

February 8, 2019

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

RE: Xcel Energy Petition for Approval of Mankato Energy Center Acquisition Docket No. 18-702

Dear Mr. Wolf:

As an Xcel customer I respectfully submit the following comments on Xcel Energy's proposed acquisition of the gas-burning Mankato Energy Center. It seems to me that this proposed acquisition is trying to side-step the PUC process of integrated resource planning (which I am also following), is not in the interest of Xcel customers, and creates worrying precedents that utility resource planning is optional and utilities do not need to prove need or cost effectiveness.

The acquisition of this power plant carries significant financial and environmental risks that both make Xcel's commitments to be carbon free by 2050 impossible and seem like an attempt to shift the risk of volatile gas prices onto customers like myself. Rate basing these assets until 2046 and 2059 gives a financial benefit to Xcel while creating a stranded asset if Xcel does live up to its carbon free promise and in general as the system needs to be switched to cheaper renewables and storage.

It seems to me that a short-term power purchase agreement is preferable compared to ownership and gives consumers more protection as well as Xcel more flexibility to meet its very important renewable and carbon free goals. It also guards against risk of not meeting current and future statutory goals or pollution regulations within the plant's lifetime. **I ask the Commission to not approve this purchase.** Should the Commission decide otherwise, it should—at a minimum—require utility shareholders to bear fuel price risk and provide other financial safeguards for customers.

Thank you for the opportunity to comment.

Sincerely,

Jacob Herbers
Graduate Research Assistant,
UMN Center for Science, Technology, and Environmental Policy