Minnesota, both in scope and in priority, as:

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- Standby Rates
 - CHP Evaluation Methodology and Criteria
 - Mapping CHP Opportunities
 - CHP Ownership Problems and Solutions
 - Education and Training Needs and Options
 - Adapting CIP for Supply-Side Investments

NRG dGen looks forward to working with the Department, the Public Utilities Commission, and interested parties on these and other identified issues in the future. I may be reached at 512-691-6133 or connie.corona@nrg.com with any questions regarding NRG or these comments.

Respectfully submitted,



Connie Corona
Director, Regulatory Affairs