

June 25, 2021

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Reply Comments of the City of Minneapolis on Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan, Docket No. E002/RP-19-368

Dear Mr. Seuffert,

Included here are Reply Comments submitted by the City of Minneapolis in the matter of Northern States Power Company's, d/b/a Xcel Energy, 2020-2034 Upper Midwest Integrated Resource Plan. We have generally organized our Reply around the following themes, consistent with the recommendations laid out in our initial comments:

- Center equity and customer values in resource planning decisions
- Accelerate carbon emissions reductions through earlier coal plant retirements, using a clean energy portfolio to meet capacity needs, and avoiding new natural gas plants
- Optimize demand size resources, include energy efficiency and demand response, in the IRP modeling
- Include more local generation and distributed energy resources in the plan, to build community wealth and support local renewable energy goals
- Align the Distribution System Planning and Integrated Resource Planning processes
- Consider beneficial electrification and grid flexibility as decarbonization strategies
- Reevaluate nuclear plant extensions, with host community and tribal input

We continue to applaud Xcel Energy for its commitments to renewable energy and carbon reduction. We look forward to continued dialog about resource planning, and we are available to answer any questions the Commission may have.

Sincerely,



Kim W. Havey, LEED AP, AICP
Director, Division of Sustainability

The City of Minneapolis ("Minneapolis") appreciates the opportunity to submit Reply Comments on Xcel Energy's ("Xcel") 2019 Integrated Resource Plan ("IRP") including its June 2020 Supplement. In these Reply Comments we respond to recommendations raised by other parties and further clarify our positions, although we have not fundamentally shifted our recommendations since our initial comments.

I. Center equity and customer values in resource planning decisions

Members of Xcel and Minneapolis staff spoke ahead of filing reply comments, and we were pleased that the Company was responsive within its alternative plan to some important recommendations in our initial comments. However, we understand that Xcel disagrees with the City's and other parties' recommendations to prioritize equity within resource planning. Minneapolis emphasizes the importance of centering equity and socioeconomic considerations in this resource plan.

We point to Ben Fowke's leadership as Chairman and Chief Executive Officer of Xcel Energy on May 28, 2020 when he joined 50 other Minnesota CEOs in acknowledging that his company has a role to play in embracing the principles of greater equity, diversity and inclusion (DEI) in the company and in the communities Xcel serves.

We are...committed to investing in substantive change in our organizations and the communities we serve to address racial inequities and social justice. Change has to start today, and it needs to start with us.

Mr. Fowke's commitment on the part of his company was appropriate and achievable. The electricity grid, a critical part of a local government's public infrastructure, is entrusted to the care of monopoly utilities like Xcel Energy, and we believe the utility is uniquely positioned to improve DEI in Minnesota communities through its investment decisions. Resource planning has the power to strengthen communities.

A number of other parties raised the importance of considering equity in the IRP process in their initial comments, which we reference below. We also highlight precedents from other states that require utilities to consider equity, environmental justice, and energy burden in resource planning and other proceedings:

- The Clean Energy Transformation Act in Washington state requires IRPs to include an assessment, informed by the cumulative impact of: the equitable distribution of energy and non-energy benefits and reductions of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health, economic, and environmental benefits, and the reduction of costs and risks; and energy security and resiliency.
- The California Public Utilities Commission now requires that IRPs include an analysis of disadvantaged communities served and air quality impacts along with a summary of outreach and evaluation criteria that will be used in procurement located in disadvantaged communities
- The Colorado Public Service Commission now considers equity and must address historical inequalities in any matter that comes before them
- Maine now includes reducing greenhouse gas (GHG) emissions to meet reduction goals and addressing and mitigating disproportionate energy burdens on environmental justice populations and underserved utility customers as a basic purpose of the public utility regulatory system

- In Connecticut Council on Climate Change is now required to analyze climate mitigation and adaptation through an energy equity lens – to expand access and remove barriers for underserved and overburdened communities to participate in energy programs, as reflected in the latest IRP filed in the state in 2020
- Michigan’s public utilities commission is expanding its environmental review of IRPs to include considerations of environmental justice
- In Oregon, the PUC must prioritize decarbonization, mitigating energy burden, and addressing inequities of affordability and environmental justice; the PUC is further authorized to consider differential energy burdens on low-income customers and other social and economic inequities

We hope the Minnesota PUC will look to the leadership of these peer states and the examples in our initial comments to prioritize equity and socioeconomic considerations when considering this and future IRP filings. We highlight from our initial comments that to achieve an equitable clean energy transition, it’s essential that principles of distributive and procedural justice are applied to the planning process.

- Distributive justice means the fair allocation of the costs and benefits of the transition, such as support being directed holistically to the whole community — not just the workers — and it includes environmental remediation in addition to social and economic assistance.
- Procedural justice involves consideration of a comprehensive range of interests and issues in transition planning, and intentionally inclusive participation processes and power distribution in decision-making forums, ensuring that historically underrepresented voices are included.

This approach is increasingly being used by government agencies at all levels, including the Biden Administration, with the commitment to delivering 40 percent of the benefits of federal investments to disadvantaged communities through the Justice40 Initiative, and tracking performance toward that goal through the establishment of an environmental justice scorecard. This commitment reflects the opportunity, and necessity, of using the clean energy transition to support and invest in those communities that have been left behind, and ensure that those who have suffered the most harm in the past are the first to benefit.

The Federal Energy Regulatory Commission (FERC) also announced plans to incorporate environmental justice and equity concerns into the Commission’s decision-making. This is critical because, in the words of Shalanda Baker - Senior Advisor to the Office of the Secretary at the Department of Energy - in her book *Revolutionary Power*, the clean energy transition risks reinforcing existing inequalities if the underlying systemic issues are not addressed. She suggests that the transition away from the fossil fuel-driven energy system offers an opportunity to upend existing socioeconomic inequality and foster lasting structural change. We recommend that Xcel Energy take this opportunity and make a similar commitment with the clean energy investments in this IRP.

Sierra Club states in their comments “it is essential that utilities craft their IRPs through a lens of equity and access to the benefits of clean energy,” especially in the context of the disproportionate harm done to BIPOC (Black, Indigenous, and People of Color) Minnesotans by the COVID pandemic and economic fallout, the climate crisis, and centuries of systemic racism. They also identify ways that Xcel Energy’s proposed plan is inconsistent with the company’s commitment “to the principles of greater inclusion, diversity and equity in our company and community”, including underestimating the potential of distributed and community solar. Minneapolis supports the Sierra Club’s “Clean Energy for All” (CEFA) plan as it would deliver greater and more

equitable socioeconomic benefits for customers, including those disproportionately impacted by the recent COVID pandemic and previous environmental and economic harms.

The Distributed Solar Parties' (DSP) comments emphasize the access and equity benefits of distributed generation, stating "distributed generation allows energy users to own and control the long-term revenue from future energy sources, allowing individuals and families to share in wealth that historically has been limited to utility investors (for utility-owned assets) and Wall Street (for energy assets operating under Power Purchase Agreements with utilities)". We support the DSP's recommendation that the IRP evaluate future energy sources in ways that prioritize creating wealth, health, and opportunity for low-income communities and communities of color.

We also support the recommendations of Fresh Energy, Community Stabilization Project, Green & Healthy Homes Initiative, Inquilinxs Unidxs Por Justicia, Minnesota Housing Partnership, National Housing Trust, and Natural Resources Defense Council ("Energy Efficiency for All partners") for the ways that Xcel Energy might consider equity and environmental justice in its plan, including by:

- adopting practices in furtherance of procedural justice;
- developing environmental justice-focused initiatives to be incorporated throughout the utility;
- reporting on comprehensive recruitment, hiring, retention, and advancement goals and strategies for staff and board, as well as deepening its supplier and vendor diversity efforts; and
- modifying the IRP to remove the proposed gas plant and focus on equitably delivered energy efficiency and renewable energy investments.

Minneapolis strongly agrees with the Community Energy Justice Commenters, a cohort of environmental justice and community-based organizations (including some signatories from Minneapolis), recommendation in planned reply comments, that Xcel Energy should prioritize local, distributed renewables, efficiency, and energy storage to equitably build community wealth, deepen energy affordability, alleviate health burdens, which will begin to redress the costly environmental racism currently inflicted by the energy system. Specifically, the Commission should require Xcel Energy to:

- carve out a specific percent of its solar additions in this 15-year planning period to be produced by local renewables that are community owned, and
- model energy efficiency as the highest priority, least cost, and equity-focused resource that it is

The IRP process is a valuable platform for Xcel Energy and stakeholders to forecast, analyze, and discuss potential resource futures. While it is critical to use data and modern modeling techniques to plan utility investments, relying exclusively on quantitative methods to evaluate resource plans is an inherently incomplete and exclusive exercise. In every modeling exercise, the data used and methodologies applied contain bias, and therefore the decision of what data to use and how is a political decision. While the Commission has taken strides to increase the transparency and rigor of the IRP modeling process, it will always be inaccessible to the vast majority of stakeholders yet it should be designed to reflect the values of Xcel Energy customers. Therefore, Minneapolis suggests that, in addition to requiring rigorous modeling, the Commission takes a people-centered approach and considers the moral values implicit in utility resource planning in order to better align the direction of Xcel Energy's investments with the customers they are trusted to serve.

Minneapolis appreciates and acknowledges the effort Xcel Energy and other stakeholders have put into their modeling. Below we reference the proposed resource plans presented by other parties in this docket that support Minneapolis's priorities of:

- accelerating carbon emissions reduction through earlier coal plant retirement,
- considering a clean energy portfolio approach to meeting future capacity need,
- analyzing alternatives to gas to meet black start and other system needs,

- using modeling assumptions that allow for optimization of energy efficiency and demand response,
- including more local generation,
- aligning the distribution system and integrated resource planning processes,
- considering beneficial electrification and grid flexibility as decarbonization strategies, and
- reevaluating the proposed nuclear plant extensions in Xcel Energy's preferred plan.

II. Accelerate carbon emissions reductions through earlier coal plant retirements, using clean energy portfolios to meet capacity needs, and avoiding new gas plants

A number of parties ran their own modeling in order to come up with alternatives to Xcel Energy's preferred plan. These models demonstrate the ability to cost effectively achieve Minneapolis's priority of accelerating carbon reductions through early coal plant retirement, no new fossil fuel generation, and utilizing a clean energy portfolio (including battery storage and other distributed energy resources) to meet future resource needs.

- A. The Citizens Utility Board of Minnesota (CUB) modeled and submitted the "Consumers' Plan" with their initial comments, demonstrating that Xcel Energy could retire all their uneconomic coal plants by 2025 and achieve a cumulative cost savings of \$6.45 billion. The Consumers' Plan also achieves greater carbon reductions (86% by 2030) and empowers customers with more demand-side resources and flexibility. Minneapolis supports the Consumers' Plan as a strategy for accelerated carbon emissions reduction, and specifically the earlier coal plant retirements modeled in the CUB Plan.
- B. The Clean Energy Organizations' (Fresh Energy, Clean Grid Alliance, Union of Concerned Scientists, and the Minnesota Center for Environmental Advocacy) plan uses a clean energy portfolio - of renewable energy, battery storage, and demand response - to meet not only capacity needs, but also provide essential reliability and other grid services (including black start). The plan adds over 15,000 MW of utility-scale renewables, and another 1,250 MW of hybrid solar and battery storage to replace the natural gas combined cycle plant at Sherco. As noted in our initial comments, we support the use of clean energy portfolios to meet capacity needs and deliver grid services at lower costs and with less risk than fossil fuel plants.
- C. The DSP comments model a method of using distributed solar as a system resource to meet capacity needs, rather than the passive distributed generation modeling used by Xcel Energy. This method results in significantly more distributed solar - 1,851 MW of rooftop solar and 2,051 MW of community solar gardens - than Xcel Energy's preferred plan. We support this optimized approach to distributed generation, for the access and equity benefits referenced above, as well as the distribution grid value it can provide. We also recommend that Xcel model the inclusion of wholesale distributed solar (1-10 MW) as a more cost effective means to add solar to the grid than utility scale solar.
- D. We support Sierra Club's initial comments and CEFA Plan showing that the Sherco CC, King, and Monticello plants are not needed for black start or other reliability services because they are too large and inflexible to serve as a black start resource. We support the recommendation that battery storage can provide the required black start services.

All these plans referenced above - the CUB Consumers' Plan, the DSP model, the Sierra Club's CEFA Plan, and

the CEO's preferred plan - avoid building new fossil fuel generation, including Xcel Energy's proposed 800 MW combined cycle gas plant in Becker.

III. Optimize demand side resources, including energy efficiency and demand response, in the IRP modeling

As stated in our initial comments, we believe the evidence showing that demand side measures, including distributed solar, energy efficiency, and demand flexibility measures, hold the key to cost effective and equitable decarbonization in an electrified future. The modeling submitted by CUB supports these points by showing that demand side measures and distributed energy resources (DER) provide benefits at the distribution level that enable rapid, cost effective decarbonization. The Distributed Solar Parties model shows that distributed solar can meet resource needs while providing carbon and equity benefits to the state. With these analyses in mind, we reiterate our initial position that, in order to effectively deploy DER Xcel Energy must work to represent the full value of DER in the modeling process for the next IRP proceeding, including equity benefits, and allow demand side measures and DER to compete in the resource model uninhibited by artificial constraints.

Furthermore, in our initial comments, we take the position that energy efficiency, distributed solar, demand response, and demand flexibility measures should be evaluated using a societal discount rate because these program costs are recovered from customers through bill riders and not by utility raised capital. Therefore, they should be evaluated using a discount rate that reflects the ratepayer base and not the utility's weighted average cost of capital.

In practice, the variety of modeling approaches available to utilities and advocates make consistent treatment of the discount rate difficult. For instance, the WIS:dom model employed by CUB treats demand flexibility as a change to load shape and thus did not have a discount rate applied. Xcel Energy's modeling treated demand flexibility as a 'resource' program and factored in a discount rate to the cost effectiveness analysis. This creates an inconsistent analysis framework for demand flexibility. The Sierra Club analysis addresses the discount rate for battery storage but was restricted to using one discount rate at the company level in their modeling, and thus was not able to apply societal discount rates to demand side resources. We believe this important analysis factor, the discount rate, should be explicitly and transparently discussed.

IV. Include more local generation and distributed energy resources in the plan to build community wealth and support local renewable energy goals

As a local unit of government, we are concerned that an increasing number of city and county Climate Action Plans and climate goals will not be achievable under the plan and supplement filed by Xcel. We emphasize that the climate goals we adopted in 2013 were based on the state's own 2007 goals and the science available at the time. However, we do not operate a municipal utility, and we rely heavily on Xcel and the State of Minnesota to support us to achieve these goals, adopted consistent with the public interest and consistent with state statute. A coalition of 38 Minnesota local governments within Xcel Energy's service territory submitted a joint letter in this proceeding emphasizing the importance of this IRP in meeting those shared decarbonization goals. Minneapolis supports the consideration of local government clean energy goals - including in-boundary renewable and equitable decarbonization - in the Xcel Energy resource planning process.

As referenced above, both the Distributed Solar Parties and the coalition of environmental justice and community based organizations reference the potential for distributed generation to build community

wealth, address energy burden, and alleviate health impacts from the energy system. We support more DER in the Xcel Energy plan for these reasons, and to meet the clean energy goals of local communities, many of which call out in-boundary renewable generation.

Minneapolis supports the DSP's *'Distributed Generation as a Resource'* proposal that assigns pricing for additional increments of distributed solar with the utility's cost, rather than the all-in cost borne by the solar owner. This allows the model to select additional distributed solar. We support the approach of modeling increments of incentive levels by the utility to achieve the goal for distributed solar installation.

V. Align Distribution System Planning and Integrated Resource Planning processes

With increased deployment of DER – including rooftop solar generation, electric vehicles, on-site storage, etc. – through either customer installation or the selection of distributed generation as a resource (as recommended by the DSP in their comments), utilities should work to align their resource and distribution system planning processes. A comprehensive electricity planning process, as recommended by the National Association of Regulatory Utility Commissioners (NARUC) and National Association of State Energy Officials (NASEO) Task Force, could help to manage system complexities and avoid unnecessary costs associated with operating a more distributed grid. This would allow utilities to better account for the quantity, location, capabilities, and load shapes of resources added to the distribution system and the bulk power system, and also help utilities to safely and cost effectively meet current and emerging grid needs such as increased flexibility, resilience, and DER integration. We therefore recommend that the Commission and the utility take steps to better align the distribution and resource planning processes in Minnesota.

VI. Consider beneficial electrification and grid flexibility as decarbonization strategies

As a number of parties emphasized in their comments, Xcel Energy underestimates the potential of demand-side electrification as both a decarbonization and efficiency strategy.

- CUB's Consumers' Plan demonstrates the demand flexibility that a proactive beneficial electrification strategy could provide.
- Sierra Club's CEFA plan emphasizes new forms of demand response and flexible load that will be introduced through transportation electrification, building heating, and water heating.

Minneapolis continues to support a strategy that proactively utilizes beneficial electrification to achieve decarbonization, grid flexibility, and address equity issues.

VII. Reevaluate nuclear plant extensions, with host community and tribal input

As demonstrated by the Sierra Club's CEFA Plan, extending the Monticello nuclear license is not in customers' interests, both in terms of the overall cost of the plan and the environmental impacts of the nuclear waste. Given the potential risk associated with ongoing operation of the plant, Minneapolis therefore requests that Xcel Energy reevaluate the nuclear plant extensions in the next IRP.

Minneapolis also supports the Prairie Island Indian Community's (PIIC) request to be included in any planning related to the Prairie Island Nuclear Generating Plant (PINGP). As noted by the PIIC in their comments - "Because of the close proximity of the PINGP units 1 and 2 and its Independent Spent Fuel Storage

Installation (ISFSI), the Community has a compelling interest in ensuring that we are engaged in any proceedings at the State and Federal levels.”

The comments state that the PIIC was not consulted in the siting of the plant, did not benefit from the plant’s construction nor its continued operation (through things like job creation or tax benefits), and has in fact experienced negative impacts such as destruction of important archaeological sites and the release of radiation due to a steam generator tube rupture. Given this context and the principles of distributive and procedural justice laid out above, Xcel Energy must work closely with the Prairie Island Indian Community, a sovereign nation, in planning for whether to renew the operating licenses for the Prairie Island Nuclear Plant.

VIII. Summary of Recommendations

The City of Minneapolis recommends that the Commission require Xcel Energy to:

1. Center equity in resource decisions, by:
 - a. Designing for the equitable delivery of electricity services and programs for energy burdened customers in this IRP
 - b. Conducting a comprehensive planning process to advance a just and equitable clean energy transition as part of the next IRP planning cycle.
 - c. Creating new options to improve customer access to energy efficiency and renewable energy.
 - d. Submitting a plan by January 2022 to bring its workforce’s racial and gender diversity in line with the population it serves and with the utility’s stated goals.
 - 1.d.1 Diversity in workforce should start with leadership
 - 1.d.2 Promote intentional workforce development and hiring efforts in Minneapolis
 - e. Working closely with the Prairie Island Indian Community, a sovereign nation, in planning for whether to renew the operating licenses for the Prairie Island Nuclear Plant.
2. Retire the King and Sherco 3 coal plants earlier than 2028 and 2030, consistent with the Citizens Utilities Board “Consumers Plan.”
3. Require a Clean Energy Portfolio approach if new capacity is needed, as part of a competitive bidding process
4. Analyze black start options that do not require natural gas, and share this analysis prior to the next RFP for new generation or IRP planning cycle
5. Develop a more sophisticated approach to optimize demand size resources, include energy efficiency and demand response, in the next IRP modeling process, by using a consistent societal discount rate to analyze both energy efficiency and demand response resources in this and future IRP

And the City of Minneapolis makes the following recommendations for the next Xcel Upper Midwest IRP:

1. Include more local generation and distributed energy resources in the plan
 - Work with governments with local distributed solar goals to develop programs that can support their community, with an emphasis on low-income customers.
 - Develop new local renewable resources for municipal loads and our community through special contracts, expanded community solar offerings, and on-site solar incentives.
 - Consider beneficial electrification and grid flexibility as decarbonization strategies.
2. Model demand side resources at a more granular level in the next IRP filing.
3. Assign value to equity impacts and non-energy benefits of DSM programs.
4. Model demand flexibility programs separately from traditional demand response programs

5. Include More Local Generation and Distributed Energy Resources in the Plan.
 - The City of Minneapolis requests the Commission require Xcel Energy to work with customers with local distributed solar goals to develop programs that can support their community, with an emphasis on low-income customers.
 - The City of Minneapolis would like to work with Xcel Energy to develop new local renewable resources for municipal loads and our community through special contracts, expanded community solar offerings, and on-site solar incentives.
6. Align integrated distribution system planning and integrated resource planning processes.
7. Consider beneficial electrification and grid flexibility as decarbonization strategies.
 - The City of Minneapolis will support Xcel Energy to ensure new electric loads through vehicle electrification or fuel switching can be designed to be grid assets.
 - Minneapolis requests the Commission ensure electrification plans are built into any future high electrification scenario.
8. Reevaluate the Monticello nuclear plant extension in the next IRP cycle

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

CERTIFICATE OF SERVICE

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 25th day of June 2021, I served a copy of the following via e-mail:

**COMMENTS OF THE CITY OF MINNEAPOLIS REGARDING DOCKET
NO. 19-368**

at the last known email addresses of said entities/individuals on the attached Service List.



Stacy A. Miller

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