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January 22, 2024

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

-Via Electronic Filing-

Re: IN THE MATTER OF XCEL ENERGY'S COMPETITIVE RESOURCE ACQUISITION
PROCESS FOR UP TO 800 MEGAWATTS OF FIRM DISPATCHABLE GENERATION
DOCKET NO. E002/CN-23-212

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, is pleased to submit to the Minnesota Public Utilities Commission (Commission) three proposals as part of the competitive resource acquisition process to identify up to 800 megawatts (MWs) of firm dispatchable resources to meet Xcel Energy's need in the 2027 to 2029 timeframe:

- Bison Generating Station – Construction of two natural-gas-fired, simple-cycle, 210 MW combustion turbine (CT) generators and three 9 MW Reciprocating Internal Combustion Engines (RICE) for a total of 447 MWs. The CT generators would be capable of co-combusting up to 30 percent hydrogen upon initial operation. The proposed facilities would be located adjacent to Xcel Energy's Bison substation in Cass County, North Dakota, and have a planned in-service date of September 2028.
- Lyon County Generating Station – Construction of two natural-gas-fired, simple-cycle, 210 MW CTs, totaling 420 MWs. The CT generators would be capable of co-combusting up to 30 percent hydrogen upon initial operation. The proposed facilities would be located at a greenfield generating station in Lyon County, Minnesota, adjacent to the "Terminal Substation" proposed as part of the Minnesota Energy Connection

Project (MNEC) and could provide voltage support to MNEC. The proposal has a planned in-service date of December 2027.

- Sherco West BESS – Construction of a 58 MW long-duration 48-hour battery energy storage system (BESS) near our planned Sherco West Solar Generating System in Sherburne County, Minnesota. This proposal has a planned in-service date of December 2028. The Company also considered the alternative of an up to 300 MW 4-hour duration lithium-ion battery at this location with a December 2027 planned in-service date.

These proposals reflect Xcel Energy's commitment to our carbon reduction goals, Minnesota's 100 percent by 2040 requirement, and our obligation to reliably serve our customers. As identified in our 2019 Integrated Resource Plan (IRP), the Commission recognized that up to 800 MWs of firm dispatchable resources would more likely than not be needed in the 2027 to 2029 timeframe to reliably transition our system away from central station fossil fuel plants to a regional system that increasingly relies on renewable and other carbon-free generation. As we have previously noted, obtaining firm dispatchable generation is crucial even if these resources are not producing large amounts of energy throughout the year. Indeed, we view these resources as an insurance policy for the times our customers need them the most. We do not expect to use them frequently, but the times we will need to use them will be critical. Our proposals offer the attributes we previously identified, including the ability for resources to dispatch over long durations, which are critical to meeting our future needs and ensuring reliability during the transitions of our generation fleet.

The firm dispatchable generation provided by the Bison Generating Station and/or the Lyon County Generating Station will serve multiple system needs and is an important part of our broader resource plan to meet the Company's energy and capacity requirements. Importantly, these proposals also reflect Xcel Energy's nation-leading commitment to innovation. Just as Xcel Energy was an early adopter of wind and battery technologies, these CT proposals are capable of co-combusting hydrogen and natural gas. This capability provides additional flexibility and opportunity to displace a portion of the natural gas usage and reduce greenhouse gas emissions as we move toward zero-carbon fuels. The Company has not identified or proposed specific green hydrogen sources within this filing, but if the Commission approves CTs, the Company will continue to investigate potential options moving forward and, should a reasonable alternative be identified, bring a proposal to the Commission. We note that

the CTs will be capable of co-combusting up to 30 percent hydrogen without further modification to the turbines and that the site for each proposal has been designed to enable the addition of an electrolyzer that could produce green hydrogen on site. With additional modifications in the future, we anticipate that the CTs could be capable of operating with higher levels of hydrogen over time, and by 2050, be capable of 100 percent hydrogen operation.

The Company's Sherco West BESS 58 MW proposal is designed to comprehensively evaluate the potential for battery energy system storage to deliver similar grid attributes to meet the firm dispatchable need. This proposal would utilize well-known lithium-ion battery technology designed to operate in a 48-hour, long-duration to meet critical system needs like those we experience during Minnesota's cold winter seasons. This proposal also provides a flexible-forward looking storage option ideally located adjacent to the Company's Sherco Solar Generating System and at the site of our retiring Sherco Generating Station.

Each of these proposals reflects the Company's commitment that all Construction Craft Employees utilized to construct the proposal will be covered by a collective bargaining agreement with a union affiliated with the local council of North America's Building Trades Unions.

These proposals include the required information related to alternatives analysis and other content requirements of Minn. R. Ch. 7849 applicable in this competitive resource acquisition process. However, with respect to forecast, the Company notes that it anticipates filing its next IRP in February 2024. That plan will include up-to-date system-wide modeling, and we believe it will again affirm the need for firm dispatchable resources to continue to reliably meet the needs of our customers. Xcel Energy will file the updated forecast and other relevant information from the 2024-2040 IRP in this docket after it is efiled in with the 2024-2040 IRP.

The Company respectfully requests the Commission evaluate each of these resource proposals as part of the competitive resource acquisition process. We request that the Commission approve the appropriate resource mix to obtain firm dispatchable resources to serve our need in the 2027 to 2029 timeframe.

In accordance with Minnesota Rules part 7849.0210, subpart 1, the Company is submitting an application and processing fee of \$10,000, plus \$50 for each megawatt of proposed plant capacity for each proposal. We have submitted a check in the amount of \$32,350 for the Bison Generating Station; \$31,000 for the Lyon County

Generating Station; and \$12,900 for the Sherco West BESS. Checks in these amounts will be provided under separate cover.

The Company is also providing additional confidential information regarding blackstart and restoration to further inform the Commission's analysis of proposals in this docket. The document, "Xcel Energy Blackstart Attributes and Needs" contains information related to critical electric infrastructure (CEII), the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. Xcel Energy protects CEII as confidential information, as its disclosure would be likely to substantially jeopardize the security of vital system restoration information, and property against trespass, or physical injury or otherwise cause financial harm from its disclosure. This document is marked as "NOT-PUBLIC" in its entirety as confidential CEII that Xcel Energy considers Security Information as defined by Minn. Stat. § 13.37(1)(a). Pursuant to Minnesota Rule 7829.0500. subp. 3, we provide the following description of the excised material:

1. **Nature of the Material:** The document details Xcel Energy's system restoration and blackstart attributes needs.
2. **Authors:** The document was prepared by Xcel Energy's Transmission Real Time Planning engineering personnel in consultation with counsel.
3. **Importance:** The document includes information Xcel Energy protects as confidential information, as its disclosure would be likely to substantially jeopardize the security of vital system restoration information, and property against trespass, or physical injury or otherwise cause financial harm from its disclosure.
4. **Date the Information was Prepared:** January 2024.

Further, certain information related to costs located in Appendix B of each of the Company's proposals has been designated Trade Secret pursuant to Minnesota Statute § 13.37, subd. 1(b). This filing includes the public version of each Appendix B. The Trade Secret versions of each Appendix B are being separately e-filed, and will be provided only to those parties that are eligible to review nonpublic information in this docket.

We are serving our proposals on the Office of the Attorney General, the Department of Commerce, and others on the official service list in this docket. A summary of each

Mr. Will Seuffert
January 22, 2024
Docket No. E002/CN-23-212
Page 5 of 6

filing will be served on parties on the attached miscellaneous service list, and to the parties in the Company's current general rate case. Copies of our proposals can be found on the Commission's eDockets website in the above-referenced docket (e.g., by entering "23" in the year field and "212" in the number field). Xcel Energy will also be providing the Department of Commerce with a Data Intake Form for each proposal.

Please contact Alex Cutchey at alex.cutchey@xcelenergy.com or (612) 216-8084 or me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/ Bria E. Shea

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Enclosures
cc: Service Lists

**In the Matter of Xcel Energy's
Competitive Resource Acquisition
Process for up to 800 Megawatts of
Firm Dispatchable Generation
MPUC Docket No. E002/CN-23-212**

CERTIFICATE OF SERVICE

Breann L. Jurek certifies that on the 22nd day of January 2024, she e-filed on behalf of Northern States Power Company, doing business as Xcel Energy, a true and correct copy of the following documents:

1. Filing Letter;
2. Bison Generating Station Proposal, together with the filing summary and public Appendices A-D;
3. Bison Generating Station Proposal NONPUBLIC Appendix B;
4. Lyon County Generating Station Proposal, together with filing summary and public Appendices A-D;
5. Lyon County Generating Station Proposal NONPUBLIC Appendix B;
6. Sherco West BESS Proposal, together with the filing summary and public Appendices A-C;
7. Sherco West BESS Proposal NONPUBLIC Appendix B;
8. NONPUBLIC and PUBLIC versions of Xcel Energy Blackstart Attributes and Needs; and
9. Certificate of Service.

to the Minnesota Public Utilities Commission, via edockets (www.edockets.state.mn.us). Said documents were also served on the Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: January 22, 2024

Signed: /s/ Breann L. Jurek

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