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October 16, 2019

VIA E-FILING

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

**Re: In the Matter of Xcel Energy's 2020-2034 Upper Midwest Integrated Resource
Plan
Docket No. E002/RP-19-368**

Dear Mr. Wolf:

In advance of the Minnesota Public Utilities Commission's (the "Commission") agenda meeting on October 17, 2019, addressing Xcel's ongoing integrated resource plan ("IRP"), Xcel Large Industrials ("XLI") submits this brief letter comment in support of Citizens Utility Board of Minnesota's ("CUB") October 16, 2019, letter in the above mentioned docket¹ in response to Xcel's update letter filed on October 8, 2019.² XLI also responds to the extension request submitted by the Sierra Club, Vote Solar, and the Institute for Local Self-Reliance ("Sierra Club, et al.") on October 16, 2019³ and a letter filed by the Clean Energy Organizations ("CEOs") filed on October 16, 2019.⁴

XLI supports the positions outlined in CUB's letter: mainly, that (a) the Commission should require supplemental modeling for the Mankato Energy Center ("MEC") that does not assume Xcel ownership; (b) there should be an extension of the procedural schedule allowing intervenors the appropriate amount of time to respond after Xcel's supplemental modeling;⁵ and (c) Xcel should not be able to introduce additional EnCompass modeling at a late stage of this proceeding. XLI has serious concerns with Xcel's proposal to implement supplemental modeling in March

¹ CUB Letter (Oct. 16, 2019) (eDocket No. 201910-156678-01).

² Xcel Update Letter (Oct. 8, 2019) (eDocket No. 201910-156423-01) ("Xcel Update Letter").

³ Sierra Club, et al. Extension Variance Request (Oct. 16, 2019) (eDocket No. 201910-156642-01) ("Sierra Club, et al. Extension Request").

⁴ CEOs Letter (Oct. 16, 2019) (eDocket No. 201910-156643-01) ("CEOs Letter").

⁵ If the Commission approves Xcel's proposed supplemental filing date of December 6, 2019, XLI respectfully submits that an extension of at least 90 days is appropriate to allow for additional clarification and information requests based on the updated modeling.

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2020 and strongly disagrees with any scenario allowing Xcel to supplement its original modeling to support its preferred plan. Intervenor has already expended resources assessing the Company's first set of Strategist modeling and are prepared to conduct a similar review of Xcel's supplemental Strategist modeling. To force customer-advocate intervenors to review and analyze modeling for two distinct modeling tools (i.e., Strategist and EnCompass) would dramatically increase the cost of participation in this docket with no clear benefit. Furthermore, allowing the introduction of a new modeling tool would likely cause undue delay in the form of extended commenting deadlines, as evidenced by the letters filed on October 16, 2019, by the Sierra Club, et al. and CEOs, and the nine-month comment extension requests included therein.⁶ To be sure, such an extension could begin to render irrelevant the demand and energy forecasts, as well as other forecasted assumptions used in the Company's modeling. Therefore, XLI requests the Commission refuse to allow Xcel to file additional EnCompass modeling results in this IRP, and – to the extent the Commission permits the Company to make any EnCompass presentations at planning meetings, including modeling results – such evidence should not be considered in this docket.

XLI appreciates the Commission's attention to this matter and looks forward to continued dialogue in this docket.

By copy of this letter all parties have been served. A Certificate of Service is also attached.

Very truly yours,

/s/ Andrew P. Moratzka

Andrew P. Moratzka

hln
Attachment

cc: Service List

⁶ See Sierra Club, et al. Extension Request at 2; CEOs Letter at 1-3. Both groups seek an extension until after Xcel files all modeling. See also Xcel's Update Letter at 2, contemplating an April 2020 EnCompass filing.

CERTIFICATE OF SERVICE

I, Heidi Nelson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

LETTER COMMENT ON BEHALF OF XCEL LARGE INDUSTRIALS

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

Dated this 16th day of October, 2019.

/s/ Heidi Nelson

Heidi Nelson

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