

June 26, 2023

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
Saint Paul, MN 55101-2147

RE: DOCKET NO. E002/M-21-694 In the Matter of Xcel Energy's Resilient Minneapolis Project-Petition for Approval for Updated Costs

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") appreciates the opportunity to offer comments on the June 9, 2023 filing by Xcel Energy ("Xcel") regarding the Resilient Minneapolis Project ("RMP"). The City of Minneapolis respectfully requests additional time to continue to engage with the hosts, Xcel, and community stakeholders before a Commission decision is made about the original pilot petition.

Since the comment period opened, Minneapolis has appreciated our initial discussions with the RMP host sites and Xcel and notes that more conversations are planned with all parties. We are also working productively with a grantor where the RMP project was one of the components for securing a resiliency staffing grant.

Minneapolis understands that the host sites remain interested in transforming their community centers into resiliency hubs so they can continue to provide critical services within their respective environmental justice communities in the event of power outages. We also appreciate that Xcel remains willing to discuss ways to support the hosts with their respective clean energy and resiliency goals. We are hopeful that continued conversations along with emerging federal funding opportunities may lead to solutions that address the inflationary pressures and cost effectiveness concerns highlighted by Xcel in the June 9 letter.

For these reasons, Minneapolis respectfully requests that the Commission not take action on canceling the original RMP pilot at this time.

Thank you for your consideration of our comments in this important matter as parties seek solutions to accomplish the goals of the RMP.

Respectfully submitted,



Kim W. Havey (He/Him)  
Division Director  
Sustainability, Healthy Homes and the Environment

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 26th day of June 2023, I served a copy of the following via e-mail and/or via U.S. Mail:

**CITY OF MINNEAPOLIS COMMENTS**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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## Electronic Service List:

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| Kenneth        | Rance                          | krance@sabathani.org                 | Sabathani Community Center           | 310 East 38th St Rm #120 Minneapolis, MN 55409                   | Electronic Service | No  |
| Mark           | Rathbun                        | mrathbun@greenergy.com               | Great River Energy                   | 12300 Elm Creek Blvd Maple Grove, MN 55369                       | Electronic Service | No  |
| Michael        | Reinertson                     | michael.reinertson@avantenergy.com   | Avant Energy                         | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402           | Electronic Service | No  |
| John C.        | Reinhardt                      | N/A                                  | Laura A. Reinhardt                   | 3552 26th Ave S Minneapolis, MN 55406                            | Paper Service      | No  |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD   | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131           | Electronic Service | Yes |
| Kevin          | Reuther                        | kreuther@mncenter.org                | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206 St. Paul, MN 551011667                 | Electronic Service | No  |
| Isabel         | Ricker                         | ricker@fresh-energy.org              | Fresh Energy                         | 408 Saint Peter Street Suite 220 Saint Paul, MN 55102            | Electronic Service | No  |
| Noah           | Roberts                        | nroberts@cleanpower.org              | Energy Storage Association           | 1155 15th St NW, Ste 500                                         | Electronic Service | No  |

|            |           |                                      |                                             |                                                                            |                       |     |
|------------|-----------|--------------------------------------|---------------------------------------------|----------------------------------------------------------------------------|-----------------------|-----|
|            |           |                                      |                                             | Washington,<br>DC 20005                                                    |                       |     |
| Amanda     | Rome      | amanda.rome@xcelenergy.com           | Xcel Energy                                 | 414 Nicollet Mall<br>FL 5<br>Minneapolis,<br>MN 55401                      | Electronic<br>Service | No  |
| Robert K.  | Sahr      | bsahr@eastriver.coop                 | East River<br>Electric Power<br>Cooperative | P.O. Box 227<br>Madison,<br>SD 57042                                       | Electronic<br>Service | No  |
| Joseph L   | Sathe     | jsathe@kennedy-graven.com            | Kennedy &<br>Graven,<br>Chartered           | 150 S 5th St Ste<br>700<br>Minneapolis,<br>MN 55402                        | Electronic<br>Service | No  |
| Thomas     | Scharff   | thomas.scharff@versoco.com           | Verso Corp                                  | 600 High Street<br>Wisconsin<br>Rapids,<br>WI 54495                        | Electronic<br>Service | No  |
| Kay        | Schraeder | kschraeder@minnkota.com              | Minnkota Power                              | 5301 32nd Ave S<br>Grand Forks,<br>ND 58201                                | Electronic<br>Service | No  |
| Christine  | Schwartz  | Regulatory.records@xcelenergy.com    | Xcel Energy                                 | 414 Nicollet Mall<br>FL 7<br>Minneapolis,<br>MN 554011993                  | Electronic<br>Service | Yes |
| Dean       | Sedgwick  | Sedgwick@ItascaPower.com             | Itasca Power<br>Company                     | PO Box 455<br>Spring Lake,<br>MN 56680                                     | Electronic<br>Service | No  |
| Maria      | Seidler   | maria.seidler@dom.com                | Dominion Energy<br>Technology               | 120 Tredegar<br>Street<br>Richmond,<br>Virginia 23219                      | Electronic<br>Service | No  |
| Will       | Seuffert  | Will.Seuffert@state.mn.us            | Public Utilities<br>Commission              | 121 7th Pl E Ste<br>350<br>Saint Paul,<br>MN 55101                         | Electronic<br>Service | Yes |
| Patricia F | Sharkey   | psharkey@environmentallawcounsel.com | Midwest<br>Cogeneration<br>Association.     | 180 N LaSalle St<br>Ste 3700<br>Chicago,<br>IL 60601                       | Electronic<br>Service | No  |
| Bria       | Shea      | bria.e.shea@xcelenergy.com           | Xcel Energy                                 | 414 Nicollet Mall<br>Minneapolis,<br>MN 55401                              | Electronic<br>Service | No  |
| Doug       | Shoemaker | dougs@charter.net                    | Minnesota<br>Renewable<br>Energy            | 2928 5th Ave S<br>Minneapolis,<br>MN 55408                                 | Electronic<br>Service | No  |
| Anne       | Smart     | anne.smart@chargepoint.com           | ChargePoint, Inc.                           | 254 E Hacienda<br>Ave<br>Campbell,<br>CA 95008                             | Electronic<br>Service | No  |
| Trevor     | Smith     | trevor.smith@avantenergy.com         | Avant Energy,<br>Inc.                       | 220 South Sixth<br>Street<br>Suite 1300<br>Minneapolis,<br>Minnesota 55402 | Electronic<br>Service | No  |
| Joshua     | Smith     | joshua.smith@sierraclub.org          |                                             | 85 Second St FL<br>2<br>San Francisco,<br>California 94105                 | Electronic<br>Service | No  |
| Ken        | Smith     | ken.smith@districtenergy.com         | District Energy<br>St. Paul Inc.            | 76 W Kellogg<br>Blvd<br>St. Paul,<br>MN 55102                              | Electronic<br>Service | No  |
| Ken        | Smith     | ken.smith@ever-greenenergy.com       | Ever Green<br>Energy                        | 305 Saint Peter<br>St<br>Saint Paul,<br>MN 55102                           | Electronic<br>Service | No  |

|          |            |                                      |                                     |                                                                          |                    |    |
|----------|------------|--------------------------------------|-------------------------------------|--------------------------------------------------------------------------|--------------------|----|
| Beth H.  | Soholt     | bsoholt@windonthewires.org           | Wind on the Wires                   | 570 Asbury Street<br>Suite 201<br>St. Paul,<br>MN 55104                  | Electronic Service | No |
| Sky      | Stanfield  | stanfield@smwlaw.com                 | Shute, Mihaly & Weinberger          | 396 Hayes Street<br>San Francisco,<br>CA 94102                           | Electronic Service | No |
| Jamez    | Staples    | jstaples@renewablenrgpartners.com    | Renewable Energy Partners           | 3033 Excelsior Blvd S<br>Minneapolis,<br>MN 55416                        | Electronic Service | No |
| Russ     | Stark      | Russ.Stark@ci.stpaul.mn.us           | City of St. Paul                    | 390 City Hall<br>15 West Kellogg<br>Boulevard<br>Saint Paul,<br>MN 55102 | Electronic Service | No |
| Byron E. | Starns     | byron.starns@stinson.com             | STINSON LLP                         | 50 S 6th St Ste 2600<br>Minneapolis,<br>MN 55402                         | Electronic Service | No |
| James M  | Strommen   | jstrommen@kennedy-graven.com         | Kennedy & Graven, Chartered         | 150 S 5th St Ste 700<br>Minneapolis,<br>MN 55402                         | Electronic Service | No |
| Eric     | Swanson    | eswanson@winthrop.com                | Winthrop & Weinstine                | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN 554024629   | Electronic Service | No |
| Dean     | Taylor     | dtaylor@pluginamerica.org            | Plug In America                     | 6380 Wilshire Blvd, Suite 1000<br>Los Angeles,<br>CA 90048               | Electronic Service | No |
| Stuart   | Tommerdahl | stommerdahl@otpc.com                 | Otter Tail Power Company            | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN 56537              | Electronic Service | No |
| Pat      | Treseler   | pat.jcplaw@comcast.net               | Paulson Law Office LTD              | 4445 W 77th Street<br>Suite 224<br>Edina, MN 55435                       | Electronic Service | No |
| Curt     | Volkman    | curt@newenergy-advisors.com          | Fresh Energy                        | 408 St Peter St<br>Saint Paul,<br>MN 55102                               | Electronic Service | No |
| Roger    | Warehime   | roger.warehime@owatonnautilities.com | Owatonna Municipal Public Utilities | 208 S Walnut Ave<br>PO BOX 800<br>Owatonna,<br>MN 55060                  | Electronic Service | No |
| Jenna    | Warmuth    | jwarmuth@mnpower.com                 | Minnesota Power                     | 30 W Superior St<br>Duluth,<br>MN 55802-2093                             | Electronic Service | No |
| Samantha | Williams   | swilliams@nrdc.org                   | Natural Resources Defense Council   | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL 60606                   | Electronic Service | No |
| Joseph   | Windler    | jwindler@winthrop.com                | Winthrop & Weinstine                | 225 South Sixth Street, Suite 3500<br>Minneapolis,<br>MN 55402           | Electronic Service | No |
| Robyn    | Woeste     | robynwoeste@alliantenergy.com        | Interstate Power and Light Company  | 200 First St SE<br>Cedar Rapids,<br>IA 52401                             | Electronic Service | No |

|             |           |                       |                                   |                                                            |                    |    |
|-------------|-----------|-----------------------|-----------------------------------|------------------------------------------------------------|--------------------|----|
| Yochi       | Zakai     | yzakai@smwlaw.com     | SHUTE, MIHALY & WEINBERGER LLP    | 396 Hayes Street<br>San Francisco, CA 94102                | Electronic Service | No |
| Christopher | Zibart    | czibart@atcllc.com    | American Transmission Company LLC | W234 N2000 Ridgeview Pkwy Court<br>Waukesha, WI 53188-1022 | Electronic Service | No |
| Kurt        | Zimmerman | kwz@ibew160.org       | Local Union #160, IBEW            | 2909 Anthony Ln<br>St Anthony Village, MN 55418-3238       | Electronic Service | No |
| Patrick     | Zomer     | Pat.Zomer@lawmoss.com | Moss & Barnett PA                 | 150 S 5th St<br>#1200<br>Minneapolis, MN 55402             | Electronic Service | No |