

November 19th, 2018
Via Electronic Filing

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
St. Paul, MN 55101

RE: Comments of Community Power Regarding Xcel Energy's Request for the 2020-2034 Upper Midwest Resource Plan Due Date to be Extended to July 1, 2019
Docket No. E002/RP-15-21

Dear Mr. Wolf and members of the Minnesota Public Utilities Commission,

Community Power respectfully submits these comments regarding Xcel Energy's request for an extension to the submission of its 2020-2034 Upper Midwest Resource Plan. Community Power is a grassroots organization that educates and activates residents of Minnesota cities and towns to create clean, local, equitable, affordable, and reliable energy systems. We have been participating actively in Xcel Energy's stakeholder process, as well as conducting parallel community engagement and education activities to help Xcel Energy customers understand the significance of the resource planning process and provide meaningful input into it.

Community Power believes that this particular plan is pivotal in the future of Minnesota's electric services because:

1. It comes at a critical juncture with the retirement of Xcel Energy's baseload fleet - and thus the evaluation of how best to replace the energy and capacity it represents
2. It represents a key opportunity to integrate more effective modeling of non-power plant resources including distributed generation, demand-side alternatives, and transmission solutions into Integrated Resource Planning and utility modeling generally as the PUC required in its last IRP order (January 11, 2017)

With so much weight on this plan, it requires deep and meaningful engagement of energy users to ensure that Minnesota communities served by Xcel have an opportunity to understand and give meaningful input into the shape of our energy future.

Meaningful engagement requires time, dedication, and deep commitment to thoughtful analysis and inclusive deliberation. Yet time is not the only required ingredient for success; achieving these goals also requires a willingness to utilize new analytic tools, meaningfully consider solutions that haven't previously been on the table, and a commitment to creating a process that builds a vision rooted in the needs and interests of the diverse communities that use this energy system. At Community Power, we are eager to see this process done thoroughly and well,

through a regulatory process enriched by creative thinking, grounded in public participation, and committed to the oversight that the PUC provides.

As is further developed in the sections below, Community Power supports the granting of the extension on the condition that Xcel Energy uses the extra time to get the engagement and modeling processes right. In supporting an extension request, we feel that Xcel must:

1. Conduct analysis and modeling that fairly compares demand-side and supply-side alternatives, and effectively integrates distribution-level modeling, demand side management, and grid reorganization under a range of assumptions without pre-assuming at the outset of the analysis the solution set it prefers. For transparency, Xcel should also disclose the relative shareholder benefit based on projected utility-owned assets in its scenario analyses. We have included below several elements of this modeling and analysis that we would like to see addressed.
2. Facilitate deep and meaningful public engagement. As participants in Xcel Energy's current stakeholder process, we feel that the current process does not create accessible and meaningful ways for participants to shape the trajectory of Xcel's Preferred plan or its approach to analysis, and have included below a number of recommendations on how to make engagement relevant to the public.
3. Commit to the Commission-centered resource planning process as the appropriate venue, and not propose or support legislation that preempts Commission oversight .

We provide further detail on these three elements below.

1. Analysis and Modeling That Fairly Evaluates All Options

In its last Xcel resource plan order, the Commission required, among other things, that:

"14. In its next resource plan filing, Xcel shall:

- a. describe its plans and possible scenarios for cost-effective and orderly retirement of its aging baseload fleet, including Sherco, King, Monticello, and Prairie Island.*
- b. evaluate combinations of supply-side (distributed and centralized), demand-side, and transmission solutions that could in the aggregate meet post-retirement energy and capacity needs as well as contribute to grid support.*
- c. explore the role of cost-effective combined heat and power solutions.*
- d. report on its solar acquisition progress.*
- e. provide a full and thorough cost-effectiveness study that takes into account the technical and economic achievability of 1,000 MW of additional demand response, or approximately 20% of Xcel's system peak in total by 2025.*

f. summarize its investigation and findings concerning the potential for an energy efficiency competitive bidding process for customers that have opted out of CIP.

15. In future resource plan filings, analysis and inputs must, to the extent possible, be consistent with Xcel's distribution system planning."

Community Power has seen a number of shortcomings in the analysis presented to date that should be addressed in the time granted for this extension. We have communicated many of these items directly to Xcel Energy through the stakeholder process as well.

Absurd Baseline Model

Given the findings of independent studies such as Grid Lab's *Smarter Grid* study, the proposed baseline Strategist model isn't just poor, it's absurd. It does not reflect Xcel's public commitment to reach 60% renewable by 2030, nor does it model any additional cost reductions for wind and solar, where a declining cost curve has continued for decades, or model for more than marginal changes in natural gas fuel costs over the span of the resource plan. It also omits the aggressive commitments to clean energy that many municipalities and communities in Xcel Energy territory have already made, such as the 100% renewable electricity commitment of the Minneapolis Clean Energy Partnership, of which Xcel Energy is a member. Baseline modeling should reflect likely outcomes based on public commitments and the economic realities of renewable energy costs.

Artificially Constrained Analysis

In multiple stakeholder meetings, Xcel representatives framed the modeling discussion around this position: "Xcel is not willing/or able to go above 60% renewable or 80% carbon free (numbers and thresholds have changed meeting to meeting) so that's what we're going to analyze" and then brought forward analytic processes to evaluate how to achieve that predetermined goal.

Community Power is aware of other existing analysis, including Grid Lab's *Smarter Grid* study that find that cost-effective strategies to pursue electric grid decarbonization are *also* less expensive than business as usual.¹ Recommendations from that study suggest it would be most cost-effective for Minnesota electricity consumers to close all existing coal plants, add another 2,000 MW of wind and 1,000 MW of utility-scale solar, and add 1,000 MW of energy storage, all before 2030, with an estimated savings for doing so of \$600-\$1200 per customer annually as compared to current practices.

Given the enormous economic and environmental benefit of rapidly closing aging coal plants and deploying clean energy to both Xcel customers and the state as a whole, modeling should

¹ <https://www.mcknight.org/programs/midwest-climate-energy/mn-smarter-grid/>

not be artificially constrained to limit identification of cost-effective measures to deliver cleaner electricity.

A Blind Eye to Distribution-Level Changes

Strategist modeling has not incorporated power flow or generation assets at the distribution level. Xcel Energy had stated in the 2016 IRP that it understood that its modeling was not capturing the distribution system effectively, that it did not have the time to effectively integrate distribution-level modeling into the 2016 IRP but would do so in its next IRP.

In the 2018 stakeholder meetings, Xcel has been saying the same thing it said last time: ‘we know we need to do it, but we don’t have time now’. **The extension should not be granted if it will not result in Xcel completing the promised assessment of likely customer-driven distribution-level impacts.**

As an illustration of the scale and speed of distribution-level changes, California’s grid has been fundamentally changed in the past decade by 700,000 customer-sited solar installations with a collective capacity of 7 gigawatts (see footnote for a time-lapse).² Minnesota’s grid is likely to experience similar substantial change in the next decade. The time to have a truly integrated resource plan is now; the Commission cannot continue to accept plans that omit distribution-level changes as an *Integrated* Resource Plan.

A Necessary Distribution Modeling Scenario

At least one distribution-planning scenario should include the *Smarter Grid* Study “Local Decarbonization” scenario, which found it cost-effective from a customer bill savings standpoint to install up to 13,000 MW of rooftop solar by 2050. Failing to incorporate this scenario could result in Xcel massively overestimating electricity demand, and overbuilding new infrastructure that customers are then on the hook to pay for. For example, the total 2050 electricity demand under Xcel’s E3 study is 6-7% higher than in the *Smarter Grid* Study’s Deep Decarbonization model with low distributed energy deployment, and 25% higher than the *Smarter Grid* Study’s distributed-energy-heavy Local Decarbonization model. This is likely due to a dangerously low forecast of distributed energy and/or energy efficiency deployment.

Lack of Sensitivities that Reflect History

Natural gas price assumptions are a crucial driver of what is considered economical in resource planning models. So far, we have primarily seen scenarios based on marginal price increases of a few percentage points per year, but a cursory look at the history of natural gas prices shows a

² <https://ilsr.org/visualizing-calif-booming-solar-market/>

trajectory of sudden and often unexpected price swings; as recently at 10 years ago, natural gas prices were roughly 6 times the price today. Natural gas price sensitivities used for analysis should at least encompass the range of prices seen historically.

There are at least three pieces of additional evidence to suggest that smoothly rising curves are a poor projection of natural gas price risk. Some fracking industry analysts suggest that there is a financial bubble in the fracking industry, as low interest rates have allowed Wall Street to provide billions in capital that cannot be recovered at current natural gas prices.³ Additionally, gas price forecasts are unlikely to capture the exploding demand for gas. EIA data suggests utilities have plans for 60 gigawatts of new gas capacity in the next five years, and *Utility Dive* reports nearly 20 gigawatts of new gas plant builds in 2018 alone.⁴ Finally, these two factors will only be exacerbated by long-run rising costs of gas extraction as lower cost resources are depleted. A serious evaluation of future natural gas costs would evaluate current prices against the availability of further reserves that can be extracted at that price, versus reserves that will require higher prices to become feasible; a number of such analyses point to a rapidly depleting reserve of low-cost gas⁵. Due to all of these factors, sensitivity analyses should include the long-tail risk of a rapid escalation in gas prices, especially since customers and not utility shareholders hold all of the fuel price risk.

Evaluate Customer Benefits More Broadly

Resource plans almost always focus on the cost of energy per unit, but this resource plan must accurately analyze actual customer impact. In particular, the scenario analysis should include potential bill impacts, not just rate impacts. As an illustration, the *Smarter Grid* study found that the Local Decarbonization scenario resulted in electricity cost per unit about \$0.01 higher than the default Decarbonization scenario, but because electricity demand was 18 billion kilowatt-hours lower, the total cost to customers was nearly identical. Although uncounted, the Local scenario also likely results in much higher job and economic impacts, as distributed energy resources tend to be more labor intensive and because savings would be more distributed among customers owning distributed energy resources. The regulatory process is intended to guide energy utilities to make decisions in the public interest; evaluating what is in the public interest requires looking at the benefits provided by energy job creation, community wealth building, and the economic multipliers of recirculating energy dollars in local communities, not just a sole factor of rates.

Missing Analysis:

In the stakeholder process, Community Power has not yet seen any meaningful analysis of items b-f required by the PUC's order that the 2020-2034 IRP must:

³ <https://www.nytimes.com/2018/09/01/opinion/the-next-financial-crisis-lurks-underground.html>

⁴ <https://www.utilitydive.com/news/eia-gas-to-outpace-renewables-for-2018-us-gen-additions/522980/>

⁵ <https://www.scribd.com/document/219405163/Marcellus-Resource-Assessment-for-New-York-April-10-2014>

- b. *evaluate combinations of supply-side (distributed and centralized), demand-side, and transmission solutions that could in the aggregate meet post-retirement energy and capacity needs as well as contribute to grid support.*
- c. *explore the role of cost-effective combined heat and power solutions.*
- d. *report on its solar acquisition progress.*
- e. *provide a full and thorough cost-effectiveness study that takes into account the technical and economic achievability of 1,000 MW of additional demand response, or approximately 20% of Xcel's system peak in total by 2025.*
- f. *summarize its investigation and findings concerning the potential for an energy efficiency competitive bidding process for customers that have opted out of CIP.*

2. Public Process Designed for Meaningful Input and Participation

Community Power has participated in Xcel Energy's IRP Stakeholder meetings since they began in June 2018. While they have proven informative about Xcel's current approach and work, we have not found them to be a responsive process that seeks to develop a preferred plan based in community input nor are they accessible to a broad range of energy users who make up Xcel's customer base, a fact that we've brought to Xcel's attention from the beginning of the stakeholder process as needing a remedy. Some of the ways we think the stakeholder process needs to be transformed include:

- **Listening to input to help shape the goals** rather than defining the goals and presenting them as set, and then requesting feedback on them without being flexible in adapting it. For example, early on in the process, Xcel Energy set decarbonization targets without the input of stakeholders as to what they want the goals to be, or converting coal plants to natural gas without determining whether ratepayers wished that or other resource considerations in the retirement scenarios for Sherco. IRP objectives were defined and ranked by Xcel (Reliability, Cost, Risk, Environment), as a part of the first presentation in June; these items should have been up for consideration and discussion among stakeholders. Ratepayers have a vested interest in the ordering of these priorities, and are paying for them regardless. Also in this first meeting, nuclear energy was stated as a diminishing aspect of the energy mix, while wind, solar, storage and natural gas were considered mainstays. The presence of nuclear and natural gas in the next 5-15 years of the energy resource mix should be a matter of discussion. The presence of energy efficiency and other demand side integrations should be a part of this same discussion to create a complete picture to base responses off of, rather than lightly relegating them to the Integrated Distribution Plan discussions.

- **Readiness to evaluate new questions and new approaches**, such as using storage as a reliability measure. Conversations in the IRP Stakeholder Workshops indicated that it has been demonstrated that black start certification has been granted to natural gas plants, formerly denied that designation, due to the addition of energy storage being built into the plant. This suggests that the storage media are the black start reliability measure, not the natural gas plant, so while Xcel touts natural gas conversions of coal plants as necessary for reliability, often claiming that certain plant retirements are - or might be - held up by MISO on reliability grounds, it seems similar solutions for the perceived threat to reliability posed by the variability of renewable energy sources might prove a long term solution to overall systemic reliability and black start potentials in a more renewable energy heavy energy mix. This possibility is worthy of deeper analysis, as it could pose solutions to multiple existing problems - the stakeholder process to date has not provided the space or opportunity to evaluate a more innovative approach.
- **Presentations that inform and support stakeholders in exploring what is possible**, rather than seeking solely to convince. Xcel Energy has used a substantial portion of the time in its stakeholder sessions bringing in speakers whose presentations seek to convince the audience of Xcel Energy's positions rather than give stakeholders the tools and context with which to give input on where we should go. For example, both Jesse D. Jenkins Ph.D and Dr. Christopher TM Clack presented modeling scenarios based upon projected weather, broad based electrification and the addition of renewables, then asserted that natural gas would have to take over for coal and as renewables concentration achieves 85% the benefits start to diminish, while nuclear is declared a requirement for decarbonization. All of those projections were based upon utility scale renewables only. These scenarios needed to include multiple mixes of utility and non-utility scale renewables, "no natural gas" permutations, storage contributions (Jenkins did Clack did not), etc. so that participants could gauge the paths that sound most palatable and propose further models and strategies, instead attendees were simply told what would work (which conveniently aligned with Xcel's desired option).
- **Participatory facilitation of stakeholder sessions** that allows robust stakeholder dialogue and collects rich input based on the insights and interests of the stakeholders. Xcel Energy stakeholder sessions to date have primarily focused on a small number of formats; primarily presentation of extended technical information verbally and via Power Point followed by limited opportunities for individual questions and comments. While this approach can be helpful in some contexts, using it as the exclusive form of stakeholder engagement dramatically limits stakeholders' ability to meaningfully shape the outcome. In general, large-group formats where significant volumes of information are presented to everyone (when they may or may not be the types of information that each participant is seeking) followed by large-group opportunities to speak is a reliable way to ensure that most of the time is spent on content that is either already known, inaccessible, and/or irrelevant to most of the participants and that feedback is limited, brief, and fragmented. A participatory process could include more interactive design elements including:
 - Multiple learning tables/discussion groups where sub-sets of participants are able to dive deeper into topics that they wish to understand more deeply

simultaneously/without having to spend all the available time superficially covering everything without having deeper questions answered.

- Interactive activities to deepen understanding and engagement such as Gallery Walks (participants writing ideas on butcher paper in response to a series of shared prompts), World Cafe conversations on specific topics, Fishbowl conversations where stakeholders listen to a smaller self-selecting group of stakeholders dialogue on a specific topics, and open-space break-outs based on topics of specific stakeholder interest.
- Adequate time for stakeholders to clarify questions with Xcel representatives
Opportunities - whether verbally, in a large group and in small groups, in writing via flip charts, or post-its, or through a virtual space outside of formal meetings - for stakeholders to respond, clarify, and further develop concerns raised by other stakeholders in a way that can further develop recommendations to Xcel and build clarity and unity among stakeholders.
- Genuine opportunity to give collaborative recommendations: After an opportunity for stakeholders to identify questions that they think should be explored further or concerns that they have with the analysis, creating time and space for small groups of stakeholders to work together to provide recommendations for an approach to how Xcel should pursue the question and concern. This would allow stakeholders to work together to provide clear recommendations for how Xcel should proceed with evaluating the issue at hand, rather than simply a list of things Xcel should address, which may end up not being addressed at all or is addressed in a way that does not actually respond to stakeholder concerns.
- Fill the hole in group process expertise - hire/contract community-embedded experts in group process design in an ongoing way. The group facilitation tools we have seen used in stakeholder process are rudimentary at best; there is a robust field of group process knowledge out there that can focus on effective process design to maximize creativity, relevance, quality of ideas developed, and opportunities for input. This sort of group process expertise should be brought into the process.
- **Accessible and relevant language.** Only a small proportion of stakeholders are well-versed in the technical and regulatory language of utility management, and while these stakeholders who already have the lingo to participate are important stakeholders with meaningful input, they are not the only stakeholders with relevant and meaningful input. We know from extensive community experience that many; whether individual homeowners and renters, local businesses and corporations, community organizations and local governments have significant insights into how energy investment decisions, program offerings, and development strategies impact the wealth, health, and choices of their constituents, yet lack the formal lingo of utility-speak. Indeed, we find that the vast majority of what is currently described as a stakeholder process would be unintelligible for the most impacted “stakeholder” - the average energy user. While there may be appropriate venues for acronym-heavy formal language - even in parts of a stakeholder process designed for stakeholders conversant in this language - it is unnecessary in a

significant proportion of situations, and serves only to obfuscate the conversation for many. This is an unacceptable norm if we consider average energy-users (and therefore their input, experience, and goals) as valuable participants rather than passive, disinterested, or even ignorant recipients.

For example, compare the equivalency of meaning and divergence of public comprehensibility between:

- “The 2020-2034 Xcel Energy IRP will evaluate demand forecasting and capacity needs and compare the cost-effectiveness of combinations of supply-side (including thermal generators and DG) resources, DSM, and transmission alternatives to develop a least-cost plan for energy generation over a 15-year time horizon.” and...
- “Right now, Xcel Energy is preparing a required proposal for approval by state regulators as to what combination of energy sources will be the most affordable, reliable, and environmentally safe over the next 15 years. As part of this process, called an Integrated Resource Plan - or IRP - Xcel Energy must evaluate and estimate future energy use across the state, and look at which combinations of large-scale power plants, community-scale energy (like wind and solar), investments to reduce energy usage through energy efficiency, and investments to upgrade our electric grid will best meet these needs over the next 15 years.”

While we understand that there may be parts of a stakeholder process that are appropriate to design specifically for technical experts and energy professionals, a stakeholder process that is designed exclusively for these voices to be heard misses the vast majority of interests and concerns of Minnesota communities.

- **Meeting Format Allowing Working People to Attend.** The current stakeholder workshops have all been held during business hours on a weekday at the Xcel Buildings on Nicollet in downtown Minneapolis and at the Wilder Center in St. Paul.. These locations and format is accessible for stakeholders whose full-time job relates to energy, and who are located in the Twin Cities with easy access to transportation. It is not accessible to the vast majority of energy users, in Xcel territory, who have a stake and will be impacted by these decisions. Many cannot take multiple days off work (per month for several months) to participate in stakeholder discussions, and many live far enough away that coming to meetings in the core metro area is not possible. Additionally, managing an effective stakeholder process that seeks to respond to the needs of all energy users should address barriers such as translation and interpretation for the tens of thousands of non-English speakers in Xcel Energy’s customer base, and childcare for parents.
- **Partner with Community Organizations to lead Stakeholder Engagement:** Many concerned stakeholders cannot be reached by a direct invitation from Xcel, because Xcel does not have an existing relationship with them. Additionally, many communities would be more likely to give feedback were stakeholder input opportunities managed and guided through existing community-based organizations that they trust. To

effectively engage these communities, stakeholder feedback workshops should be run not by Xcel but by trusted community outreach partners, with Xcel representatives present and with suggestions and input here also guaranteed to be taken into account in the IRP process (as ignoring the feedback generated there would foment further alienation and distrust from those communities, and their allies).

To attempt to create opportunities for meaningful public understanding and input into the IRP process, Community Power is, in partnership with other community organizations, conducting a series of public education and engagement activities related to this IRP that we think show promise in terms of an approach to public engagement that reflects the process we should be using. These activities include:

- 5 community meetings in Minneapolis, Saint Cloud, Minnetonka, Stillwater, and Northfield hosted in partnership with the Sierra Club to inform community members about the issues at stake in this IRP and gather initial input into the desired energy vision
- A collaborative deep-dive with 25 community members identified through these initial meetings to evaluate and provide recommendations on the IRP process, important questions the process should evaluate, and solutions members want to see in their communities.
- 2 upcoming Energy Comedy nights focused on the IRP proceedings hosted in collaboration with Theater of Public Policy and including opportunity for attendees to provide input on the IRP process.

Some feedback generated from these processes is attached to this comment as Appendix A, and will also be provided to Xcel Energy through their stakeholder process.

An important note about these parallel efforts: We do not feel like Community Power or our organizational partners have the capacity as small grassroots organizations to conduct these types of in-depth stakeholder engagements that are accessible and relevant to energy users across Xcel's statewide service territory in the range of communities needed and in a way that meaningfully shapes Xcel Energy's preferred plan. Xcel Energy, as a company with \$11 billion in annual revenues and responsible for meeting the energy needs of almost 1.5 million Minnesota energy users, has both the resources to support these types of real public engagement on the scale needed and the ability to directly incorporate the input gathered as the foundation for its 2020-2034 Integrated Resource Plan. We would like to see that it does so.

3. Commitment to the Regulatory Process without side-steps

In 2017, Xcel Energy supported passage of HF113, allowing the utility to circumvent the statutory authority of the Public Utilities Commission to build a new gas-fired power plant in Becker, Minn. In 2018, Xcel Energy supported passage of SF 3504 to reduce risk exposure for

the company's shareholders at the expense of its customers by pre-determining prudence for its nuclear power plant retrofits.

Given that this extension request places the 2019 IRP filing after the 2019 legislative session, it would be a show of bad faith for Xcel Energy to draft, propose, or support legislation that would undermine the Commission's authority to properly oversee this resource plan. We feel that it is important to get clear commitment from Xcel Energy to use the extra months of the extension to thoroughly pursue the analysis and public engagement processes identified in our first two points and refrain from attempts to secure legislative predetermination of the efforts this IRP is intended to evaluate.

* * *

In conclusion, we appreciate Xcel Energy's desire to prepare a thorough Integrated Resource Plan through thorough and open-minded analysis and meaningful consultation with a full range of stakeholders. We support the granting of Xcel Energy's request for an extension for filing on the condition that Xcel use this extra time to:

1. Conduct thorough analysis and modeling that fairly compares all options
2. Create a public stakeholder process designed for meaningful input and participation
3. Commit to the regulatory process by avoiding side-steps

We ask that the PUC consider defining criteria and objectives for ensuring that Xcel uses the extra five months of the requested extension to effectively meet these outcomes. We appreciate your time and consideration and look forward to continuing to engage in this IRP as the process unfolds.

Respectfully submitted,

/s/ Marcus Mills
Vice-President
Community Power
2720 E. 22nd St.
Minneapolis, MN 55407
marcus@communitypowermn.org

APPENDIX A: Community Input Exercises & Responses Gathered to date regarding Xcel's upcoming IRP, conducted by Community Power and Sierra Club in 2018

EXHIBIT A. Input gathered at Community Feedback Session, evening of October 25th at Black Forest Inn Community Room, 1 E 26th St, Minneapolis, MN 55404.

Description of method of gathering feedback:

A two hour workshop was held that included:

- Summary of what an Integrated Resource Plan is, why it is significant for our energy future, and what the PUC has required in this Integrated Resource Plan
- Summary of major issues reviewed so far in the Stakeholder process
- Summary of prior community engagement efforts hosted by Community Power and Sierra Club and main themes of feedback from these sessions
- Q&A based on participant interests
- Small group breakouts to identify participant ideas on four major themes (facilitated as small group discussions with major ideas recorded on flip chart paper and transcribed below):
 - **Process:** What would it need to make this process accessible to you and your community? How should Xcel do this? How can we make this happen?
 - **Public Interest:** What should this [IRP] process be able to see? What is energy connected to? How does it connect to your life?
 - **Equity and Community Impact:** How should this process include equity and Community Transition?
 - **Pathways:** What will it take to get to our [energy] vision?
- Gallery walk where all participants review the ideas of the small groups and note support for ideas they agree with
- Identification of interest in further involvement in the stakeholder process

Transcribed feedback:

Prompt: What would it need to make this process accessible to you and your community? How should Xcel do this? How can we make this happen?

Responses:

- Better/more widespread Engagement/advertisement
- Social media engagement !
- Teach-in sessions ! (Maybe at community centers, parks? In places accessible to all)
- Local community orgs/associations; Get community !
- Members aware of their agency - more transparency;
- Language transformation and digestibility of concepts;
- Legislative direction toward transparency as well as political/public pressure;
- How is Xcel held accountable to study possibilities that they don't have initial interest in pursuing?

- Debunk what/how PUC works; PUC resources/transparency;
- Change the rules the PUC must obey;
- Market – educate folks via factors that affect them and translate into action.

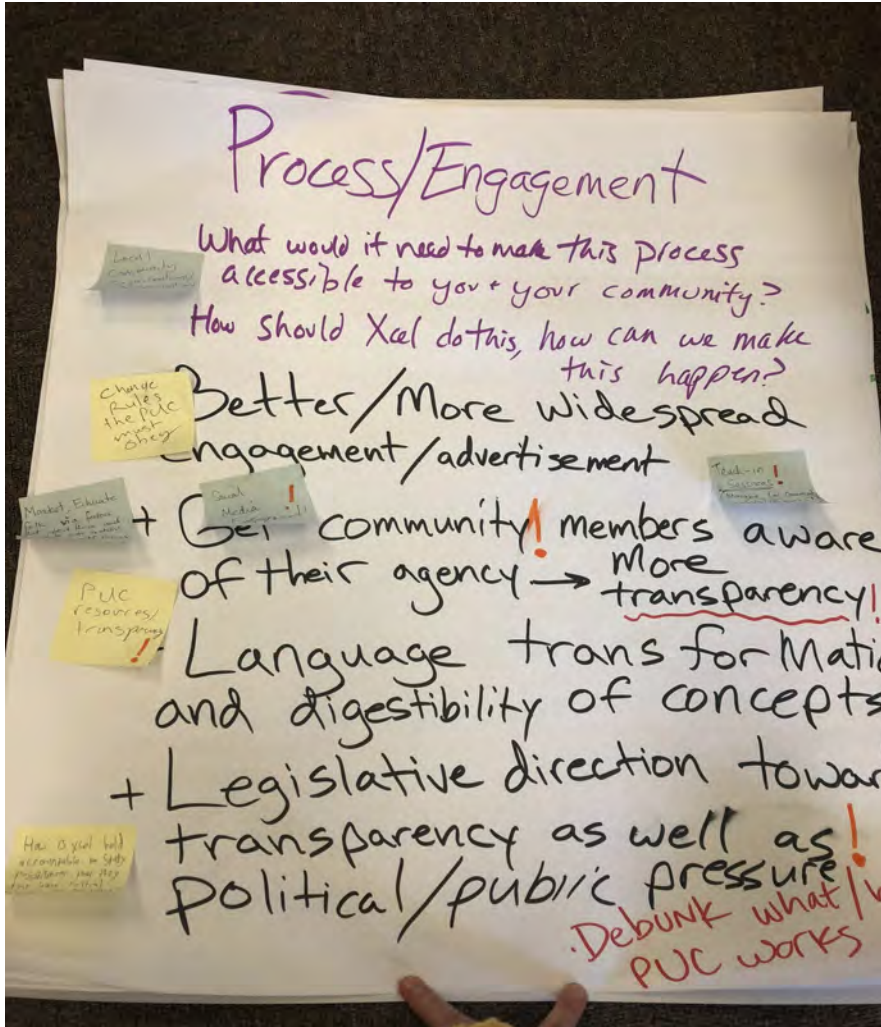


Photo of Group Brainstorm written in black/red and on sticky notes on desired “Process & Engagement” practices that Xcel could adopt for its IRP Stakeholder Process (gathered from October 25th Community Engagement Session in Minneapolis). Prompt is written in purple.

Prompt: What should this [IRP] process be able to see? What is energy connected to? How does it connect to your life?

Responses:

- How do we allow communities to choose their vision? Continue investments or not?
- Financing should be for public good not shareholder return!
- community control-municipalization/community ownership !!
- Smarter grid/decentralized response
- Build neighborhood projects and community
- Post-it: People have more ability to decide where their energy dollars go - moved so public interest translate (?),
- Water, Indigenous Rights
- Line 3 - no new pipelines !

- Use flat-top buildings for solar !!
- Survey for all solar/RE resources
- Planning Block by block planning
- Participatory planning
- Jobs/training
- Engagement/Ease - Should be helping people in an engaged way to make energy saving easy
- Xcel is not being a good public servant
- Shouldn't be paid on amount of energy sold, only doing energy efficiency work reluctantly/when forced
- No corporate takeover of public utilities
- What matters to people? Speak to them from that
- Integrate food, garden, compost, green space and energy !
- Transportation system that's FREE easy, quick !
- Pressure Xcel-->pressure Metro Transit !
- Education for lowering use of energy

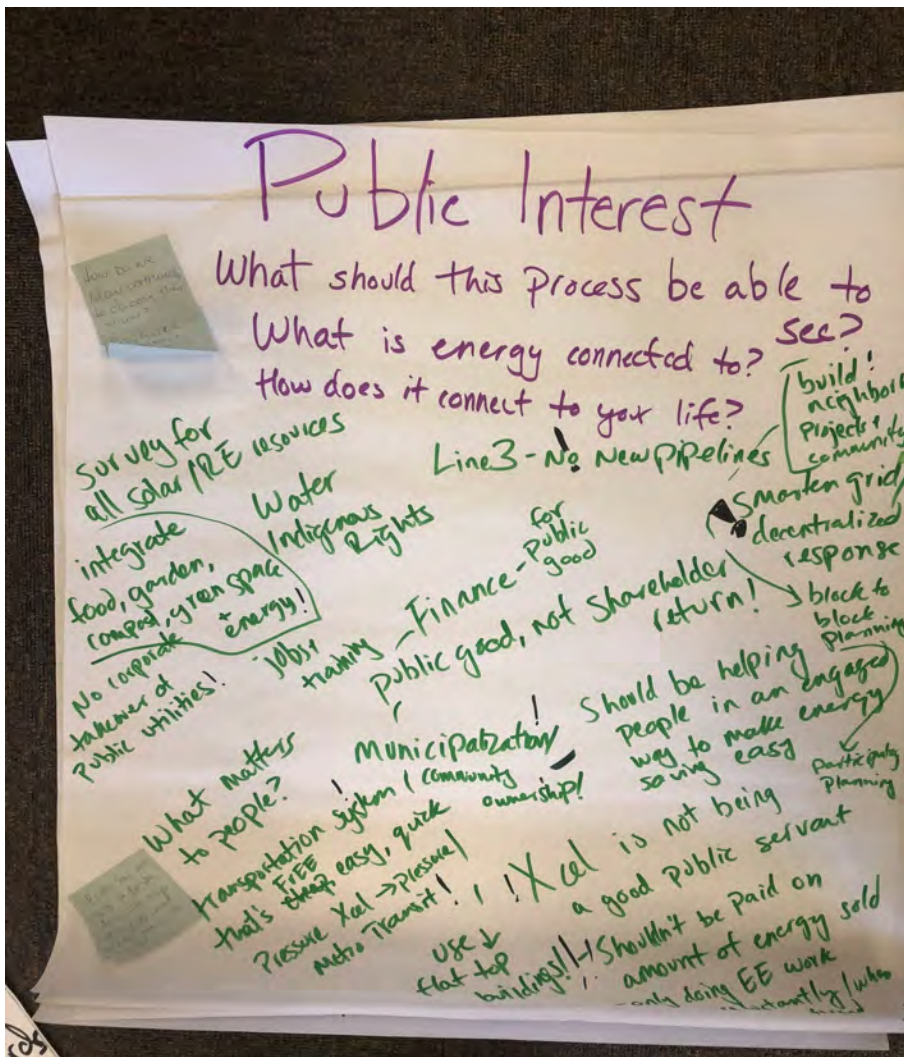


Photo of Group Brainstorm **written in green and on sticky notes** on how Xcel's current IRP should incorporate broader "Public Interest" from October 25th Community Engagement Session in Minneapolis. Prompt is written in purple.

Prompt: How should this process include equity and Community Transition?

Responses:

- Social: bulk buying in low income communities – also of solar panels and installation
- Targeted taxation or rate increases to subsidize low income energy access
- Facilitate flow of people in and out of community (not sure if this refers to physical community?)
- Should not have to pay more for grid – we should all pay for low populated communities
- Workforce development + job training programs;
- Partnerships with trade schools + universities;
- Siting customer-owned generation;
- Ancillary job development;
- RE Policy: Wind/solar!
- Mechanisms for selling energy back onto grid
- Inclusive financing
- More public engagement
- Who is doing the education?
- More Xcel engagement in averting climate crisis.

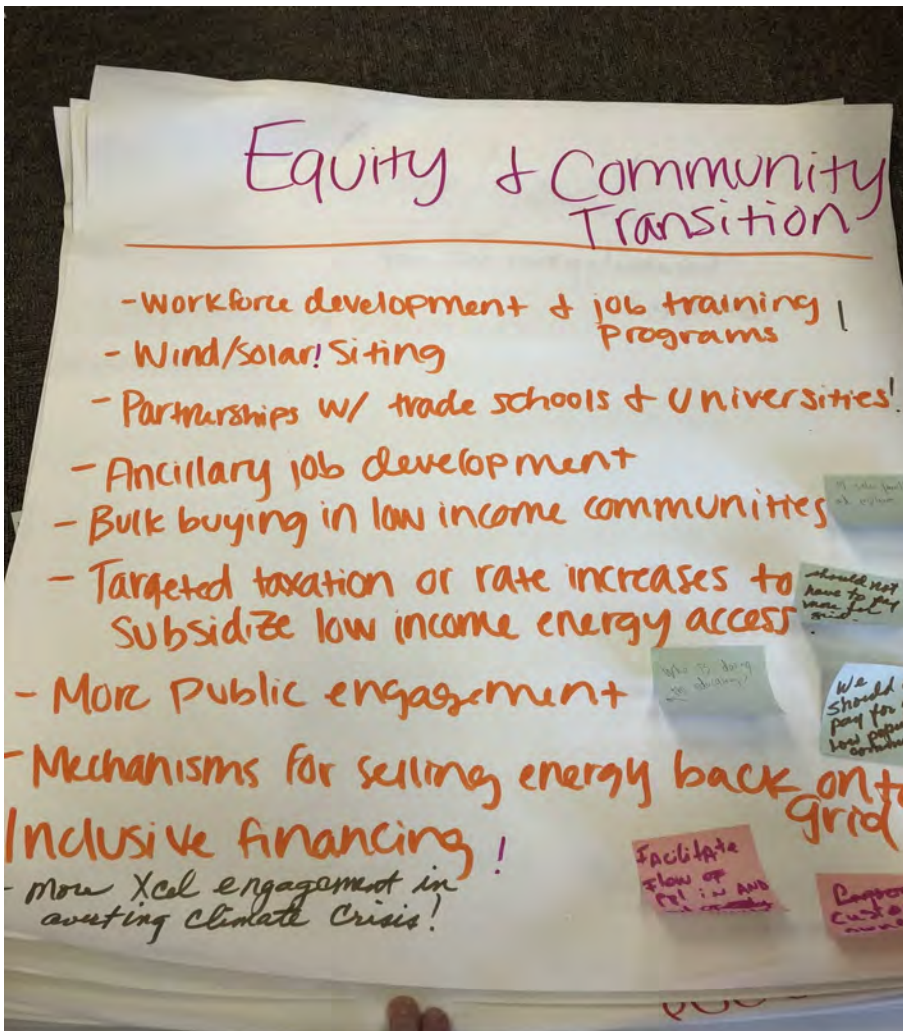


Photo: **Group Brainstorm** written in orange and on sticky notes on priorities related to “Equity & Community Transition” gathered from October 25th Community Engagement Session in Minneapolis. Prompt is written in purple.

Prompt: What will it take to get to our [energy] vision?

Responses:

- Post-it Tell Xcel over and over again: embrace the problem, take responsible action to avert climate disaster
- less monopoly more individual/ community choice
- ballot/constitutional amendment
- formalize legally user/consumer input
- reevaluating consumerism
- Alternatives to fossil fuels
- viral spread of new tech
- green jobs + transitions !
- Education
- more options
- mass mobilization
- political pressure
- community voices
- appoint/ influence PUC

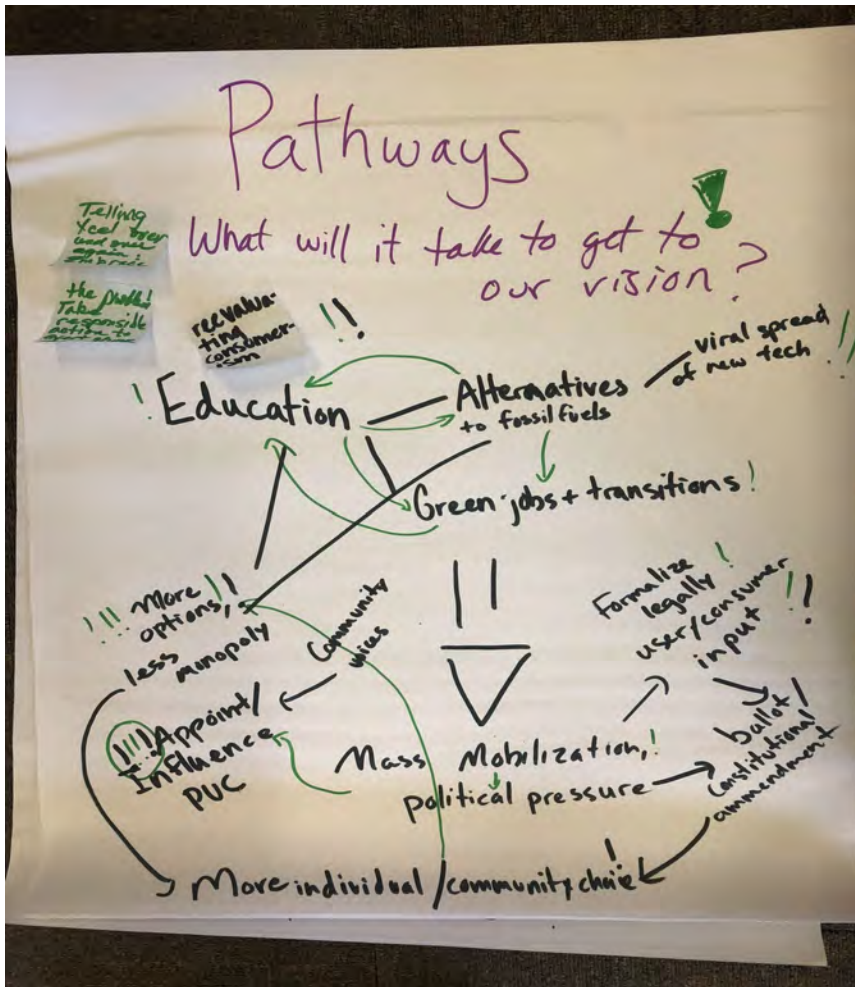


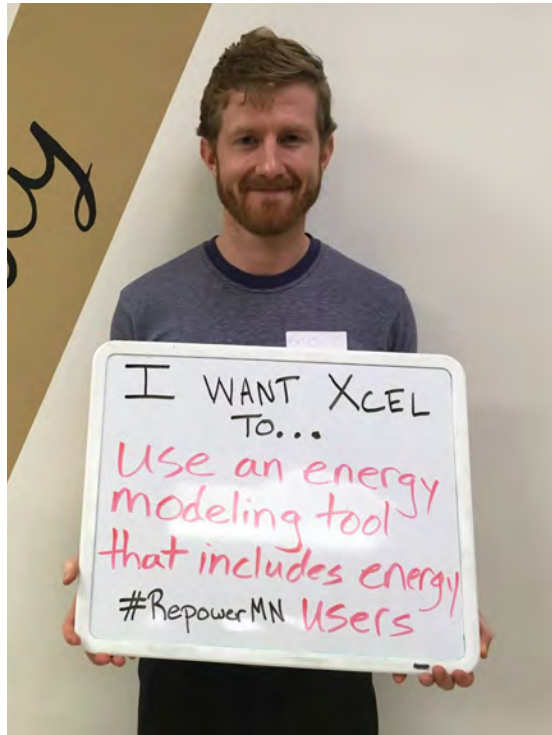
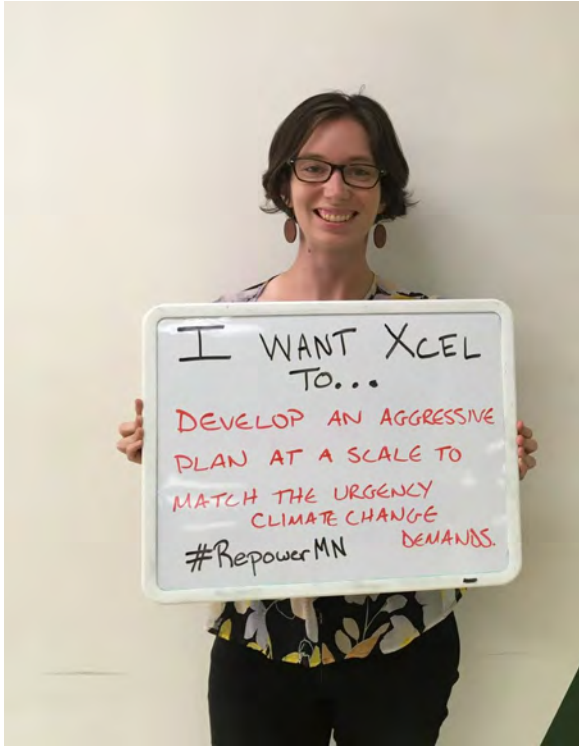
Photo of **Group Brainstorm** written in black/green and on sticky notes on "Pathways to Reach Shared Energy Vision" gathered from October 25th Community Engagement Session in Minneapolis. Prompt is written in purple.

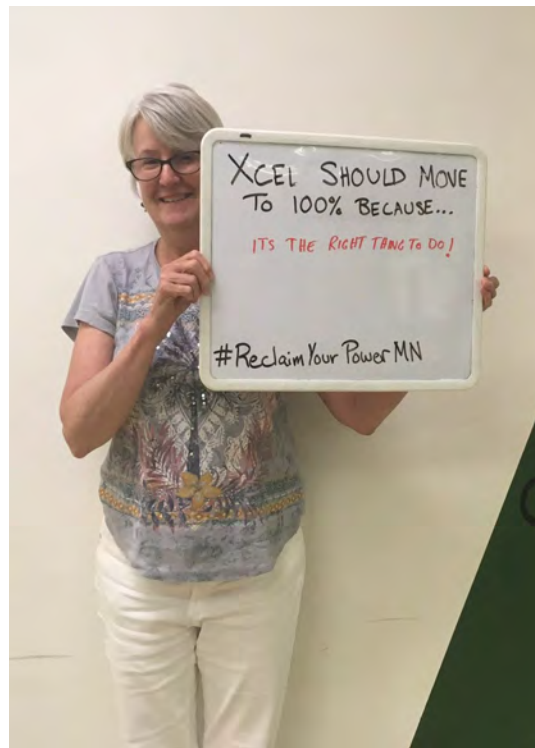
EXHIBIT B. Input gathered at Community Feedback Sessions conducted by Sierra Club with support from Community Power in Stillwater, St. Cloud, Minneapolis, Minnetonka, and Northfield between late July and mid September 2018. Sessions included:

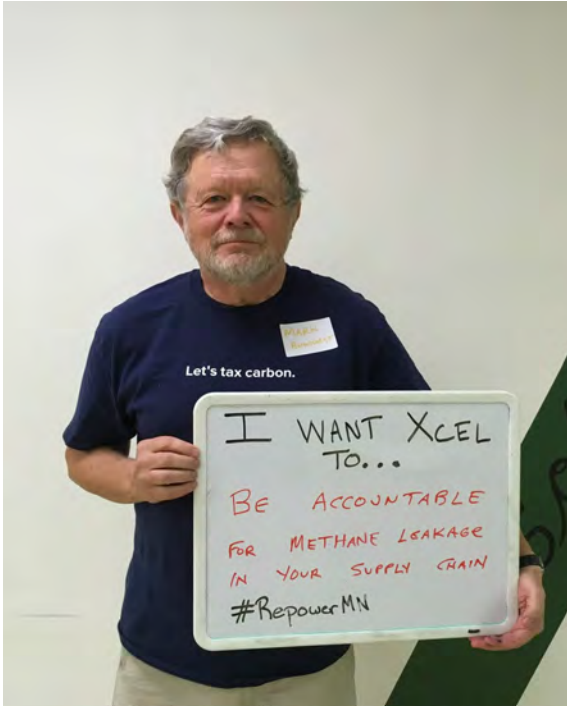
- Summary of what an Integrated Resource Plan is, why it is significant for our energy future, and what the PUC has required in this Integrated Resource Plan
- Q&A based on participant interests
- Small group breakouts to map participant's energy vision and goals
- Opportunities for participants to give feedback via photo petitions and letters
- Identification of interest in further involvement in the stakeholder process

Photos of energy-users and their priorities taken during each feedback session:

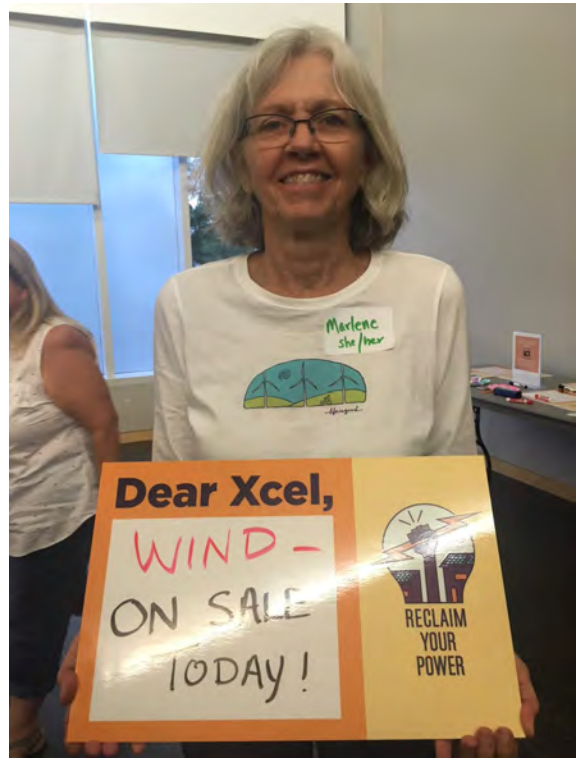
















Letters from energy-users with detailed priorities gathered during each feedback session.

9/17/18

Dear Ben Folke,

My name is Hannah Read and I am writing to you to urge you to commit to getting more of Minnesota's energy from renewable sources. I am a junior Environmental Studies and Economics major at St. Olaf College, and I can confidently say that this decision would be a win both environmentally and financially. As the time approaches to finalize the IRP, we must acknowledge the real danger posed by natural gas, coal, and other fossil fuels. I come from Massachusetts, where gas lines owned by Columbia Gas have exploded, and National Grid is responsible for ongoing gas leaks. Pipelines are more dangerous and prone to leak than ever before, and this poses a real public health risk. I worked for Environment Massachusetts and Toxics Action Center to prevent these pipelines from being built, and Minnesota must follow the same trajectory. Methane leaks not only contaminate the water supply, but also is more potent as a greenhouse gas than CO₂. Massachusetts has shut down all its coal power plants, and it's time for Minnesota to do the same. The future is in renewables. Let's make it happen, together.

Sincerely,
Hannah Read

Dear Ben Folke,

My name is Elizabeth and I am a junior at St. Olaf College in Northfield, MN. Even though I am not from Minnesota originally, it has been my beloved home for the past 2+ years. I have loved getting to explore and experience the profound beauty of this magnificent state.

I am writing to encourage you to reevaluate your current renewable energy goals and commit to 100% fossil fuel free energy by 2050. We know this is possible, and it would have a lasting positive impact on the state and people of Minnesota. As such a large and powerful corporation, you have the unique opportunity to create profound change. You would be a corporate leader in a way that many other large corporations are not.

Preserving the natural beauty of Minnesota is so imperative to allow for future generations to enjoy just as much as we do today. In moving towards renewable energy options, you move away from environmentally-damaging coal and nuclear power plants. Not only is this safer for the environment, it is safer for the people who work in and near these power plants.

In conclusion, I encourage you to increase your goal of renewable energy to 100% by 2050.

Sincerely,
Elizabeth Danuser

September 17th,
2018

Dear Ben,

I am a student at G. Osof College, located in Northfield, MN. My voice and the voices of other young people like me who are going to feel the worst effects of climate change yet to come matter. We matter and our planet matters. Time is moving quickly and it is well past time to act.

As I've learned from it, Xcel Energy has committed to a desire to lead renewable energy transitions. Thus I as a student (with the support of my family) encourage you to boldly incorporate plans for renewable energy as an alternative to outdated coal & nuclear plants in Minnesota when considering and planning for the upcoming Integrated Resource Plan. The Sierra Club and independent community groups are advocating for a just transition to energy, renewable energy, that is the only way forward on a path to healthy, prosperous communities. The benefits outweigh the costs of a plan like the one you have the opportunity to enact. Retraining workers and transitioning facilities are investments in humankind.

LET'S DO THIS!

Thank you for your time,
Margaret Pattus

Dear Ben Folke,

I am a long time resident of Minnesota. I have seen how Minnesota weather has changed.

- now winter with no cross country skiing
- hotter summers
- long allergy seasons
- insect pests are not killed by cold
- extreme rains & floods

And the speed of change is increasing! I follow you closely & I know that with the climate scientists we seem, their worst fears be others.

I also know that moving to clean energy will not hurt the economy and it will provide good jobs, and clean air & clean water.

As Xcel develops its Resource Plan, I want to see it set a goal - and reach a goal - of 100% fossil-fuel free energy.

Thank you

Janet Petri
Northfield MN

Dear Mr. Folke,

I am a student living in Northfield, MN. My family has been using Xcel for years and love that we can sign up for renewable energy. I am happy, excited, and grateful that Xcel is increasing its clean energy goals. However, I am seeing the effects of climate change around me already, hurting my family and my home - flooding, fires and more - and I know that we need to do better. As a young person, I am experiencing changes that I thought I would be seeing as a 30, 40, or 50 year old. That is why I am taking time to ask you to make Xcel's IRP for the next 15 years even more ambitious. Xcel has been a leader in clean energy, and I know that it can do even better. We NEED it to do better - to be safe and healthy and to be able to plan well for the future.

I ask that you make sure the IRP includes a very speedy transition to 100% renewable energy and a phase-out/retirement of fossil fuel energy sources. This is necessary and helpful not only for the climate but for consumers. Please support clean energy.

Thank you for your time and support,

Katie Schroer

Dear Ben Folke

I think you is such an important force for you as an energy company. The way we have defined energy as it relates and a better energy and better knowledge about our source of energy, and better knowledge about consumption. At this moment, you hold a lot of power. We are at the brink of an opportunity to redefine our relationship to energy - something we desperately need. Energy doesn't have to be the dirty, it's many environmental impacts have pointed it to be. With renewable energy we will be working with the earth, not against it, to power our electrical needs.

This gathering inspired me how you have worked with Sierra Club in the past and how that was a very successful endeavor. I think the natural partnership between the Sierra Club and Xcel would be a complete game changer in the story of our nation and people (ward) environmental policy. Putting in place stable alternatives to energy based on the fracking, natural gas, & coal. Sierra Club continues its goals and partnering with the staples of society, such as companies like Xcel. In a political time of such polarization, bridge together to solve the problem is what we need more than ever. Thank you for your time & consideration!

Sincerely,

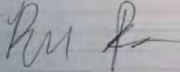
Maddi Fratland

Dear Ben Folke,

I am currently an Environmental Studies major at Saint Olaf College in Northfield, MN. As an ES major, I spend a lot of time thinking about the way we use and get our energy. I also think a lot about the intersection of energy and social issues. The majority of clean energy use is directed at minority groups, especially those that are impoverished for the sake of our planet, our society, and especially for those that climate change will hurt the most. I urge you to listen to the Sierra Club's renewable energy plan. Reaching their goal of 100% clean energy by 2050 is not only possible, it's your responsibility to the public. Minnesota has always been a leader in green energy. Let's continue that legacy.

Thank you for taking the time to listen.

Bladen Pohl



Dear Ben Folke,

I am currently a student at St Olaf and am studying environmental science. As you may know, St Olaf gets a portion of its energy from its wind turbine which serves as a beacon of sustainability for both the college and community.

At this moment in time, I am deeply concerned for the future of MN's energy and the country at large. The more I engage with my studies at college, the more uncertain I become for the future. Xcel has committed to 85% carbon free energy by 2030. My hope is that this vision can be exceeded. I know I speak for the majority of my campus in saying that without a commitment to 100% clean energy by 2030, our community will be deeply disappointed. The path to change is clear and I hope that for the sake of the future of this earth, you & your team will consider this request.

Thank you,
Jodie Pore

Dear Ben Folke,

I am a college student in Northfield, MN, and I care deeply about the future of Minnesota's energy future because the choices we make in the next few years in regards to our energy will fundamentally change the future of our climate. We can either choose to make the change to renewable energy, and make a change away from the fossil fuels that are causing the intense impacts of climate change, or we can stay with the fossil fuels that exacerbate climate change effects.

As a young person, I am very concerned about my future and the future of any children I may have. I want myself and my children to experience a world that is not marred by extreme weather events, sea level rise, and suffering of global citizens. You have the power to change the destructive path that we have been going down. The transition to clean energy can be profitable, healthy, and just. Please consider transitioning to 100% clean electrical energy by 2030.

Thank you so much for your time.

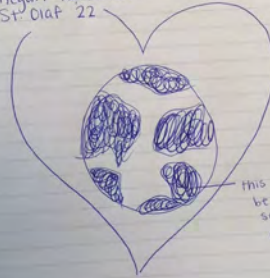
Kristen Koeth

Dear Ben,

It is really, really important to me that Xcel take the extra efforts to produce more eco-friendly energy! I think that it is super important that we start to think more about the future of our Earth. I guess we could go to Mars, but if I'm being perfectly frank, I LOVE the Earth! It is such a beautifully magnificent home and it makes me so sad to see it dying! So, please consider greener options for your customers' sake and the Earth's sake!

Thanks for reading!

Megan Kaymeister
St. Olaf 22



this totally supposed to be Africa... I'm so sorry for my awful drawing skills!

9/17/18

Dear Ben Folke,

I would like to see more of an effort to transition to clean energy. I live in Northfield, MN and go to school at St. Olaf college. One of the things I've encountered at St. Olaf is the idea that clean energy is not profitable. As we've discussed in my classes, this is simply not true. A transition to cleaner energies ~~will~~ ^{will} increase the number of jobs in Minnesota, as well as improve the health of our beloved environment. You are energy company, no one said you need to stick to dirty energy - you have the power to do better. I hope you take this into account.

Thank you!

Jessica Mitchell
St. Olaf College '19

Sept 17, 2018

Dear Mr. Folke,

I am a resident of Northfield, Minnesota and the mother of two children. I have been a customer of Xcel for 20 years and am grateful I've been able to sign up for renewables.

As Xcel begins its planning for the next 15 years, I urge you to support a plan to retire your coal plants and move toward 100% renewable sources.

Moving away from coal will set up air conditioning for better air quality, less carbon emissions, and potential job growth in the future.

I know that planning for the future is never easy, but Minnesotans have long supported changes that protect our children and our environment. I and many other Minnesotans will be watching as the IRP is discussed this fall.

Sincerely,
Ben Folke
Pamela Fickenscher
206 W. Main St
Northfield MN 55057

Sept. 17, 2018

Dear Mr Folke,

I'm at this community event, where we're all writing you to urge you to replace coal with clean energy. You'd be surprised. It's a big room, and full of your customers, telling you what they want. But CO2 wouldn't be allowed?

I'm also a professional in the future, where I'd had the opportunity to work on their partnerships w/ the City of St Paul on 14 million worth of electric car charging stations. I'm very impressed w/ this proposal, and with your part of it.

Thank you.

You need to bring that same approach to every thing you do.

- Forward looking
- Community-based.

Coal & natural gas are neither of those.

I'm looking forward to see next week that

- takes over from fossil (whether for cars or homes)
- that is powered locally - wind, solar, geothermal.

Thanks for your work.

- Kevin Schaefer
206 W. Main St, 55105

Dear Ben Folke,

My name is Henry Hanson, and I am a concerned citizen of Northfield MN. As a customer of your energy resources, I would like to tell you about how I would like MN energy to change.

I know that in the near future many of your current coal, nuclear, & natural gas plants are up for retirement. I would like to see all of these plants retired by 2030!

As ~~best~~ Xcel energy job to decide ~~the~~ ^{what} the ~~best~~ ^{best} energy plants will look like, I would like to voice my opinion!

I expect Xcel energy to transition towards 100% renewable energy. I expect to hold you accountable to your SDG carbon free by 2050 mission.

Without an Integrated Resource Plan that is made up of renewables, Xcel energy will continue to harm our environment & atmosphere. I believe that to keep your current plants running is a threat to Minnesota's health & future.

Thank you for listening to my comments & for building a better future.

- Henry

Examples of Energy Grid Vision exercise detailing customer priorities and responses to Xcel's current IRP from four feedback sessions.

