

January 26, 2022

Via Electronic Service

Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
121 7th Pl. E #350
St. Paul, MN 55101

RE: Docket No. 19-368, Xcel Energy 2020-2034 Upper Midwest Integrated Resource Plan

Dear Mr. Seuffert:

Enclosed please find a List of Supported Decision Options of the Citizens Utility Board of Minnesota (CUB). CUB provides this list in response to Chair Sieben's request made during the hearing.

Where CUB's decision options indicate action "by 2025," the Commission may wish to substitute "within five years," as 2025 is no longer the end of the five-year action plan due to the delays in this docket.

As requested by Commissioner Tuma, CUB is discussing decision option B4 (regarding the resource acquisition process) with Xcel and the Office of the Attorney General, with the goal of agreeing on a common recommendation to the Commission.

Thank you for your attention to this matter.

Sincerely,

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Encl.: CUB's List of Supported Decision Options

CUB's List of Supported Decision Options

The Citizens Utility Board of Minnesota (CUB) provides below a list of Decision Options that it supports in this proceeding. The list below follows the numbering used in the Commission's Staff Briefing Papers. For those Decision Options that CUB supports as written, we list only the Decision Option number. For those Decision Options that CUB supports with modification, we provide the text of Decision Option as we would support it.

A. Resource Plan Preferences

1. Approve the Alternate Plan as detailed in Xcel's June 25, 2021 Reply Comments, including but not limited to the following elements:
 - b. Approve Xcel ownership of Sherco and King gen-tie lines plus renewable resources added on the lines up to the Company's current interconnection rights.
 - c. Approve plan to continue pursuing a 10-year extension for the Monticello Nuclear plant.
 - d. But not including specific approval of the Lyon County Combustion Turbine (CT) and Fargo CT.
5. (As corrected by CUB's Notice of Errata filed on January 24, 2022): Approve CUB's Consumers Plan as described in CUB's Initial Comments and highlighted below:
 - a. Retire 2,683 MW of coal plants and 559 MW gas combustion turbines.
 - b. Approve a total of 4,522 MW of wind, 3,940 MW of utility-scale PV, 1,965 MW of distributed PV (including projects up to 40 MW connected to the distribution system), and 1,259 MW of battery storage.
 - c. ~~By 2025~~Within five years, approve 3,000 MW of wind, as well as 333 MW of distributed PV and 1,400 MW of utility-scale PV."
6. Require Xcel to retire its remaining coal plants in the next five years and to move to economic commitment of all units as quickly as possible.
7. Require Xcel to retire or allow the expiration of PPAs for at least 550 MW of gas combustion turbine power plants in the next five years.
18. Require that Xcel consider and pursue opportunities to deploy renewable resources and storage technologies on a schedule faster than in its Alternative Plan, if such deployment would be cost-effective, maintain reliability, and aid in achieving compliance with decarbonization policies.

B. Resource Acquisition

4. (Amended as follows): Require Xcel to issue one or more RFPs for approximately 3,000 MW of new wind capacity and 1,400 MW of new solar capacity in the next five years. To

ensure such processes are competitive, robust, and transparent, require future wind and solar procurement RFP processes to meet, at a minimum, the following conditions:

- a. The competitive-bidding process should be administered by an independent third-party.
 - b. The competitive-bidding process should include a request for proposals that is posted publicly and open to any interested developer.
 - c. Except for projects connected to the Sherco and King gen-tie lines, Tthe request for proposals should not include geographic limitations.
 - d. The request for proposals should be open to power purchase agreements (excepting projects connected to the Sherco and King gen-tie lines), build-transfer proposals, and utility self-build projects.
 - e. Xcel's proposed bidding process, timeline, evaluation criteria, and request for proposals language should be filed with the Commission at least one month prior to the issuance of the request for proposals. This filing should also include a contingency plan describing the subsequent process should the bidding process fail to elicit a meaningful number of bids.
5. Require Xcel to enable the adoption of approximately 300 MW of new distributed solar -- including rooftop, community, and larger-sized, distribution system-tied developments -- and 600 MW of new battery storage in the next five years.

C. Blackstart

1. Review Xcel's future blackstart needs in a future planning meeting or set of planning meetings.

1a. (CUB addition): Require that any resource proposal for meeting blackstart needs be made in the next IRP, where the full value and services of new generating units – including its capacity, energy, blackstart, stability, or other values – can be evaluated in the context of the broader resource plan.

D. Next IRP

1. Require Xcel to submit its next IRP by June 30, 2023.
- 3a. (DSP modification): Require Xcel to work with stakeholders to include developa 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.
4. Require Xcel to work with stakeholders to develop a modeling construct 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.

11. Require Xcel to account for anticipated effects of advanced rate design, demand response, and any other efforts to shift customer demand in its next IRP.
14. Require that Xcel's next IRP include a deeper analysis of storage options, including making solar-battery hybrids a resource option, and also a deeper analysis of the role of hydrogen and clean fuel alternatives in Xcel's resource mix.
15. Require Xcel to pursue robust in-state and ~~intra~~interstate transmission expansion. Require Xcel to report on activities and progress to expand ~~intra~~interstate transmission capacity in its next IRP.

E. Miscellaneous

1. Require Xcel to explain, in its next Integrated Distribution Plan (IDP), how its distribution plan will put the Company on track to meet the level of distributed energy resource (DER) deployment in its approved IRP.
4. Require Xcel to proactively plan investments in hosting capacity and other necessary system capacity to allow distributed generation, ~~and~~ electric vehicle, ~~(and, CUB would add,~~ additional beneficial electrification) additions consistent with DER deployment targets.
5. Require Xcel to plan for aggregated DERs to provide system value including energy/capacity during peak hours.
6. Require Xcel to propose programs for beneficial electrification, including programs for efficient fuel switching under the new Energy Conservation and Optimization Act.