



VOTE SOLAR

January 24, 2022

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

Re: E002/RP-19-368 - *In the Matter of Xcel Energy's 2020-2034 Integrated Resource Plan*

Dear Mr. Seuffert;

On behalf of the Vote Solar, the Institute for Local Self Reliance, Cooperative Energy Futures, and the Environmental Law & Policy Center (the Distributed Solar Parties or DSP), please accept the enclosed alternative decision option for the Commission's consideration in Docket No. E002/RP-19-368 *In the Matter of Xcel Energy's 2020-2034 Integrated Resource Plan (IRP)*.

The DSP propose an alternative to Decision Option D.3 which was offered by Xcel Energy; the Clean Energy Organizations; Laborer's International Union of North America, Minnesota and North Dakota; the International Union of Operating Engineers, Local 49; and the North Central States Regional Council of Carpenters in the January 12, 2022 letter filed in this docket.

Redline of Proposed Alternative Decision Option D.3a to the original Decision Option D.3<sup>1</sup>:

Require Xcel to work with stakeholders to include develop a modeling construct for distribution connected solar that reflects only the utility cost to incentivize incremental behind-the-meter distributed generation as a supply resource that enables identification of economic distributed solar additions as part of the Company's next resource plan.

Require that Xcel include improved load flexibility and demand response modeling methodologies going forward and in its next resource plan.

Thank you for your consideration. We look forward to responding to your questions on this important matter.

Respectfully Submitted,

/s/ William D. Kenworthy  
Regulatory Director, Midwest  
Vote Solar

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<sup>1</sup> Staff Briefing Papers for Docket No. E002/RP-19-368, pg. 192.

Vote Solar

360 22<sup>nd</sup> Street, Ste. 730 Oakland, CA 94612  
[www.votesolar.org](http://www.votesolar.org)

### **CERTIFICATE OF SERVICE**

I, William D. Kenworthy, 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 Chicago, Illinois; or

xx by electronic filing.

**MPUC Docket Nos: E002/RP-19-368**

Dated this 24th day of January 2022.

/s/

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William D. Kenworthy  
Regulatory Director, Midwest  
Vote Solar

| First Name | Last Name | Email                          | Company Name                                | Address                                                            | Delivery Method    | View Trade Secret | Service List Name                 |
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| First Name     | Last Name          | Email                             | Company Name                       | Address                                                         | Delivery Method    | View Trade Secret | Service List Name             |
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| First Name | Last Name      | Email                                    | Company Name                                                    | Address                                                                                 | Delivery Method    | View Trade Secret | Service List Name             |
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| Alice      | Madden        | alice@communitypowermn.org         | Community Power                      | 2720 E 22nd St<br><br>Minneapolis,<br>MN<br>55406                     | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
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| Pam        | Marshall      | pam@energycents.org                | Energy CENTS Coalition               | 823 7th St E<br><br>St. Paul,<br>MN<br>55106                          | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Mary       | Martinka      | mary.a.martinka@xcelenergy.com     | Xcel Energy Inc                      | 414 Nicollet Mall<br>7th Floor<br>Minneapolis,<br>MN<br>55401         | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
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| David      | Moeller    | dmoeller@allete.com            | Minnesota Power                             | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093                                                  | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
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| Evan       | Mulholland | emulholland@mncenter.org       | Minnesota Center for Environmental Advocacy | 1919 University Ave W Ste 515<br><br>Saint Paul,<br>MN<br>55101                                     | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
|            |            |                                |                                             |                                                                                                     |                    |                   |                               |

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| Alan       | Muller       | alan@greendel.org                | Energy & Environmental Consulting   | 1110 West Avenue<br><br>Red Wing,<br>MN<br>55066                           | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Carl       | Nelson       | cnelson@mncee.org                | Center for Energy and Environment   | 212 3rd Ave N Ste 560<br><br>Minneapolis,<br>MN<br>55401                   | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
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| David      | Niles        | david.niles@avantenergy.com      | Minnesota Municipal Power Agency    | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| M. William | O'Brien      | bobrien@mojlaw.com               | Miller O'Brien Jensen, P.A.         | 120 S 6th St Ste 2400<br><br>Minneapolis,<br>MN<br>55402                   | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Ric        | O'Connell    | ric@gridlab.org                  | GridLab                             | 2120 University Ave<br><br>Berkeley,<br>CA<br>94704                        | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Carol A.   | Overland     | overland@legalelectric.org       | Legalelectric - Overland Law Office | 1110 West Avenue<br><br>Red Wing,<br>MN<br>55066                           | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Jessica    | Palmer Denig | jessica.palmer-Denig@state.mn.us | Office of Administrative Hearings   | 600 Robert St N<br>PO Box 64620<br>St. Paul,<br>MN<br>55164                | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| J. Gregory | Porter       | greg.porter@nngco.com            | Northern Natural Gas Company        | 1111 South 103rd St<br><br>Omaha,<br>NE<br>68124                           | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Greg       | Pruszinske   | gpruszinske@ci.becker.mn.us      | City of Becker                      | PO Box 250<br>12060 Sherburne Ave<br>Becker,<br>MN<br>55308                | Electronic Service | No                | OFF_SL_19-368_19-368_Official |

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| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD   | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131 | Electronic Service | Yes               | OFF_SL_19-368_19-368_Official |
| Kevin          | Reuther                        | kreuther@mncenter.org                | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206<br><br>St. Paul,<br>MN<br>551011667      | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Nathaniel      | Runke                          | nrunke@local49.org                   |                                      | 1765 County Hwy 16<br><br>Rochester,<br>MN<br>55902                | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Joseph L       | Sathe                          | jsathe@kennedy-graven.com            | Kennedy & Graven, Chartered          | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402            | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Richard        | Savelkoul                      | rsavelkoul@martinsquires.com         | Martin & Squires, P.A.               | 332 Minnesota Street Ste W2750<br><br>St. Paul,<br>MN<br>55101     | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Jeff           | Schneider                      | jeff.schneider@ci.red-wing.mn.us     | City of Red Wing                     | 315 West 4th Street<br><br>Red Wing,<br>MN<br>55066                | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Mark           | Schoennauer                    | markwsch@hotmail.com                 |                                      | 607 19th St NW Apt 17<br><br>Rochester,<br>MN<br>55901             | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Douglas        | Seaton                         | doug.seaton@umwlc.org                | Upper Midwest Law Center             | 8421 Wayzata Blvd Ste 300<br><br>Golden Valley,<br>MN<br>55426     | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission          | 121 7th Pl E Ste 350<br><br>Saint Paul,<br>MN<br>55101             | Electronic Service | Yes               | OFF_SL_19-368_19-368_Official |
|                |                                |                                      |                                      |                                                                    |                    |                   |                               |

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|------------|----------------|--------------------------------|-------------------------------------------|--------------------------------------------------------------------------|--------------------|-------------------|-------------------------------|
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com      | Shaddix And Associates                    | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423              | Electronic Service | Yes               | OFF_SL_19-368_19-368_Official |
| Andrew R.  | Shedlock       | Andrew.Shedlock@KutakRock.com  | Kutak Rock LLP                            | 60 South Sixth St Ste 3400<br><br>Minneapolis,<br>MN<br>55402-4018       | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Ken        | Smith          | ken.smith@districtenergy.com   | District Energy St. Paul Inc.             | 76 W Kellogg Blvd<br><br>St. Paul,<br>MN<br>55102                        | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Joshua     | Smith          | joshua.smith@sierraclub.org    |                                           | 85 Second St FL 2<br><br>San Francisco,<br>California<br>94105           | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Beth H.    | Soholt         | bsoholt@windonthewires.org     | Wind on the Wires                         | 570 Asbury Street Suite 201<br><br>St. Paul,<br>MN<br>55104              | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Anna       | Sommer         | ASommer@energyfuturesgroup.com | Energy Futures Group                      | PO Box 692<br><br>Canton,<br>NY<br>13617                                 | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Mark       | Spurr          | mspurr@fvbenergy.com           | International District Energy Association | 222 South Ninth St., Suite 825<br><br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Byron E.   | Starns         | byron.starns@stinson.com       | STINSON LLP                               | 50 S 6th St Ste 2600<br><br>Minneapolis,<br>MN<br>55402                  | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Scott      | Strand         | SStrand@elpc.org               | Environmental Law & Policy Center         | 60 S 6th Street<br>Suite 2800<br>Minneapolis,<br>MN<br>55402             | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
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| First Name | Last Name | Email                               | Company Name                        | Address                                                                     | Delivery Method    | View Trade Secret | Service List Name             |
|------------|-----------|-------------------------------------|-------------------------------------|-----------------------------------------------------------------------------|--------------------|-------------------|-------------------------------|
| James M    | Strommen  | jstrommen@kennedy-graven.com        | Kennedy & Graven, Chartered         | 150 S 5th St Ste 700<br><br>Minneapolis, MN 55402                           | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Eric       | Swanson   | eswanson@winthrop.com               | Winthrop & Weinstine                | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis, MN 554024629         | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Lynnette   | Sweet     | Regulatory.records@xcelenergy.com   | Xcel Energy                         | 414 Nicollet Mall FL 7<br><br>Minneapolis, MN 554011993                     | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Thomas     | Tynes     | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America | 101 Constitution Ave NW<br>Ste 525 East<br><br>Washington, DC 20001         | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Lisa       | Veith     | lisa.veith@ci.stpaul.mn.us          | City of St. Paul                    | 400 City Hall and Courthouse<br>15 West Kellogg Blvd.<br>St. Paul, MN 55102 | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Julie      | Voeck     | julie.voeck@nee.com                 | NextEra Energy Resources, LLC       | 700 Universe Blvd<br><br>Juno Beach, FL 33408                               | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Samantha   | Williams  | swilliams@nrdc.org                  | Natural Resources Defense Council   | 20 N. Wacker Drive<br>Ste 1600<br>Chicago, IL 60606                         | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Laurie     | Williams  | laurie.williams@sierraclub.org      | Sierra Club                         | Environmental Law Program<br>1536 Wynkoop St Ste 200<br>Denver, CO 80202    | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Joseph     | Windler   | jwindler@winthrop.com               | Winthrop & Weinstine                | 225 South Sixth Street,<br>Suite 3500<br><br>Minneapolis, MN 55402          | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
|            |           |                                     |                                     |                                                                             |                    |                   |                               |

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| Tim        | Wulling   | t.wulling@earthlink.net |                                              | 1495 Raymond Ave.<br>Saint Paul,<br>MN<br>55108         | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Emily      | Ziring    | eziring@stlouispark.org | City of St. Louis Park                       | 5005 Minnetonka Blvd<br>St. Louis Park,<br>MN<br>55416  | Electronic Service | No                | OFF_SL_19-368_19-368_Official |
| Patrick    | Zomer     | Pat.Zomer@lawmoss.com   | Moss & Barnett a<br>Professional Association | 150 S. 5th Street, #1200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_19-368_19-368_Official |