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: CAPX Applicants
Date of Request: May 2, 2008
Response Requested: May, 16 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.

Please provide electronic copies of all information requests and all responses made by CapX Applicants to parties or participants other than Citizens Energy Task Force ("CETF") to date and in the future throughout this entire proceeding.

Response by: _____

Title: _____

Department: _____

Telephone: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 2

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

In their Application for Certificates of Need for Three 345 kV Transmission Line Projects in this matter ("Application"), Applicants stated that the three CapX 345 kV projects were needed to meet 4,000 to 6,000 MW of additional demand for electrical power from Applicants' systems in Minnesota and parts of surrounding states from 2009 to 2020.

A) Do Applicants currently maintain that any or all of the three CapX 345 kV projects are needed due to system wide growth in demand for electrical power from 2009 to 2020?
B) If so, which projects do Applicants believe are needed for this reason?
C) What level of system wide growth in demand for electrical power from 2009 to 2020 do Applicants forecast to reach this conclusion as to each or any of the proposed CapX 2020 projects?

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 3

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

A. Please provide all data and assumptions in Figure 6-4 on page 6.10 of the Application, the Median Resource Plan Forecast, in a Microsoft Excel spreadsheet.

B. Please identify for each utility in Figure 6-4 what percentage of conservation was assumed in the above Median Resource Plan Forecast.

C. Please provide in a Microsoft Excel spreadsheet data and descriptions comparable to Figure 6-4 and to the Excel document in Part A reflecting the Low Growth Resource Plan Forecast or its equivalent.

D. Please identify, for each utility and as an average, what percentage of conservation was assumed in the Low Growth Resource Plan Forecast.

E. Please provide the spreadsheet in Part A with additional columns showing all adjustments in Calculated Annual Growth Rate and Load Growth 2009-2020 required if an assumption of 1% conservation is made.

F. Please provide the spreadsheet in Part A with additional columns showing all adjustments in Calculated Annual Growth Rate and Load Growth 2009-2020 required if an assumption of 1.5 % conservation is made.

G. Please provide the spreadsheet in Part C with additional columns showing all adjustments in Calculated Annual Growth Rate and Load Growth 2009-2020 required if an assumption of 1% conservation is made.

H. Please provide the spreadsheet in Part C with additional columns showing all adjustments in Calculated Annual Growth Rate and Load Growth 2009-2020 required if an assumption of 1.5 % conservation is made.

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 4

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

In Appendix A-1, page 29 of the Technical Study for the Application contains a statement that, at the 4,500 MW load/generation level "there was less justification for some of the various recommended transmission lines" under the "eastern bias" generation pattern.

A. To which transmission lines did this statement refer?
B. If the above statement from page 29 of Appendix A-1 doesn't reflect Applicants' current views, please provide a narrative explanation.

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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.

Appendix A-1, pages 27-29 of the Technical Study for the Application explains that to derive the 4,500 MW load growth analysis from the 6,300 MW load growth assumptions for the specified utilities, the study assumed a linear growth rate, scaled each utility's load growth uniformly down by a factor of 2/3, scaled each generator down uniformly by 2/3 and then individually removed transmission facilities recommended under a 6,300 MW analysis to determine which facilities would also be needed under these 4,500 MW growth assumptions.

A. Explain why this uniformly scaled-down analysis is appropriate to provide a basis to determine the need for the proposed transmission facilities under a 4,500 MW load growth assumption. Specifically, explain why an analysis based on different rates of growth over time of various utilities and/or selection of different generation sources is not required to determine whether specific transmission facilities are needed.

B. Describe the resources that were used to conduct the scaled-down analysis in Part A. Specifically describe the computer model used, the personnel capabilities needed to conduct the analysis, the approximate time such analysis took and the approximate cost of conducting this portion of the technical analysis.

C. Was a comparable analysis ever done by the Applicants of what transmission facilities would be needed under an assumption of 4,000 MW load growth from the utilities specified in Appendix A-1 between 2009 and 2020?

D. Was a comparable analysis ever done by the Applicants of what transmission facilities would be needed under an assumption of 3,500 MW load growth from the utilities specified in Appendix A-1 between 2009 and 2020?

E. Was a comparable analysis ever done by the Applicants of what transmission facilities would be needed under any load growth assumption less than 4,500 MW load growth from the utilities specified in Appendix A-1 between 2009 and 2020?

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 6

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

Figure 1-10 on page 1.17 of the Application summarizes cost information regarding the CapX projects. Please provide a breakdown of the costs for the CapX projects as specified below. If there are any costs that are not specifically known to Applicants at this time, please provide a reasonable estimate of costs, where available, and state if and when Applicants will have more detailed cost information. As to each cost identified, please also state whether that cost is included or is not included in the cost estimates in Figure 1-10.

A. Construction costs, separately specifying estimated land acquisition costs, for
   1) 345 kV Twin Cities - LaCrosse transmission line
   2) 161 kV North Rochester – Northern Hills transmission line
   3) 345 kV Twin Cities – Fargo transmission line
   4) 345 kV Twin Cities – Brookings County transmission line

B. Costs for upgrades associated with constructing
   1) 345 kV Twin Cities-LaCrosse transmission line
   2) 161 kV North Rochester – Northern Hills transmission line
   3) 345 kV Twin Cities – Fargo transmission line
   4) 345 kV Twin Cities – Brookings County transmission line

C. Monetized cost of electric line losses associated with
   1) 345 kV Twin Cities-LaCrosse transmission line
   2) 161 kV North Rochester – Northern Hills transmission line

3) 345 kV Twin Cities – Fargo transmission line
4) 345 kV Twin Cities – Brookings County transmission line

D. Costs of environmental externalities, including global warming impacts from construction and operation of transmission lines for
1) 345 kV Twin Cities-LaCrosse transmission line
2) 161 kV North Rochester – Northern Hills transmission line
3) 345 kV Twin Cities – Fargo transmission line
4) 345 kV Twin Cities – Brookings County transmission line
5) Upgrades associated with constructing the facilities in Parts D1 through D4.

Response by: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 7

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

In Applicants' Attachment to their Response to North American Water Office ("NAWO") Information Request No. 12, Applicants identified the specific facilities used to model the three generation scenarios in the Technical Study, Appendix A-1 of the Application.

A. 1) Please state whether each of the generation sources identified in the "Base MW" columns of this Attachment represents coal energy generation.
2) If any of the generation sources in this column are an energy source other than coal, please explain.
3) Please confirm or deny that the Base MW resource identified as located in Forbes, Minnesota is the proposed Mesaba coal gasification plant.
4) Please confirm or deny that the Base MW resource identified as located in Big Stone, South Dakota is the Big Stone coal plant.

B. Please explain whether the generation scenarios described in this Attachment included any of the following, identifying the number of MW and location of any generation resources in the following categories:
1) Generation that would qualify as renewable energy objective/renewable energy standard generation located in Northern Minnesota.
2) Generation that would qualify as renewable energy objective/renewable energy standard generation located in the Twin Cities Metro area.
3) Distributed renewable energy generation, under 10 MW, as defined in Minn. Stat. 216B.2411.

4) Dispersed renewable energy generation, from 10MW to 40 MW, as defined in Minnesota Session Laws 2007, Ch. 136, Art. 4, Section 17.

Response by: _____

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Department: _____

Telephone: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 8

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

A. Under the load and generation assumptions modeled in Appendix A-1 and described in Attachment 12 of Applicants' response to NAWO Information Request 12, state for each Applicant utility whether that utility would meet its renewable energy standard obligations by 2020: 1) under the 6,300 MW load growth assumption, or 2) under the 4,500 MW load growth assumption.
B. Have the Applicants conducted an analysis similar to that in Appendix A-1 to determine what transmission facilities are needed by 2020 if generation is modeled based on the purchase by each utility of generation resources to meet its renewable energy standard obligation by 2020? If so, what load growth assumption was used to conduct this analysis?
C. Please provide copies of all documents reflecting the analysis described in Part B.
D. If the analysis described in Part B has not been conducted, please explain what impediments, if any, would prevent Applicants from performing that analysis.

Response by: _____

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Telephone: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 9

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

A. Have Applicants tested whether the 345 kV transmission facilities identified in Appendix A-1 would still be needed under a set of generation assumptions where 600 MW of energy is provided between 2009 and 2020 by dispersed renewable generation as defined in Minnesota Session Laws 2007, Ch. 136, Art. 4, Section 17?
B. Please provide copies of all documents reflecting the analysis described in Part A.
C. If the analysis described in Part A has not been conducted, please explain what impediments, if any, would prevent Applicants from performing that analysis?
D. Have Applicants tested the whether 345 kV transmission facilities identified in Appendix A-1 would still be needed under a set of generation assumptions where 1200 MW of energy is provided between 2009 and 2020 by dispersed renewable generation as defined in Minnesota Session Laws 2007, Ch. 136, Art. 4, Section 17?
E. Please provide copies of all documents reflecting the analysis described in Part D
F. If the analysis described in Part D has not been conducted, please explain what impediments, if any, would prevent Applicants from performing that analysis?

Response by: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 10

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

In their Application, Applicants state that the primary driver for the Twin Cities – LaCrosse 345 kV line is the need for community service reliability in the Rochester Area and in the LaCrosse/Winona Area.

A. Please state whether there is any additional basis for Applicants, claim that the Twin Cities – LaCrosse 345 kV line is needed other than community service reliability concerns between 2009 and 2020. If so, please explain.

B. Please state whether of Applicants' claim that the Twin Cities – LaCrosse line is needed is based on community service reliability concerns in areas other than the Rochester Area and LaCrosse/Winona Area. If so, please describe the salient areas and concerns.

C. Please state whether and through what date construction of the above Twin Cities – LaCrosse line is projected to be sufficient to provide community service reliability to 1) the Rochester Area or 2) the Winona/LaCrosse area.

D. If construction of the Twin Cities- LaCrosse line will not be sufficient to provide community service reliability to either the Rochester Area or the Winona/LaCrosse Area, describe every additional transmission or generation facility that will be needed to provide community service reliability to each area, identifying the nature, size, length, costs and proposed construction year of the

facility that would be needed in addition to the Twin Cities-LaCrosse 345 kV transmission line.

E. Assuming the forecasted growth rates contained in the Application, describe each alternative that Applicants compared to the proposed Twin Cities – LaCrosse 345 kV power line to determine that the 345 kV line was cost-effective to provide community service reliability: including upgrading of existing generation and transmission facilities; new generation of various sizes and technologies at various locations closer to load; transmission lines of different sizes, types, lengths and locations and any reasonable combinations of these alternatives. If the alternatives were considered separately for each community service reliability area (Rochester Area, Winona/LaCrosse Area), please describe each alternative for each community service reliability area separately.

F. For each alternative described in Part E, provide a spreadsheet describing the costs of the alternative, including 1) costs of transmission system upgrades; 2) electrical line losses; 3) costs of upgrading, constructing, repowering or retiring of generation resources; 4) costs of purchasing energy from remote or local generation; and 5) costs of greenhouse gas emissions and other environmental externalities related to energy generation, whether the generation is generated at a local or remote location. Please also provide in spreadsheet or narrative form a description of the community service reliability or other benefits of each alternative.

Response by: _____

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Telephone: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 11

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

In their Application (page 4.5), Applicants assess the need for community service reliability at the Rochester Public Utilities substations by applying a compound growth rate of 3.46% to grow the summer peak load to the year 2020.

A. Please state whether Applicants continue to rely on the above forecast to assess community service need and, if not, provide a narrative explanation.

B. Have the Applicants determined at what level of growth in summer peak demand in the Rochester Area the need for the proposed Twin Cities – Rochester 345 kV power line for community service reliability would be triggered? If so, please state the level calculated.

C. What load management, energy conservation, efficiency and/or smart grid alternatives did Applicants evaluate as means to provide for demand or community service reliability in the Rochester Area either alone or in combination with transmission or local generation alternatives?

D. Please provide in Microsoft Excel spreadsheet form an analysis of the costs and savings from all alternatives evaluated in Part C as compared to the costs of the 161 kV and 345 kV CapX projects selected to provide community service reliability in the Rochester Area.

Response by: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 12

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

In their Application (page 4.14), Applicants assess the need for community service reliability in the LaCrosse/Winona area by applying a growth rate of 3.4% for Vernon Electrical Cooperative, 2.8% for Oakdale Electrical Cooperative, 1.7% for Riverdale Electrical Cooperative and 2.3% for the substations served by Dairyland Power and a growth rate of 2.3% for the Xcel Energy substations to grow the summer peak load to the year 2020.

A. Please state whether Applicants continue to rely on the above forecasts to assess community service need and, if not, provide a narrative explanation.

B. Have the Applicants determined at what level of forecasted growth in summer peak demand in the LaCrosse/Winona Area the need for the proposed Twin Cities – Rochester 345 kV power line for community service reliability would be triggered? If so, please state the level calculated.

C. What load management, energy conservation, efficiency and/or smart grid alternatives did Applicants evaluate as means to provide for demand or community service reliability in the LaCrosse/Winona Area either alone or in combination with transmission or local generation alternatives?

D. Please provide in Microsoft Excel spreadsheet form an analysis of the costs and savings from all alternatives evaluated in Part C as compared to the costs of the CapX projects selected to provide community service reliability in the LaCrosse/Winona Area.

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 13

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

In their Application, Applicants state that the primary driver for the Twin Cities – Fargo 345 kV line is the need for community service reliability.

A. Please state whether there is any additional basis for Applicants' claim that the Twin Cities – Fargo 345 kV line is needed other than community service reliability concerns between 2009 and 2020.

B. Please state whether the need for the Twin Cities – Fargo 345 kV line is based on community service reliability concerns in any or all of the following areas discussed in the Application: 1) the South Zone of the Red River Valley; 2) the Alexandria Area; 3) the St. Cloud Area.

C. Please state whether the need for the Twin Cities – Fargo 345 kV line is based on community service reliability concerns in areas other than those described in Part B. If so, identify the salient areas and concerns.

D. Please state whether construction and through what date the Twin Cities – Fargo line is projected to be sufficient to provide community service reliability to 1) the South Zone of the Red River Valley; 2) the Alexandria Area; and/or 3) the St. Cloud Area.

E. If construction of the Twin Cities- Fargo line will not be sufficient to provide community service reliability to the South Zone of the Red River Valley, the Alexandria Area, and/or 3) the St. Cloud Area, please describe every additional

transmission or generation facility that will be needed to provide community service reliability to each area, identifying the nature, size, length, costs and proposed construction year of the facility that would be needed in addition to the Twin Cities-Fargo 345 kV transmission line.

F. Assuming the forecasted load growth rates contained in the Application, describe each alternative that Applicants compared to the proposed Twin Cities – Fargo 345 kV power line to determine that the 345 kV line was cost-effective to provide community service reliability: including upgrading of existing generation and transmission facilities; new generation of various sizes and technologies at various locations closer to load; transmission lines of different sizes, types, lengths and locations and any reasonable combinations of these alternatives. If the alternatives were considered separately for each community service reliability area (South Zone of the Red River Valley, Alexandria Area, St. Cloud Area), please describe each alternative for each community service reliability area separately. If they were not considered separately for each community service reliability area, please explain why this wasn't done.

G. For each alternative described in Part F, provide a spreadsheet describing the costs of the alternative, including 1) costs of transmission system upgrades; 2) electrical line losses; 3) costs of upgrading, constructing, repowering or retiring of generation resources; 4) costs of purchasing energy from remote or local generation; and 5) costs of greenhouse gas emissions and other environmental externalities related to energy generation, whether the generation is generated at a local or remote location. Please also provide in spreadsheet or narrative form a description of the community service reliability or other benefits of each alternative.

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 14

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

A. Please explain for the South Zone of the Red River Valley, what assumptions were used to determine the 2020 winter peak load forecast on which the Applicant' analysis of community service reliability was based: 1) what percentage of annual growth was assumed; 2) from where was it derived; 3) in which integrated resource plan, if any, has this forecast been accepted or adopted; 4) what is the justification for and impact of the load adjustment factor in the analysis and 5) what the term "MW at Risk" signifies in Figure 4-13.

B. Have the Applicants determined at what level of forecasted growth in winter peak demand in the South Zone of the Red River Valley the need for the proposed Twin Cities – Fargo 345 kV power line to provide community service reliability would be triggered? If so, please state the level calculated.

C. What load management, energy conservation, efficiency and/or smart grid alternatives did Applicants evaluate as means to provide for demand or community service reliability in the South Zone of the Red River Valley Area either alone or in combination with transmission or local generation alternatives?

D. Please provide in Microsoft Excel spreadsheet form an analysis of the costs and savings from all alternatives evaluated in Part C as compared to the costs of the CapX project selected to provide community service reliability in the South Zone of the Red River Valley Area.

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 15

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

A. Please explain for the Alexandria Area, what assumptions were used to determine the 2020 winter peak load forecast on which the Applicant' analysis of community service reliability was based): 1) what percentage of annual growth was assumed; 2) from where was it derived; 3) in which integrated resource plan, if any, has this forecast been accepted or adopted; 4) what is the justification for and impact of the load adjustment factor in the analysis and 5) what the term "MW at Risk" signifies in Figure 4-16.
B. Have the Applicants determined at what level of forecasted growth in winter peak demand in the Alexandria Area the proposed Twin Cities – Fargo 345 kV power line would not be needed for community service reliability? If so, please state the level calculated.
C. What load management, energy conservation, efficiency and/or smart grid alternatives did Applicants evaluate as means to provide for demand or community service reliability in the Alexandria Area either alone or in combination with transmission or local generation alternatives?
D. Please provide in Microsoft Excel spreadsheet form an analysis of the costs and savings from all alternatives evaluated in Part C as compared to the costs of the CapX project selected to provide community service reliability in the Alexandria Area

Response by: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 16

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

A. Please explain for the St. Cloud Area, what assumptions were used to determine the 2020 summer peak load forecast on which the Applicant' analysis of community service reliability was based): 1) what percentage of annual growth was assumed; 2) from where was it derived; 3) in which integrated resource plan, if any, has this forecast been accepted or adopted; 4) what is the justification for and impact of the load adjustment factor in the analysis and 5) what the term "MW at Risk" signifies in Figure 4-19.

B. Have the Applicants determined at what level of forecasted growth in summer peak demand in the St. Cloud Area the need for the proposed Twin Cities – Fargo 345 kV power line to provide community service reliability would be triggered? If so, please state the level calculated.

C. What load management, energy conservation, efficiency and/or smart grid alternatives did Applicants evaluate as means to provide for demand or community service reliability in the St. Cloud Area either alone or in combination with transmission or local generation alternatives?

D. Please provide in Microsoft Excel spreadsheet form an analysis of the costs and savings from all alternatives evaluated in Part C as compared to the costs of the CapX project selected to provide community service reliability in the St. Cloud Area

Response by: _____

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Requested by Paula Maccabee, *Counsel for CETF*

REQUEST NUMBER: 17

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

A. The Application states at page 4.40 that community reliability needs do not dictate the timing of the proposed Twin Cities – Brookings County 345 kV transmission line Do Applicants agree that community reliability needs alone would not justify construction of the Twin Cities – Brookings County project? Explain.

B. The Application states at page 4.40 that the Twin Cities – Brookings County 345 kV project is primarily based on the need to add generation outlet capacity in southwestern Minnesota to accommodate increasing amounts of available wind energy generation.

1) In determining that the Twin Cities- Brookings County transmission line was needed to provide generation outlet capacity for available wind generation, did Applicants model scenarios based on specific wind generation amounts and locations? If so, please state the amounts and locations included in the modeling and, to the extent known, state the name of the wind project and developer/owner associated with the wind generation.

2) Were the amounts and locations of wind generation for which generation outlet capacity was modeled the amounts and locations specified in the Attachment to Applicants' Response to NAWO Information Request 12?

3) How did Applicants determine which amounts and locations of wind generation should be considered in modeling the need for transmission to provide

generation outlet capacity? Please state the methods used to derive the generation scenarios modeled, including the individuals and resources consulted.

Response by: _____

Title: _____

Department: _____

Telephone: _____