



414 Nicollet Mall
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May 2, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

—Via Electronic Filing—

RE: RESPONSE TO DEPARTMENT OF COMMERCE COMMENTS
PROPOSED DECISION OPTIONS
ELK CREEK--REPLACEMENT SOLAR ENERGY PURCHASE AGREEMENTS
DOCKET NOS. E002/M-19-568, E002/M-19-33, E002/M-21-222

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this brief response to the April 17, 2023 Comments of the Department of Commerce, Division of Energy Resources regarding our March 30, 2023 supplement to our December 9, 2022 request for approval of two Solar Energy Purchase Agreements (Replacement PPAs) to replace the Amended and Restated Solar Energy Purchase Agreement approved by the Commission in its May 18, 2021 Order in Docket No. E002/M-19-568. The Replacement PPAs will serve our Renewable*Connect (R*C) customers. Additionally, we provide suggested Decision Options for the Commission's consideration at its upcoming May 11, 2023 agenda meeting.

We appreciate the Department's thorough review of the Company's supplemental filing providing information regarding our analysis of the benefits of the Replacement PPAs considered during negotiations with the seller, National Grid Renewables (NGR), to resolve the resource challenges identified in the R*C proceeding. We thank the Department for its conclusion that Xcel Energy demonstrated the original Elk Creek Solar Project was not viable, and that the Replacement PPAs approved by the Commission¹ show a substantial savings over alternative PPAs currently available in

¹ *In the Matter of the Amended and Restated Elk Creek Solar Energy Purchase Agreement*, Docket No. E002/M-19-568, ORDER APPROVING REPLACEMENT SOLAR POWER PURCHASE AGREEMENTS SUBJECT TO ADDITIONAL REQUIREMENTS AND PRUDENCY REVIEW at 4 (April 14, 2023).

the market. As stated in our December 9 request for approval of the Replacement PPAs and March 30 supplemental filing, the Company respectfully requests that the Commission allow the Company to recover the costs for the Replacement Projects and interim Replacement Energy, RECs, and Capacity from Renewable*Connect customers.

To support that determination, we offer the following suggested Decision Options:

1. Find that the cancelation of the Elk Creek Solar PPA was prudent.
2. Allow Xcel Energy to recover the costs for the approved Solar Energy Purchase Agreements – Louise Solar Project and Fillmore County Solar Project – and interim Replacement Energy, RECs, and Capacity from Renewable*Connect customers.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact me at bria.e.shea@xcelenergy.com or Mary Martinka at mary.a.martinka@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

cc: Service Lists

CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document(s) on the attached list(s) of persons.

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

or

xx electronic filing

**Docket Nos. E002/M-19-568
E002/M-19-33
E002/M-21-222**

Dated this 2nd day of May 2023

/s/

Marie Horner
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 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-568_Official
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