



October 16, 2019

Via Electronic Filing

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Reply to Xcel Energy's October 8, 2019 Update
2020-2034 Upper Midwest Integrated Resource Plan
Docket No. E002/RP-19-368

Dear Mr. Wolf:

The Citizens Utility Board of Minnesota (CUB) provides its response to Xcel Energy's October 8, 2019 letter update in this docket. In that letter, Xcel inappropriately suggested (1) procedures for the IRP, which would either create a confusing and resource-intensive Integrated Resource Planning (IRP) process or would provide Xcel an unfair advantage in presenting its case and (2) participation in a Commission planning meeting regarding EnCompass modeling, at issue in this ongoing IRP proceeding. Both of these suggestions are improper and could deprive intervenors with the ability to adequately evaluate, investigate and respond to whatever Xcel proposes as its preferred plan.

CUB agrees that the Commission should require Xcel to perform a new model run that does not assume Company ownership of the Mankato Energy Center ("MEC"). In its letter, Xcel requests until December 6, 2019 to perform additional Strategist modeling, but also suggests that it would supplement the record sometime in the April 2020 timeframe with an EnCompass model run. CUB supports a delay in the procedural schedule that gives intervenors adequate time to respond to Xcel's updated filing but opposes allowing Xcel multiple opportunities to introduce modeling results and opposes suggestions that this entire proceeding be delayed to allow Xcel to acquire a new model.

CUB has serious concerns that Xcel's proposed process of presenting supplemental modeling, would inappropriately introduce additional evidence into the record after parties are likely to present comments and Proposed alternative resource plans, pursuant to Minn. R. 7843.0300, Subpart 11. At best, this would create a convoluted record with multiple comments on multiple presentations. At worst, this could provide Xcel an opportunity to provide additional evidence to support its preferred plan, while potentially depriving intervenors of the ability to adequately conduct discovery and rebut any inappropriate assumptions or inputs in the updated models. As such, CUB requests that

the Commission refuse to allow Xcel to present multiple rounds of modeling in the proceeding.

Instead, the Commission should act quickly to get this process moving via new Strategist modeling as expeditiously as possible. While EnCompass may prove to be an improvement over Strategist in the future, the Company's decision to acquire EnCompass now should not impact expedient and efficient review of its IRP. Indeed, Xcel has already created multiple unnecessary delays in this proceeding.

Further, Xcel suggests in its letter that it could present information regarding EnCompass at a Commission planning meeting in the March 2020 timeframe. To the extent there is a disputed question in this proceeding as to whether or not to utilize EnCompass, the Commission should not consider extra-record evidence regarding EnCompass via Xcel presentations at a Commission planning meeting. To do so would exceed the IRP's procedural bounds, defined in Minn. R. 7843.0500, Subpart 1, which requires that a Commission Decision be "based upon the record, which is information filed with the Commission in the resource plan proceeding of a utility..." Since the Commission must authorize and approve Xcel's modeling in the IRP, any consideration of EnCompass modeling should be made on the record with adequate opportunity for intervenors to respond.

CUB appreciates the Commission's consideration of this matter. Copies of the filing have been served on the service list of this proceeding. Please contact me if you have any questions regarding this filing.

Respectfully submitted,

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Dated: October 16, 2019

CERTIFICATE OF SERVICE

I, Blake Elder, 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 16th day of October 2019

/s/Blake Elder

Blake Elder

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