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March 19, 2024

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

**RE: 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:

Fresh Energy, Clean Grid Alliance, Sierra Club, and Minnesota Center for Environmental Advocacy, collectively the Clean Energy Organizations (CEOs), respectfully submit this letter regarding the issue named above ("the Xcel Firm Dispatchable docket") and the Minnesota Public Utilities Commission Agenda Meeting on March 21, 2024.

CEOs did not participate in the instant comment period regarding completeness of the submitted bids because we were not able to receive access to trade secret versions before Initial Comments, and therefore deferred to the Department's expertise in reviewing bids for completeness. Similarly, we did not comment on the procedural questions because we believed the Commission had already determined the issue should be sent to the Office of Administrative Hearings (OAH) for a contested case. However, we plan to participate in the next phase of this proceeding and have brought on grid reliability and EnCompass modeling experts (Energy Futures Group, GridLab, and Telos Energy) to assist in our evaluation of the bids.

We do not object to the Department's recommendation that the Commission *not* refer the issue to OAH for a contested case (decision option 4), and could support development of this record through a standard formal comment process *as long as* that process provides sufficient ability for parties to evaluate bids and participate in record development. A comment process would provide significant administrative and procedural time savings compared to a contested case, and would allow CEOs to put those resources into analysis instead.

Below, we recommend a slightly modified procedural schedule. This has been adjusted from the staff Decision Options 4a and 4b to meet minimum modeling time requirements identified by Telos Energy and Energy Futures Group. These timeline requirements are:

- CEOs and Telos Energy would need access to the relevant PSSE (power flow) modeling files at least three months (ideally four) ahead of providing Initial Comments.
- CEOs would need at least two months from the filing date of Xcel's Initial Comments before filing our Initial Comments.

Therefore, CEOs propose the following procedural schedule. We recognize that our need for two months from Xcel's initial comments (e.g., from August 30 to October 31, 2024) likely makes the Commission's intended date of December 19, 2024 for a decision in this case infeasible. Our intention is not to cause delay to the case, and we appreciate the desire to move this proceeding forward in a timely manner to keep 2027 in-service dates viable. This is the fastest procedural schedule we can commit to without adjusting the Company's August 30, 2024 date for providing initial review.

- **August 30, 2024** – Xcel submits Initial Comments
- **October 31, 2024** – Initial Comments
- **November 29, 2024** – Reply Comments
- **December 13, 2024** – Supplemental Comments
- **January 30, 2024** – Commission Decision

CEOs have discussed this issue and shared our proposed timeline with Xcel and the Department of Commerce, and neither party was opposed.

Regarding the other decision alternatives: CEOs support decision option 2, to allow bidders 7 days from the agenda meeting to provide any missing information; however, a negative check-off or similar process may need to be established in order for such additional information to be reviewed and bids deemed complete or incomplete. We would support staff decision options 4 (parts a, b, and c) with the timeline modifications noted above. We do not take a position on decision options 5, 6, and 7 proposed by Clean Grid Alliance at this time, but believe these are relevant issues to be addressed in the next phase of the proceeding.

Thank you for your consideration. If you have any questions or need additional information, please contact Isabel Ricker at the information below.

/s/ Isabel Ricker

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