



414 Nicollet Mall
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October 8, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: UPDATE
2020-2034 UPPER MIDWEST INTEGRATED RESOURCE PLAN
DOCKET NO. E002/RP-19-368

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, provides this update to the Minnesota Public Utilities Commission regarding our 2020-2034 Upper Midwest Integrated Resource Plan filed in this docket on July 1, 2019. We offer this letter in advance of the Commission's October 17, 2019 hearing in case the Commission would like to discuss the upcoming procedural steps at that time.

Since our initial filing was made over three months ago, some changes have evolved within the resource planning landscape such that we wanted to inform the Commission and stakeholders and also offer a modeling update and potential extension to the current procedural schedule. Specifically, some of the resource changes include the modeling of the Mankato Energy Center (MEC) as a purchased power agreement (PPA) rather than as a company owned asset consistent with the Commission's recent decision, the reduction in size of our Crowned Ridge wind project due to the recent assignment of significant transmission upgrade costs, and potential updates to our proposed acquisitions of the Mower and Longroad wind repowering projects pending the timing of a Commission decisions in those dockets.

In addition, we also have had conversations with the Department of Commerce on our modeling assumptions and offer to align some of those inputs with their feedback as well, including our wind and solar accredited capacity assumptions, solar profile assumptions, hourly price shapes, and other issues in the modeling.

If the Commission agrees with a modeling update to incorporate these changes, the Company could provide an updated modeling filing by December 6, 2019. While this timing may not perfectly align with the Commission's September 27, 2019 decision in the MEC docket (which indicated we should make an updated IRP filing within 30 days of the Commission's order in that docket), a set filing date would be helpful for certainty surrounding the ongoing procedural schedule.

In addition, we also note that we are in the final stages of procuring EnCompass, a new capacity expansion modeling tool. We anticipate installing the tool soon and training on it in the coming months such that we would be ready to discuss the modeling tool as well as provide a supplemental view for our resource plan in the first quarter of 2020. We talked with some stakeholders about their interest in participating in a potential Commission planning meeting in the March 2020 timeframe on the new modeling tool. This planning meeting could engage all the Minnesota utilities who are also transitioning to this new tool and could cover a variety of topics, including (1) providing an overview of EnCompass, (2) discussing the differences and improvements as compared to our current modeling tool, and (3) providing a presentation of EnCompass results on our IRP.

In addition to a planning meeting, we also offer to provide a supplemental filing in the April 2020 timeframe in our IRP using EnCompass. The spring filing would likely be a supplement to the record, intended to be used as a benchmark against our strategist outcomes and further meant to be a transitional tool to develop capabilities, experience, and basis for discussion with stakeholders- many of whom are also transitioning to this new tool.

If the Commission is interested in these additional views into our resource plan, we request an extension of the procedural schedule as the Commission sees fit. For reference, the current schedule was set in the July 3, 2019 Notice of Comment period in this docket which identified November 8, 2019 for initial comments and January 8, 2020 for reply comments.

Copies of the filing have been served on Commission staff, the Department of Commerce, and the Office of the Attorney General – Residential Utilities Division.

Please contact me at (612) 330-6064 or bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

/s/

BRIA E SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
c: Service List

CERTIFICATE OF SERVICE

I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/RP-19-368

Dated this 8th day of October 2019

/s/

Paget Pengelly
Regulatory Administrator

[illegible]

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