



**Minnesota Pollution  
Control Agency**

**Request for Comments  
December 3, 2015**

**RE: In the Matter of Establishing an Updated Estimate of the Costs of Future Carbon Dioxide Regulation on Electricity Generation Under Minn. Stat. § 216H.06  
Docket No. E999/DI-15-708, Docket No. E999/CI-07-1199**

The Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Commerce, Division of Energy Resources (DOC) (together, the Agencies) invite comments on the range of cost estimates for the future cost of carbon dioxide (CO<sub>2</sub>) regulation on electricity generation. To ensure consideration, written comments must be received by:

**4:30 p.m. on January 14, 2016.**

Please file comments under Docket No. E999/CI-15-708 using the edockets system at <https://www.edockets.state.mn.us/>.

**Because the Minnesota Public Utilities Commission (Commission) is not required to provide an additional opportunity for interested parties to provide written comments after the final recommendation to the Commission has been submitted, the Agencies encourage those who are interested in commenting to do so in response to this notice.**

## **BACKGROUND**

Minn. Stat. § 216H.06 requires the Minnesota Public Utilities Commission (Commission) to update annually an estimate of the likely range of costs of future carbon dioxide regulation on electricity generation. The estimate must be used in all electricity generation resource acquisition proceedings. The annual updates of the estimate must be made by the Commission following informal proceedings conducted by the Commissioners of the DOC and MPCA that allow interested parties to submit comments.

The current estimate was set in the Commission's April 28, 2014 Order as follows:

1. The Commission maintains its estimate of the range of likely costs of CO<sub>2</sub> regulation at between \$9 and \$34 per ton of CO<sub>2</sub> for 2014 and 2015.
2. Utilities shall begin applying the above range of CO<sub>2</sub> values in their resource planning as of 2019.

## PRELIMINARY RECOMMENDATION AND NEXT STEPS

At this time, the Agencies expect to recommend that the Commission maintain the current estimate of the range of likely costs of CO<sub>2</sub> regulation at between \$9 and \$34 per ton of CO<sub>2</sub> emitted, beginning in 2022.

The Agencies intend that our next recommendation to the Commission will take into account significant federal regulatory changes currently underway and the State of Minnesota's decisions in how to comply with federal "Clean Power Plan" requirements under Section 111(d) of the Clean Air Act. The final recommendation may change in response to comments received. **The Commission is not required to provide an additional opportunity for interested parties to provide written comments after the Agencies have provided a final recommendation to the Commission.** Oral comments may be solicited at the appropriate Commission agenda meeting.

Please note that the cost range of future carbon dioxide regulation established in this docket addresses only the *regulatory* costs of CO<sub>2</sub> emissions, as specified by Minn. Stat. §216H.06. An estimate of the regulatory costs of CO<sub>2</sub> only considers the anticipated future regulatory actions affecting electricity generators, such as a carbon tax, emissions permits, or some other regulatory mechanism. There are other costs to society resulting from CO<sub>2</sub> emissions, commonly referred to as externality costs, which are not included or considered in this docket. See Docket No. E999/CI-14-643 for the Commission's proceeding addressing non-regulatory externality costs.

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Request for Comments**

**Docket No. E999/DI-15-708 and E999/CI-07-1199**

**Dated this 3<sup>rd</sup> day of December 2015**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_15-708_15-708
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15-708_15-708
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-708_15-708
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-708_15-708
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road PO Box 13200 Grand Forks, ND 58208-3200	Electronic Service	No	OFF_SL_15-708_15-708
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_15-708_15-708
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_15-708_15-708
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_15-708_15-708
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-708_15-708
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_15-708_15-708

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karlene	Fine	kfine@nd.gov	Industrial Commission of North Dakota	14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck, ND 58505	Electronic Service	No	OFF_SL_15-708_15-708
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-708_15-708
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-708_15-708
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-708_15-708
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-708_15-708
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_15-708_15-708
Joel	Larson	jl Larson@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road  Grand Forks, ND 58203	Electronic Service	No	OFF_SL_15-708_15-708
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-708_15-708
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-708_15-708
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-708_15-708

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peter	Nelson	peter.nelson@americanexperiment.org	Center of the American Experiment	8441 Wayzata Boulevard Suite 350 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_15-708_15-708
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-708_15-708
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_15-708_15-708
Steven	Nyhus	swnyhus@flahertyhood.com	Flaherty & Hood PA	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_15-708_15-708
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_15-708_15-708
Thomas L.	Osteraas	N/A	Excelsior Energy	150 South 5th Street Suite 2300  Minneapolis, MN 55402	Paper Service	No	OFF_SL_15-708_15-708
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_15-708_15-708
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_15-708_15-708
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_15-708_15-708

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_15-708_15-708
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-708_15-708
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-708_15-708
David	Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-708_15-708
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	OFF_SL_15-708_15-708
Darryl	Tveitbakk	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_15-708_15-708
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_15-708_15-708
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_15-708_15-708

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_7-1199_1
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_7-1199_1
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_7-1199_1
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_7-1199_1
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road PO Box 13200 Grand Forks, ND 58208-3200	Electronic Service	No	OFF_SL_7-1199_1
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_7-1199_1
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St  Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_7-1199_1
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_7-1199_1
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_7-1199_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_7-1199_1



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karlene	Fine	kfine@nd.gov	Industrial Commission of North Dakota	14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck, ND 58505	Electronic Service	No	OFF_SL_7-1199_1
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_7-1199_1
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_7-1199_1
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_7-1199_1
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_7-1199_1
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	OFF_SL_7-1199_1
Joel	Larson	jl Larson@minnkota.com	Minnkota Power Cooperative, Inc.	1822 Mill Road  Grand Forks, ND 58203	Electronic Service	No	OFF_SL_7-1199_1
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_7-1199_1
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_7-1199_1
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_7-1199_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Peter	Nelson	peter.nelson@americanexperiment.org	Center of the American Experiment	8441 Wayzata Boulevard Suite 350 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_7-1199_1
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_7-1199_1
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_7-1199_1
Steven	Nyhus	swnyhus@flahertyhood.com	Flaherty & Hood PA	525 Park St Ste 470  Saint Paul, MN 55103	Electronic Service	No	OFF_SL_7-1199_1
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_7-1199_1
Thomas L.	Osteraas	N/A	Excelsior Energy	150 South 5th Street Suite 2300  Minneapolis, MN 55402	Paper Service	No	OFF_SL_7-1199_1
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor  Madison, WI 53703	Electronic Service	No	OFF_SL_7-1199_1
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_7-1199_1
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_7-1199_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_7-1199_1
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_7-1199_1
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_7-1199_1
David	Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_7-1199_1
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	OFF_SL_7-1199_1
Darryl	Tveitbakk	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_7-1199_1
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_7-1199_1
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_7-1199_1