

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the matter of Northern States Power Co.'s,)
d/b/a Xcel Energy's, Petition for Approval of)
Large General Time of Day Service Customers and) **PUC Docket No. E002/M25-289**
Large Peak Controlled Time of Day Service Tariffs)

SUPPLEMENTAL COMMENTS OF CLEAN GRID ALLIANCE

December 5, 2025

I. INTRODUCTION

Clean Grid Alliance (“CGA”) submits these Supplemental Comments in the matter of the large load customer tariff (“the Tariff”) proposed by Xcel Energy d/b/a Northern States Power (“Xcel” or “the Company”) to (1) ask Xcel to consider alternative resource procurement arrangements; (2) highlight the broad base of support for an interconnection queue process that prioritizes Large Load Customers (“LLCs”) with clean energy, co-location, or flexibility attributes, as demonstrated in both Initial and Reply Comments,¹ but which criteria the Company was silent about in the Company’s own Reply Comments; and (3) urge Xcel to amend the language of the Interconnection Agreement (“IA”), which as currently written appears to prohibit, as a matter of course, behind-the-meter-generation (“BTMG”) from accessing the Company’s system. Before delving into these matters, CGA would also like to commend Xcel for its commitment to achieving “100 percent carbon-free electricity by 2040, including new large customer loads” and stated willingness to engage with stakeholders in developing clean electricity procurement programs for LLCs taking service on the Tariff.²

II. SUPPLEMENTAL COMMENTS

1. Xcel should provide an avenue for LLCs to “bring their own” clean energy resources.

In response to CGA’s recommendation that Xcel explore alternative resource procurement arrangements, including variations on the “bring your own generation” (“BYOG”) theme,³ Xcel

¹ Minnesota PUC. Docket No. E002/M25-289. *“In the Matter of Northern States Power Co.’s, d/b/a Xcel Energy’s, Petition for Approval of Large General Time of Day Service customers and Large Peak Controlled Time of Day Service Tariffs”*. See Initial Comments of CGA, the Environmental Law & Policy Center/Vote Solar (“ELPC/VS”), Fresh Energy/the Minnesota Center for Environmental Advocacy (“Fresh Energy/MCEA”), Geronimo Power, and Tract Capital Management, LP (“Tract”), and Reply Comments of the Data Center Coalition (“DCC”) and Google.

² Reply Comments of Xcel, p. 34. (Filed November 5, 2025).

³ Initial Comments of CGA, pp. 8-11 and at pp. 12-14. (Filed October 11, 2025).

only stated it intends “to work with any new [LLC] and specific goals they may have to procure new renewable or carbon-free resources or innovative carbon technologies.”⁴ In Initial Comments, we provided numerous examples of, and justification for, BYOG programs that have been developed elsewhere to meet the “specific goals of LLCs” but which Xcel did not specifically respond to.

Hence, CGA asks that Xcel specifically include and evaluate BYOG opportunities in the collaborative stakeholder process the Company has stated it is open to for the 24/7 carbon-free voluntary program.⁵

2. Xcel should prioritize LLC interconnection requests based on clean energy, co-location, and flexibility attributes of prospective customers.

Stakeholders representing both the energy and data center industries and consumer and environmental advocates recommend or support the development of an interconnection queue for LLCs that prioritizes requests based on these characteristics: LLC plans to develop clean back-up resources, co-locate with existing clean energy generation, “bring their own” clean energy generation, and/or operate flexibly to minimize strain on the Company’s system. Multiple stakeholders filed Initial Comments recommending Xcel develop an interconnection queue management system for prospective Large Load Customers, with several further suggesting the Company should prioritize load interconnection requests by the criteria listed above.⁶ CGA, the Environmental Law and Policy Center/Vote Solar (“ELPC/VS”), Fresh Energy/the Minnesota Center for Environmental Advocacy (“Fresh Energy/MCEA”), and Geronimo Power proposed the prioritization of LLC interconnection requests based on whether those loads intended to bring

⁴ Reply Comments of Xcel, pp. 34-35.

⁵ *Ibid.*

⁶ CGA, ELPC/VS, Fresh Energy/MCEA, Geronimo Power, and Tract submitted Initial Comments advocating for the Company to develop an efficient, transparent process by which to manage interconnection requests from LLCs.

clean energy resources, either via sleeved power purchase agreements or BTMG, co-locate with existing or planned generation, or commit to flexible operations. Tract Capital Management, LP (“Tract”) recommended a transparent queue management process.

These ideas were supported by additional parties in Reply Comments: Google stated it “supports the recommendation by other parties to expedite clean energy programs associated with very large loads,”⁷ and the Data Center Coalition (“DCC”) stated it is supportive of an interconnection process prioritizing potential LLCs providing “that any additional flexibility or clean energy procurement arrangements should remain voluntary options for customers.”⁸

Xcel, for its part, claimed the Company “is actively reviewing the potential for prioritization that includes a fair and objective consideration of a number of factors.”⁹ However, Xcel was silent as to whether such factors do—or would—include co-location or clean energy or flexibility attributes of the LLC.

Relatedly, we noted in Reply Comments that the Federal Energy Regulatory Commission (“FERC”) was soliciting comment on principles related to expediting large load interconnections, including for load-generation hybrids, under the Advanced Notice of Proposed Rulemaking (“ANOPR”), “Interconnection of large loads to the interstate transmission system.”

¹⁰ Responding to the ANOPR, the Midcontinent Independent System Operator (“MISO”) described its current effort to develop a “zero-injection generator interconnection agreement” that would enable generation paired with load to be studied “outside the standard queue

⁷ Reply Comments of Google, p. 14. (Filed November 5, 2025).

⁸ Reply Comments of DCC, pp. 6-7. (Filed November 5, 2025).

⁹ Reply Comments of Xcel, p. 32.

¹⁰ FERC. Docket No. RM26-4-000. “Interconnection of large loads to the interstate transmission system”. (Opened October 27, 2025).

process.”¹¹ MISO also stated it “fully supports the efficient use of [the] transmission system, which could involve expedited study processes for large loads that agree to be curtailable or hybrid facilities that agree to [be] curtailable and dispatchable.”¹² Such comments – and the ANOPR itself – demonstrate serious regional and national interest in facilitating the interconnection of hybrid customers (i.e., loads paired with generation and/or storage). The ANOPR introduced questions of state versus federal jurisdiction over large load interconnections to the interstate transmission system, matters which could take many months or even years to resolve. Yet, state commissions clearly have regulatory authority over large load interconnection to a utility’s distribution system, such as is contemplated here. The Minnesota Public Utility Commission (“the Commission”), then, should proactively govern these large load interconnections and promote efficient use of the Minnesota grid that avoids transmission constraints and congestion, responds to state decarbonization imperatives, and ensures “speed to power” for LLCs, starting with this docket.

Thus, CGA reiterates and expands upon our prior comments to recommend that Xcel prioritize LLC interconnection requests based on a prospective customer’s voluntary plans to develop clean BTMG or procure clean energy resources in partnership with the Company, co-locate with existing clean energy generation, and/or operate flexibly, a position which is well-supported by the diverse stakeholders listed above.

¹¹ FERC. Docket No. RM26-4-000. Comments of MISO. (Filed November 21, 2025). P. 13.

¹² *Ibid.*

3. Xcel should modify the language of the IA to clarify that LLCs are not prohibited from exporting BTMG for wholesale sale, subject to their compliance with applicable laws, regulations, and MISO tariffs.

In response to urging from CGA and other parties in Initial Comments that Xcel not prohibit LLCs from interconnecting to its system and/or exporting BTMG for wholesale sale, the Company clarified the IA “does not prohibit, nor does it authorize either interconnection of BTM generation or export of such generation over the Company’s system for wholesale sale”.¹³ CGA appreciates this explanation. However, the current language of the form IA included in the Company’s Petition appears to prohibit both BTMG interconnection and exports over Xcel’s system.¹⁴ Xcel states issues related to BTMG interconnection and exports, including our recommendation in Initial Comments that Xcel incentivize clean BTMG,¹⁵ are “outside the scope of the present docket.”¹⁶ Nonetheless, it is within the scope of the current docket to ensure the language of the IA does not unduly impact the live issue of BTMG interconnection and/or export for wholesale sale that the Company itself states would “be better handled in a separate docket” that “all appropriate parties” can participate in.¹⁷

Therefore, CGA encourages Xcel to write the IA in such a way as to make clear that either BTMG interconnection or exports utilizing the Company’s system are not prohibited

¹³ Reply Comments of Xcel, p. 33.

¹⁴ See the Company’s Petition, Attachment H, “IA, Section 103(e)”, which reads: “*This Interconnection Agreement provides no rights to Customer with respect to any backup generation located at the premises used to support the Data Center. Under no circumstance, whatsoever, including without limitation during an Emergency (except as may be necessary to prevent damage to the Company Facilities and the Company System), will Customer’s backup generation at the Data Center be allowed to feed any energy over the Point(s) of Interconnection onto the Company System.*”

¹⁵ Initial Comments of CGA, pp. 12-14.

¹⁶ Reply Comments of Xcel, p. 33.

¹⁷ *Ibid.*

outright, but rather are subject to state and federal laws and regulations, applicable MISO tariffs, and (potentially) the results of a future docketed proceeding.

III. CONCLUSION

CGA appreciates this Supplemental Comment opportunity, and we look forward to hearing from the Commission on these matters as well as engaging with the Company and other parties in future related stakeholder opportunities, such as the development of the Clean Energy and Capacity Tariff required by Minnesota statute, any other carbon-free electricity procurement program for Xcel's LLCs, and any proceeding on BTMG.