

April 23, 2026

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St Paul, MN 55101

Re: 2025 Integrated Distribution Plan Docket Number E-002/M-25-142

Dear Ms. Bergman:

We appreciate the opportunity to comment on Xcel Energy's 2025 Integrated Distribution Plan.

EV Charging Rates:

The City of Minneapolis appreciates Xcel Energy's consideration to create a public EV charging rate and are pleased to see action on this included in Xcel's reply comments. We believe this will be important to help create equitable access to EV charging for Minnesota residents and in Minneapolis where the City aims to create accessible, affordable, clean transportation options.

Local Electrification Overlay Pilot:

The City of Minneapolis would like to reiterate the value of incorporating locally informed electrification scenarios into integrated distribution planning (described as a "Minneapolis Electrification Scenario" in our original comments on February 26, 2026). As development patterns change and the City takes a more active role in understanding electrification potential across the community and guiding clean energy development, utility planning should reflect these activities. Without coordination and modeling of one or more local electrification scenarios that are informed by City activities, Xcel Energy may not be able to provide the quality of services needed by the community. Further, local coordination in support of decarbonization aligns with the overarching tenants of the Clean Energy Partnership between the City, Xcel, and CenterPoint Energy.

The City of Minneapolis respectfully proposes that Xcel Energy incorporate such local information into integrated distribution planning across its service territory where data is available. We believe that this

has value across for many communities throughout the service territory. Additionally, electrification forecasting and scenario analysis aligns with existing IDP filing requirements and would likely be a task that existing utility tools, such as LoadSEER, are well equipped to handle. There is precedent for similar types of analysis, namely Otter Tail Power's analysis for Morris in their 2023 IDP. However, we believe that this electrification overlay could have benefits across a broader portion of the service territory.

To test the value of this concept, we proposed that a local electrification overlay be developed and piloted in the next IDP to show the value of local data inputs during modeling and planning. The City of Minneapolis could support Xcel in the creation of this overlay by bringing data sharing and coordination capacity. We could identify important and available data that could be provided. Data may include: thermal energy network priority zones (shape and load estimates), dense electrification estimates based on increased residential and small business incentives in environmental justice areas (such as our Green Zones), and electrification interests for existing district energy systems.

In the long-run, this could be a standard activity incorporated into the utility planning process and allow the utility to have greater visibility of upcoming capacity constraints and customer resource needs. In addition to Minneapolis, the City of Minneapolis welcomes Xcel Energy to incorporate one or more other communities into this pilot to develop an electrification overlay. The benefits of incorporating such an overlay could be evaluated and considered for incorporation into base modeling in relevant areas across the service-territory.

Mobile Battery Pilot:

As mentioned in our original comments, the City of Minneapolis supports Certification of the Mobile Battery Pilot and understands that reply comments regarding the Certification of the Pilot were due on April 9. Separate from the decision to Certify, the City appreciates the opportunity to provide reply comments per Xcel Energy's helpful response to our comments regarding pilot reporting and information sharing.

The Mobile Battery Pilot is intended to serve in locations where temporary capacity bridging is needed. Within this scope and beyond, learnings from the pilot could inform how this or similar mobile battery technologies could help provide grid capacity and reliability support, especially in areas where infrastructure is older and aligns with underserved communities or environmental justice areas. The City believes that transparency on applied use cases, site/scenario conditions, measured benefits, and general learnings will be valuable to understand. Such reporting would help stakeholders learn from this pilot in more detail and at the speed of implementation, instead of waiting until a pilot end point.

The City of Minneapolis respectfully proposes an annual or biennial reporting cadence for Xcel in the existing IDP docket to help make these learnings available to all stakeholders.

Resilience Hubs:

The issue of outages and disparities of service relate directly to the Resilient Minneapolis Project (RMP), led by Xcel Energy. Progress in creating Resilience Hubs at Sabathani Community Center, Minneapolis

American Indian Center, and a group Minneapolis Public Schools buildings in North Minneapolis is discussed in the IDP. We appreciate Xcel's continued partnership on the RMP and note the updates provided, including: "RMP implementation has moved forward and smoothly in 2025 with the execution of microgrid agreements; hiring of an engineering, procurement, and construction contractor; completion of detailed engineering designs for microgrids; progress on federal and city permitting, and negotiation of easements with host sites."

Beyond the RMP, as noted in our Clean Energy Partnership MOU with Xcel Energy, the City would like to see equal reliability across Minneapolis, including in our environmental justice areas. Our MOU asks that Xcel and the City work together to report on "reliability metrics applied to the City of Minneapolis" and that they "perform equal to or better than [the] Company's Minnesota territory as a whole." We welcome the opportunity for these metrics to be reported in future Xcel IDP filings.

Department of Commerce Proposed IDP Process:

The City of Minneapolis has been part of the engagement activities lead by the Department of Commerce regarding modifications to the IDP process, standards, and review process.

In general, the City of Minneapolis appreciates the consideration of how equity is incorporated into this process, review of the value of reliability to help manage affordability, manage utility planning standard review burdens through a work group model.

The City of Minneapolis supports the following modifications that are the result of stakeholder input:

1. Identify the main system planning standards that Xcel uses for each Commission-approved review topic;
 - G. Select one or more planning standards, in agreement with intervenors, to review before the next IDP;
 - H. Set alternative system planning scenarios to analyze, in agreement with intervenors;
 - I. Perform a quantitative analysis of alternative system planning standards that measure estimated costs and benefits of alternative system planning standards;
 - J. Require Xcel to present the results of steps A-D in the next IDP cycle; and
 - K. Request comments to approve, modify, or reject the revised system planning standards for each Commission-approved review topic.
2. The Department recommends the Commission establish the following system planning standard review schedule, with each phase to repeat every eight years:
 - E. 2027: Capacity
 - F. 2029: Reliability and Asset Health
 - G. 2031: Grid Modernization, Distributed Energy Resources, and Operation and Maintenance
 - H. 2033: Budgeting
3. The Department recommends the Commission establish an ad hoc system planning standard

review process that shall:

- F. Allow any intervenor to request a planning standard review;
 - G. Set the parameters that shall be reviewed;
 - H. Require the Commission to approve, modify, or reject the request for a planning standard review, limited to one such planning standard review per IDP cycle;
 - I. Require Xcel to present the results of the planning standard review in its next IDP; and
 - J. Request comments to approve, modify, or reject Xcel's system planning standard.
4. The Department recommends the Commission order the Distribution Data Reporting work group to identify IDP filing requirements that Xcel and intervenors agree can be removed.
5. The Department recommends that the Commission create a new filing requirement which states: All new distribution spending projects and programs with an estimated historical or forecasted five-year budget of \$25 million or greater shall, at minimum, address the following:
- E. Estimated cost or range for the project/program;
 - F. Consideration of feasible alternatives to the proposed spending;
 - G. Quantitative estimation of expected outcomes; and
 - H. Sensitivity analysis of cost and outcome assumptions.
6. The Department recommends the Commission order the creation of a single proceeding to be noticed in each IDP docket to discuss the appropriate value of reliability. The comment period should address:
- F. The valuation of the cost of unserved energy;
 - G. The use of price caps for the cost of unserved energy;
 - H. Forecasting methodologies for reliability benefits;
 - I. Appropriate uses cases for the value of reliability; and
 - J. The potential to employ different values of reliability by customer class.
7. The Department recommends the Commission order either A or B:
- C. Xcel file its IDP, TEP, and IDP-Related Ad Hoc filings in odd-numbered years. MP, DEA, and OTP file their IDP and TEP in even-numbered years, with the next filing due in 2028.
 - D. All IDPs are filed in odd-numbered years. All TEPs and IDP-Related Ad Hoc Filings are filed in even-numbered years, with the next filing due in 2028.

We believe that with adoption of our suggestions, Xcel's Integrated Distribution plan can enhance local effectiveness in ensuring reliability, long-term affordability, and carbon reductions. We appreciate the opportunity to comment on the IDP and look forward to continued collaboration with the Public Utilities Commission, Department of Commerce and Xcel Energy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Hoyer', with a stylized, cursive script.

Megan Hoyer
Director of Climate Equity Action

Frank Hornstein
Intergovernmental Relations Coordinator Sustainability