



November 19, 2018

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

**RE: IN THE MATTER OF XCEL ENERGY'S REQUEST FOR AN EXTENSION TO SUBMIT ITS 2020-2034 UPPER MIDWEST INTEGRATED RESOURCE PLAN
DOCKET NO. E002/RP-15-21**

Dear Mr. Wolf:

Center for Energy and Environment ("CEE") respectfully submits this letter in support of Xcel Energy's request for a five-month extension to file its 2020-2034 Upper Midwest Integrated Resource Plan ("IRP").

On October 15, 2018, Xcel Energy requested that the Minnesota Public Utilities Commission ("Commission") approve a five-month extension to file its next IRP to provide time for the company to continue to work with stakeholders and allow for the production of additional studies and pertinent information. If the extension were approved, Xcel Energy would file its IRP by July 1, 2019.

Xcel Energy noted in its filing that it has the necessary resources to meet forecasted energy and capacity needs through 2024 and no additional resource approvals are needed in the near term. The company also reaffirmed its commitment to filing an IRP with an 85 percent carbon free generation mix by 2030. Xcel Energy provided the following reasons for and benefits of delaying its IRP filing.

- A five-month extension will provide additional time for stakeholders to engage with and provide input into the models and underlying assumptions of Xcel Energy's IRP. Xcel Energy has hosted a number of stakeholder meetings to discuss its upcoming IRP. At these meetings, stakeholders have expressed strong interest in additional discussion of the Xcel Energy system, the company's IRP, and the statewide context of both.
- The extension will provide the opportunity to incorporate the preliminary results and findings of a host community study, which is being conducted by CEE. Xcel Energy is participating, along with Minnesota Power, in our study to assess the value of hosting a power plant for host communities, and the potential impact of power plant retirements on those communities. The findings of this study will be critically important considering the upcoming plant retirements on Xcel Energy's system.
- The extension will provide time to conduct additional modeling of demand-side management resource potential for Xcel Energy's upcoming IRP. CEE, Optimal Energy, and Seventhwave are completing the Minnesota statewide Demand-Side Management ("DSM") Potential Study. Upon its completion, Xcel Energy may benefit from modeling additional DSM scenarios to account for factors that are unique to Xcel Energy to inform its IRP filing. The results of this modeling may have significant implications for the company's resource needs in its IRP.

CEE believes that continued engagement with stakeholders around stakeholder priorities and input into modeling and assumptions; the findings of CEE's study to assess the impact of plant closures on host communities; and

results of additional modeling of DSM potential are critically important to the company's IRP and warrant a five-month delay in the company's filing.

Xcel Energy engaged with CEE to gather our thoughts and concerns regarding an extension in advance of its request to the Commission. We appreciate Xcel Energy's open communication and consideration of how a change in timing would affect stakeholders. We look forward to working with Xcel Energy in the development of its next IRP.

We support Xcel Energy's request for a five-month extension to file its IRP. Given that Xcel Energy needs no additional resource approvals in the near term, remains committed to filing a plan that is 85 percent carbon free by 2030, and the benefits of an extension, as noted above, we encourage the Commission to grant Xcel Energy's request.

We thank the Commission for its consideration of this letter.

Sincerely,

/s/

Audrey Partridge
Regulatory Policy Manager
Center for Energy and Environment

BEFORE THE MINNESOTA DEPARTMENT OF COMMERCE
85 7th Place East, Suite 500
St. Paul, Minnesota 55101

AFFIDAVIT OF SERVICE


Docket No. E002/RP-15-21

I, Audrey Partridge, hereby certify that on this 19th day of November 2018, I served Center for Energy and Environment's Comments In the Matter of Xcel Energy's Request for an Extension to Submit Its 2020-2034 Upper Midwest Integrated Resource Plan on the following persons on the attached Service Lists by:

XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

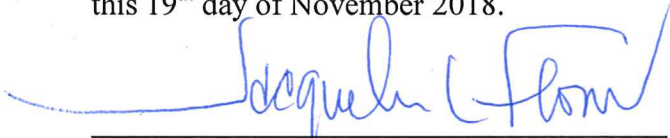
XX electronic filing





Audrey Partridge

Subscribed and sworn to before me
this 19th day of November 2018.



Notary Public

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