



August 11, 2025

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Docket No. E002/CI-16-521: In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy

Acting Executive Secretary Bull,

Clean Energy Economy Minnesota (CEEM), the Coalition for Community Solar Access (CCSA) and the Minnesota Solar Energy Industries Association (MnSEIA) - collectively the Clean Energy Organizations (CEOs) hereby submit an additional decision option for the August 14th, 2025 agenda meeting on Docket E999/CI-16-521 –In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611 (Regarding the Xcel Internal Transmission Study (ITS)). Decision Option 2 as written, in combination with other decision options, remains the CEO's preference. This modification is offered only as an alternative should the existing DO 2 not be adopted.

If DO 2 as written is not adopted, the CEOs offer CEOs Modified 2:

CEOs Modified 2: Order Xcel to stay the ITS process through January 1, 2026.

Respectfully submitted,

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Director of Government Affairs

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