

recommendation, and GMO's current substitute tariff sheet, as it has included the cost of removal of coal and propane at the retired Sibley generation facility.¹

5. The OPC has laid out the reasoning behind these two objections in greater detail in a *Memorandum* which has been attached to this filing. This *Memorandum* includes the amount the OPC recommends GMO's Actual Net Energy Cost be adjusted by to account for the subject of these two objections.

6. The OPC therefore request the Commission reject GMO's substitute tariff sheet filed on July 25, 2019, and order the company to file a new substitute tariff sheet with an adjustment to its Actual Net Energy Cost to account for (1) The cost of auxiliary power GMO used for its steam operations at its Lake Road station, and (2) The cost of the removal of coal and propane at the retired Sibley generation facility. The interest amount included in the FAC tariff sheet should also be modified to account for these reductions in cost.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission reject GMO's substitute tariff sheet filed on July 25, 2019, and order the company to file a new substitute tariff sheet to account for the adjustments related herein.

Respectfully submitted,

¹ The OPC also notes its continuing belief that it was imprudent for GMO to have entered into the Rock Creek and Osborn Wind Projects purchased power agreements ("PPAs") and, consequently, the OPC's belief that GMO should not be permitted to recoup the costs associated with these PPAs through its FAC. The OPC is not asking the Commission to make an adjustment for the losses GMO incurred in relation to these PPAs at this time, however, because, while the decision to enter into the contract may have been imprudent, it is not in violation of GMO's FAC tariff sheets.

