

Dear MN Public Utilities Commission,

**Please defer any decision on Xcel's two proposed new methane gas peaker plants** to ensure adequate time for public input and evaluation of clean energy alternatives.

This past June, Xcel was [successfully convinced to drop its plans](#) to build their proposed new 835 MW Sherco gas plant. However, Xcel countered by proposing to build two 400 MW gas-fired peaker plants in the years 2027-2029.

That is a step in the right direction for overall carbon reduction because peaker plants only operate a fraction of the time as opposed to continuously. But, **peaker plants emit more carbon emissions per unit of electricity** due to being less efficient. **They also emit [disproportionately more health-damaging air pollutants](#)** – mainly ozone forming chemicals like nitrogen oxides (NOx) and harmful particulates – that contribute to poor local air quality and harm public health.

Furthermore, **Minnesota law requires utilities to consider non-fossil fuel alternatives before building new fossil gas plants.** (Minn. Stat. § 216B.2422, subd. 4). Xcel did not fully evaluate clean energy alternatives for their proposed alternative plan.

At least three intervening organizations, [Sierra Club](#), [Fresh Energy and Partners](#), and [Citizens Utility Board MN](#) did this required analysis and created alternative 15-year energy plans using the same modeling software as Xcel. Guess what they all found? [Minnesota can meet energy needs with a lot more local, distributed renewable power, efficiency, "demand-response" and storage AND no new gas plants, all while maintaining reliability and slashing energy costs by over \\$1 billion annually.](#)

Meanwhile Xcel has been very selective with their modeling - refusing to test any renewables, aggressive efficiency and storage-focused energy future without the new gas plants. **Xcel can't prove a blanket claim that the new gas plants are necessary when they refused to even test any other scenario.** Xcel [has also forecasted an unrealistically low](#) amount of new community and rooftop solar despite its popularity, leaving Xcel to capture all profits from renewables while Minnesota solar developers have also filed 120 complaints against Xcel for [slow walking local, community-based competition](#) (e.g. solar projects not owned by the utility). Xcel understandably wants new gas plants because it is infrastructure that they get guaranteed profits from, and stabilizes their monopoly over energy generation that is under fire from a rapidly transforming and modernizing grid.

These peaker plants that Xcel added to the plan at the last moment after years of delays are not proposed to be built until 2027-2029. Because at least one more new 15-year energy plan (IRP) will be submitted by Xcel before then, there is no need for the MN Public Utilities Commission to rush to include these hastily proposed plants in this Integrated Resource Plan (IRP) docket. Delaying any decision until the next IRP Process would give ample time for Xcel, stakeholders, and the public to evaluate alternatives while moving other pieces of the IRP forward without more delay, while being able to take advantage of the continued downward slope in renewable and storage battery technology's prices.

By the year 2034, the cost of energy from fossil gas is predicted to be twice that of solar and 60% higher than that of wind. Xcel Energy itself says in their 2017 Colorado Energy Plan Fact Sheet that “We are not building any new natural gas generation, reducing the risk of stranded costs”. Why wouldn’t this also apply in Minnesota? We don't want to be paying years for power plants that can no longer compete with renewables.

Thank you,

Paula Holden  
Minneapolis, MN

To the Commissioners of the PUC:

During the last Xcel Energy IRP comment period, literally thousands of Minnesotans wrote the Public Utilities

Commission, opposing Xcel Energy's proposed new fossil gas plant in Becker, MN. We celebrated when Xcel then submitted an alternate plan that no longer included this plant. But it turns out they have merely replaced one large fossil gas plant with two smaller fossil gas plants (peaker plants generally used only in times of high demand).

Several weeks ago, the IPCC (Intergovernmental Panel on Climate Change) released their report that the damage caused by burning fossil fuels is now widespread and severe. The report specifically named methane, the primary component of fossil gas, as an extremely potent greenhouse gas--with eighty times more warming power than carbon dioxide pollution over the first 20 years. We simply can not allow any new fossil fuel infrastructure to be built.

Multiple studies and even alternative plans modeled by local environmental organizations show we can get the energy we need from clean, renewable sources, like solar and wind, plus storage. We don't need to use fossil fuels as a source anymore. Yet again, Xcel has refused to test this premise and instead included fossil gas in all the scenarios they document as having modeled. They once more ignored a Minnesota statute that requires consideration of non-fossil fuel alternatives.

While the latest IRP implies an eventual transition from fossil fuel to hydrogen at both new peaker plants, pitifully little supporting information is given: when, how, cost, lifecycle, stranded assets, increased dangers of hydrogen? Much more research is needed. The best answer before us now is to delay any decision on the proposed peaker plants. They will not come online until 2027 and 2029 respectively, and we know there will be at least one new IRP before then.

I urge the Commission to defer any decision on Xcel's two proposed fossil gas plants and instead support additional renewable energy plus storage. Give the public, other stakeholders, the Commission, and Xcel adequate time to evaluate clean energy alternatives, which are becoming lower cost and more technologically advanced all the time. Make Minnesota clean and green!

Sincerely,  
Catherine Early  
St. Paul 350 volunteer

Dear Minnesota Public Utilities Commission (PUC),

This summer the IPCC (Intergovernmental Panel on Climate Change) issued a "Code Red" for humanity. As the IPCC report documents, the damage driven by burning fossil fuels is now widespread and severe. The report specifically names methane, the primary component of fossil gas, specifically as an extremely potent greenhouse gas, more than 80 times as powerful as carbon dioxide pollution.

We simply can't afford to build new fossil gas plants in a climate crisis. Xcel's decision to remove the Sherco CC plant from its alternative plan is a victory for our climate and Xcel customers. However, their proposal to build new gas peaker plants undermines that progress.

The proposed peaker plants would burn fossil gas - releasing CO2 into the atmosphere at the plant and leading to upstream emissions of methane, an extremely potent greenhouse gas, during its extraction (usually by fracking) and transportation of the gas. Peaker plants emit more carbon emissions per unit of electricity than combined cycle plants and also disproportionately emit health-damaging air pollutants - mainly ozone forming chemicals like nitrogen oxides (NOx) and harmful particulates - that contribute to poor local air quality and harm public health.

Not only would the peaker plants exacerbate the climate crisis, they would also fail to address reliability and risks to ratepayers. All energy resources are subject to outages during extreme weather events, including gas plants, which experienced the absolute highest outage rate during the February 2021 storm because of equipment failures or fuel supply disruptions. Instead of building new gas plants, Xcel should expand the use of renewable energy and storage resources to reduce the risks of increased costs to ratepayers and reliability.

Three alternative plans presented by interveners did not rely on any new fossil gas plants to meet Minnesota's future energy needs. Xcel chose not to fully evaluate these clean energy alternatives for its proposed plan despite a Minnesota statute requiring consideration of non-fossil fuel alternatives

Ultimately, there is no need for the Commission to rush and decide now whether to let Xcel build two new gas power plants as these plants are not slated to go online until 2027 and 2029. This gives time for Xcel, stakeholders, the Commission, and the public to evaluate alternatives after this IRP. Thus I urge the Commission not to approve the proposed peaker plants at this time.

Sincerely,  
Linda and Gregg Gridley  
607 Clifford St Saint Paul, MN 55104-4907 [lsfroiland@gmail.com](mailto:lsfroiland@gmail.com)

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Sincerely,  
Gretchen Bratvold  
3444 Edmund Blvd Minneapolis, MN 55406-2942 [gbratvold@usinternet.com](mailto:gbratvold@usinternet.com)

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Sincerely,  
Cherie Hales  
511 E King St Winona, MN 55987-4350  
[cheriehales@gmail.com](mailto:cheriehales@gmail.com)

Dear Minnesota Public Utilities Commission (PUC),

We all know that the climate issue is now a "Code Red" for humanity. The damage driven by burning fossil fuels is widespread, severe, and inescapable. Methane, the primary component of fossil gas, is an extremely potent greenhouse gas, more than 80 times as powerful as carbon dioxide pollution.

So why would we, at this critical time for the survival of humanity, would we be building new fossil gas plants? Xcel's decision to remove the Sherco CC plant from its alternative plan is a victory for our climate and Xcel customers. However, their proposal to build new gas peaker plants undermines that progress. The time to stop our dependence on fossil fuels is now -- for the sake of our children and grandchildren!

We don't even need these plant now - they would not go online until 2027 and 2029. There is ample time for us to find alternatives. Please vote in opposition to Xcel's plan to build new gas power plants.

Sincerely,  
Jacqueline Rolfs  
3208 Townview Ave NE Saint Anthony, MN 55418-2554 [jackie.rolfs@gmail.com](mailto:jackie.rolfs@gmail.com)

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Sincerely,  
Mary Miller  
3804 Cedar Lake Pl Minneapolis, MN 55416-3567 [marygracm@aol.com](mailto:marygracm@aol.com)

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Sincerely,  
Audrey Parry

4047 Aldrich Ave S Minneapolis, MN 55409-1415 [audreyparry916@gmail.com](mailto:audreyparry916@gmail.com)

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Sincerely,  
Jesse Peterson-Brandt

4148 43rd Ave S Minneapolis, MN 55406-3537 [jessevpb@gmail.com](mailto:jessevpb@gmail.com)

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Sincerely,  
Margaret Kirtley-Sternberg  
320 E Buffalo St Duluth, MN 55811-2437  
[kirtleys8@yahoo.com](mailto:kirtleys8@yahoo.com)

Dear Minnesota Public Utilities Commission (PUC),

The planet is in the midst of a climate crisis. We need to come together and stop global warming. Those of us who live in countries of plenty have for years been spewing greenhouse gases into the atmosphere at a far greater rate than underdeveloped countries. We must draw the line and stop building new fossil fuel plants such as the peaker plants proposed by Xcel.

I was delighted that Xcel decided not to build the Sherco CC plant and hoped that future plans from Xcel would rely on renewable energy sources. I am dismayed that instead Xcel is proposing peaker plants that would burn fossil gas - releasing CO<sub>2</sub> into the atmosphere at the plant and leading to upstream emissions of methane, an extremely potent greenhouse gas.

I believe that we in Minnesota need to think globally as we make these local/state decisions. I have had the privilege of traveling to Pacific island nations and territories. The Republic of the Marshall Islands will literally disappear if we do not stop global warming. Decisions we make in Minnesota can affect people everywhere on the planet.



In the case of these peaker plants, I am especially distressed because interveners presented three alternative plans that did not rely on any new fossil gas plants to meet Minnesota's future energy needs. Xcel chose not to fully evaluate these clean energy alternatives for its proposed plan despite a Minnesota statute requiring consideration of non-fossil fuel alternatives.

In addition, Xcel's timeline for these plants is to go online in 2027 and 2029. It seems that the Commission does not need to make an immediate decision on Xcel's proposal. This gives us the opportunity for Xcel, stakeholders, the Commission, and the public to evaluate alternatives after this IRP.

Please do not to approve the proposed peaker plants at this time. Thank you.

Sincerely,  
Marcia Gustafson  
1050 Marsh St Unit 212 Mankato, MN 56001-1129 [marciagus@earthlink.net](mailto:marciagus@earthlink.net)

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Sincerely,  
Nicolaas VanMeerten  
PO Box 5005 Saint Paul, MN 55101-7005  
[vanm0034@umn.edu](mailto:vanm0034@umn.edu)

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Sincerely,  
Pamela Thinesen  
6165 Green Valley Rd Ramsey, MN 55303-3272 [pthin01@hotmail.com](mailto:pthin01@hotmail.com)

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Sincerely,

Nathan Zerbe

2696 Horseshoe Ln Woodbury, MN 55125-8424 [nathan\\_zerbe@msn.com](mailto:nathan_zerbe@msn.com)