



414 Nicollet Mall
Minneapolis, MN 55401

March 5, 2024

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

—Via Electronic Filing—

RE: SUPPLEMENTAL REPLY COMMENTS – APPLICATION COMPLETENESS
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, submits this supplement to our Reply Comments filed with the Minnesota Public Utilities Commission on February 27, 2024 in response to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed February 20, 2024, in the above-noted docket. With this supplemental reply filing, we clarify for the record several items included in our February 27 Reply to allow the Department to fully assess completeness of our project proposal applications.

A. Bison Generating Station and Lyon County Generating Station

1. *Minn. R. 7849.0240 Subp. 2 C - Effects of the facility in inducing future development*

Though the projects do not directly induce future development, the Bison and Lyon County Generating Stations will provide socially beneficial uses by supplying firm dispatchable capacity, and price certainty for our customers. Further, as detailed and quantified within the proposals, the projects will stimulate economic growth indirectly by providing temporary and full-time positions and will positively impact their counties by increasing the local tax base.

2. *Minn. R. 7849.0250 A (1) - Discussion of economies of scale on facility size and timing*

The Bison and Lyon County Generating Stations produce economies of scale in their construction and O&M leading to a lower cost of installed kilowatt hour. F class turbines impact economies of scale by reducing the initial cost per unit of capacity due to the high efficiency of the turbines, and their ability to co-combust hydrogen. Further, the auxiliary structures for the projects are supported by a modular turbine design of multiple turbines, allowing for costs savings, increased efficiency and a smaller operational footprint as auxiliary structures are shared. Having multiple units allows outages and maintenance to be planned between the turbines to ensure the projects are available to provide power even when one turbine is offline and undergoing maintenance.

Also, we note that we may be able to combine procurement activity for the Bison and Lyon County Generating Stations with that of other Xcel Energy projects in different jurisdictions to secure additional economies of scale in our equipment and materials procurement. The result of these gains in economics of scale is a lower cost of production for electricity.

B. Sherco West Battery Energy Storage System (BESS)

1. *Minn. R. 7849.0320 H - Potential types/ quantities of solid wastes produced in tons/year*

The Sherco West BESS project is anticipated to produce 0 tons of operational solid waste per year. Though the Sherco West BESS project is not anticipated to generate operational solid waste, solid waste from unplanned equipment failure and replacements over the life of the project are possible. Any waste as a result of these replacements will be recycled or otherwise disposed of.

We thank the Commission, and the Department, for this opportunity to provide additional information regarding the above-noted items via this supplement to the record and look forward to working with the Commission, Department, parties and other interested stakeholders to complete this proceeding in a timely and efficient manner.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Alex Cutchey at alex.cutchey@xcelenergy.com or (612) 216-8084 or me at monsherra.s.blank@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s /

MONSHERRA S. BLANK
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Encl
c: Service List

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. E002/CN-23-212

Dated this 5th day of March 2024

/s/

Christine Schwartz
Regulatory Administrator

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