

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

February 15, 2019

PUC Docket No: E002/M-19-39

RE: Petition by Northern States Power Company, d.b.a. Xcel Energy, for Approval of Contracts and Ratemaking Treatment for Provision of Electric Service to Google's Data Center Project

Dear Mr. Wolf:

As a large customer of Xcel Energy with an interest in both economic development and renewable energy, the City of Minneapolis appreciates the opportunity to comment on the proposed special Agreement between Xcel Energy and Google for electric service to serve Google's planned data center in Becker, Minnesota.

The City of Minneapolis supports the efforts of the parties to reach an agreement that, as we understand it:

- Results in 100% renewable energy procurement for Google's operations at the data center
- Includes a discounted rate resulting in a savings to the customer
- Includes a minimum term
- Requires implementation of an energy conservation plan
- Does not negatively impact the utility's other customers

Like Google and other electric customers, the City of Minneapolis shares a goal to meet our electricity needs with 100% renewable energy, referred to as "Clean Generation" in the modified, proposed ESA.

The City requests that the Commission direct Xcel to work with stakeholders to propose a carbon neutral, economic development tariff, with an all-electric requirement or option, to be made available to other customers as well.

Respectfully submitted,



Mr. Kim W. Havey, LEED AP, AICP
Manager
Division of Sustainability

