



414 Nicollet Mall  
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June 26, 2023

—Via Electronic Filing—

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

RE: COMMENTS  
RESILIENT MINNEAPOLIS PROJECT COST INCREASE PETITION WITHDRAWAL  
DOCKET NO. E002/M-21-694

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this brief response to the Institute for Local Self-Reliance's (ILSR's) June 22, 2023 Comments, in the above-referenced matter.

As an initial matter, the Company writes to clarify that the decision to suspend the Resilient Minneapolis Project (RMP) was not made unilaterally but was made in consultation with the RMP host organizations and the City of Minneapolis. The Company has a long history of working in close partnership with the City, Sabathani Community Center, the Minneapolis American Indian Center (MAIC), and Renewable Energy Partners (REP) on this and related efforts. We co-developed the RMP concept with the City of Minneapolis in our last two (2019 and 2021) Integrated Distribution Plans. We have been working closely with Sabathani, MAIC, and REP since mid-2021, when we conducted a Request for Applications and selected these three RMP sites. We worked closely with the City and hosts when we proposed the RMP in our November 2021 Integrated Distribution Plan. The Commission certified RMP in June 2022, and since then, we have continued to work with the hosts on project design, identification of critical loads for resilience hub purposes, battery sizing and siting, permitting, and keeping them up to date on the Request for Proposals process the Company initiated in November 2022. We have met at least monthly with the hosts to provide updates. All of those joint efforts are summarized in the Company's December 1, 2022 RMP Annual Report.<sup>1</sup>

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<sup>1</sup> Northern States Power Company, doing business as Xcel Energy. RESILIENT MINNEAPOLIS PROJECT ANNUAL REPORT. December 1, 2022. Docket No. E002/M-21-694.

We have also continuously supported the hosts' related energy efforts – for example, meeting regularly with MAIC's architects and contractors to integrate the RMP batteries into their broader ongoing building renovation, supporting energy efficiency projects (lighting retrofits and smart thermostats) at Sabathani, and supporting Sabathani's proposed conversion of its heating and cooling systems to geothermal. Through these efforts, as well as all three hosts' and the City's active participation on Xcel Energy's Equity Stakeholder Advisory Group, the Company has kept in close contact with our partners and made clear we are committed to their equitable clean energy efforts for the long term.

The Company's decision to withdraw our Petition and suspend RMP was difficult and, as already noted, was reached in consultation with the City and RMP hosts. As the Commission knows, we filed our April 19, 2023 PETITION FOR APPROVAL OF UPDATED COSTS in order to explain inflationary and supply chain factors beyond the Company's control that caused us to request a revised cost cap of \$17.6 million. That Petition makes clear our strong desire, as of that time, to continue to implement RMP at all three host sites.<sup>2</sup>

In mid-May, we heard from the City of Minneapolis the desire for a comment extension, and also for reconsideration of some fundamentals of the project design that the City had not raised previously. We then spoke with the three hosts. From them, we likewise heard a desire to re-evaluate the project design, along with a request for more time for the hosts to conduct community engagement to assess what benefits their communities are seeking from the RMP and whether microgrids remain a top priority. The Company did not object to these requests or find them unreasonable, though we were surprised at the timing. We had not heard such fundamental concerns about the project design at any point since 2021, nor in our monthly check-ins – only when our Petition was before the Commission. This timing to raise such concerns was challenging, since a near-term decision was needed to avoid losing the locked-in pricing from our chosen engineering, procurement, and construction (EPC) contractor. We had also invested significant staff time in project design, and in developing, issuing and evaluating a Request for Proposals based on what we understood as a mutual agreement on the project approach and, up to that point, strong support from the hosts.

Under these circumstances – with the RMP already challenged by significant cost increases for batteries, microgrid equipment, transformers, and other necessary infrastructure due to industry-wide inflationary pressures, combined with suddenly becoming aware of the City's and hosts' uncertainties about the project and request for more time – we could not in good faith move forward with executing an EPC contract that would have put customers and the Company at risk of stranded assets or further cost increases from a potential subsequent delay or scope change. We made the difficult decision to request withdrawal of our April 19, 2023 Petition, step back, and take time to reassess. We noted our intent to “continue

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<sup>2</sup> Northern States Power Company, doing business as Xcel Energy. RESILIENT MINNEAPOLIS PROJECT PETITION FOR APPROVAL OF UPDATED COSTS. April 19, 2023. Docket No. E002/M-21-694.

discussions with the RMP hosts on potential future collaborations, including but not limited to community resiliency projects, as we continue our commitment to connect with and support our communities.”<sup>3</sup>

We remain committed to those discussions. We will continue our conversations with the hosts and the City of Minneapolis on their energy priorities and those of the communities they serve. ILSR suggests that the Commission require Xcel Energy to meet with project stakeholders and submit a joint petition. Such an action is not necessary. We will continue to work with the RMP stakeholders; however, we want to ensure that any project meets the needs of our community partners. While we have not ruled out the possibility of re-commencing work on resilience hubs and/or microgrids at some point in the future, our understanding is that the hosts may have other, higher priorities for collaboration with Xcel Energy than microgrids in the near term. To the extent any additional projects are identified, we will bring those forward to the Commission as appropriate. Further, in practice, ILSR’s suggestion would have the same effect as approving the Company’s notice of withdrawal of our Petition.

We respectfully request that the Commission approve Xcel Energy’s notice to withdraw our April 19, 2023 Petition pursuant to Minn. R. 7829.0430.

We have electronically filed this document with the Commission and copies have been served on the parties on the attached service list. Please contact Taige Tople at [taige.d.tople@xcelenergy.com](mailto:taige.d.tople@xcelenergy.com) or me at [amber.r.hedlund@xcelenergy.com](mailto:amber.r.hedlund@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

AMBER HEDLUND  
MANAGER, REGULATORY PROJECT MANAGEMENT

cc: Service List

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<sup>3</sup> Northern States Power Company, doing business as Xcel Energy. RESILIENT MINNEAPOLIS PROJECT WITHDRAWAL OF PETITION. June 9, 2023. Docket No. E002/M-21-694.

## CERTIFICATE OF SERVICE

I, Christine Schwartz, 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 Minneapolis, Minnesota

xx electronic filing

**DOCKET No.      E002/M-21-694**

Dated this 26<sup>th</sup> day of June 2023

/s/

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Christine Schwartz  
Regulatory Administrator

[illegible]

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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-694_21-694
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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-694_21-694
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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