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Comments:

With the current climate crisis and knowing that air pollution is the second cause of premature death around the world, the Integrated Resource Plan presented by Xcel Energy seems to be out of context.

Starting with gas, let's be clear, gas is not a bridge fuel, is a fossil fuel, therefore no fossil fuel infrastructure should be approved or built in Minnesota during a climate crisis, particularly when its lifespan is multiple decades. In this regard, a new Rocky Mountain Institute (RMI) study has found that most proposed gas power plants—and the pipelines that are being built to serve them—are likely to become uneconomic and unnecessary by 2035, as cheaper, cleaner energy alternatives outcompete them, meaning that Xcel will transfer the cost of these "stranded" assets to its customers. So, let just say that money not invest in renewals is a waste of money.

I understand that the retirement of coal units stated in Xcel Energy IRP, a decision I recognize and applaud, will leave a huge gap in its generation capacity, however this gap should be filled with renewal energy, and should not be an excuse to build a new combine cycle gas plant. This situation offers a huge opportunity to increase the deployment of Distributed Generation such as rooftop and community solar. Additionally, to help with this gap, the IRP should be addressing in parallel, the variability of renewal generation by consider flexible loads, deployment of storage and extensive energy efficiency to provide all the grid services and the power needs.

It is also worth noticing, that the IRP deployment of renewal energies starts to late in their plan, again relying more in fossil fuel than in addressing the issues of variability of renewal energy as well as supporting more Distributed Generation, like rooftop and community solar, since they contemplate a very small growth on those asset in the IRP.

Is difficult to understand why Distributed Generation has not a major contribution in the energy generation of the plan. Based on Minnesota Department of Commerce data, in the last four years, solar energy has grown in the state to produce 1206.37 MW, being 613 MW of those produce by community solar. Therefore, adding only 40,000 MW by 2034 seems insufficient, both to tackle the climate crisis, by moving away from fossil fuels, and to provide users with the type of energy they want to receive.

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