## BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of a Petition by Excelsior Energy, Inc. for Approval of a Power Purchase Agreement under Minn. Stat. §216B.1694, and Determination of Least Cost Technology and Establishment of a Clean Energy Minimum Under Minn, Stat. §216B.1693.

MPUC Docket: E/6472/M-05-1993 OAH Docket: 12-2500-17260-2

## MCGP MOTION TO INCLUDE MISO SYSTEM IMPACT STUDY DATED 1/16/07

MCGP was grante leave to supplement the hearing record with the "MISO Generation Deliverability Study Method," and any other publicly available MISO documents showing the inputs, assumptions and results for the steps in each of the MISO studies. It has come to the MCGP attorney's attention that on January 16, 2007, a follow-up draft System Impact Study for Long Term Transmission Service – Addendum 1 was released and in addition to listing likely upgrades needed, states:

This report is in draft form and differs from the deliverability results posted the day after this report initially was posted. The customer had requested an update so we posted what was known at the time.

Currently an updated report is being reviewed by the ad hoc group with results that more closely align with the deliverability results.

The changes to the results from the January 4th draft to the one being reviewed are because of the inclusion of planned network upgrades which are correspond to a higher queued TSR. Those upgrades are not yet in service, therefore it was inappropriate to include these upgrades in the initial load flow tests.

Although the study was tweaked to include appropriate upgrades in the initial tests, firm transmission service was again rejected. This study is important to demonstrate that unlike electricity, the studies are not binary, they are cumulative and to be interpreted collectively, as stated in MISO/MAPP protocol – the studies Excelsior produced, dated 1/5/07 are not determinative of service or of the upgrades necessary, and apply only to deliverability assuming prior upgrades detailed in the other studies are made.

Available on line at http://oasis.midwestiso.org/documents/Miso/A324 Interim Report-OASIS Addendum1.pdf

Although all Intervenors are under a continuing obligation to produce relevant documentation for the record, neither Xcel nor Excelsior have produced this study. MCGP offers it for inclusion to more fully inform the record.

Respectfully submitted:

Date: January 30, 2007

Carol A. Overland

#254617

Attorney for mncoalgasplant.com OVERLAND LAW OFFICE

P.O. Box 176

Red Wing, MN 55066

(612) 227-8638

overland@redwing.net