

February 26, 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:

The City of Minneapolis appreciates the opportunity to comment on Xcel Energy's Integrated Distribution Plan (IDP). The Plan is a critical tool in ensuring that Minnesota, and Minneapolis alike, reach our clean energy goals and our community-wide goal of carbon neutrality by 2050. The City places a high priority on equitable service and cost distribution as well as efforts to actively incorporate community-level climate and clean energy goals. Our feedback is summarized per the proposed PUC questions herein.

Topic I: Mobile Battery System Certification

Questions 11: Approval

The City of Minneapolis supports Xcel Energy's proposal of the Mobile Battery System and supports certification of this proposal. The City understands that non-wires alternatives will at times be a cost-effective tool for offering residents reliable service and greater access to clean energy. We agree that grid flexibility is an important tenant of serving customers successfully and reliably in this era of faster electrification, supply-chain uncertainty, and more extreme weather events.

Question 12: Streamlining

The City of Minneapolis supports Xcel Energy's request for streamlining the certification process for mobile battery system projects. Ways to make the certification less onerous while ensuring that transparency is maintained is important. We believe that the most vital information for future certification will be provided under the four (4) topic areas proposed by Xcel, including "why a project is necessary" and "project objectives and benefits to customers". However, we do believe that additional analysis and context will be important.

Ahead of future certifications, the City believes that an inventory of deployment instances, what types of customers benefited, and where the deployments were sited (urban, suburban, rural), as well as the benefits realized at the customer level and more broadly, will be important context to understand the distribution of benefits and costs. Quantifiable benefits such as increased uptime, service quality, and

capacity bridging services will be important to understand.

Xcel's Plan stated three (3) Equity and Energy Justice Principles, but acknowledged that they will be hard to implement due to Xcel's lack of influence. The City appreciates the work of engaging stakeholders to consider equity concerns. However, the City is concerned about the upward pressure on rates that all rate-payers will pay if these interested in understanding how the mobile battery may be deployed in instances of power outages, especially in areas where reliability has been lower, and how learnings from this program could have secondary beneficial impacts in future non-wires proposals.

Topic II: IDP

Question 14: Approval statement

The City supports certification of this IDP. While we have concerns about the upward pressure that these infrastructure costs will have on rates, we believe that Xcel is building upon learning from prior IDPs and appreciate the ongoing and vital efforts made to engage stakeholders in this process. The City agrees with Xcel's distribution planning principles of flexibility through lower system loading, maximizing infrastructure life, and evaluating for cost-effective alternatives.

Question 16: Feedback on Forecasting Methodology and Proactive Capacity

The City recognizes and appreciates Xcel's efforts to consider and incorporate community-based climate goals. We understand that there are 415 cities and municipal jurisdictions that exist in Xcel's Minnesota service territory and that each City's goals are diverse with varying baselines. Comprehensively incorporating DER, beneficial electrification, and efficiency goals into LoadSEER analysis is challenging without more detailed scenarios to model and evaluate.

As the largest City in Xcel's Minnesota service territory, we believe that incorporating a 'Minneapolis electrification scenario' into future planning would be helpful to understand more localized grid congestion. The following are examples of elements that could be part of this scenario:

- **Distributed Energy Efficiency and Electrification:** The City has been administering \$10 million or more in energy efficiency and electrification investments since 2023, with lower levels of investment before this time.¹ These are distributed activities, but are a pocket of non-utility program investment that is not seen in other parts of Xcel's service territory.
- **Thermal Energy Potential Study:** The City of Minneapolis has launched its Thermal Energy potential study to identify priority areas in the community where TENs have the greatest technical and financial potential and where this potential aligns with our Green Zones and other community input, as well as business and stakeholder interest in action. These could introduce large pockets of electrification with the potential to expand over time.
- **Deep, Dense Weatherization and Electrification:** Under the Clean Energy Partnership, between the City, Xcel Energy, and Centerpoint Energy, work plan priorities are established that could result in concentrated deployments of efficiency or electrification.

The City welcomes further coordination with Xcel to understand how a Minneapolis electrification

¹ These climate funds have been enabled through revenues collected via City of Minneapolis franchise fees.
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scenario could be beneficial to ensuring that our grid system is prepared to receive larger and faster beneficial electrification, even beyond historical trends and most recent trends in vehicle electrification.

We look forward to continuing to engage with Xcel and stakeholders as the process moves forward and thank you for the consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Megan Hoyer". The signature is fluid and cursive, with the first name "Megan" being more prominent than the last name "Hoyer".

Megan Hoyer
Director of Climate Equity Action

Frank Hornstein
Intergovernmental Relations Coordinator Sustainability