



June 14, 2013

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**VIA E-FILING AND U.S. MAIL**

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101

RE: In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need  
MPUC Docket No. E-002/CN-12-1240

Dear Dr. Haar:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") June 10, 2013 Notice of Filing Deadline, Invenergy Thermal Development LLC ("Invenergy") respectfully submits both public and non-public versions of the attached information and checklist, responsive to the requirements of Minnesota Rule 7849.0310, as applicable to this competitive resource acquisition process.

Please note that, as with prior Invenergy submissions, certain of the data provided by Invenergy includes highly sensitive pricing information, developed by Invenergy. Invenergy has taken all necessary and reasonable steps to maintain the confidentiality of this information and, if disclosed, Invenergy would suffer economic harm and its competitors in the energy markets would gain competitive and economic advantages. As such, these forms include data that: (1) was developed and supplied by Invenergy; (2) is the subject of reasonable efforts by Invenergy to maintain its secrecy; and (3) derives independent economic value, actual or potential, from not being generally known to or accessible by the public, including Invenergy's competitors in the energy marketplace.

Therefore, where appropriate, Invenergy has designated certain information as non-public data, pursuant to Minnesota Statutes § 13.37, subd. 1 (b) and Minnesota Rules 7829.0500. Invenergy denotes those documents containing non-public information with the header **NON-PUBLIC DOCUMENT – CONTAINS TRADE SECRET INFORMATION**.

Dr. Burl W. Haar

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Thank you for attention to this matter. Feel free to contact me with any questions or concerns.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Eric F. Swanson

Eric F. Swanson

Enclosures

Cc: Attached Service List

8006061v1



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafect	daafed@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1240_Official
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James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1240_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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**Cannon Falls Expansion**

<b>Minn Rule 7849.025</b>	<b>Requested Information</b>	<b>Response</b>
A.	a description of the facility, including:	
1	the nominal generating capability of the facility, as well as a discussion of the effect of the economies of scale on the facility size and timing;	TRADE SECRET INFORMATION REDACTED.
2	a description of the anticipated operating cycle, including the expected annual capacity factor;	The proposed expansion is designed to operate as a peaking facility. Annual Capacity Factor will be determined on the electrical supply needs of Northern States Power. Typical annual capacity factors for peaking facilities are in the 5 to 10% range.
3	the type of fuel used, including the reason for the choice of fuel, projection of the availability of this fuel type over the projected life of the facility, and alternate fuels, if any;	The primary fuel will be natural gas. Natural gas was selected due to its clean burning properties, abundance, low cost, and number of compatible generating units. Natural gas is anticipated to be readily available throughout the life of the project. The unit will also be capable of burning ultra-Low Sulfur #2 Fuel Oil as a backup. The unit will share the fuel oil unloading and storage facilities with the existing Cannon Falls units.
4	the anticipated heat rate of the facility; and	TRADE SECRET INFORMATION REDACTED.
5	to the fullest extent known to the applicant, the anticipated areas where the proposed facility could be located;	Please see site map, located at the end of Section 2.0 Executive Summary
B.	a discussion of the availability of alternatives to the facility, including but not limited to:	
1	purchased power;	Exempt
2	increased efficiency of existing facilities, including transmission lines;	Exempt

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3	new transmission lines;	Exempt
4	new generating facilities of a different size or using a different energy source (fuel oil, natural gas, coal, nuclear fission, and the emergent technologies); and	Exempt
5	any reasonable combinations of the alternatives listed in sub items (1) to (4);	Exempt
C.	for the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:	
1	its capacity cost in current dollars per kilowatt;	TRADE SECRET INFORMATION REDACTED.
2	its service life;	TRADE SECRET INFORMATION REDACTED.
3	its estimated average annual availability;	TRADE SECRET INFORMATION REDACTED.
4	its fuel costs in current dollars per kilowatt hour;	TRADE SECRET INFORMATION REDACTED.
5	its variable operating and maintenance costs in current dollars per kilowatt hour;	TRADE SECRET INFORMATION REDACTED.
6	the total cost in current dollars of a kilowatt hour provided by it;	TRADE SECRET INFORMATION REDACTED.
7	an estimate of its effect on rates system wide and in Minnesota, assuming a test year beginning with the proposed in-service date;	TRADE SECRET INFORMATION REDACTED.

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8	its efficiency, expressed for a generating facility as the estimated heat rate, or expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations; and	TRADE SECRET INFORMATION REDACTED.
9	the major assumptions made in providing the information in subitems (1) to (8), including projected escalation rates for fuel costs and operating and maintenance costs, as well as projected capacity factors;	TRADE SECRET INFORMATION REDACTED.
D.	a map (of appropriate scale) showing the applicant's system; and	Not applicable.
E.	such other information about the proposed facility and each alternative as may be relevant to determination of need.	Not applicable.
<b>Minn Rule 7849.032</b>	<b>Requested Information</b>	<b>Response</b>
A.	the estimated range of land requirements for the facility with a discussion of assumptions on land requirements for water storage, cooling systems, and solid waste storage;	TRADE SECRET INFORMATION REDACTED.
B.	the estimated amount of vehicular, rail, and barge traffic generated by construction and operation of the facility;	TRADE SECRET INFORMATION REDACTED.
C.	for fossil-fueled facilities:	
1	the expected regional sources of fuel for the facility;	TRADE SECRET INFORMATION REDACTED.

PUBLIC DOCUMENT – TRADE SECRET INFORMATION REDACTED

2	the typical fuel requirement (in tons per hour, gallons per hour, or thousands of cubic feet per hour) during operation at rated capacity and the expected annual fuel requirement at the expected capacity factor;	TRADE SECRET INFORMATION REDACTED.
3	the expected rate of heat input for the facility in Btu per hour during operation at rated capacity;	TRADE SECRET INFORMATION REDACTED.
4	the typical range of the heat value of the fuel (in Btu per pound, Btu per gallon, or Btu per 1,000 cubic feet) and the typical average heat value of the fuel; and	TRADE SECRET INFORMATION REDACTED.
5	the typical ranges of sulfur, ash, and moisture content of the fuel;	TRADE SECRET INFORMATION REDACTED.
D.	for fossil fueled facilities:	
1	the estimated range of trace element emissions and the maximum emissions of sulfur dioxide, nitrogen oxides, and particulates in pounds per hour during operation at rated capacity; and	TRADE SECRET INFORMATION REDACTED.
2	the estimated range of maximum contributions to 24-hour average ground level concentrations at specified distances from the stack of sulfur dioxide, nitrogen oxides, and particulates in micrograms per cubic meter during operation at rated capacity and assuming generalized worst-case meteorological conditions;	TRADE SECRET INFORMATION REDACTED.
E.	water use by the facility for alternate cooling systems, including:	
1	the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second;	TRADE SECRET INFORMATION REDACTED.
2	the estimated groundwater appropriation in million gallons per year; and	TRADE SECRET INFORMATION REDACTED.
3	the annual consumption in acre-feet;	TRADE SECRET INFORMATION REDACTED.

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F.	the potential sources and types of discharges to water attributable to operation of the facility;	The evaporative cooler blowdown will be the largest discharge of water. This will be done to prevent scaling within the evaporative cooling system.
G.	radioactive releases, including:	
1	for nuclear facilities, the typical types and amounts of radionuclides released by the facility in curies per year for alternate facility designs and levels of waste treatment; and	N/A
2	for fossil-fueled facilities, the estimated range of radioactivity released by the facility in curies per year;	None
H.	the potential types and quantities of solid wastes produced by the facility in tons per year at the expected capacity factor;	N/A
I.	the potential sources and types of audible noise attributable to operation of the facility;	TRADE SECRET INFORMATION REDACTED.
J.	the estimated work force required for construction and operation of the facility; and	TRADE SECRET INFORMATION REDACTED.
K.	the minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility.	TRADE SECRET INFORMATION REDACTED.

**Hampton Corners**

<b>Minn Rule 7849.025</b>	<b>Requested Information</b>	<b>Response</b>
A.	a description of the facility, including:	
1	the nominal generating capability of the facility, as well as a discussion of the effect of the economies of scale on the facility size and timing;	TRADE SECRET INFORMATION REDACTED.
2	a description of the anticipated operating cycle, including the expected annual capacity factor;	The proposed expansion is designed to operate as a peaking facility. Annual Capacity Factor will be determined on the electrical supply needs of Northern States Power. Typical annual capacity factors for peaking facilities are in the 5 to 10% range.
3	the type of fuel used, including the reason for the choice of fuel, projection of the availability of this fuel type over the projected life of the facility, and alternate fuels, if any;	The primary fuel will be natural gas. Natural gas was selected due to its clean burning properties, abundance, low cost, and number of compatible generating units. Natural gas is anticipated to be readily available throughout the life of the project. The unit will also be capable of burning ultra-Low Sulfur #2 Fuel Oil as a backup.
4	the anticipated heat rate of the facility; and	TRADE SECRET INFORMATION REDACTED.
5	to the fullest extent known to the applicant, the anticipated areas where the proposed facility could be located;	Please see site map, located at the end of Section 2.0 Executive Summary
B.	a discussion of the availability of alternatives to the facility, including but not limited to:	
1	purchased power;	Exempt
2	increased efficiency of existing facilities, including transmission lines;	Exempt
3	new transmission lines;	Exempt
4	new generating facilities of a different size or using a different energy source (fuel oil, natural gas, coal, nuclear fission, and the emergent technologies); and	Exempt

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5	any reasonable combinations of the alternatives listed in sub items (1) to (4);	Exempt
C.	for the proposed facility and for each of the alternatives provided in response to item B that could provide electric power at the asserted level of need, a discussion of:	
1	its capacity cost in current dollars per kilowatt;	TRADE SECRET INFORMATION REDACTED.
2	its service life;	TRADE SECRET INFORMATION REDACTED.
3	its estimated average annual availability;	TRADE SECRET INFORMATION REDACTED.
4	its fuel costs in current dollars per kilowatt hour;	TRADE SECRET INFORMATION REDACTED.
5	its variable operating and maintenance costs in current dollars per kilowatt hour;	TRADE SECRET INFORMATION REDACTED.
6	the total cost in current dollars of a kilowatt hour provided by it;	TRADE SECRET INFORMATION REDACTED.
7	an estimate of its effect on rates system wide and in Minnesota, assuming a test year beginning with the proposed in-service date;	TRADE SECRET INFORMATION REDACTED.
8	its efficiency, expressed for a generating facility as the estimated heat rate, or expressed for a transmission facility as the estimated losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations; and	TRADE SECRET INFORMATION REDACTED.
9	the major assumptions made in providing the information in sub items (1) to (8), including projected escalation rates for fuel costs and operating and maintenance costs, as well as projected capacity factors;	TRADE SECRET INFORMATION REDACTED.
D.	a map (of appropriate scale) showing the applicant's system; and	Not applicable.

PUBLIC DOCUMENT – TRADE SECRET INFORMATION REDACTED

E.	such other information about the proposed facility and each alternative as may be relevant to determination of need.	Not applicable.
<b>Minn Rule 7849.032</b>	<b>Requested Information</b>	<b>Response</b>
A.	the estimated range of land requirements for the facility with a discussion of assumptions on land requirements for water storage, cooling systems, and solid waste storage;	TRADE SECRET INFORMATION REDACTED.
B.	the estimated amount of vehicular, rail, and barge traffic generated by construction and operation of the facility;	TRADE SECRET INFORMATION REDACTED.
C.	for fossil-fueled facilities:	
1	the expected regional sources of fuel for the facility;	TRADE SECRET INFORMATION REDACTED.
2	the typical fuel requirement (in tons per hour, gallons per hour, or thousands of cubic feet per hour) during operation at rated capacity and the expected annual fuel requirement at the expected capacity factor;	TRADE SECRET INFORMATION REDACTED.
3	the expected rate of heat input for the facility in Btu per hour during operation at rated capacity;	TRADE SECRET INFORMATION REDACTED.
4	the typical range of the heat value of the fuel (in Btu per pound, Btu per gallon, or Btu per 1,000 cubic feet) and the typical average heat value of the fuel; and	TRADE SECRET INFORMATION REDACTED.

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5	the typical ranges of sulfur, ash, and moisture content of the fuel;	TRADE SECRET INFORMATION REDACTED.
D.	for fossil fueled facilities:	
1	the estimated range of trace element emissions and the maximum emissions of sulfur dioxide, nitrogen oxides, and particulates in pounds per hour during operation at rated capacity; and	TRADE SECRET INFORMATION REDACTED.
2	the estimated range of maximum contributions to 24-hour average ground level concentrations at specified distances from the stack of sulfur dioxide, nitrogen oxides, and particulates in micrograms per cubic meter during operation at rated capacity and assuming generalized worst-case meteorological conditions;	TRADE SECRET INFORMATION REDACTED.
E.	water use by the facility for alternate cooling systems, including:	
1	the estimated maximum use, including the groundwater pumping rate in gallons per minute and surface water appropriation in cubic feet per second;	TRADE SECRET INFORMATION REDACTED.
2	the estimated groundwater appropriation in million gallons per year; and	TRADE SECRET INFORMATION REDACTED.
3	the annual consumption in acre-feet;	TRADE SECRET INFORMATION REDACTED.
F	the potential sources and types of discharges to water attributable to operation of the facility;	The evaporative cooler blowdown will be the largest discharge of water. This will be done to prevent scaling within the evaporative cooling system.
G.	radioactive releases, including:	
1	for nuclear facilities, the typical types and amounts of radionuclides released by the facility in curies per year for alternate facility designs and levels of waste treatment; and	N/A
2	for fossil-fueled facilities, the estimated range of radioactivity released by the facility in curies per year;	None

PUBLIC DOCUMENT – TRADE SECRET INFORMATION REDACTED

H.	the potential types and quantities of solid wastes produced by the facility in tons per year at the expected capacity factor;	N/A
I.	the potential sources and types of audible noise attributable to operation of the facility;	TRADE SECRET INFORMATION REDACTED.
J.	the estimated work force required for construction and operation of the facility; and	TRADE SECRET INFORMATION REDACTED.
K.	the minimum number and size of transmission facilities required to provide a reliable outlet for the generating facility.	TRADE SECRET INFORMATION REDACTED.

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