

October 15, 2021

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

RE: Supplemental 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 Supplemental Comments submitted by the City of Minneapolis in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Supplemental Comment Period in the Matter of Northern States Power Company's, d/b/a Xcel Energy, 2020-2034 Upper Midwest Integrated Resource Plan, Docket No. E002/RP-19-368.

We focus our comments on responding to the topics identified by the Commission in their Notice of Supplemental Comment Period and the changes in Xcel's Alternate Plan. We also reiterate some recommendations from our initial comments that were not addressed in the Alternate Plan, including the need to:

- Center equity and customer values in resource planning decisions
- Include more local generation and distributed energy resources to improve energy affordability, build community wealth, and support local renewable energy goals
- Align the Distribution System Planning and Integrated Resource Planning processes
- Prioritize beneficial electrification and grid flexibility as decarbonization strategies

We applaud Xcel Energy for responding to stakeholder feedback and offering an Alternate Plan that does not include the Sherco CC plant, accelerates the additions of renewables and energy storage on the system, and adds demand side resources, including energy efficiency and demand response.

Additionally, Minneapolis wishes to acknowledge the support from the Bloomberg Philanthropies American Cities Climate Challenge grant, and especially technical assistance provided by the Institute for Market Transformation, in the development of our Supplemental Comments.

We look forward to continued dialogue about resource planning and are available to answer any questions the Commission may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "K. W. Havey", with a stylized flourish at the end.

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

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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**In the Matter of Northern States  
Power Company's, d/b/a Xcel Energy,  
2020– 2034 Upper Midwest Integrated  
Resource Plan**

**Docket No. E002/RP-19-368**

**SUPPLEMENTAL COMMENTS OF THE CITY OF MINNEAPOLIS**

The City of Minneapolis ("Minneapolis") appreciates the opportunity to submit Supplemental Comments on Xcel Energy's ("Xcel") 2020-2034 Integrated Resource Plan (IRP), including Xcel's Alternate Plan presented in June 2021 Reply Comments. In these Supplemental Comments we respond to the questions in the Commission's Notice of Supplemental Comment Period addressing the changes included in the Alternate Plan and reiterate key priorities from our previous comments.

**1. Should the Commission approve, modify, or reject Xcel Energy's Alternate Plan, as described in the Company's June 25, 2021 Reply Comments?**

Minneapolis recommends approval of the Alternate Plan with modifications as described below.

***We support Xcel Energy's Alternate Plan that does not include a new combined cycle gas plant as it better aligns with City goals and federal policy trends***

We support the removal of the Sherco Combined Cycle (CC) gas plant in the update to the IRP. This change aligns with several the City's earlier recommendations in this proceeding to:

- opt for a clean energy portfolio to meet resource needs and deliver grid services, including black start restoration, at a lower cost and with less risk than fossil power plants
- accelerate carbon emissions reductions by avoiding new gas plants
- aid cities and the State of Minnesota in achieving our greenhouse gas emissions reduction goals.

Eliminating plans for a decades-long investment in a new combined cycle gas plant will also likely make it easier for Xcel to comply with new state and federal clean energy and carbon reduction policies in years to come.

***We recommend alternatives to gas peaking plants to meet new firm dispatchable resource needs***

While we understand the need for firm dispatchable resources to maintain reliability and recognize that the current model Xcel employs selects gas peaker units, for technical and economic reasons outlined in our initial comments we recommend that Xcel meet these needs with other resources.

Many community members and organizations we spoke with in developing our initial comments expressed concern about potential stranded assets with the construction of any new fossil fuel plants. Many were concerned about the potential cost to customers, as well as the carbon impacts associated with gas. We therefore do not support the proposed new combustion turbine (CT) plants in Lyon County, Minnesota and Fargo, North Dakota.

We reaffirm our initial recommendation to utilize energy storage to meet the need for firm dispatchable resources. The transition to battery storage systems is accelerating as a replacement for gas peakers as battery technology now provides faster response at a lower cost.<sup>1</sup> We recommend deploying the 250 MW of planned energy storage resources that are included in Xcel's Alternate Plan sooner than proposed to field test the capabilities of this resource for meeting future needs.

***We support the acceleration of renewables and energy storage additions***

As outlined in previous comments, Minneapolis strongly supports accelerating carbon reductions through utilizing a clean energy portfolio - including battery storage and other distributed energy resources - to meet future needs. We therefore support the proposal by Xcel to add nearly 6,000 MW of renewables over the course of this plan, and also support the proposed transmission that will enable interconnection of variable wind and solar resources. Given the significant new wind and solar investments Xcel is proposing in this IRP, we believe there is an opportunity to prioritize contracting with women and minority-owned businesses, providing skills training and pathways in energy careers for underrepresented communities in the utility workforce. The Federal government has made a commitment to deliver 40 percent of the benefits of federal investments to underserved and environmental justice communities, and we recommend the Xcel make a similar commitment with their wind, solar, and energy efficiency investments - to allocate at least 20 percent to contracts with women and minority-owned businesses in support of the Company's ESG commitments.

**2. If the Commission modifies the Alternate Plan, what modifications should the Commission make?**

In addition to the changes recommended above, Minneapolis suggests the following modifications:

***We recommend the nuclear operating licenses be re-evaluated in the next IRP cycle***

We continue to believe the nuclear extensions should be re-evaluated in the next IRP cycle, with tribal and host community input. Minneapolis, along with many other local jurisdictions within 33 counties, is within the 50-mile Ingestion Planning Zone.<sup>2</sup> This is the priority area of concern in the case of a catastrophic event

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<sup>1</sup> *Battery Storage - the New, Cleaner Peaker*, April 2021 by the Clean Energy Council.

<https://assets.cleanenergycouncil.org.au/documents/resources/reports/battery-storage-the-new-clean-peaker.pdf>

<sup>2</sup> Minnesota Department of Public Safety Division of Homeland Security and Emergency Management Radiological Emergency Preparedness Fact Sheet. <https://dps.mn.gov/divisions/hsem/radiological-emergency->

at the Monticello Nuclear Generating Plant or the Prairie Island Nuclear Generating Plant possible radioactive material “release that could potentially contaminate water supplies, food crops and livestock above FDA guidelines, or result in ground contamination above EPA guidelines.”<sup>3</sup> This and nuclear waste-related risks should be carefully evaluated before operating licenses are extended.

Xcel has demonstrated, in modeling from its Monticello Spent Fuel Storage Certificate of Need Application, that it is possible to replace the full capacity and energy output of the Monticello nuclear plant with wind, solar, and battery energy storage, and no gas.<sup>4</sup> We encourage the PUC to recommend that Xcel thoroughly review alternatives to nuclear, given the uncertainty associated with nuclear waste storage.

***We recommend maximizing cost-effective distributed energy resource potential in the plan***

We continue to believe more local generation and DER will lead to a more equitable and affordable resource plan as well as helping support renewable energy goals within the state<sup>5</sup> and local jurisdictions that Xcel serves. Therefore, we appreciate that Xcel has agreed to work with partners to improve the modeling in the next IRP to include more DER. As we recommended in our original comments in relation to energy efficiency and demand response, it is important to continue the non-energy benefits of resources. When it comes to renewable energy, the non-energy benefits - such as improved health and economic development - are even greater for distributed generation.

**3. Should the Commission adopt a proposed alternative plan under Minn. R. 7843.0300 subp. 11? If so, provide a narrative with quantitative analysis supporting how the proposed changes are in the public interest, considering the factors listed in part 7843.0500, subp. 3.**

We recommend that the Commission adopt a proposed Alternative Plan with the following changes:

- removal of the Sherco Combined Cycle (CC) gas plant as requested by Xcel
- reject the proposed new combustion turbine (CT) plants in Lyon County, Minnesota and Fargo, North Dakota
- utilize energy storage and other carbon-free technologies to meet the need for firm dispatchable resources
- accelerate carbon reductions through utilizing a clean energy portfolio – including battery storage and other distributed energy resources – to meet future needs
- reevaluate nuclear operating licenses in the next IRP cycle, and
- maximize cost-effective distributed energy resource potential in the plan

**4. What resource acquisition process(es) should Xcel use to implement the approved resource plan?**

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[preparedness/Documents/2018%20HSEM13%20-%20Intermediate%20Ingestion%20Phases.pdf](#)

<sup>3</sup> *Id.*

<sup>4</sup> <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId=%7b3045A37B-0000-CE5E-BE6B-40DFD1FB0BF2%7d&documentTitle=20219-177630-03>

<sup>5</sup> Minnesota Solar Jobs Act of 2013

Best practices require that if new capacity is needed, Xcel should pursue an all-source procurement,<sup>6,7</sup> a unified resource acquisition process that allows a full range of potential resources to compete on equal footing, instead of issuing a gas-only RFP for new capacity. Today, combinations of clean energy portfolios (CEP) can deliver all grid services typically provided by fossil power plants at lower costs and with less risk.<sup>8</sup> If Xcel retires coal plants and builds new natural gas, there is a high risk that Xcel is replacing one stranded asset with another.

An October 2019 report from the Rocky Mountain Institute (RMI) found that new clean energy portfolios have not only declined in cost by 80 percent since 2010, but are “now lower-cost on a levelized basis than new gas plants” and projected to “undercut operating costs of existing gas plants” within 10-20 years.<sup>9</sup> RMI analyzed the economics of every proposed gas-fired power plant in the United States and found over 90 percent of proposed gas-fired capacity would be more expensive than an equivalent CEP. The risk of new gas becoming stranded is widely recognized. Utilities in Arizona,<sup>10</sup> Michigan,<sup>11</sup> Oregon,<sup>12</sup> New Mexico,<sup>13</sup> and Utah<sup>14</sup> plan to replace retiring coal fleets with portfolios of renewable energy, storage, energy efficiency, and demand flexibility to modernize infrastructure and improve grid resiliency. This reduces the risk of stranded assets, decreases pollution, and saves customers money.

Further, we encourage all-source procurements to run candidate resources through a portfolio model in order to understand their capacity value as compared to a single-source solution. It should also include a robust assessment of energy efficiency and demand response programs to identify the most cost-effective projects.

The Commission should consider a review of bidding procedures to revisit rules for fairness and objectivity.<sup>15</sup> The Commission should ensure that utility ownership of generation is not at odds with competitive bidding, and that clear codes of conduct are in place to ensure that all bidders have symmetric data and information.

The Commission has the opportunity to codify the CEP approach by making all-source procurement a

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<sup>6</sup> Making The Most Of The Power Plant Market: Best Practices For All-Source Electric Generation Procurement. Energy Innovation Policy and Technology. Apr 2020. <https://energyinnovation.org/wp-content/uploads/2020/04/All-Source-Utility-Electricity-Generation-Procurement-Best-Practices.pdf>

<sup>7</sup> Lauren Shwisberg, Mark Dyson, Grant Glazer, Carl Linvill, and Megan Anderson, How to Build Clean Energy Portfolios: A Practical Guide to Next-Generation Procurement Practices, RMI, 2021. <http://www.rmi.org/insight/how-to-build-clean-energy-portfolios>.

<sup>8</sup> Dyson, Mark. The decade of clean energy: Trends, opportunities, and risks that will shape the 2020s. Rocky Mountain Institute presentation to the Minnesota Legislative Energy Commission. Nov 13, 2020. <https://www.leg.mn/2020/Dyson%20-%20MN%20LEC%2020201113.pptx>

<sup>9</sup> Dyson, Mark, Grant Glazer, and Charles Teplin. The Growing Market for Clean Energy Portfolios + Prospects for Gas Pipelines in the Era of Clean Energy. 2019. <https://rmi.org/insight/clean-energy-portfolios-pipelines-and-plants>

<sup>10</sup> Arizona New-Build Gas Moratorium to Continue. Feb 11, 2019. <https://www.greentechmedia.com/articles/read/arizona-new-build-gas-moratorium-to-continue#gs.culf5w>

<sup>11</sup> Lovins, Amory. Reinventing Fire. 2014. <https://rmi.org/insight/reinventing-fire/>

<sup>12</sup> Integrated Resource Planning: Leading the way to Oregon’s clean energy future. 2019. <https://www.portlandgeneral.com/our-company/energy-strategy/resource-planning/integrated-resource-planning>

<sup>13</sup> NM Docket 19-00018-UT. New Mexico approves 100% renewables + storage replacement for San Juan coal capacity. July 30, 2020. <https://www.utilitydive.com/news/new-mexico-approves-100-renewable-replacement-for-san-juan-coal-capacity/582557/>

<sup>14</sup> Walton, Robert. PacifiCorp to add 7 GW renewables + storage, close 20 of 24 coal plants. Oct 3, 2019. <https://www.utilitydive.com/news/pacificorp-to-add-7-gw-renewables-storage-close-20-of-24-coal-plants/564299/>

<sup>15</sup> *Id.* p.3

requirement. The requirement is in place in Colorado<sup>16</sup> and Washington.<sup>17</sup>

Xcel Energy Colorado successfully ran an all-source procurement and demonstrated the market can provide cost competitive responses to RFPs.<sup>18</sup> All-source procurement can also improve equity outcomes and support local workforce development.

## **6. Are there other issues or concerns related to this matter?**

### ***We encourage Xcel to center equity and customer values in resource planning decisions***

As noted in our previous comments, we believe the resource planning process is an opportunity to pursue a more equitable energy future - minimizing adverse socioeconomic effects and adverse impacts on the environment.<sup>19</sup> While Xcel mentions equity issues in the context of expanding distributed solar and based on a limited perspective of the costs and benefits of these resources, we believe there is an opportunity to consider equity more broadly in the IRP process. We recommend that the Commission and Xcel review the community input regarding Xcel's IRP that we submitted with our initial comments in February of 2021, and have also included as Attachment A. This unique perspective based on the lived experience of community members in Minneapolis provides important insights into how we can maximize the benefits of the clean energy transition proposed in this IRP.

A key opportunity for addressing equity in the IRP and other utility planning processes is to consider energy burden and how the plan will impact those communities and customers that experience the highest energy burden. A report looking at six years of energy burden data in Minneapolis reveals that while the average energy burden in the city in 2019 was 3.1% (below the national average of 3.6%), there are wide disparities between the most burdened and least burdened communities, measured by census tract.<sup>20</sup> The top quintile of most burdened tracts in Minneapolis had an energy burden of 5.6% in 2019, compared to 1.9% in the least burdened tracts. The map below shows the energy burden in Hennepin County by census tract, which ranges from 1% to 13%. The darker shade of purple represents census tracts with highest energy burden (closer to 13%) and the lighter colors represent neighborhoods with lowest energy burden (3% or less).

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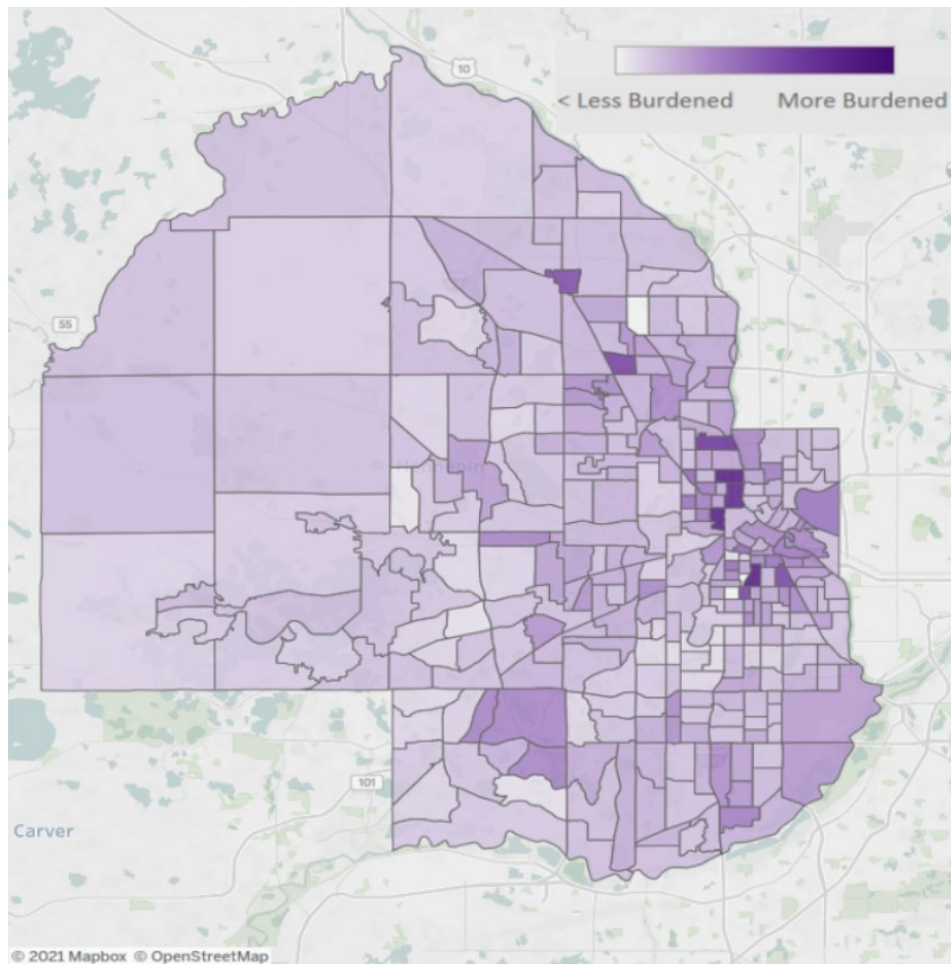
<sup>16</sup> <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=8835&fileName=4%20CCR%20723-3>

<sup>17</sup> <https://www.utc.wa.gov/docs/Pages/DocketLookup.aspx?FilingID=190837>

<sup>18</sup> Making The Most Of The Power Plant Market: Best Practices For All-source Electric Generation Procurement. Energy Innovation Policy and Technology. Apr 2020. <https://energyinnovation.org/wp-content/uploads/2020/04/All-Source-Utility-Electricity-Generation-Procurement-Best-Practices.pdf>

<sup>19</sup> Minn. Rule 7843.0500, Subp. 3.

<sup>20</sup> Minneapolis Energy Burden Report, February 2021. Greenlink Equity Map: <https://www.equitymap.org/minneapolis-energy-burden-impacts>



*Figure 1- 2019 energy burden for households in Hennepin County, census tract<sup>21</sup>*

The City of Minneapolis, Xcel Energy, and the Minnesota Public Utilities Commission have a collective responsibility to carefully examine how the decisions made in this resource plan will benefit and burden communities, particularly low-income households and communities of color, that are already severely burdened. With the City’s Strategic and Racial Equity Action Plan (SREAP), Minneapolis’s goal is to prioritize “sustainable practices and renewable resources to equitably address climate change while restoring and protecting our soil, water and air.”<sup>22</sup> We ask that Xcel and the Commission consider these disparate impacts in the planning process and offer to share data we have in order to understand and mitigate these disparities.

We continue to believe more local generation and DER will lead to a more equitable and affordable resource plan as well as helping support renewable energy goals within the state<sup>23</sup> and local jurisdictions that Xcel serves. Therefore, we appreciate that Xcel has agreed to work with partners to improve the modeling in the next IRP to include more DER. As we recommended in our original comments in relation to

<sup>21</sup> Energy burden is the percent of income that a household spends on electricity and gas bills; an energy burden over 6% is considered “high” or “unaffordable” while a burden over 10% is considered “severe”.

<sup>22</sup> City of Minneapolis Strategic & Racial Equity Action Plan.

<http://www2.minneapolismn.gov/www/groups/public/@citycoordinator/documents/webcontent/wcmssp-225343.pdf>

<sup>23</sup> Minnesota Solar Jobs Act of 2013



## Summary of Recommendations

In summary, the City of Minneapolis recommends:

- Approval of Xcel's decision to not pursue a new combined cycle gas plant at the Sherco site.
- Approval of Xcel's proposed reutilization of interconnections at Sherco and King sites and the proposed renewable resources added on the lines if determined to be in the public interest and does not stifle market competition.
- Approval of Xcel's requested use of Modified Track 2 process for solar and wind additions needed before the next IRP, ensuring a competitive bidding process. Minneapolis recommends that this process includes the opportunity for DERs to compete.
- Rejecting the construction of 800 MW of new gas CTs in Lyon County and Fargo.

Consistent with our previous comments, the City of Minneapolis 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. Creating new options to improve customer access to energy efficiency and renewable energy.
  - c. Submitting a plan in 2022 to bring its workforce's racial and gender diversity in line with the population it serves and with the utility's stated goals.
  - d. 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. Deploy the 250 MW of planned energy storage resources from Xcel's Alternate Plan sooner than proposed to field test the capabilities of this resource for meeting future needs.

For the next Xcel Energy Upper Midwest IRP, the City of Minneapolis makes the following recommendations:

1. Conduct a comprehensive planning process to advance a just and equitable clean energy transition as part of the next IRP planning cycle, including a collaborative, participatory planning process through stakeholder workshops as an alternative to the limited information requirements that Xcel proposed in the Alternate Plan, which will be more time efficient while allowing for more community input.<sup>24</sup>
  - This can advance procedural equity in developing the next IRP and address stakeholder priorities in advance so that fewer parties feel the need to run their own models.
2. Include more local generation and distributed energy resources in the plan
  - Work with customers 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.
3. Model demand side resources at a more granular level in the next IRP filing. Develop a more sophisticated approach to optimize demand side 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 IRPs
4. Assign value to equity impacts and non-energy benefits of DSM programs.
5. Model demand flexibility programs separately from traditional demand response programs
6. Align integrated distribution system planning and integrated resource planning processes.
7. Consider beneficial electrification and grid flexibility as decarbonization strategies.
  - Ensure new electric loads through vehicle electrification or fuel switching can be designed to be grid assets.
  - Ensure electrification plans are built into any future high electrification scenario.
8. Re-evaluate the Monticello nuclear plant extension in the next IRP cycle.

Finally, Minneapolis thanks the Commission for consideration of our supplemental comments.

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<sup>24</sup> Xcel Reply Comments. Section 4 - pages 152-156.

## ATTACHEMENT A COMMUNITY INPUT REGARDING XCEL'S IRP<sup>25</sup>

Maximizing the benefits from a clean energy future requires gathering input on resource planning from the people who will be most impacted.<sup>26,27</sup> To this end, City of Minneapolis staff met with numerous community-based organizations, BIPOC (Black, Indigenous, and People of Color) community leaders, and City of Minneapolis advisory groups regarding Xcel Energy's IRP over the past several months. We also drew from the direction provided by our two Green Zones<sup>28</sup> - place-based community solutions initiatives - to aid in developing the City's positions on various topics related to the IRP.

Community members emphasized that the time is now for governments and corporate leaders to center decision-making based on the needs of historically marginalized people. They asked that we recognize their recommendations based on their lived experience as being valid.

Below are summaries of direction and feedback from our community members that offer context for the City's recommendations.

### *A. Northside Green Zone Task Force<sup>29</sup>*

The *Minneapolis Northside Green Zone 5-Year Work Plan* was adopted in March 2020<sup>30</sup> and includes the following priorities that relate to this IRP:

- **Improve air quality, livability, and pollinator habitat** through vegetation, clean energy, and energy efficiency.
- **Create career pathways to renewable energy, energy efficiency and construction.** From internships to apprenticeships to journeymen to management and business ownership, model pathways programs after existing efforts in Public Works, Police and Fire.
- **Advance opportunities in the Northern Green Zone as City leadership engages with our energy providers.** See the Clean Energy Partnership work plan, *WD.1: Improve Equitable Access to Clean Energy Jobs*.
- **Work with Xcel Energy to identify ways to obtain training and improve access to high quality local jobs for Northern Green Zone residents.** See Xcel's vision of diversity and corporate diversity policy, including a Council for Diversity And Inclusion.

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<sup>25</sup> Excerpt from City of Minneapolis Initial Comments in this docket. Feb 11, 2021.

<sup>26</sup> Best Practices in Electric Utility Integrated Resource Planning. Regulatory Assistance Project. 2013.

<sup>27</sup> Real People, Real Change: Strategies for just energy transitions. International Institute for Sustainable Development. Dec 2018.  
<https://www.iisd.org/system/files/publications/real-people-change-strategies-just-energy-transitions.pdf?q=sites/default/files/publications/real-people-change-strategies-just-energy-transitions.pdf>

<sup>28</sup> City of Minneapolis Green Zones initiative: <http://www2.minneapolismn.gov/sustainability/policies/green-zones>

<sup>29</sup> Resolution establishing the Northside Green Zone Task Force. March 5, 2019.

[https://lms.minneapolismn.gov/Download/MetaData/11391/2019-00258%20Resl%20050\\_Id\\_11391.pdf](https://lms.minneapolismn.gov/Download/MetaData/11391/2019-00258%20Resl%20050_Id_11391.pdf)

<sup>30</sup> City of Minneapolis Northside Green Zone 5-Year Work Plan. Mar. 2020.

<http://www2.minneapolismn.gov/www/groups/public/@citycoordinator/documents/webcontent/wcmsp-226440.pdf>.

- **Carbon Zero Homes / Sustainable Housing / Healthy housing.** Create a Sustainable Building Policy for all new housing development that includes requirements for solar panels or other renewable energy options and a ban on the use of harmful building materials.

#### B. Southside Green Zone Council<sup>31</sup>

The Minneapolis Southside Green Zone's (SSGZ) *Achieving Climate and Environmental Justice in the Southside Green Zone: Recommendations for City of Minneapolis Work Plan Action (2020-2025)*<sup>32</sup> was adopted in December 2019 and includes priorities that relate to this IRP. Issues identified in the SSGZ Work Plan include:

- The cost of electric and heating utility bills is too high
- Energy and climate resources/planning are not for our housing needs and could displace us
- Displacement and green gentrification have been shown to be the path of many cities moving toward sustainability planning. The SSGZ Council feels strongly that Minneapolis must do things differently and understand that these are integral pillars to this being a climate and environmental justice plan.

"A suite of solutions is proposed that are intended to work together to address this historic legacy of environmental racism in the city and transition hotspot pollution areas into healthy, regenerative spaces for those that live, work, play and pray there."

Energy solutions the SSGZ recommends the City of Minneapolis pursue include:

- **Advocate for Inclusive Financing for Energy Measures and ensure accessed by SSGZ Residents/Small Businesses.** Many energy improvements have high upfront costs (refrigerator, insulation, heat pumps, solar, etc.) which are a barrier to adoption. The City should ensure implementation of the pilot CenterPoint Energy committed to doing and expand inclusive financing to electric utilities.
- **Ensure Clean Energy Partnership (CEP) 2021-2023 Workplan in 2020 is Accountable to SSGZ.** The Clean Energy Partnership is a City partnership with CenterPoint and Xcel Energy. The next workplan for the timeframe 2021-2023, will be developed in 2020. When designing and implementing the Clean Energy Partnership workplan, the City, EVAC and Sustainability Office must show benefit to low-income residents and specifically the SSGZ. Clean Energy Partnership programs targeted in SSGZ must be coupled with priorities on Green Economy & Anti-Displacement and Self-Determination & Accountability (see full SSGZ workplan). Reports should break down benefits to Green Zones, housing affordability, and health benefits by income, renter/homeowner, race.
- **Integrate Emergency Preparedness, Climate Change and Health Impacts into Energy Planning and Programs for SSGZ.** Low-income communities of color in the SSGZ are on the frontlines of climate change in Minneapolis. Energy planning should target emergency preparedness (solar, efficiency, onsite renewables for heating and cooling, battery storage) for households and critical community spaces (community centers, nonprofits, libraries, schools, pharmacies, clinics, etc.).

<sup>31</sup> Resolution establishing the Southside Green Zone Council. November 10, 2018.

[https://lms.minneapolismn.gov/Download/MetaData/11777/2019-00352%20Resl%20084\\_Id\\_11777.pdf](https://lms.minneapolismn.gov/Download/MetaData/11777/2019-00352%20Resl%20084_Id_11777.pdf)

<sup>32</sup> SouthSide Green Zone Work Plan. Dec 16, 2019.

<http://www2.minneapolismn.gov/www/groups/public/@citycoordinator/documents/webcontent/wcmssp-222057.pdf>

- **Tie Energy Projects Procured for City's Renewable Energy Goals to Prioritizing Community Ownership Models and Local Hiring.** The city has strong goals for purchasing to meet its renewable energy goals. These energy projects should prioritize community-owned green business and clean energy projects that incorporate job opportunities (solar, weatherization, energy efficiency) for residents in the Green Zones.

#### *C. The Energy Vision Advisory Committee<sup>33</sup>*

The Energy Vision Advisory Committee (EVAC) advises the Clean Energy Partnership (Minneapolis, Xcel, and CenterPoint) to inform energy planning, funding, and resource deployment decisions.

EVAC's most recent recommendations are shaped by the challenges of the pandemic and include:<sup>34</sup>

- **Use an equitable and just process:** Ensure all relief and recovery efforts are guided by accountable input from communities most impacted, particularly BIPOC communities and low-income communities.
- **Provide economic relief for high energy burdens:** Ensure that vulnerable communities, particularly BIPOC and low-income communities, are held harmless for the unsustainable energy burdens that have accrued as a result of COVID-19 and recent uprisings. Ensure that at least [60%] of such relief within Minneapolis accrues to BIPOC residents and BIPOC-owned businesses.
- **Enable clean, resilient, and just rebuilding:** Ensure that at least [60%] of recovery and rebuilding investments benefit BIPOC residents and BIPOC-owned businesses and that recovery and rebuilding is done in a way that creates resilience to future challenges, reduces local air pollution and health risks, and fights climate change.
- **Create a racially just clean energy workforce:** Ensure that at least [60%] of clean energy job creation in Minneapolis creates meaningful and long-term career opportunities for BIPOC residents.

#### *D. Community Environmental Advisory Commission*

The Community Environmental Advisory Commission is especially concerned about new gas plants, GHG emissions, and meeting climate goals. In an Oct. 21, 2020 letter to City of Minneapolis elected officials, the Commission asked that “our City bring the following comments forward to the Public Utilities Commission regarding Xcel’s Integrated Resource Plan.” (The full letter is included as Attachment A.)

- **Determine the need for the proposed Becker gas plant to** avoid the use of fracked gas and avoid stranded assets.
- **Prioritize the use of renewables** for generation and to meet greenhouse gas reduction goals.
- **Consider the use of biogas** sourced from methane produced by livestock manure, food waste, landfills, and wastewater treatment plants instead of natural gas when a switch to renewable sources is not feasible in the short term.
- **Xcel should offer an inclusive financing program** as part of its resource planning to enable renters and low-income homeowners to make energy efficiency improvements in Minneapolis and throughout the state.

<sup>33</sup> Minneapolis Clean Energy Partnership. About the Partnership. <https://mplscleanenergypartnership.org/about/>.

<sup>34</sup> EVAC Energy Relief & Recovery Recommendations. <https://mplscleanenergypartnership.org/wp-content/uploads/2021/02/2021-EVAC-Energy-Relief-and-Recovery-Recommendations.pdf>

## *E. American Indian Leaders*

The following input was offered to City staff during a January 2021 meeting with American Indian community leaders to inform the City's 100 percent renewable electricity vision.<sup>35</sup> Minneapolis highlights feedback relevant to Xcel's resource planning:

- **Ensuring access to renewable energy is as important as accelerating renewable energy sources.** Local renewables are important for residents to have connection to the earth and the environment.
  - Our community of urban American Indians is disproportionately energy-burdened and does not have the wealth to own houses and/or own the wealth to meaningfully participate in renewable energy. We are disproportionately renters and are housing-cost burdened, thus we encourage renter-specific solutions for Native communities that increase access to both renewable and energy efficiency programs.
- **We want the Public Utilities Commission, Xcel Energy and the City of Minneapolis to figure out how to weave incentives for energy efficiency and renewables for tenants.** This will support customers participating in affordable housing and Tenant Opportunity to Purchase Assistance (TOPA). We encourage co-operatives and resident-owned opportunity models.
- **We're interested in opportunities for community ownership models of renewable infrastructure.** This can support homeownership and build wealth.
- **Energy storage is important to be resilient and to not waste energy produced.** Energy storage solutions should be piloted and supported in vulnerable communities.
  - In Little Earth of United Tribes in South Minneapolis, the entire community grid goes down during power outages and energy storage is a big need to address the race against the time when there are power outages because we have elders who are relying on oxygen and other health related machines.
- **The State of Minnesota needs to meaningfully and thoughtfully, in partnership with Tribal Governments, start addressing nuclear waste.** We have yet to, as a State, start a dialogue and create pathways to clean up nuclear waste. In the last few decades, Native American reservations have become nuclear waste dump sites, and disproportionately face health and environmental consequences for poor regulation of uranium mining. We want more energy from solar and wind and retiring nuclear plants as battery energy solutions improve.
- **Indigenous people make-up about 1% of the State's population, but 16% of the homeless population.** Energy cost- burden is precursor to homelessness. Inability to pay a high energy bill could lead to destabilizing a family's housing situation if they fall behind in paying rent or mortgage.

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<sup>35</sup> City of Minneapolis Sustainability Division staff met with American Indian community leaders in January 2021 to discuss the Minneapolis 100% Renewable Electricity resolution and inform the development of our 100% Blueprint. Attendees included Margarita Ortega, Howasta Means, Binisekwe Means, Lance LaMont, and Robert Blake.

In short, the Native American Indian Community wants clean water, air, and access to clean energy so we can raise healthy families and live in healthy communities.<sup>36</sup>

#### *F. Climate Justice and Community Organizations Input*

Since this IRP includes decisions that will define all Xcel customers' energy futures for decades to come, Minneapolis worked in partnership with local<sup>37</sup> and national partners<sup>38</sup> to discuss priorities regarding Xcel's IRP from environmental justice and community leaders. These positions do not represent the positions of the City of Minneapolis but rather what staff heard during multiple meetings:

- **No new gas plants;** instead consider meeting any need with distributed energy resources like energy efficiency, solar, demand side management, battery storage; this will avoid stranded gas plants that customers pay for.
- **Include more significant levels of local solar production** with programs to support it; small scale solar creates more local jobs and local ownership
- **Close Xcel's two remaining Minnesota coal plants** earlier than planned.
- **Intentionally plan opportunities for workforce training and career pathways in BIPOC communities.**
- **Xcel should offer an inclusive financing program to greatly help low-income people do [energy] efficiency and access rebates.** It also allows renters to pay the cost during their occupancy when they benefit from the improvement.
- **The PUC should consider how the IRP will improve equitable outcomes** to avoid creating greater economic disparities.
- **Increase the amount of renewable energy in the grid mix faster than proposed.**
- **Recognize that the IRP can reduce energy burden for low-income customers** who pay a high percentage of income for energy costs; address needs in low-income housing in poorly insulated places. This will improve housing security and increase equity.
- **[The Commission, Xcel and the City of Minneapolis have a role to] ensure BIPOC communities share equitably in the energy transition.**
- **Xcel should close the waste-to-energy facility in Minneapolis, Hennepin Energy Recovery Center,** to reduce local pollution impacts that nearby residents experience.
- **The Monticello nuclear plant license should not be extended by 10 years.** The land we reside on and develop is stolen from Indigenous people. We can respect Indigenous people and the land

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<sup>36</sup> The American Indian leaders added this final note specific to this IRP after reviewing this section for accuracy. Feb 3, 2021.

<sup>37</sup> Center for Earth Energy and Democracy, Citizens Utility Board-MN, Community Power, Sierra Club, and City of Saint Paul

<sup>38</sup> Bloomberg Philanthropies American Cities Climate Challenge partners, including National Resources Defense Council Action Fund, Institute for Market Transformation, Rocky Mountain Institute, and World Resources Institute. GridLab also contributed.

they share with us by being responsible stewards when making decisions that impact the environment. Nuclear power is expensive and leads to radioactive waste that we don't have a way to store permanently.



STATE OF MINNESOTA    )  
                                  ) ss.    **CERTIFICATE OF SERVICE**  
COUNTY OF HENNEPIN    )

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 15th day of October 2021, I served a copy of the following via e-mail and/or via U.S. Mail:

**SUPPLEMENTAL COMMENTS OF THE CITY OF MINNEAPOLIS regarding  
Docket No. 19-368**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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Stacy A. Miller

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