

January 26, 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 Sierra Club, the Distributed Solar Parties (Vote Solar, the Institute for Local Self Reliance, Cooperative Energy Futures, and the Environmental Law & Policy Center), and the City of Minneapolis, we offer the following joint revised Decision Option to Decision Option A.31 from the Staff Briefing Papers. As described by the Distributed Solar Parties in its opening statements, the proposed revision would introduce an interim target for behind-the-meter distributed generation for 2025 consistent with the modeling in the Clean Energy for All Plan.

Proposed Revision to Decision Option A.31:

Approve the need for 2,050 MW of community solar and 1,851 MW of distributed generation solar, and require Xcel to bring forward a proposal in 2022 for programs that could incentivize the growth of solar distributed generation within its territory at levels consistent with Sierra Club's Clean Energy For All Plan, with an interim target of 530 MW of behind-the-meter DG by 2025, and in a manner that would advance the goals of equity and access.

The 530 MW of distribution connected solar represents existing distributed solar plus distributed generation additions modeled in the Sierra Club's CEFA plan.

Thank you for your consideration.

Sincerely,

/s/ Will Kenworthy

William Kenworthy
Regulatory Director, Midwest
Vote Solar

/s/ Laurie Williams

Laurie Williams
Senior Attorney
Sierra Club

/s/ Kim W. Havey

Kim W. Havey, LEED AP, AICP
Director, Division of Sustainability
City of Minneapolis

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 26th day of January 2022.

/s/ William D. Kenworthy

William D. Kenworthy
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