

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF COMMISSION STAFF'S)	AFFIDAVIT OF JON THURBER
REQUEST TO INVESTIGATE NORTHERN)	
STATES POWER COMPANY dba XCEL)	EL16-037
ENERGY'S PROPOSED FUEL CLAUSE)	
RIDER)	

I, Jon Thurber, do state and affirm as follows:

1. I am a utility analyst for Commission Staff (Staff) of the South Dakota Public Utilities Commission (Commission).
2. I am familiar with the ratemaking laws, rules, and principles of the State of South Dakota.
3. Staff filed a request to investigate Northern States Power Company dba Xcel Energy's (Company or NSP) proposed Fuel Clause Rider (FCR). The Commission assigned this filing as Docket EL16-037. I was assigned to Docket EL16-037 and I have reviewed NSP's filings that pertain to the issues I am addressing.
4. I participated in four sets of discovery sent from Staff to NSP and am familiar with responses received from NSP.
5. NSP provided the integrated resource plans and economic analyses that were filed before the Minnesota Public Utilities Commission (Minnesota PUC) and North Dakota Public Service Commission (North Dakota PSC) to support the prudence of the Marshall Solar, North Star Solar, and Aurora Solar resource selections.
6. The North Dakota PSC found in Docket PU-15-095 that NSP did not show the Geronimo (Aurora) Solar PPA to be a prudent resource addition.
7. The Marshall Solar and North Star Solar purchase power agreements (PPAs) were selected through a solar request for proposal for utility scale solar resources in April 2014. In response to

Staff Data Request 3-1, NSP confirmed they did not compare the Marshall Solar and North Star Solar PPAs to other electricity alternatives for capacity or energy purposes.


8. In North Dakota PSC Docket PU-14-810, the Company stated that it was acquiring the 187 MW Solar Portfolio resource additions, which included the Marshall and North Star Solar projects, to the integrated NSP System primarily to comply with Minnesota's Solar Energy Standard. The North Dakota PSC found that NSP did not show the 187 MW Solar Portfolio to be prudent.
9. In the response to Staff data request 1-5 as shown on Confidential Exhibit_JPT-1, NSP provided information regarding all PPAs included in the proposed December FCR.
10. Confidential Exhibit_JPT-2 outlines fifteen Community-Based Energy Development project PPAs that met the requirements of Minnesota Statute §216B.1612.
11. Confidential Exhibit_JPT-3 details six Renewable Energy Development Fund project PPAs that met the requirements of Minnesota Statute §116C.779.
12. Confidential Exhibit_JPT-4 outlines five PPAs that exceed an average cost per MWh of \$100 included in the proposed December FCR.
13. Staff is concerned that the resources identified above are not cost effective and result in unjust and unreasonable FCR rates for South Dakota customers.

Dated this 8th day of May, 2017.



Jon Thurber

Subscribed and sworn to before me this 8th day of May, 2017.



(Notary Public)

My Commission expires: TINA DOUGLAS
My Commission Expires
March 21, 2023

