



414 Nicollet Mall  
Minneapolis, MN 55401

May 2, 2022

—Via Electronic Filing—

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

RE: PETITION FOR AMENDMENT OF COMMISSION ORDER  
DOCKET NO. E002/RP-19-368

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Petition seeking a limited amendment to the Commission's April 15, 2022 Order Approving Plan with Modifications and Establishing Requirements for Future Filings, pursuant to Minn. R. 7829.3000.

Specifically, the Company requests that the Commission amend Order Point 2.A.1 as follows:

Each year through 2034, Xcel shall save, on average, at least 780 gigawatt-hours via energy efficiency.

We note that the language the Commission adopted in Order Point 2.A.1 is consistent with that suggested by the Company in a January 26, 2022 letter submitted in this docket. That letter, however, unintentionally omitted that the Company's proposed energy efficiency achievements in the Company's proposed Alternate Plan are on an average annual basis, as laid out in our June 25, 2021 Reply Comments:

The Alternate Plan continues to include significantly increased levels of EE with average annual energy savings of over 780 GWh.<sup>1</sup>

That approach to average energy efficiency savings has been consistent in the Company's plans in this docket since our initial filing in 2019:

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<sup>1</sup> Xcel Energy Reply Comments, June 25, 2021, at 25 (emphasis added).

Our Preferred Plan also proposes to add significant amounts of EE based on the December 2018 Minnesota Energy Efficiency Potential Study: 2020-2029. In fact, our proposal includes an *annual average of over 780 GWh of savings for 2020-2034*. Our last Resource Plan included 1.5 percent annual EE savings assumption, but our current proposal achieves much higher levels of savings – ranging from approximately 2 to 2.5 percent annually. Relative to a 1.5 percent assumed savings level, our proposal achieves more than 200 MW of additional demand savings by 2023, and more than 800 MW by 2034.<sup>2</sup>

This approach of average annual energy savings also is consistent with the Commission’s prior resource plan orders. For example, in the Company’s prior resource plan, the Commission’s Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings included the following order point:

*An average annual energy savings level of 444 GWh for all planning years is approved.*<sup>3</sup>

Based on the foregoing, we respectfully request the Commission make a limited amendment to its Order, as shown above, to reflect that energy efficiency savings will be on an average annual basis, consistent with the Company’s Alternate Plan and Commission precedent. We thank the Commission for its time and consideration of this Petition and apologize for the unintentional omission in our January 26, 2022 letter.

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 Aaron Tinjum at [aaron.j.tinjum@xcelenergy.com](mailto:aaron.j.tinjum@xcelenergy.com) if you have any questions concerning this filing.

Sincerely,

/s/

**BRIA E. SHEA**  
**DIRECTOR, REGULATORY & STRATEGIC ANALYSIS**

c: Service List

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<sup>2</sup> 2020-2034 Upper Midwest Integrated Resource Plan, July 1, 2019, at 13 (emphasis added).

<sup>3</sup> Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings, Jan. 11, 2017, at Order Point 11 (emphasis added).