



414 Nicollet Mall  
Minneapolis, MN 55401

October 15, 2018

—Via Electronic Filing—

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: REQUEST FOR EXTENSION  
2020-2034 UPPER MIDWEST INTEGRATED RESOURCE PLAN  
DOCKET NO. E002/RP-15-21

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, respectfully requests the Minnesota Public Utilities Commission grant the Company a five-month extension to submit its 2020-2034 Upper Midwest Integrated Resource Plan (IRP). The Commission's January 11, 2017 Order in Docket No. E002/RP-15-21 directed the Company to submit its next resource plan filing on February 1, 2019. We ask that the due date be extended to July 1, 2019. This five-month extension will provide time to continue our work with stakeholders, allow for the production of additional studies and information relevant to the IRP, and will not adversely impact the plan we ultimately file since we do not have any actions necessary in our five-year action plan.

As the Commission is aware, our 2020-2034 IRP will be more robust, wide-ranging, and complex than a typical IRP. It requires the evaluation and discussion of possible scenarios for the orderly retirement of our entire baseload fleet—over 4,000 MW. It also involves the consideration of more resources and technologies than contemplated in prior IRPs, significant coordination with our distribution planning team and integrated distribution plan (IDP), scenarios for the electrification of transportation and other sectors, substantial coordination with our transmission planning team and ensuring the reliability of our system not only with the baseload retirements but also the considerable addition of renewables.

In light of this very broad scope, we have made a concerted effort to work with stakeholders -- through seven formal workshops and additional one-on-one meetings. These meetings have included robust discussions of the evolving electric system, the current state of the industry and various policy changes being contemplated, reliability and resiliency considerations, distribution and transmission inputs, and have helped to build a mutual understanding of our system and the work ahead of us. We have brought in numerous third parties to discuss their viewpoints and studies on some of the top stakeholder issues, in particular decarbonization of electricity and other economic sectors.

We have also engaged a consultant, E3, to perform independent modeling and analysis of our system and ensure transparent work and access to the data and models for stakeholders. E3 is an industry-leading firm based in San Francisco and consults extensively for utilities, developers, government agencies and environmental groups on clean energy issues. E3 is using three types of models to provide perspective on our IRP: (1) the RESOLVE model, which evaluates and optimizes the least-cost portfolios of resources to meet system demand considering carbon and other constraints, (2) the RECAP model, which evaluates the reliability of electric energy and system capacity of the optimized resource portfolios over thousands of simulated weather years, and (3) the PATHWAYS model, which evaluates economy-wide scenarios for meeting Minnesota's statutory goal of 80 percent reduction in greenhouse gases below 2005 levels by 2050.

Our workshops and meetings so far have provided a forum for productive dialogue. They are designed to ensure that stakeholders have the opportunity to help shape the future of the NSP System, and potentially build some consensus around the preferred plan that we will ultimately submit to the Commission. The meetings have shown stakeholders' desire for additional, deeper discussions about our system, our IRP, and the broader context of statewide decarbonization pathways.

Stakeholders have shown an interest in not only a better understanding of our system and our work, but additionally the work of E3. Specifically, stakeholders are interested in determining how they could use E3's tools to inform their participation both in our IRP and in other forums. Stakeholders are particularly interested in the PATHWAYS work because it provides broader context for our plan and statewide actions that would be necessary -- in the electricity sector, electrification of other sectors, and through other measures in sectors less amenable to electrification -- to achieve the state's greenhouse gas goals. We have

shared the PATHWAYS methods and preliminary results with the state agencies, who have expressed interest in deeper analysis of some sectors and technologies.

Proposing a plan in February would require the Company to cut short discussions with many interested stakeholders, particularly given the time required to model data that spans such a large area and timeframe. Extending the deadline for the IRP to July 2019 will allow time for these stakeholders to absorb this information and provide the Company with their perspectives.

In addition, we are participating along with Minnesota Power in a study that the Center for Energy and Environment (CEE) is just getting underway on the value of hosting a power plant for host communities, and the potential impact of power plant retirement on selected communities. This study is in its initial stages and is anticipated to be completed mid to late next year. While this study may not be entirely finalized by July 2019, even the preliminary findings will be of interest to stakeholders and could have an impact on our IRP and likely parties' recommendations. A February filing without the benefit of even the initial findings of this third-party study could position decisions without a full record or helpful supporting information and reference points.

CEE, Optimal Energy, and Seventhwave also are completing a Minnesota state-wide Demand-Side Potential study. The Department of Commerce is supervising this project and we have been participating in the stakeholder work. The study is intended to inform the decision makers for Minnesota's Conservation Improvement Program (CIP) regarding which market sectors, geographic areas, utility service territories, end uses, measures, and programs can be targeted and reach consensus policy recommendations that will help maximize cost-effective energy efficiency potential statewide. Advisory committee members are reviewing a near-final draft of the report that was circulated this week. We are reviewing that document and will then need a report with Xcel Energy specific data and may need additional scenarios to be modeled for factors that are unique to our program portfolio to supplement the state-wide study with information to support the DSM portion of our IRP filing. This additional modeling would take about 2-3 months which is an incredibly tight timeframe for the DSM inputs to be used for a February filing.

We do not have any actions necessary in our five-year action plan. In other words, we have the necessary resources to meet forecasted energy and capacity needs through 2024. We, therefore, do not believe there is any harm in delaying our filing to provide for the developments discussed above. Indeed, we have committed to

our vision of being 85 percent carbon free by 2030. This delay is not intended to back off our environmental leadership strategy or corporate vision; rather, it is to provide additional time to gather more information and work with stakeholders to further a mutual understanding, reach additional areas of consensus, and provide a platform for stakeholders to explore broader carbon reduction strategies.

We recognize that utility IRPs are staged in consideration of resource availability. If Ottertail Power's recent request to delay their IRP from June of 2019 to June of 2020<sup>1</sup> is approved by the Commission, there may be time and resources available for review of our plan within the July timeframe. Additionally, between now and the first quarter of 2019, we are on track to file several large and potentially resource-intensive filings including two electric vehicle filings, a new Renewable\*Connect filing, and our Integrated Distribution Plan. Mid-next year may be a slower time for large filings from Xcel Energy and other utilities, and thus allow more resources for IRP review.

We have socialized our intent to request a delay with many stakeholders who were involved in our previous IRP and the current IRP to date, including:

- Minnesota Public Utilities Commission Staff
- North Dakota Public Service Commission Staff
- South Dakota Public Utilities Commission Staff
- Wisconsin Public Service Commission Staff
- Michigan Public Service Commission Staff
- Minnesota Department of Commerce
- Minnesota Center for Environmental Advocacy
- Fresh Energy
- Wind on the Wires
- Sierra Club
- Minnesota Large Energy Consumers
- Minnesota Chamber of Commerce
- Center for Energy and the Environment
- Citizens Utility Board
- Baseload Plant Host Communities
- City of Minneapolis
- City of St. Paul

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<sup>1</sup> Docket No. E017/RP-16-386

In closing, we respectfully request that our 2020-2034 Upper Midwest IRP due date be extended to July 1, 2019. This five-month extension will provide time to continue our work with stakeholders, allow for the production of additional studies and information relevant to the IRP, and will not adversely impact the plan we ultimately file since we do not have any actions necessary in our five-year action plan.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Bria Shea at (612) 330-6064 or [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

AAKASH H. CHANDARANA  
REGIONAL VICE PRESIDENT  
RATES AND REGULATORY AFFAIRS

c: Service List

## CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota;

xx by courier; or

xx by electronic filing.

**Docket No.**  
**E002/RP-02-15-21**

Dated this 15<sup>th</sup> day of October 2018

/s/

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Jim Erickson

Regulatory Administrator

| First Name  | Last Name | Email                            | Company Name                       | Address   | Delivery Method    | View Trade Secret | Service List Name     |
|-------------|-----------|----------------------------------|------------------------------------|---|--------------------|-------------------|-----------------------|
| David       | Aafedt    | daafedt@winthrop.com             | Winthrop & Weinstine, P.A.         | Suite 3500, 225 South Sixth Street<br><br>Minneapolis, MN 554024629           | Electronic Service | No                | OFF_SL_15-21_Official |
| Christopher | Anderson  | canderson@allete.com             | Minnesota Power                    | 30 W Superior St<br><br>Duluth, MN 558022191                                  | Electronic Service | No                | OFF_SL_15-21_Official |
| Alison C    | Archer    | aarcher@misoenergy.org           | MISO                               | 2985 Ames Crossing Rd<br><br>Eagan, MN 55121                                  | Electronic Service | No                | OFF_SL_15-21_Official |
| Mara        | Ascheman  | mara.k.ascheman@xcelenenergy.com | Xcel Energy                        | 414 Nicollet Mall Fl 5<br><br>Minneapolis, MN 55401                           | Electronic Service | Yes               | OFF_SL_15-21_Official |
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| James J.    | Bertrand  | james.bertrand@stinson.com       | Stinson Leonard Street LLP         | 50 S 6th St Ste 2600<br><br>Minneapolis, MN 55402                             | Electronic Service | No                | OFF_SL_15-21_Official |
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| John           | Coffman            | john@johncoffman.net                 | AARP  | 871 Tuxedo Blvd.<br>St. Louis, MO<br>63119-2044                 | Electronic Service | No                | OFF_SL_15-21_Official |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us    | Office of the Attorney General-DOC          | 445 Minnesota Street Suite 1800<br>St. Paul, MN<br>55101        | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Riley          | Conlin             | riley.conlin@stoel.com               | Stoel Rives LLP                             | 33 S. 6th Street Suite 4200<br>Minneapolis, MN<br>55402         | Electronic Service | No                | OFF_SL_15-21_Official |
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| Leigh          | Currie             | lcurrie@mncenter.org                 | Minnesota Center for Environmental Advocacy | 26 E. Exchange St., Suite 206<br>St. Paul, Minnesota<br>55101   | Electronic Service | Yes               | OFF_SL_15-21_Official |
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| Ian            | Dobson             | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD          | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul, MN<br>551012130 | Electronic Service | Yes               | OFF_SL_15-21_Official |
| John           | Farrell            | jfarrell@ilsr.org                    | Institute for Local Self-Reliance           | 1313 5th St SE #303<br>Minneapolis, MN<br>55414                 | Electronic Service | No                | OFF_SL_15-21_Official |



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| Sharon     | Ferguson  | sharon.ferguson@state.mn.us         | Department of Commerce            | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198       | Electronic Service | No                | OFF_SL_15-21_Official |
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| Richard    | Johnson          | Rick.Johnson@lawmoss.com      | Moss & Barnett                       | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402             | Electronic Service | No                | OFF_SL_15-21_Official |
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| Mark J.    | Kaufman          | mkaufman@ibewlocal949.org     | IBEW Local Union 949                 | 12908 Nicollet Avenue<br>South<br><br>Burnsville,<br>MN<br>55337           | Electronic Service | No                | OFF_SL_15-21_Official |
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| David      | Moeller   | dmoeller@allete.com            | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093  | Electronic Service | No                | OFF_SL_15-21_Official |
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| David      | Niles      | david.niles@avantenergy.com   | Minnesota Municipal Power Agency     | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_15-21_Official |
| Carol A.   | Overland   | overland@legalectric.org      | Legalelectric - Overland Law Office  | 1110 West Avenue<br>Red Wing,<br>MN<br>55066                               | Electronic Service | No                | OFF_SL_15-21_Official |
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| Greg       | Pruszinske | gpruszinske@ci.becker.mn.us   | City of Becker                       | Box 250<br>12060 Sherburne Ave<br>Becker,<br>Minnesota<br>55308            | Electronic Service | No                | OFF_SL_15-21_Official |
| Kevin      | Reuther    | kreuther@mncenter.org         | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206<br>St. Paul,<br>MN<br>551011667                  | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Richard    | Savelkoul  | rsavelkoul@martinsquires.com  | Martin & Squires, P.A.               | 332 Minnesota Street Ste W2750<br>St. Paul,<br>MN<br>55101                 | Electronic Service | Yes               | OFF_SL_15-21_Official |
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| Larry L.   | Schedin        | Larry@LLSResources.com       | LLS Resources, LLC                        | 332 Minnesota St, Ste W1390<br><br>St. Paul, MN 55101              | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com    | Shaddix And Associates                    | 7400 Lyndale Ave S Ste 190<br><br>Richfield, MN 55423              | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Ken        | Smith          | ken.smith@districtenergy.com | District Energy St. Paul Inc.             | 76 W Kellogg Blvd<br><br>St. Paul, MN 55102                        | Electronic Service | No                | OFF_SL_15-21_Official |
| Joshua     | Smith          | joshua.smith@sierraclub.org  |   | 85 Second St FL 2<br><br>San Francisco, California 94105           | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Jessie     | Smith          | jseim@piic.org               | Prairie Island Indian Community           | 5636 Sturgeon Lake Rd<br><br>Welch, MN 55089                       | Electronic Service | No                | OFF_SL_15-21_Official |
| Beth H.    | Soholt         | bsoholt@windonthewires.org   | Wind on the Wires                         | 570 Asbury Street Suite 201<br><br>St. Paul, MN 55104              | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Anna       | Sommer         | anna@sommerenergy.com        | Sommer Energy LLC                         | PO Box 766<br><br>Grand Canyon, AZ 86023                           | Electronic Service | Yes               | OFF_SL_15-21_Official |
| Mark       | Spurr          | mospurr@fvbenergy.com        | International District Energy Association | 222 South Ninth St., Suite 825<br><br>Minneapolis, Minnesota 55402 | Electronic Service | No                | OFF_SL_15-21_Official |
| Byron E.   | Starns         | byron.starns@stinson.com     | Stinson Leonard Street LLP                | 50 S 6th St Ste 2600<br><br>Minneapolis, MN 55402                  | Electronic Service | No                | OFF_SL_15-21_Official |

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| James M.   | Strommen  | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered          | 470 U.S. Bank Plaza<br>200 South Sixth Street<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | OFF_SL_15-21_Official |
| Robert     | Stupar    | rob.stupar@enel.com          | Enel Green Power North America, Inc. | 816 Connecticut Avenue<br>NW<br>Suite 600<br>Washington,<br>DC<br>20006              | Electronic Service | No                | OFF_SL_15-21_Official |
| Eric       | Swanson   | eswanson@winthrop.com        | Winthrop & Weinstine                 | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629            | Electronic Service | No                | OFF_SL_15-21_Official |
| Douglas    | Tiffany   | tiffa002@umn.edu             | University of Minnesota              | 316d Ruttan Hall<br>1994 Buford Avenue<br>St. Paul,<br>MN<br>55108                   | Electronic Service | No                | OFF_SL_15-21_Official |
| Lisa       | Veith     | lisa.veith@ci.stpaul.mn.us   | City of St. Paul                     | 400 City Hall and<br>Courthouse<br>15 West Kellogg Blvd.<br>St. Paul,<br>MN<br>55102 | Electronic Service | No                | OFF_SL_15-21_Official |
| Julie      | Voeck     | julie.voeck@nee.com          | NextEra Energy Resources, LLC        | 700 Universe Blvd<br><br>Juno Beach,<br>FL<br>33408                                  | Electronic Service | No                | OFF_SL_15-21_Official |
| Samantha   | Williams  | swilliams@nrdc.org           | Natural Resources Defense Council    | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL<br>60606                            | Electronic Service | No                | OFF_SL_15-21_Official |
| Cam        | Winton    | cwinton@mnchamber.com        | Minnesota Chamber of Commerce        | 400 Robert Street North<br>Suite 1500<br>St. Paul,<br>Minnesota<br>55101             | Electronic Service | No                | OFF_SL_15-21_Official |
| Daniel P   | Wolf      | dan.wolf@state.mn.us         | Public Utilities Commission          | 121 7th Place East<br>Suite 350<br>St. Paul,<br>MN<br>551012147                      | Electronic Service | Yes               | OFF_SL_15-21_Official |
|            |           |                              |                                      |  |                    |                   |                       |

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|-------------|-----------|----------------------------|--|---|--------------------|-------------------|-----------------------|
| Jonathan G. | Zierdt    | jzierdt@greatermankato.com | Greater Mankato Growth                       | 1961 Premier Dr Ste 100<br>Mankato,<br>MN<br>56001      | Electronic Service | No                | OFF_SL_15-21_Official |
| Patrick     | Zomer     | Patrick.Zomer@lawmoss.com  | Moss & Barnett a<br>Professional Association | 150 S. 5th Street, #1200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_15-21_Official |