



414 Nicollet Mall
Minneapolis, MN 55401

December 12, 2025

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

—Via Electronic Filing—

RE: SUPPLEMENTED RESPONSES TO DOC IRs NOS. 8 AND 9
ANALYSIS RESULTS: LAKE WILSON BESS IMPACTS ON CONGESTION
APPROVAL OF PPAs FOR FIRM DISPATCHABLE RESOURCES
DOCKET NOS. E002/CN-23-212

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed supplemented responses to the Department of Commerce's Information Requests (IR) Nos. 8 and 9 in the above-referenced docket. In our initial responses submitted to the Department on December 8, 2025, we committed to providing the results of a PROMOD analysis evaluating the impact of Invenergy's proposed Lake Wilson Solar and Battery Energy Storage System (BESS) project on future congestion and curtailment in the project area. We provide the supplemented Department IRs 8 and 9 on the record in this docket to confirm the project as proposed would negatively impact future congestion in the region, to the detriment of our customers.

Our PROMOD runs include the proposed Lake Wilson project (150 MW solar and 95 MW battery) at the node specified in its Generation Interconnection Agreement (GIA) to most accurately estimate the impact of the Lake Wilson project on future congestion in the project area. Our analysis shows that this project does not relieve transmission congestion; instead, it negatively impacts existing transmission constraints and increases congestion charges and curtailments in an already congested region. We include further discussion of the analysis in the attached supplemented response to Department IR 8.

Portions of the supplemented responses and Attachment A to Department IR 8 in its entirety are marked Not-Public as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes

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curtailment detail the Company and project developers protect as confidential and analysis results derived from modeling data the Company protects as proprietary. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Attachment A to Department IR 8 is marked as “Not-Public” in its entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following description of the protected material:

1. **Nature of the Material:** Attachment A is a live Excel spreadsheet supporting congestion-related calculations discussed in the response.
2. **Authors:** Company’s Energy Supply and Market Modeling personnel.
3. **Importance:** The Company and project developers protect curtailment detail as confidential, and the Company protects analysis results derived from modeling data as proprietary. Other parties could obtain economic value from its use, which could affect negotiations regarding future projects to the detriment of our customers.
4. **Date the Information was Prepared:** Attachment A was prepared for purposes of this response.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Shannon Whiton at shannon.whiton@xcelenergy.com or me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
cc: Service List

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Xcel Energy	Information Request No.	8
Docket No.:	E002/CN-23-212	Supplement
Response To:	Minnesota Department of Commerce	
Requestor:	Steve Rakow	
Date Received:	November 24, 2025	

Question:

Reference(s): Xcel's November 12, 2025 Reply Comment

Xcel's November 12, 2025 Reply Comment states "the [Lake Wilson] project's intermittent solar component and solar to storage ratio have been a primary impairment to the project from the onset, and would exacerbate congestion in the project area."

Please explain:

- A. How the "intermittent solar component and solar to storage ratio" would be an impairment to a project.
- B. How the "intermittent solar component and solar to storage ratio" would exacerbate congestion.

Response:

The Lake Wilson project will add generation to an already congested area. Oversaturation or otherwise oversupply of generation in a given location degrades the stability and reliability of the electric grid. Without sufficient local demand to offset the local supply, the value of adding a new generator is diminished. In this case, the ratio of charging capacity available from the storage component is not sufficient to offset the oversupply aggravated by the new generation and therefore is an impairment to the project. This insufficiency, rather than relieving congestion, will instead contribute to higher levels of local oversupply which is the underlying cause of congestion and therefore exacerbates the grid instability. Based on our analysis of forecast LMPs (which is the market indicator of congestion), we do not expect the storage component to sufficiently mitigate the impact of the added generation. We are currently working to conclusively determine the impacts of the Lake Wilson project using a PROMOD analysis with 150 MW solar and 95 MW storage based on the information provided by Invenergy's data intake form on the Lake Wilson project. We will supplement this response with the results of that analysis by December 12, 2025.

Supplement:

The Xcel Energy operating companies NSP-Minnesota and NSP-Wisconsin operate an integrated transmission system (the NSP System) that comprises more than 8,400 miles of transmission and sub transmission facilities operating at voltages between 23.7 kilovolts (kV) and 500 kV, and approximately 550 transmission and distribution substations. The NSP System is within the Midcontinent Independent System Operator (MISO) footprint and serves retail customer loads in Minnesota, North Dakota, South Dakota, Wisconsin and Michigan.

When transmission facilities reach their limits, system operators must adjust generation dispatch—often curtailing lower-cost resources and relying on higher-cost units—raising overall production costs. Curtailment is the reduction of renewable output, such as wind or solar, due to transmission constraints or reliability needs.

Congestion charges measure the economic impact of these constraints. In PROMOD and similar models, they are calculated as shadow price (the marginal cost of relieving a constraint by 1 MW) multiplied by the flow on that constraint. This produces a dollar value indicating the financial burden of limited transmission capacity. While congestion costs appear in the MISO market as a part of Locational Marginal Prices (LMPs), in planning models they are forward-looking indicators, not guaranteed payments.

LMPs reflect the value of electricity at specific grid locations and include three components: marginal energy cost, congestion cost, and transmission losses. When transmission limits prevent cheaper generation from serving load, more expensive generation is dispatched, increasing prices. Redispatch costs arise when operators reorder generation to alleviate congestion, often replacing low-cost units with higher-cost alternatives.

To better quantify the impact of the Lake Wilson project on regional congestion, we utilized the MISO Economic Model reference case under the Series 1A Future 2A Long Range Transmission Plan (LRTP) Tranche 2 scenario. We added the 150 MW solar and 95 MW storage project at the bus assigned to Lake Wilson's Generation Interconnection Agreement (GIA) and performed 8,760-hourly dispatch PROMOD modeling for all major study regions including MHEB, MISO, TVA OAT, PJM, SERC, SPP, and TVA in 2032, 2037, and 2042. The MTEP scenario includes transmission expansion projects in LRTP Tranches 1 and 2, the JTIQ projects, as well as planned and future generators.

When we evaluated adding the proposed solar generator plus battery storage, we focused on the 10 most critical transmission constraints that are relevant to this project. Table 1 shows the total congestion charge on the transmission constraints that already experience high congestion in the base case without Lake Wilson, as well as the congestion charges after Lake Wilson is added. Our analysis showed that congestion charges on these constraints increased by \$1.5 to \$3.5 million compared to the base case. Congestion

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charges measure the economic penalty of transmission limitations—they reflect how much extra cost is introduced because the grid must rely on more expensive resources. In simple terms, adding this generator makes existing bottlenecks worse, forcing the system to operate less efficiently in the region.

Table 1
Congestion Charge Comparison (\$ million) with and without Lake Wilson

	2032	2037	2042
Base Congestion Charge	\$ 1,053.08	\$ 369.22	\$ 513.24
Change (w/ Lake Wilson) Congestion Charge	\$ 1,056.61	\$ 370.74	\$ 516.33
Delta	\$ 3.53	\$ 1.52	\$ 3.09

In addition to congestion charges, we found that the inclusion of the Lake Wilson battery negatively impacts curtailment in the region. PROMOD simulation results across all modeled years, as shown in Figure 1 and Table 2, indicate that total curtailment levels from regional generating units are higher with the inclusion of Lake Wilson compared to the base case without Lake Wilson. This demonstrates that adding the 95 MW storage does not materially reduce curtailment for the on-site solar facility and provides no significant relief for neighboring renewable resources. We provide support for our calculations in live Excel format as Attachment A to this response.

Figure 1
Base and Change (with Lake Wilson) Case Curtailments (MWh)
by Simulation Year

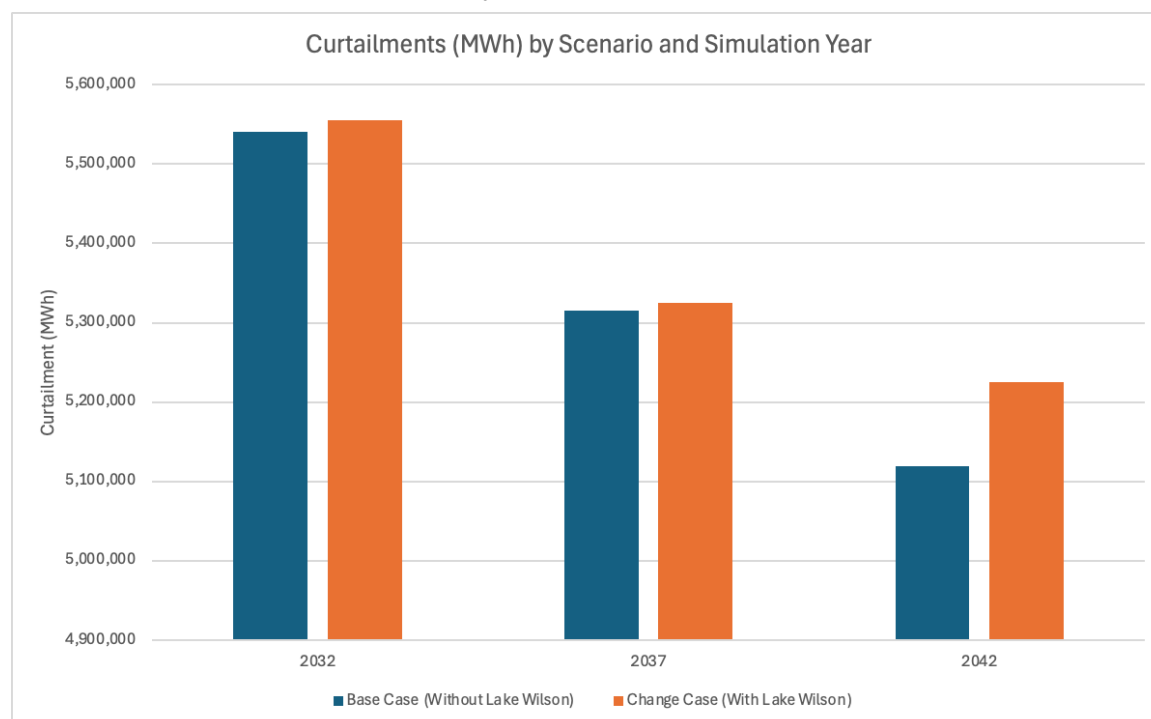


Table 2

Curtailment forecast of regional renewable generators (MWh)

Base Case (without Lake Wilson) compared to Change Case (with Lake Wilson)

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In conclusion, the PROMOD analysis with and without Lake Wilson indicates that this project does not relieve transmission congestion; instead, it worsens existing transmission constraints and drives up congestion charges and curtailments in an already congested region.

Portions of this supplemented response and Attachment A in its entirety are marked Not-Public as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes curtailment detail the Company and project developers protect as confidential and analysis results derived from modeling data the Company protects as proprietary. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Attachment A is marked as “Not-Public” in its entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following description of the protected material:

1. **Nature of the Material:** Attachment A is a live Excel spreadsheet supporting congestion-related calculations discussed in this response.
2. **Authors:** Company’s Energy Supply and Market Modeling personnel.

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3. **Importance:** The Company and project developers protect curtailment detail as confidential, and the Company protects analysis results derived from modeling data as proprietary. Other parties could obtain economic value from its use, which could affect negotiations regarding future projects to the detriment of our customers.
4. **Date the Information was Prepared:** Attachment A was prepared for purposes of this response.

Preparer:	Bixuan Sun
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Date:	December 8, 2025
Date Supplemented:	December 12, 2025

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Northern States Power Company

Docket No. E002/CN-23-212
DOC Information Request No. 8 Supplement
Attachment A

Attachment A provided with the Trade Secret version of this response is marked Not-Public as it contains information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes curtailment detail the Company and project developers protect as confidential and analysis results derived from modeling data the Company protects as proprietary. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Attachment A is marked as “Not-Public” in its entirety. Pursuant to Minnesota Rule 7829.0500, subp. 3, we provide the following description of the protected material:

1. **Nature of the Material:** Attachment A is a live Excel spreadsheet supporting congestion-related calculations discussed in this response.
2. **Authors:** Company’s Energy Supply and Market Modeling personnel.
3. **Importance:** The Company and project developers protect curtailment detail as confidential, and the Company protects analysis results derived from modeling data as proprietary. Other parties could obtain economic value from its use, which could affect negotiations regarding future projects to the detriment of our customers.
4. **Date the Information was Prepared:** Attachment A was prepared for purposes of this response.

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Xcel Energy	Information Request No.	9
Docket No.:	E002/CN-23-212	Supplement
Response To:	Minnesota Department of Commerce	
Requestor:	Steve Rakow	
Date Received:	November 24, 2025	

Question:

Reference(s): Xcel's November 12, 2025 Reply Comment

Xcel's November 12, 2025 Reply Comment states "the [Lake Wilson] project's intermittent solar component and solar to storage ratio have been a primary impairment to the project from the onset, and would exacerbate congestion in the project area."

Please provide:

- A. The hourly Locational Marginal Prices (LMP), for a three year period, for
 - 1) the node the Lake Wilson project would use or a nearby node that would represent the Lake Wilson project; and
 - 2) Xcel's main load node.
- B. An explanation of how Xcel estimated the impact of the Lake Wilson project on existing congestion in the project area and the results of the estimation.
- C. A list of the generation and load that, in Xcel's estimation, would be impacted by Lake Wilson.

Response:

- A. Please see Attachment A to this response, provided in live Excel spreadsheet format, for the requested Locational Marginal Price data.
- B. As explained in the Company's Comments filed on Nov 24, 2025, we conducted an analysis using Locational Marginal Prices (LMPs) modeled in the MISO Economic Model reference case under the Series 1A Future 2A Long Range Transmission Plan (LRTP) Tranche 2 scenario. Specifically, we examined the forecasted LMPs at a nearby wind farm node – where the Lake Wilson project would be located – which considers all existing and planned generation in the MISO queue as well as the transmission projects in MISO's Long Range

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Transmission Plan (LRTP) Tranche 2 portfolio. We compared the forecasted hourly LMPs to the Lake Wilson hourly solar production profile provided in Invenergy's bid to estimate curtailment.

Our analysis accounts for the differences between wind and solar generation profiles in that area and, as shown in Table 2 below, still shows a **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** percent curtailment for the Lake Wilson solar component through 2037.

Table 2
(XE Comments – 11/24/25)
Expected Curtailment: Lake Wilson Solar Proxy LMP Analysis

	10-Year (2032)	15-Year (2037)	20-Year (2042)
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MWh Produced			
MWh Curtailed			
Percent Curtailed			

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As mentioned in the response to Department of Commerce IR No. 8, we are currently performing PROMOD runs to include the proposed Lake Wilson project (150 MW solar and 95 MW battery) in the node specified in its Generation Interconnection Agreement (GIA). This analysis will provide more accurate estimate of the impact of the Lake Wilson project on future congestion in the project area. We will supplement this response with the results of that analysis by December 12, 2025.

- C. We plan to provide the list of generation and load impacted by Lake Wilson in the PROMOD analysis by December 12, 2025.

Portions of this response and Attachment A are marked Not-Public as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This information includes curtailment detail the Company and project bidders protect as confidential, and locational marginal pricing data that requires executing a non-disclosure agreement with MISO to access. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Supplement:

Please see Table 2 in the Company's response to Department of Commerce IR No. 8 Supplement, which shows the list of generation impacted by Lake Wilson in the PROMOD analysis.

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Date: December 8, 2025
Date Supplemented: December 12, 2025

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies or summaries of the foregoing documents 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 No. E002/CN-23-212

Dated this 12th day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

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88	J.	Porter	greg.porter@nngco.com	Northern Natural Gas Company		1111 South 103rd St Omaha NE, 68124 United States	Electronic Service		No	23-212Official
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90	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-212Official
91	Kurt	Rempe	krempe@nationalgridrenewables.com	National Grid Renewables Development, LLC		8400 Normandale Lake Blvd Suite 1200 Bloomington MN, 55437 United States	Electronic Service		No	23-212Official
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105	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-212Official
106	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
107	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-212Official

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109	Sean	Stalpes	sean.stalpes@state.mn.us		Public Utilities Commission	121 E. 7th Place, Suite 350 Saint Paul MN, 55101-2147 United States	Electronic Service		No	23-212Official
110	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
111	Jayme	Trusty	execdir@swrdc.org	SWRDC		2401 Broadway Ave #1 Slayton MN, 56172 United States	Electronic Service		No	23-212Official
112	Jen	Tyler	tyler.jennifer@epa.gov	US Environmental Protection Agency		Environmental Planning & Evaluation Unit 77 W Jackson Blvd. Mailstop B-19J Chicago IL, 60604-3590 United States	Electronic Service		No	23-212Official
113	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	23-212Official
114	Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-212Official
115	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23-212Official
116	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	23-212Official
117	Julianna	Wei	julianna.wei@rondo.com	Rondo Energy, Inc.		1960 North Loop Alameda CA, 94502 United States	Electronic Service		No	23-212Official
118	Alan	Whipple	sa.property@state.mn.us		Minnesota Department Of Revenue	Property Tax Division 600 N. Robert Street St. Paul MN, 55146-3340 United States	Electronic Service		No	23-212Official
119	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO,	Electronic Service		No	23-212Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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121	Rob	Witwer	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		767 Third Ave 17th Floor New York NY, 10017 United States	Electronic Service		No	23-212Official
122	Jonathan	Wolfgram	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	445 Minnesota St Ste 147 Woodbury MN, 55125 United States	Electronic Service		No	23-212Official
123	Tim	Wulling	t.wulling@earthlink.net			1495 Raymond Ave. Saint Paul MN, 55108 United States	Electronic Service		No	23-212Official
124	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-212Official
125	Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park		5005 Minnetonka Blvd St. Louis Park MN, 55416 United States	Electronic Service		No	23-212Official
126	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-212Official
127	David	Zoppo	david.zoppo@huschblackwell.com	American Transmission Company LLC		33 East Main Street Suite 300 Madison WI, 53703 United States	Electronic Service		No	23-212Official