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February 8, 2019

– VIA ELECTRONIC FILING –

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

RE: In the Matter of the Application of Northern States Power Company, D/B/A Xcel Energy
Acquisition of the Mankato Energy Center (MEC)
MPUC Docket No. E002/PA-18-702

Dear Executive Secretary Wolf:

IBEW Local Union 949 ("Local Union") represents approximately 479 Xcel Energy workers, with approximately 409 of them working and residing in the state of Minnesota. Our workers are employed in all facets of Xcel's operations from generation to transmission and delivery, state wide. In addition, Local Union 949 represents an additional 1,300 working men and women who in many instances work and/or reside in Xcel Energy's service territory.

The Local Union has reviewed Xcel Energy's proposal to acquire the Mankato Energy Center (MEC), and we are filing these comments to express our organization's support for the transaction and for Xcel Energy's ownership and operation of MEC. Xcel has been a longstanding and constructive partner of the Local Union, and we believe Xcel's purchase of MEC will benefit our members and their families, as well as the plant's current employees, the Mankato region, Xcel's ratepayers, and the state of Minnesota.

We understand from Xcel Energy's petition that it intends to honor the majority voice of employees with respect to union representation. Since the MEC petition was filed, we have also had constructive discussions with Xcel regarding potential next steps for a positive transition should the MEC employees decide to unionize. We believe Xcel's actions in this regard reflect its constructive approach to working with labor and its commitment to partnering with the Local Union in order drive benefits for its customers and the state.



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We note that MEC has changed ownership in recent years, and we believe Xcel's purchase of the plant will bring stability to the plant and surrounding area. That stability will benefit not only the plant's current employees, but also the Mankato region generally. Additionally, we believe Xcel Energy's ownership of MEC will result in this Commission having greater oversight regarding the future of the plants and its operations, which we support.

Finally, we understand from Xcel Energy's petition that its ownership of MEC is likely to produce benefits for Xcel customers over the life of the plant. Experienced and skilled operators will be critical to achieving that outcome, and Xcel Energy's ownership of MEC will ensure the retention and fair treatment of those workers, so that all of their customers can benefit.

We appreciate the opportunity to provide these comments.

Sincerely,



Mark Kaufman

Business Representative

CERTIFICATE OF SERVICE

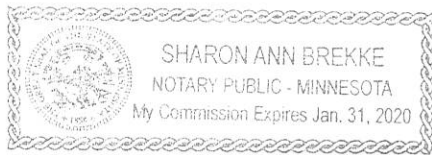
**In the Matter of the Application)
Of Northern States Power Company)
D/B/A Xcel Energy Request for)
Approval of forthcoming acquisition)
with Xcel Energy and Mankato Energy)
Center ? Southern Company.)**

MPUC DOCKET NO. E002/PA-18-702

I hereby certify that I have, this 8th day of February 2019, caused the foregoing document to be filed by electronic eDockets, and eServed or sent by US Mail, as noted, to all parties on the attached service list.



KATIE JASKULKE



Subscribed and sworn to before me
this 8th day of February, 2019.



Notary Public

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