



November 24, 2025

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

VIA E-FILING

**Re: Clean Energy Organizations' Comments on Invenergy's Request for Action
In the Matter of Xcel Energy's Competitive Resource Acquisition 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,

The Clean Energy Organizations ("CEOs")¹ appreciate the opportunity to comment on Invenergy's request for action filed November 10, 2025, seeking a Commission order that Xcel resume negotiations with Invenergy on the Lake Wilson Solar Energy Center ("Lake Wilson") project. By way of background, the CEOs participated in both Xcel Energy's ("Xcel") CN-23-212 ("Firm Dispatchable") and RP-24-67 ("IRP") dockets. The CEOs were also a party to the Settlement Agreement ("Settlement") reached in both those dockets and filed on October 2, 2024.²

As a party to that Settlement, we supported the suite of projects selected to resolve the Firm Dispatchable acquisition docket.³ It was a priority for the CEOs that the Firm Dispatchable docket's resource acquisition process fairly allow for clean energy projects to compete for selection in accordance with the Commission's prior order.⁴ Therefore, the diversity of technologies in the bids selected in the Settlement was important to the CEOs and a key reason the CEOs believed the Settlement was a good resolution.

¹ In this docket, the Clean Energy Organizations include Clean Grid Alliance, Fresh Energy, Minnesota Center for Environmental Advocacy and Sierra Club.

² Settlement Agreement, *In the Matter of Northern States Power Company d/b/a Xcel Energy 2024-2040 Integrated Resource Plan*, Docket No. E-002/RP-24-67, *In the Matter of Xcel Energy's Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation*, Docket No. E002/CN-23-212 (Oct. 2, 2024).

³ See *Id.* at 4-5 (settling firm dispatchable case by selecting an array of technologies, including storage and renewable hybrid projects).

⁴ See generally Order Approving Plan with Modifications and Establishing Requirements for Future Filings at Order Point 3, *In the Matter of the 2020-2034 Upper Midwest Integrated Resource Plan of Northern States Power Company d/b/a Xcel Energy*, Docket No. E002/RP-19-368 (April 15, 2022) (ordering the evaluation of renewable resources and storage to meet Xcel's firm dispatchable generation need).

The CEOs appreciate the significant uncertainty affecting the projects that were selected in the Settlement, including ever-changing tariffs, supply chain issues, and the passage of the One Big Beautiful Bill Act (“OBBBA”). We recognize that these conditions may alter a project in ways that affect that project’s viability as a good choice for Xcel’s system and customers. At the same time, we recognize that the Lake Wilson project is the only remaining firm dispatchable project that includes renewable generation. Moreover, the project is advanced in its development process with a targeted in-service date of 2027, allowing it to avail itself of tax credits before they expire as a result of the OBBBA. Given this, the CEOs believe the Lake Wilson project warrants further consideration before ending negotiations and pursuing a new acquisition process to fill this need.

In addition, the CEOs understand that congestion in the area of the project is a concern for Xcel in moving forward with Lake Wilson. However, the CEOs note that this congestion issue has been well-known for quite some time, and solutions are already under investigation.⁵ Therefore, before abandoning the Lake Wilson project, the CEOs believe it is important to have record development in this docket about:

- Whether the congestion will impact the economics of the Lake Wilson project, and how long that impact will persist.
- Recently-completed or planned transmission projects or upgrades, GETs, or other solutions aimed at resolving this congestion, and the timeline in which those solutions will be implemented; and
- Whether there are comparable, late-stage renewable or renewable/storage hybrid projects under development and not impacted by similar transmission or other system constraints, that could fill the gap created if negotiations over this project cease.

In summary, because the Lake Wilson project is a clean energy project that is well advanced and has the benefit of qualifying for tax credits before the change in federal law, we believe more work is warranted before walking away from the project. In the meantime, we believe more record development in this docket is also needed on current or forthcoming solutions to the congestion problem Xcel has identified, when those solutions will be implemented, and how the congestion affects the Lake Wilson project. For these reasons, we respectfully request the Commission order negotiations on the Lake Wilson project continue while the record is further developed.

⁵ See Order Establishing Filing Requirements at 1, *In the Matter of the Investigation into Transmission-Curtailment Matters, Drivers, and Potential Solutions to Limitations Resulting from the Nobles County Substation*, Docket No. E-999/CI-24-316 (Mar. 24, 2025) (investigating causes of congestion and curtailment around the Nobles Substation and potential solutions); 2025 Biennial Transmission Projects Report at 246, *In the Matter of the 2025 Biennial Transmission Projects Report*, Docket No. E-999/M-25-99 (Oct. 31, 2025) (analyzing benefits of a battery energy storage system to the area around the Nobles substation).

Respectfully Submitted,

/s/ Amelia Vohs

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CERTIFICATE OF SERVICE

I, Akilah Sanders-Reed, hereby certify that I have this day served copies of the enclosed document on the attached list of persons by electronic filing.

Clean Energy Organizations' Comments on Invenergy's Request for Action

Docket No. E002/CN-23-212

Docket No. E002/RP-24-67

Dated this 24th day of November, 2025

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