



January 26, 2022

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VIA E-FILING

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

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

Dear Mr. Seuffert:

The Xcel Large Industrials ("XLI")¹ submit this brief letter enclosing decision alternatives in accordance with the direction provided by Chair Sieben during the January 25, 2022, hearing on Northern States Power Company, dba Xcel Energy's ("Xcel") 2020-2034 Integrated Resource Plan ("IRP"). XLI wishes to emphasize that the key decisions before the Minnesota Public Utilities Commission ("Commission") are substantially intertwined. The early retirement of the coal units is driving the need for replacement firm dispatchable resources and also creating the opportunity to re-use the interconnection capacity through proposed gen-ties from the Sherco 3 and King sites (the "Gen-Ties"). However, these are the areas of the plan where there is the most risk to ratepayers.

The record supporting Xcel's transmission-cost modeling for the Gen-Ties is exceedingly thin. Xcel has only performed a simplistic cost analysis that uses an assumed transmission length and cost-per-mile (with an adder for synchronous condensers).² Applying just one sensitivity in the transmission costs wipes out nearly all of the savings.³ In addition, the cost of Xcel-owned solar on the Gen-Ties has the potential to be significantly more expensive than third-party owned solar sited elsewhere. This makes the Gen-Tie decision extremely risky from a ratepayer perspective. In our view, the solar resources selected in a competitive process should be dictating whether Xcel builds the Gen-Tie, not the other way around.

¹ XLI is an ad hoc consortium of large industrial customers of Northern States Power Company, dba Xcel Energy consisting for purposes of this filing of Flint Hills Resources Pine Bend, LLC; Marathon Petroleum Corporation; and USG Interiors, Inc.

² Supplemental Comment by XLI at Ex. C, p. 8 (Oct. 15, 2021) (eDocket No. 202110-178862-02).

³ *Id.*

There are also questions regarding whether the need for these firm dispatchable resources has been sufficiently supported and whether they should be combustion turbines (“CTs”), storage, or some other technology. Further, Xcel represented to the Commission that were it to build new gas-fired CTs, they would operate only 5% of the time.⁴ XLI does not believe it is in the best interest of ratepayers to retire coal units early in order to build new gas-powered CT units that are only going to run 5% of the time and may also need to be retired before the end of their useful life to meet the state’s energy goals. It seems that the more prudent course of action would be to run the existing coal units on economic dispatch for a period of time (which would create minimal carbon emissions) until there is more certainty regarding whether these units are needed and whether we can, in fact, skip a generation of gas-powered resources in favor of new technologies like storage.

Therefore, XLI supports the following revised decision options, which will defer a decision on coal unit retirements to a later date (*i.e.*, the next IRP which could be filed in 2023), giving the parties a chance to fully vet the Gen-Tie and Xcel-owned solar against third party-owned solar resources, and delaying Xcel’s firm dispatchable resource needs while technology continues to improve.

Revised Decision Option A.34. Reject Xcel’s Alternate Plan due to a lack of record support. In recognition of the need for certain resources common in various plans submitted by Xcel and supported by intervenors in this proceeding, make the following resource determinations approve Xcel’s proposed additions of:

- a. Approve 0.6 GW of Distributed Solar.
- b. Approve 2.0 GW of Energy Efficiency.
- c. Approve 0.5 GW of Demand Reduction.
- d. Approve 0.8 GW of Wind.
- e. Approve 2.7 GW of Solar.
- f. Approve repowering two firm dispatchable brownfield units in 2025 and 2026.
- g. Approve a 10-year license extension for the Monticello and Prairie Island nuclear plants.
- h. Defer a decision on the retirement dates for the Sherco 3 (2034) and King (2038) coal units until the next IRP so that the coal units can provide economic dispatch for reliability in lieu of the proposed greenfield CTs.
- i. Defer a decision on the two proposed greenfield CTs. Re-evaluate the need for firm dispatchable capacity after the renewables solicitation in Revised Decision Option B.10 is completed and the blackstart issues in Revised Decision Option C.6 have been further explored.
- j. Defer a decision on the Gen-Ties until after they have been proven to be cost-effective in the proceeding described in Revised Decision Option B.10.

⁴ While CT units typically do operate for a limited number of hours per year, efficient new CT units typically are expected to operate for more than just 5% of the hours in a year.

Revised Decision Option B.10. Require Xcel to complete a competitive bidding process to procure ~~solar plus storage projects~~ the 2.7 GW of solar and 0.8 GW of wind resources in Revised Decision Option A.34(d) and (e). The resource acquisition proceeding should solicit bids for (a) resources on the proposed Gen-Ties and (b) resources without ownership or geographic/interconnection constraints, so that the need and cost-efficiency of the proposed Gen-Ties and associated Xcel-owned solar can be adequately vetted and compared to third party-owned solar sited elsewhere.

Revised Decision Option C.6. Require a planning meeting or set of planning meetings to consider an investigatory docket to include all Minnesota utilities to address a zonal blackstart approach in Minnesota and the resources that would support such an approach. The proceeding should address:

- a. — Whether a zonal blackstart approach can provide a cost-effective (from both a rate and bill impact perspective) and reliable alternative to centralized blackstart. To the extent Xcel proceeds with a zonal blackstart plan, the following issues should be addressed in a subsequent IRP proceeding:
- a. The resources that would best support zonal blackstart to provide reliable and cost-effective capacity and energy to consumers.
- b. Whether prolonged economic dispatch of existing resources can avoid significant capital investments in interim natural gas resources, thereby ultimately accelerating the transition to a carbon-free future.

Decision Option D.1. Require Xcel to submit its next IRP by June 30, 2023 and direct Xcel to include an analysis of rate and bill impacts for each customer class in its filing, as well as an explanation of how its resource plan will help to achieve the energy policy goals set forth in Minn. Stat. § 216C.05, subd. 2(4) for all customer classes.

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

Very truly yours,

Stoel Rives LLP

/s/ Jessica L. Bayles

Jessica L. Bayles

JLB:cal
Enclosures

cc: Service List

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CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) 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.

REVISED DECISION OPTIONS ON BEHALF OF THE XCEL LARGE INDUSTRIALS

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

Dated this 26th day of January, 2022.

/s/ Carmel Laney
Carmel Laney

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