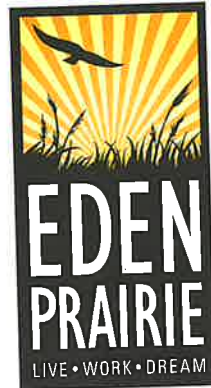
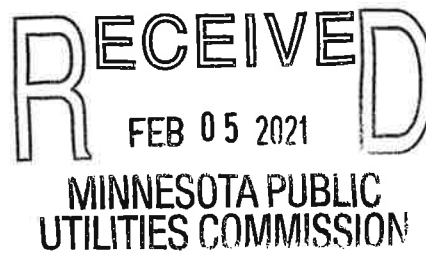


February 2, 2021

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



RE: 2020-2034 Upper Midwest Integrated Resource Plan, Docket No. E002/RP-19-368

Dear Executive Secretary Seuffert:

Thank you for the opportunity to comment on Xcel Energy's latest Integrated Resource Plan (IRP). IRPs are a key avenue for Xcel Energy to receive public input on its long-term plans. Utility operations, and therefore plans, should reflect both market realities and customer demand. We appreciate the opportunity to submit input to clarify customer demand.

The City of Eden Prairie has adopted a Climate Action Plan with the overall goal of achieving community-wide carbon neutrality by 2050. An additional goal of our Climate Action Plan relevant to this IRP is to meet 10% of our community's electricity load through on-site photovoltaics, which is roughly 51 MW of solar energy. Eden Prairie's Climate Action Plan also includes goals and actions around energy efficiency programming, green power purchase programs, fuel switching, electric vehicles, and relies on Xcel Energy's planned emissions reductions and this IRP to help us meet our climate goals.

It is our understanding that a number of communities in Minnesota will also be submitting these same comments. While individual goals vary, the shared goal of decarbonizing the electricity system for the public good is clear. Decarbonization is also an avenue to address historic inequities in our communities; the signees want to ensure that clean energy projects are a vehicle for investing in historically underserved communities.

We recognize and commend Xcel Energy's commitment to carbon reductions, continued effort to meet these goals, and willingness to undertake new modeling efforts within the IRP process. This letter contains shared suggestions for how Xcel could improve on their existing plans to align with customer demand for decarbonization and to center equity in resource decisions.

Xcel Energy's Preferred Plan does indicate that the utility will take several actions to support clean energy and decarbonization that are generally in line with the City's goals. We are particularly supportive of Xcel Energy's decisions to:

- Retire all coal plants by 2030,
- Retire the Cottage Grove and Black Dog 5 gas plants,
- Increase solar and wind generation, and
- Increase energy efficiency and demand response.

However, we believe Xcel Energy can do more to reduce carbon emissions and support underserved communities while maintaining safe, reliable, and affordable service.

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I. Center equity in the planning process

In the June 30, 2020 supplemental filing, Xcel Energy included an attachment addressing diversity, equity, and inclusion¹ and we appreciate that these topics are considered in this IRP. Many of our local governments have stated priorities to address racial inequities in our communities through our decisions related to the public services we provide. We have embarked on our own processes to understand how to create safer and more equitable cities, including assessing our policies, programs, budgets, and practices for racial equity impacts.

Electricity generation has historically been a major source of air pollution and emissions in Minnesota, and low income and communities of color have been disproportionately exposed to those pollutants that directly harm human health.² Minimizing the adverse socioeconomic effects of utility decisions means protecting communities from the impact of harmful energy production processes *and* addressing the historic impact such processes have had on people of color, while providing equitable access to the clean energy economy as a part of the solution.

II. Accelerate retirement of coal plants

We appreciate the commitment in this IRP from Xcel Energy to retire all coal on the Upper Midwest system by 2030; this supports our local government carbon reduction goals. We recommend that Xcel Energy model earlier retirement dates to reduce cost to customers as well as negative externalities, including emissions and public health impacts.

III. Explore alternatives to new natural gas

In light of our community-wide carbon neutrality by 2050 goal, we are concerned with the upstream emissions associated with the extraction and transport of fossil gas. We therefore encourage Xcel Energy to explore a clean energy portfolio – a combination of renewable energy, energy efficiency, demand response, and energy storage – to replace the capacity from retired coal plants.

IV. Increase renewable energy, including local generation

Xcel Energy's base assumption for distributed solar in the Preferred Plan is 660 MW, driven primarily by community solar gardens and the Solar*Reward incentive, which is currently set to expire in 2022 and Xcel assumes no additional rooftop solar after that time. The City of Eden Prairie Climate Action Plan has a goal to meet 10% of our community's electricity load through on-site solar by 2030, roughly 51 MW of on-site renewable generation. We recommend that Xcel take local clean energy goals, in addition to state policy and existing incentives, into consideration in forecasting and modeling for the IRP.

V. Coordinate Integrated Distribution System and Resource Planning

With the increase in customer installation of distributed energy resources (DER) – including distributed solar generation, electric vehicles, on-site storage, etc. – utilities should coordinate their resource/generation and distribution system planning to avoid unnecessary complexity and increased costs associated with operating the grid. A more comprehensive electricity planning process, as recommended by the National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Energy Officials (NASEO), will help utilities to safely and cost effectively meet current and emerging grid needs such as increased flexibility and resilience and DER integration.³ It

¹ Attachment C – Inclusion, Diversity, and Equity to the 2020-2034 Upper Midwest Resource Plan Supplement

² Minnesota Energy Justice Snapshot: <https://www.naacp.org/wp-content/uploads/2015/09/Minnesota-SnapShot.pdf>

³ NARUC-NASEO Task Force on Comprehensive Electricity Planning: <https://www.naruc.org/taskforce/>

will also help utilities to account for the quantity, location, capabilities, and load shapes of resources added to the distribution system and the bulk power system.

This is of particular importance to cities, in support of their local/in-boundary renewable energy goals, as well as their interest in resilience and reliability. Local governments are also doing infrastructure and asset planning on a localized scale, which presents a great opportunity for coordination to maximize efficiency and ensure cost effectiveness. There may also be opportunities to identify where DER may be used as assets to the grid and potential alternatives to traditional distribution investments.

VI. Include Beneficial Building Electrification and Grid Flexibility

Aside from the High Electrification sensitivity, the base scenario assumptions in this IRP include only transportation electrification, not building electrification. Eden Prairie's Climate Action Plan has goals for 9% of commercial and 17% of residential buildings to be switched from natural gas to electricity for space and water heating by 2030. If not intentionally managed, however, electrification can lead to increased grid costs, overbuilding of generation capacity, and increased energy burden. When properly designed, new electrified end uses can contribute to reliability, renewable integration, and enable a more flexible grid that can respond to shocks. We therefore recommend that the Commission require Xcel Energy to include beneficial building electrification in the load growth forecast and increased grid flexibility with a more sophisticated modeling software.

VII. Clarification on the 2034-2050 plan for carbon neutrality

Xcel Energy has made a commitment to achieve carbon-free energy by 2050, and we applaud the utility's leadership in this area. While the planning period for this IRP extends only through 2034, we request more details on the subsequent 15-year period in order to have confidence in Xcel Energy's plans to achieve that goal. Our short-term decisions related to climate action will be informed by that information, to realize our long-term carbon reduction goals.

Sincerely,



Ronald A. Case, Mayor
City of Eden Prairie