

December 30, 2021

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Docket No. E002/RP-19-368 Institute for Local Self-Reliance and Vote Solar Request for Commission Consideration of Intervenor Modeling Costs in Utility Resource Plan Dockets

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") thanks the Commission for the opportunity to comment on the Institute for Local Self-Reliance and Vote Solar's Petition requesting the Commission order public utilities, including our exclusive electric utility Xcel Energy, to provide modeling software licenses for intervening parties in resource plan dockets.

The Petition also includes an important request that utilities make additional information available without a data request, including modeling inputs and settings, outputs, assumptions, post-processing spreadsheets, and model manuals. Intervenor modeling costs in utility resource plan dockets.

Minneapolis supports both requests as being in the public interest to improve transparency and democratize information used for decision-making in resource plans. We specifically recommend that Xcel Energy be required to:

- Upon request, provide any approved intervening parties with a license for modeling software the utility cites as part of resource plan filings;
- Include modeling inputs, settings, and assumptions in resource plan filings if not trade secret or non-public.

Minneapolis does not take a position on statewide adoption as our geography is served exclusively by Xcel Energy.

Thank you for your consideration of our comments.

Sincerely,



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

STATE OF MINNESOTA)

) ss.

CERTIFICATE OF SERVICE

COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 30th day of December 2021, I served a copy of the following via e-mail:

**COMMENTS OF THE CITY OF MINNEAPOLIS REGARDING DOCKET
NO. 19-368, INSTITUTE FOR LOCAL SELF-RELIANCE AND VOTE SOLAR
REQUEST FOR COMMISSION CONSIDERATION OF INTERVENOR
MODELING COSTS IN UTILITY RESOURCE PLAN DOCKETS**

at the last known email addresses of said entities/individuals on the attached Service List.



Stacy A. Miller

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