



Physical Development Division

Dakota County
Western Service Center
14955 Galaxie Avenue
Apple Valley, MN 55124-8579

952.891.7000
Fax 952.891.7031
www.dakotacounty.us

Environmental Resources
Land Conservation
Groundwater Protection
Surface Water
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Environmental Initiatives

Office of Planning

Operations Management
Facilities Management
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Parks

Transportation
Highways
Surveyor's Office
Transit Office

July 10, 2013

Suzanne Lamb Steinhauer
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198

Thank you for the opportunity to comment on Xcel Energy's Competitive Resource Acquisition Process documents. Only two of the proposals directly impact lands and waters located within Dakota County: the Northern States Power "Application to the Minnesota Public Utilities Commission for Approval of a Competitive Resource Acquisition Proposal and for a Certificate of Need", dated 15 April 2013 and the Invenergy "Hampton Energy Center" document, dated 15 April 2013.

Environmental Resources Department:

1. **Northern States Power "Application to the Minnesota Public Utilities Commission for Approval of a Competitive Resource Acquisition Proposal and for a Certificate of Need", 15 April 2013:** Black Dog Plant: Although this proposal describes Red River Valley Units as well as upgrades to the Black Dog Plant, Dakota County Environmental Resources Department Staff have only provided comments related to the Black Dog Plant, located in the city of Burnsville, Dakota County, Minnesota.
 - a. Page 1-11, Section 1.4 Project Description, 1.4.1 Black Dog Unit: The proposal states that a new, higher pressure gas line will be needed for fuel supply to the proposed gas powered turbines. Depending on the route, it is possible that impacted soils may be encountered or generated from that work. If so, those soils will need to be properly managed in accordance with Dakota County Ordinance 110, Solid Waste Management.
 - b. Page 1-13, Section 1.5 Environmental Performance and Land Use Impacts-*Land Use*: The document indicates that "The Black Dog plant is located on a 35 acre parcel which is well buffered within an approximately 1,900 acre area owned by the Company." Contamination from coal and combustion residuals is present from past operations and site closure activities, and Xcel has enrolled the site in the MPCA's VIC program. The property is a non-conforming site as defined by Dakota County Ordinance No. 110 *Solid Waste Management*. Xcel Energy has conducted a series of investigations on the property.



Based on County staff discussions with Xcel Energy staff, the Coal Yard and Ash Ponds will be decommissioned. Contaminated soils and sediments in those areas will be stabilized but not fully cleaned up, so the property will continue to be a non-conforming site. Xcel has indicated to Dakota County staff that they have no plans to sell this portion of the property, make it accessible to the public, or use it for anything other than industrial purposes.

Black Dog Road runs along the northern edge of the property, outside of the plant's security fence, along the Minnesota River. (Xcel refers to the area as the north margin). A regional bike path is being constructed along the north margin. Xcel has indicated to Dakota County Staff that they plan to clean up this area to recreational standards by excavating and disposing of the top 4 feet of any contaminated soil in the north margin and replacing it with clean fill.

- c. Page 2-13, Section 2.5. Related Minnesota Filings and Permits, 2.5.4. Other Permits, Approvals or Notifications: The Black Dog plant is a Very Small Quantity Generator (VSQG) of hazardous wastes. It is likely that some hazardous wastes will be generated during the decommissioning of the old coal-fired units and the installation of the new gas-fired unit. The amount of wastes generated is not determined, and Xcel will need to notify Dakota County of the wastes generated during their annual hazardous waste licensing.
- d. Page 4-5, Section 4. Project Description, 4.2 Black Dog Unit 6: The documents indicate that the Black Dog Plant currently has one natural gas turbine generator and two coal-fired boilers that can also burn natural gas at the Black Dog Plant. Xcel will cease using coal in 2015. Replacing the coal-fired boilers with additional natural gas generating capacity is not expected to have negative impacts on environmental conditions at the site.
- e. Page 6-10, Section 6 Environmental Information, 6.4. Waste Generation: Paragraph 2 states that waste management practices will follow applicable laws/regulations and Table 6-6 indicates that waste water will be discharged under the facility's NPDES permit or to the sanitary sewer, and solid wastes will be managed by a contract firm or disposed of "properly". All solid wastes generated at the site must be managed in accordance with Dakota County ordinance 110, *Solid Waste Management*.

Page 6-23, Section 6. Environmental Information, 6.10.2 Water Bodies: Dakota County records indicate that there is shallow groundwater contamination on this property. However, the area has artesian conditions so that the contaminated groundwater flows upward toward the Minnesota River and Cedar Basin (where it is subject to NPDES regulation) rather than down into deeper regional aquifers.

- 2. **Invenergy "Hampton Energy Center", 15 April 2013:** Insufficient environmental information is provided to fully evaluate this proposal. Specific attributes of the facility's operation are necessary to evaluate the potential environmental concerns.
 - a. Page 5, Section 2.0 Executive Summary: Although the location is described in general terms, Attachment 3 showing the location was not included. On pg. 5, the location marked as Hampton is actually Cannon Falls.

- b. Page 12, Section 7.0 Resource Type, 7.3. Primary Fuel and Backup Alternatives: The proposal states that natural gas will be the primary fuel, with low sulfur #2 fuel oil as a backup fuel. It is not indicated how the #2 fuel oil would be stored or transferred to the facility. Underground storage tanks and above ground storage tanks supplied by tanker truck or a pipeline each have unique regulations and concerns. Tanks are regulated by the Minnesota Pollution Control Agency.
- c. Page 18, Section 13.0 Additional Considerations, 13.5. Water Resources: The proposal states that a well will be drilled to supply water needs. There is no indication how much water will be needed for operations. In addition, this project would need to meet the Vermillion Watershed Joint Powers Organizational Standards within the ordinance requirements of Hampton Ordinances.

Transportation Department:

The Environmental Report to be prepared this fall should provide a complete traffic analysis and assessment that is consistent with Environmental Assessment Worksheet documentation requirements.

Thank you again for the opportunity to review. If you have questions or concerns regarding Dakota County's comments, please contact me at 952-891-7554 or georg.fischer@co.dakota.mn.us.

Sincerely,



Georg T. Fischer, Director
Environmental Resources Department

- C: Commissioner Mike Slavik, District 1
Commissioner Liz Workman, District 5
Brandt Richardson, County Administrator



Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

26 East Exchange Street - Suite 206
Saint Paul, MN 55101-1667

651.223.5969
651.223.5967 fax

mcea@mncenter.org
www.mncenter.org

Founding Director
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Kent White

Executive Director
Scott Strand

July 10, 2013

Suzanne Lamb Steinhauer
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, Minnesota, 55101-2198

VIA ELECTRONIC MAIL

*Re: In the Matter of the Petition of Northern State Power Company d/b/a Xcel Energy for Approval of Competitive Resources Acquisition Proposal and Certificate of Need Docket
PUC Docket No. E002/CN-12-1240*

Dear Ms. Steinhauer,

Environmental Intervenors submit this letter in response to the Commission's Order requesting comments on the scope of the environmental review in the above-captioned docket. Environmental Intervenors agree with the need to assess the environmental impact of each proposal. This obligation, as set out below, extends to the proposal from Great River Energy ("GRE"). Although GRE states that its "capacity only" bid will not result in emissions, it has failed to show how this is possible. The purpose of the environmental review requirement in public utilities planning as well as in the Minnesota Environmental Policy Act is to ensure the government decision-makers have a full record of *potential* environmental impacts when making their decisions. This objective is best protected by requiring all bidding parties to submit environmental information. Moreover, prior Commission precedent requires that GRE provide environmental information for the Resource Selection process.

BACKGROUND

Northern States Power Company ("NSP"), operating as Xcel Energy, has put forth the Competitive Resource Acquisition Process Docket, aiming to acquire additional energy for projected future needs. GRE, among other bidders, submitted bid offers. However, unlike the other bidders, GRE has not provided any information about the potential for environmental effects from its bid. The Department has been charged with completing an environmental report that must include "an analysis of the potential impacts" of the projects. Minn. R. 7849.1500, subp. 1; *see also* Minn. Stat. 116D.04, subd. 2a (environmental review to identify the *potential* for significant environmental effects).

COMMENTS

I. If Xcel Purchases GRE's Zone 1 Resource Credits, Emissions Will Result from the Generation Resources Converted to Those Credits.

GRE has offered capacity resources as its bid in this docket. According to the MISO Business Practices Manual, Capacity Resources are one of three things: "Capacity Resources consist of electrical generating units, stations known as Generation Resources, External Resources (if located outside of MISO), and loads that can be dispatched to reduce demand known as Demand Response Resources that participate in the Energy and Operating Reserves Market and are available during emergencies." MISO, Business Practice Manual: Resource Adequacy, BPM-011-r11, p. 2-12 (2012) [hereinafter *manual*]. Because GRE is located within the MISO region, it is not an External Resource, and because it is seeking to provide constant capacity it is not a Demand Response Resource. Thus, GRE's capacity resources at issue in this bid "consist of electric generating units." Under MISO rules, generating units can be converted into resource credits. See Manual at 2-13.

Under MISO guidelines, generation resources converted to capacity resource credits have to be available for dispatch and operation. "Capacity Resources converted to Zonal Resource Credits (ZRCs) will be subject to the must offer requirement which will be based on offering Resources into MISO on a daily basis." Manual, 2-16. In other words, the capacity that GRE is offering in this docket is capacity that can, and will, be called on to provide energy.

Capacity is in the form of megawatts and energy is in the form of megawatts per/hour. *Application of Interstate Power Co.*, 500 N.W.2d 501, 504 (Minn. Ct. App. 1993). Thus, energy and capacity are interrelated. Using capacity generates energy; generating energy from fossil-fueled resources creates air emissions. When the grid needs additional energy GRE will have to provide its capacity to the grid for some duration of time. This durational megawatt demand on the capacity is energy. As a result, GRE's proposal has the *potential* for environmental impacts and those impacts must be evaluated in the environmental report.

II. GRE Has Not Met Its Burden to Show that It's Capacity-Only Bid Will Not Produce Emissions.

GRE has asserted that its "capacity only" bid will result in "no" emissions, but has failed to answer the obvious question of what happens when the generating units' that the capacity credits are based on are dispatched to generate electricity? As provided in the MISO manual, all capacity resources have to be offered in the MISO market on a daily basis. GRE has acknowledged, in response to IRs from the Environmental Intervenors that MISO's policy "ensures that energy is offered to MISO for the ZRCs regardless of the end purchaser." GRE Response to EI IR # 5. In other words, there *will be* energy generated from the resources underlying the ZRCs offered by GRE if Xcel were to purchase those ZRCs. GRE also fails to acknowledge that moving forward over the time period envisioned in this docket, ZRCs have the

potential not to be purchased, not be offered into the daily market, and, therefore, not to result in emissions.

GRE has not met its burden to show that its ZRCs will result in emissions regardless of the outcome of this proceeding.

III. The Commission Has Addressed this Issue Before and Said that Emissions Information Is Necessary.

In any case, the Commission has addressed this very issue previously and determined that information on the potential emissions from the capacity of existing generation resources offered in competitive bidding docket must be provided. GRE's argument today is the same argument that Xcel made during its 1998 Resource Plan Proceeding. *See In the Matter of the Application of Northern States Power Company for Approval of its 1998 Resource Plan*, Docket No. E-002/RP-98-32 at 18, "Order Modifying Resource Plan, Requiring Additional Wind Generation, Requiring Further Filings, and Setting Standards for Next Resource Plan Filing" [hereinafter "Docket No. E-002/RP-98-32"]. The 1998 Planning Proceeding arose from the Commission's overseeing of NSP's resource plan that covered the period from 1998 through 2012. The plan projected a 1.7% increase in electricity demand each year, resulting in an increase of 1,207 to 3,031 megawatts of capacity by 2012. *Id.* at 3. NSP planned to secure the extra generation through a competitive bidding process. *Id.*

In the 1998 proceeding, Xcel argued that environmental costs (pursuant to Minn. Stat. § 216B.2422, subd. 3) should not be included in evaluating a bid that was based on the capacity of existing resources. Xcel took the position that "any existing facility economical enough to prevail in the NSP bidding process would operate whether or not NSP bought its power ; NSP's purchase, then, would have no effect on the environmental and should not be assigned any environmental costs." Docket No. E-002/RP-98-32 at 18.

Here, GRE's argument is the same. In response to Environmental Intervenors' question regarding what would happen to its capacity credits if Xcel did not purchase them, GRE said: "All ZRCs owned by GRE are available to meet MISO's resource adequacy requirements." Response to EI IR #6. In other words, GRE's argument appears to be that this capacity will be available to be dispatched regardless of whether Xcel accepts its bid.

The 1998 Commission decision definitively rejected this argument. The Commission stated: "While the Company argues that existing facilities will operate whether or not NSP buys their output, making NSP's decision environmentally irrelevant, that may not be the case." Docket No. E-002/RP-98-32 at 19. It offered three reasons, all of which apply here.

First, the Commission determined that consumption of a resource in one proceeding will affect the availability of resources in other proceedings which will have an indirect if not direct effect on resources, generation, and emissions. It stated that "using existing resources creates a need for new generation somewhere on the grid, and that new generation will carry environmental costs." *Id.* Further, "[a]ssigning no costs to the decision requiring that new generation is an

exercise in denial, exactly the mindset the environmental cost statute was trying to avoid.” *Id.* Here, GRE’s excess capacity credits will, based on GRE’s assertion, either go to NSP or another party, and generation from those credits will be offered into the daily markets. If NSP takes GRE’s capacity-only bid, additional capacity may have to be made available for another party given the unavailability of GRE’s credits.

Second, the Commission stated “it is possible that factoring in environmental costs and choosing a different resource based on high environmental costs could result in the closure of extremely polluting plants, depending upon their location, transmission costs, and regulatory standards in their likely markets.” Docket No. E-002/RP-98-32 at 19. This consideration is particularly relevant here because of the resource mix GRE has to offer. GRE’s bid is based on the “entire portfolio” of its generation fleet eligible for conversion to capacity credits. Response to EI IR #3. As the Commission is aware, GRE’s resource mix is predominantly coal, the resource that causes the largest environmental damage and would have the highest environmental costs. Engaging in an “exercise of denial” prevents the Commission from having a complete understanding of the energy options available to them and an incomplete understanding of the environmental costs associated with their decision. Docket No. E-002/RP-98-32 at 19.

Third, the Commission asserted that even if NSP were correct about emissions not resulting from its proposal from existing resources, there was still value in following the statute for the sake of following the statute. The 1998 Commission stated the following:

[E]ven if it is true that an existing facility will continue to operate regardless of relatively high environmental costs, and even if this should justify *selecting* the resource, there is value in complying with the statute and recognizing the environmental costs the facility, as opposed to the selection of the facility, imposes. It is only when evaluating environmental costs becomes as integral a part of resource selection as evaluating tax consequences and reliability that the goals of the statute will have been achieved.

Id. The same reasoning applies here. Even if GRE’s capacity-only bid will result in “no emissions” as the company alleges, there is still value in obtaining the environmental information from GRE on the potential emissions from the generation resources that have been converted to capacity credits and must be offered into the daily market solely for the sake of understanding the environmental impact of the capacity-only bid.

In sum, Environmental Intervenors submit that the environmental report must address the potential for environmental effects from GRE’s proposal. Because MISO rules require resources converted to capacity credits to be offered into the daily market, there will be emissions from GRE’s proposal. Even if, however, there were some way in which no emissions would result from Xcel’s purchase of the offered credits (which GRE has failed to show), GRE should still supply emission information about those resources as was ordered by the Commission in the 1998 Plan.

Ms. Steinhauer
July 10, 2013
Page 5

Thank you for your consideration.

Sincerely,

Kevin Reuther
Legal Director

David Shaffer
Law Clerk

MINNESOTA CHAMBER *of* COMMERCE

July 10, 2013

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, MN 55101-2147

Susanne Lamb Steinhauer
Environmental Review Manager
Minnesota Department of Commerce
85 – 7th Place East, Suite 500
St. Paul, MN 55101-2198

Re: Minnesota Chamber of Commerce’s Comments on Impacts to be Evaluated in the
Environmental Report for Xcel Energy’s Competitive Resource Acquisition Proposals
Docket No. E002/CN-12-1240
Our File No. 2021-01

Dear Dr. Haar and Ms. Steinhauer:

The Minnesota Chamber of Commerce (“Chamber”) appreciates this opportunity to comment in the above-referenced Docket. The Chamber’s comments are primarily with respect to fully evaluating a “No Build” option. Material changes have been encountered since the latest analysis of Xcel’s 2010 Integrated Resource Plan that are necessary to evaluate before determining the necessity of any new acquisition.

The Chamber urges the Commission to carefully consider the impact of the following changes prior to determining whether any resource should be contracted for or constructed:

The changes include the following:

1. The projected deficiency is based on a forecast from Fall 2011. Based on a response to a discovery request in Xcel’s 2012 rate case, the forecasted need has decreased between 100 MW – 150 MW in the 2017-2019 period.¹ This significant reduction supports the

¹ See response to MCC-IR 516, docket E002/GR-12-961.

Chamber recommendation to carefully consider the No Build option. Further, it is not clear if the following adjustments are reflected in the forecast provided in most recent rate case:

- Xcel has lost substantial wholesale customers in both Wisconsin and Minnesota – Xcel no longer has a need to serve approximately 100 MW in Wisconsin and 150 MW megawatts in Minnesota, a portion of which was included in Xcel’s 2010 Rate Case as customers requiring service from Xcel’s resources²;
 - There has been reduced demand by all of Xcel’s customers – reduced customer demand resulted in increasing revenue requirements by \$62 million in Xcel’s 2012 Rate Case from lost sales revenues.³ There appears to be a significant and permanent change in need that must be reflected in the analysis, including the success of conservation efforts, as well as the loss of substantial business customers⁴;
 - Additional customers are projected to leave Xcel’s system – for example, the University of Minnesota is constructing its own 25 MW cogeneration facility.⁵ Other customers are likely evaluating self generation opportunities as well, which will further reduce need on Xcel’s system;
2. Successful conservation – improved conservation in Xcel’s CIP Program have resulted in permanent and increasing success with conservation that must be accurately reflected in Xcel’s demand forecast⁶;
 3. Legislative changes – In 2013, the legislature passed a solar mandate that will likely produce energy during peak periods and will reduce the need for the proposed peaking facilities.⁷ The effects of these statutory changes should be contemplated in determining whether there continues to be a need; and

²See *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota* (“Xcel Rate Case”), Docket No. E-002/GR-12-961, POLICY TESTIMONY (November 2, 2012) 26.

³ See *id.*

⁴ See *id.*

⁵ See *Capital Planning and Project Management*, UNIV. OF MINN., <http://www.cppm.umn.edu/chpp.html> (last visited July 9, 2013); see also *Combined Heat and Power Twin Cities Campus*, UNIV. OF MINN., <http://www1.umn.edu/regents/docket/2012/february/heatandpower.pdf> (last visited July 9, 2013).

⁶ See *Xcel Rate Case*, at 27-28.

⁷ See MINN STAT. §216b.1691 subd. 2(f) (2013).

4. Ratepayers have seen substantial electric rate increases in recent years leading to uncompetitive rates.⁸ Ratepayers cannot afford to pay for unnecessary system improvements. Furthermore, No Build options are the best way to avoid any adverse environmental impacts.⁹ Reliable service is necessary to support Minnesota's economy and the Chamber will certainly support necessary infrastructure to maintain adequate reliability to serve customer needs. However, without updated information it is impossible to make a prudent decision on future resource needs.

If you have any questions or concerns about our comments, please do not hesitate to contact me.

DATED: July 10, 2013

Respectfully submitted,

/e/ Benjamin L. Gerber
Benjamin L. Gerber
Attorney #0391158
MN Chamber of Commerce
400 Robert St. N., #1500
St. Paul, MN 55101
Phone: (651) 292-4650
Fax: (651) 292-4656

⁸ See *Xcel Rate Case*, FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATIONS (July, 3, 2013) B-5 (discussing responses from business customers upset with rate increases); see also "Average Price by State by Provider 1990-2010 (EIA-861) available at http://www.eia.gov/cneaf/electricity/epa/average_price_state.xls (using average price information); see also David M. Shaffer, *Xcel asks for 10 percent rate increase*, Star Tribune, November 2, 2012, <http://www.startribune.com/local/177008501.html> (quoting Bill Blazar on competitive rates).

⁹ See U.S. ENVTL PROT. AGENCY, ENERGY EFFICIENCY AS A LOW-COST RESOURCE FOR ACHIEVING CARBON EMISSIONS REDUCTIONS 2-15 (2009).

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method
Aafedt	David	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Electronic Service
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service
Bertrand	James J.	james.bertrand@leonard.com	Leonard Street & Deinard	Electronic Service
Bradley	Michael	bradley@moss-barnett.com	Moss & Barnett	Electronic Service
Brusven	Christina	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	Electronic Service
Church	Kodi	kchurch@briggs.com	Briggs & Morgan	Electronic Service
Daugherty	Jeffrey A.	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	Electronic Service
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service
Flumerfelt	John	jflumerfelt@calpine.com	Calpine Corporation	Electronic Service
Germundson	Travis	travis.germundson@state.mn.us	N/A	Electronic Service
Giteck	Ronald	ron.giteck@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service
Guerrero	Todd J.	todd.guerrero@kutakrock.com	Kutak Rock LLP	Electronic Service
Haar	Burl W.	burl.haar@state.mn.us	Public Utilities Commission	Electronic Service
Johnson	Richard	johnsonr@moss-barnett.com	Moss & Barnett	Electronic Service
Krikava	Michael	mkrikava@briggs.com	Briggs And Morgan, P.A.	Electronic Service
Kromar	Karen	karen.kromar@state.mn.us	MN Pollution Control Agency	Electronic Service
Larson	Douglas	dlarson@dakotaelectric.com	Dakota Electric Association	Electronic Service
Lindell	John	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service
Lipman	Eric	eric.lipman@state.mn.us	Office of Administrative Hearings	Electronic Service
Maini	Kavita	kmains@wi.rr.com	KM Energy Consulting LLC	Electronic Service
Melone	Thomas	Thomas.Melone@AllcoUS.com	Ecos Energy, LLC	Electronic Service
Meloy	Brian	brian.meloy@leonard.com	Leonard, Street & Deinard	Electronic Service
Moratzka	Andrew	apmoratzka@stoel.com	Stoel Rives LLP	Electronic Service
Niles	David W.	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Electronic Service
Nitschke	Darrell	dnitschke@nd.gov	North Dakota Public Service Commission	Electronic Service
Norrell	Ryan	rmnorrell@nd.gov	North Dakota Public Service Commission	Electronic Service
Nowicki	Bryan	bnowicki@reinhartlaw.com	Reinhart Boerner Van Deuren s.c.	Electronic Service
Patton	Bob	bob.patton@state.mn.us	MN Department of Agriculture	Electronic Service
Savelkoul	Richard	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service
Starns	Byron E.	byron.starns@leonard.com	Leonard Street and Deinard	Electronic Service
Strommen	James M.	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	Electronic Service
Swanson	Eric	eswanson@winthrop.com	Winthrop Weinstine	Electronic Service
Talcott	James	jim.talcott@nngco.com	Northern Natural Gas Company	Electronic Service
Thompson	SaGonna	Regulatory.Records@xcelenergy.com	Xcel Energy	Electronic Service

Valley	Kari L	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	Electronic Service
Veith	Lisa	lisa.veith@ci.stpaul.mn.us	City of St. Paul	Electronic Service

Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method
Borders	William	Invenergy LLC	One South Wacker Drive, Suite 1900, Chicago, IL-60606	Paper Service
Doll	John	N/A	10918 Southview Drive, Burnsville, MN-55337	Paper Service
Engelking	Betsy	Geronimo Energy	7650 Edinborough Way, Suite 725, Edina, MN-55435	Paper Service
Garvey	Edward	Residence	32 Lawton St, Saint Paul, MN-55102	Paper Service
Gordon	Craig	Invenergy LLC	One South Wacker Dr, Suite 1900, Chicago, IL-60606	Paper Service
Grooms	Lloyd	Winthrop and Weinstine	Suite 3500, 225 South Sixth Street, Minneapolis, MN-554024629	Paper Service
Holly	Mary	Winthrop & Weinstine, P.A.	225 South Sixth Street, Suite 3500, Minneapolis, MN-55402	Paper Service
Jenkins	Alan	Jenkins at Law	2265 Roswell Road, Suite 100, Marietta, GA-30062	Paper Service
Loeffler	Michael	Northern Natural Gas Co.	CORP HQ, 714, 1111 So. 103rd Street, Omaha, NE-681241000	Paper Service
Marshall	Pam	Energy CENTS Coalition	823 7th St E, St. Paul, MN-55106	Paper Service
Plumbo	Joseph V.	Local Union 23, I.B.E.W.	932 Payne Avenue, St. Paul, MN-55130	Paper Service
Reuther	Kevin	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206, St. Paul, MN-551011667	Paper Service

From: [Bob Messerich](#)
To: [Steinhauer, Suzanne \(COMM\)](#)
Subject: public comment 12-1240
Date: Wednesday, July 10, 2013 4:26:33 PM

I am concerned about the part of the proposal dealing with the solar PV projects proposed by Geronimo Energy. I believe MN should encourage a truly "distributed" system of PV. By installing Solar on land that could be otherwise used for agricultural or other commercial purposes, we are discouraging installing it in the built environment. If we meet a large portion of the new solar care out in one extended project with one developer we are also harming the budding solar industry in the state.

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