



Supplemental Comments of LIUNA Minnesota and North Dakota

November 19, 2025

Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 5510

*Re: In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation
(PUC Docket No. E002/CN-23-212)*

*In the Matter of Xcel Energy's 2024-2040 Integrated Resource Plan
(PUC Docket No. E002/RP-24-67)*

Dear Ms. Bergman,

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to provide supplemental comments in support of the petition by Xcel Energy ("Xcel") for approval of final Power Purchase Agreements ("PPAs") with Invenergy for Cannon Falls; Onward Energy for Mankato Energy Center; and D.E. Shaw Renewable Investments ("DESRI") for North Star Energy, which are expected to deliver \$103 million in Present Value Revenue Requirement ("PVRR") benefits to ratepayers, in addition to helping to ensure the continued reliability of the Xcel by ensuring access to dispatchable energy resources.

We agree with Xcel that the company has established not only that the proposed contracts are necessary to maintain affordable and reliable service, but also that they are consistent with Xcel's obligations under Minnesota's Carbon-Free Standard. We also believe that it is prudent for Xcel to negotiate a right of first offer ("ROFO") into PPAs in order to ensure that ratepayers have the opportunity to benefit from regulated ownership of generation resources whenever the utility can negotiate terms that are in the public interest. Xcel has exercised ROFO rights in several recent cases where the Public Utilities Commission ("Commission") determined that proposed acquisitions were in the public interest, and we expect that ROFO options could continue to provide value to ratepayers, especially if anticipated growth in demand for electricity continues.

We thank the Commission for its consideration.

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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