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Xcel Energy

Docket No.: E002, ET2/CN-06-1115

Response To: Susan Peirce Information Request No. 41
MN Department of Commerce

Date Received: January 22, 2008

Question:

For each of the facilities identified in response to DOC No. 34, please identify whether any of the environmental attributes associated with the renewable energy are being sold in voluntary markets as carbon offsets or other environmental offsets. If so, please identify the following information:

- a. The amount of attributes sold in kWh for 2006 and year-to-date 2007.
- b. The market or offset program in which the attributes were sold.
- c. The amount of energy represented by the attribute sale included in Column N (Generation 1/1/06-12/31/06 in kWh), Column O (Generation YTD 2007 in kWh), and Column P (Amount of 2006 generation assigned to other renewable projects-kWh) in the spreadsheet response to DOC No. 34.
- d. Please indicate whether or not the intent is to ensure that any attribute sales are kept separate from energy reported for REO/RES or green pricing purposes.
- d. If attribute sales are entirely separate from energy reported for REO/RES or green pricing purposes, please explain how the sales of each are accounted for, and the steps taken to ensure that none of the attributes associated with energy intended for REO/RES or green pricing purposes are sold in other markets pertaining to these attributes.

Response:

The following utilities have not sold any of the environmental attributes associated with the facilities identified in Department of Commerce Information Request No. 34: Xcel Energy, Minnesota Power, Otter Tail Power Company, Rochester Public Utilities, Southern Minnesota Municipal Power Agency, Missouri River Energy Services and Wisconsin Public Power Inc. Information about Minnkota Power

Cooperative was not included in response to Request to No. 34, but its renewable wind resources were identified in response to Department of Commerce Information Request No. 39, and Minnkota owns the environmental attributes associated with those facilities.

The following utilities have sold environmental attributes associated with the facilities identified in Department of Commerce Information Request No. 34: Central Minnesota Municipal Power Agency, Dairyland Power Cooperative and Great River Energy. Details about those sales are contained on the attached Excel spreadsheet.

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Date: February 12, 2008

0034	0041a Attributes Sold 2006, 2007 kWh	0041b Market or Offset Program	0041c Energy sold (kWh)	0041d Tracked separately from REO/RES?	0041d2 How are sales tracked?
Relevant Facility					
Hancock Wind Energy Center	9,322,915 (2006)	unknown	9,322,915	Tracked separately from REO/RES	It is anticipated that there will be few instances when CMMPA will sell any credits. Such transactions will be manually segregated in the reporting process.
Wolf Wind	7468652 (2006)	unknown	7,468,652	see response above	see response above
Blue Breezes	2921760 (2006)	unknown	2,921,760	see response above	see response above
Great River Energy	227,500,000 (2006) 271,600,000 (2007)	RECs- Voluntary RECs- Voluntary	Renewable energy units reported as REO/RES-eligible exclude the energy used for REC sales. Thus, Column N is the net 2006 energy generation for each REO-eligible facility. Column P is the 2006 REC, green pricing or "other" energy sales for each REO-eligible facility. Column R is calculated as the difference between Column N and Column P. The values in Column O are not related to Column N or Column P.	Great River Energy's intent is to ensure that the energy generated to support REC sales is not double counted in the calculation of GRE's achievement of the REO/RES or green pricing purposes.	Great River Energy maintains an internal database that tracks renewable energy generation using MISO metering data and MV90 metering data (the same data that M-RE's will utilize). Great River Energy also maintains an internal database that tracks Member energy sales and green pricing sales. Great River Energy assigns renewable generation to its compliance obligations (REO/RES/green pricing) and pursues REC sales only when it is determined that renewable energy generation obligations can be met first.
Trimont	200,000 (2007)	RECs- Voluntary		see response above	see response above
Elk River Station	150,000 (2006)	RECs- Voluntary		see response above	see response above
Elk River Station	2945000 (2006)	RECs- Voluntary	2,945,000	Tracked separately from REO/RES	Sales are tracked internally through Gen-Sys Energy
McNeilus Wind Farm	1043000 (2007)	RECs- Voluntary	1,043,000	Tracked separately from REO/RES	Sales are tracked internally through Gen-Sys Energy
McNeilus Wind Farm					