



414 Nicollet Mall  
Minneapolis, MN 55401

January 28, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
COMMISSION INVESTIGATION INTO SELF-COMMITMENT AND SELF-  
SCHEDULING OF LARGE BASELOAD GENERATION FACILITIES  
DOCKET NO. E999/CI-19-704

Dear Mr. Barlow:

Northern States Power Company, doing business as Xcel Energy, respectfully submits these Reply Comments in response to the Minnesota Public Utilities Commission's Notice of Comment Period in the above-noted docket.

The Company appreciates the January 13, 2020 recommendations filed by parties in this docket regarding scope and process of this investigation into the self-commitment and self-scheduling of large baseload generation facilities. However, the Company believes that the Commission's Order opening this docket and setting reporting requirements establishes the appropriate scope for exploring this topic without the additional information requested by parties in their Comments.

As described in ordering paragraph 8, the Commission opened this docket to explore potential options for seasonal dispatch and strategies for utilizing economic commitments for specific coal-fired generating plants. This exploration is, by necessity, a forward-looking process intended to assess what adjustments to the current system and operations should be considered as utilities transition to a new generation landscape composed of an increasing amount of renewable resources. The Company sees this docket as a vehicle for assessing how utilities may be able to adjust dispatch decisions now and into the future, rather than a deep dive into past dispatch practices.

While some amount of historical data is necessary to assess the current state of self-commitment and self-scheduling, we believe the appropriate historical baseline was presented in the May 8, 2019 compliance filing submitted in Docket Nos. E999/AA-17-492 and E999/AA-18-373, which analyzed the July 2016-June 2018 period. Given that the intent of this docket should be to explore future possibilities, we do not agree with the recommendation by several parties that five years of historical data should be provided, especially given that our generation mix five years ago was significantly different than our current and forecasted generation mix. In addition, markets are always changing, and the markets that informed our decisions in 2015 are different than markets in 2020. The further back we look, the less relevant the information will be to the current system and operations practices. We believe the requirement as written to provide data for the electric AAA reporting period appropriately informs this record.

As a forward-looking process, the Company does not view this investigation docket as a prudency review of past decisions, but instead as a discussion centered around future dispatch choices that have the potential to reduce costs and environmental impacts. As discussed in our December 20, 2019 Petition in Docket No. E002/M-19-804, the Company has already put forth a proposal to change dispatching practices to two of our coal generating units to adjust for a new generation mix with a higher percentage of renewables. We do not believe the OAG's proposal to address prudency issues or to second-guess past decisions would be productive or appropriate.

In addition, several parties requested utilities to provide details of planned and expected unit investments in this investigation docket. We note that these details are included in the Company's integrated resource plan (currently pending in Docket No. E002/RP-19-368). We believe resource planning dockets are the most appropriate venue for analysis of retirement dates and ongoing capital relative to alternatives instead of this investigation docket.

In summary, we believe the volume of data and analysis regarding self-commitment, self-scheduling, and dispatch policies required by the Order is sufficient to allow a full examination of possible options and potential future action. We continue to seek only minor clarifications of the Order as detailed in our January 13, 2020 Comments in this docket. We appreciate the opportunity to provide this Reply.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list.

Please contact Rebecca Eilers at [rebecca.d.eilers@xcelenergy.com](mailto:rebecca.d.eilers@xcelenergy.com) / 612-330-5570 or me at [christopher.j.shaw@xcelenergy.com](mailto:christopher.j.shaw@xcelenergy.com) / 612- 330-7974 if you have any questions regarding this filing.

SINCERELY,

/s/

CHRISTOPHER SHAW  
MANAGER, REGULATORY POLICY

Enclosures  
c: Service List

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies 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 electronic filing

**DOCKET No. E999/CI-19-704**

Dated this 28<sup>th</sup> day of January 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
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