



**Minnesota Center for
Environmental Advocacy**

January 26, 2022

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

VIA E-FILING

Re: Decision Options Supported by the Clean Energy Organizations
In the Matter of Xcel Energy's 2020-2034 Upper Midwest Resource Plan
PUC Docket No. E002/RP-19-368

Dear Mr. Seuffert:

Fresh Energy, Clean Grid Alliance, Union of Concerned Scientists, and the Minnesota Center for Environmental Advocacy (collectively "Clean Energy Organizations" or "CEOs") submit this list of decision options supported by the CEOs in the 2020-2034 Upper Midwest Integrated Resource Plan filed by Northern States Power d/b/a Xcel Energy.

While these are our preferred decision options, we do not necessarily oppose all other decision options that are absent from this list. CEOs will also continue to work with other parties to refine or develop new decisions options as requested by Commissioners.

1. CEOs support approval of Xcel's Alternate plan with modifications, as reflected in **Section A., decision option 1. a. through d.**
2. Regarding how to address non-wind and solar resources in the 2027-2030 time frame, we support three decision options as ways to acknowledge the 2027-2030 time frame for the purposes of the resource plan order, but not in any way as explicit findings of need that could proceed directly to a procurement. These are:

In Section A.,

- 2.
 - 17.a.
 - 17.b.
 - **Of those three, 17.a. is our preference.**
3. **In Section A.,** we also support decision option 18, to acknowledge that if cost-effective and beneficial to the system, we should be moving as fast as we can to add carbon-free generation.
 4. **In Section B.,** we support decision option 1.

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5. **In Section C.**, we support decision option 1 rather than decision option 5 that we initially offered in our supplemental comments.
6. **In Section D.**, we support decision option 1, rather than option 2 that we initially offered in our supplemental comments. And, we also support decision options 3., 11., 13., 14., and 22.

Respectfully,

/s/Amelia Vohs

Amelia Vohs

Regulatory Attorney

Minnesota Center for Environmental Advocacy

Attorney for Clean Energy Organizations

AV/edl

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