

**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: Minnesota Department of Commerce  
Date of Request: May 6, 2008  
Response Due: May 25, 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.*

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Please provide electronic copies of all information requests and all responses made by the Minnesota Department of Commerce and/or its offices, including the Office of Energy Security (“DOC”) to parties or participants other than Citizens Energy Task Force (“CETF”) to date and in the future throughout this entire proceeding.

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Response by: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Telephone: \_\_\_\_\_

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**REQUEST NUMBER: 2**

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Please state whether the Minnesota Department of Commerce and/or any of its offices (“DOC”) has access to the STRATEGIST software package or other modeling system to evaluate energy generation, load forecast, transmission alternatives, system reliability and costs under various energy scenarios:

- A. Identify the software package or modeling system to which the DOC has access.
- B. Summarize the capacities of the system identified in Part A. If the DOC has prepared presentation materials summarizing these capacities, please provide copies.
- C. State the nature of the DOC’s access, explaining whether the DOC has purchased the system identified in Part A or made other arrangements for its use.
- D. State whether the DOC has employees on staff or has retained consultants who have the training necessary to use the system identified in Part A, stating for each such individual, that person’s name, qualifications, experience in energy modeling and providing a curriculum vitae for that individual.

E. If the DOC has a specific budget allocated for the purpose of analyzing energy generation, transmission or load scenarios using the system identified in Part A, please itemize and describe in narrative form any applicable budget.

F. State whether the DOC has used the system identified in Part A to analyze the CapX 2020 projects or alternatives to the CapX 2020 projects proposed in this docket. If any such analysis has been done, please state:

- 1) The input assumptions for load growth forecasted, load management, conservation, generation sizes, types and locations;
- 2) Which CapX 2020 projects or alternatives to CapX 2020 projects were analyzed, stating specifically whether any of the alternatives discussed in the Environmental Report section 4.0 System Alternatives were analyzed using the system identified in Part A.
- 3) What conclusions, if any, were reached as a result of this analysis.
- 4) A summary of any costs incurred to conduct the analysis described in this Part.
- 5) Please also provide copies of all documentation pertaining to the analysis and itemize any costs incurred in conducting the analysis.

G. State whether the DOC plans to use the system identified in Part A to do any future analysis the CapX 2020 projects or alternatives to the CapX 2020 projects either prior to or after a decision is made on whether the projects are needed. If so, please state:

- 1) The proposed input assumptions for load growth, load management, conservation, generation sizes, types and locations.
  - 2) Which CapX 2020 projects or alternatives to CapX 2020 projects are proposed to be analyzed.
  - 3) The dates on which any such analysis is planned to be conducted.
  - 4) Please also provide copies of any documents reflecting the plans for this analysis.
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**REQUEST NUMBER: 3**

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The Environmental Report prepared for the CapX 2020 projects (“Environmental Report”) states,

“In fact, renewable energy development impacts or benefits could be moved from the Buffalo Ridge region to somewhere else in Minnesota or to neighboring states if adequate transmission lines are developed to serve wind energy development elsewhere.

“Under this alternative, peak-demand periods would likely increase across various parts of Minnesota, e.g. Rochester, Fargo, Alexandria and St. Cloud. An increase in localized line overloads and voltage deviations would compound and ultimately result in the increased risk of reliability outages.

- A. Please state whether the DOC has conducted any analysis modeling locations of renewable energy other than that proposed in the CapX 2020 application to substantiate whether 1) peak-demand; 2) localized line overloads and/or 3) voltage deviations would increase in Rochester, Fargo, Alexandria and/or St. Cloud as a result of locating renewable energy somewhere other than on the Buffalo Ridge. If so, please provide copies of all documents describing such analysis and its conclusions.

- B. If no analysis has been done, please explain why the DOC would expect that location of renewable energy somewhere other than on the Buffalo Ridge would increase 1) peak-demand; 2) localized line overloads and/or 3) voltage deviations in Rochester, Fargo, Alexandria and/or St. Cloud. Please specifically explain whether the proximity of the renewable generation to load or the upgrade of local transmission facilities would affect these potential outcomes?

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**REQUEST NUMBER: 4**

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The Environmental Report prepared for the CapX 2020 projects (“Environmental Report”) considers an alternative to the CapX 2020 projects based on a combination of natural gas and wind generation:

- A. Please state, for each of the following objectives stated in the CapX 2020 Application whether the DOC perceives the Generation Alternative reflected in the Environmental Report as a feasible alternative to meet that objective:
- 1) Community service reliability in the following areas – Rochester, St. Cloud, Alexandria, LaCrosse;
  - 2) Generation outlet capacity for 800 new megawatts of wind generation;
  - 3) Ability to transmit energy across the North Dakota/Minnesota and the Minnesota/Wisconsin border
- B. It appears from Table 4-4 on p. 86 of the Environmental Report that the estimated total costs of the Generation Alternative include both the costs of new transmission and the costs of construction of gas generation.
- 1) Please confirm whether the cost range from \$582,704,000 to \$764,474,400 includes both generation and transmission costs for the proposed alternative to the CapX 2020 projects. If not, please explain.

- 2) In comparing its Generation Alternative to the CapX 2020 projects, did the DOC consider that the energy scenario on which the CapX 2020 projects were based included 6,325 megawatts of new electric generation?  
(Attachment to CapX2020 Applicants' Response to NAWO Information Request 12, "Attachment to NAWO-IR12")
  - 3) Please state whether a cost comparison was made including both the transmission and generation costs of the CapX 2020 projects. If that comparison was made, please state whether the generation costs to construct the energy generation facilities described in Attachment to NAWO-IR12 or on other assumptions regarding the costs of energy in the CapX2020 scenario.
- C. Table 4-5 on p. 88 of the Environmental Report describes air quality impacts and the potential to emit of various natural gas combustion facilities described as comparable to the facilities in the Generation Alternative.
- 1) Did the DOC compare the air quality impacts of the CapX 2020 projects including impacts of the generation in the CapX 2020 model? (See Attachment to NAWO-IR12) Specifically, were air quality impacts of a) base load coal plants (1600 - 2850 MW) and b) natural gas peaking plants (1200-2450 MW) included in the DOC's analysis of the impacts of the CapX 2020 projects? If not, please explain.
  - 2) Did the DOC obtain data on the actual emissions from the natural gas peaking plants in Table 4-5 in addition to the potential to emit maximum permitted emissions?
- D. The Generation Alternative described by the DOC in the Environmental Report describes a construction plan for 862 -1048 megawatts of natural gas generation as the minimum needed for redundant capacity for reliability.
- 1) On what assumption of load growth in each community identified in Table 4-4 is this construction plan based?
  - 2) Has the DOC evaluated what construction of gas peaking plants might be needed under the following assumptions as to conservation and load management: a) 1.0 percent energy savings; b) 1.5 percent energy savings; c) 1.5 percent energy savings, plus strategies in the identified communities aimed at load management to reduce peak demands? If such an evaluation has been done, provide any conclusions reached regarding the minimum

natural gas capacity that would be needed for reliability under the above conservation and load management assumptions. Please also state what specific load management strategies were considered.

- E. Has the DOC evaluated any generation alternative that did not rely on natural gas peaking plants? Please explain.
- F. The Environmental Report states at p. 90 that a conservation and load management alternative would “seek to address the need of 4,000-6,000 megawatts.”
- 1) Has the DOC determined that conservation and load management alone are not a feasible alternative to replace all of the CapX 2020 projects? If so, explain the nature of the analysis done to reach that conclusion.
  - 2) Has the DOC evaluated any feasible combination of energy conservation and demand-side alternatives that can replace part of the need for the CapX 2020 projects? If not, please explain.
  - 3) If the DOC has evaluated the potential of energy conservation and demand-side alternatives to replace part of the need for the CapX2020 projects, please describe the potential conservation and demand side alternatives considered, their effect upon regional demand growth and on summer and winter peak demand in the communities identified in Table 4-4 and the likely cost/savings over time for these alternatives.

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Although it describes the Rules requiring analysis of this issue at p. 91, the Environmental Report does not identify any existing system upgrades and reconfiguration alternatives that were analyzed as a means of meeting the alleged need to which the CapX 2020 projects respond.

- A. Other than options that the CapX 2020 Applicants may have studied and rejected in the CapX 2020 transmission studies, is DOC aware of any other analysis of existing system upgrades and reconfiguration alternatives to meet the alleged need?
  - B. Is DOC aware of any analysis of existing system upgrades and reconfiguration alternatives done by any party which used assumptions of load growth forecast, conservation, generation size, type or location different from those assumed in the CapX 2020 Applicants' transmission studies?
  - C. Did the DOC describe or analyze any existing transmission system upgrades and/or reconfiguration alternatives to meet the need alleged by the CapX 2020 Applicants? If so, please describe any alternatives identified and impacts analyzed.
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