

February 20, 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. As someone who is concerned about environmental, climate and public health goals, my energy prices, as well as other economic benefits renewables and storage versus gas provide to MN, I do not trust that Xcel has the best interests of their customers and the state of MN in this purchase, especially as their own data shows that this will be a more expensive option per megawatt-hour already in 2023, before their current purchase agreement ends.

It seems to me that a short-term power purchase agreement is preferable compared to ownership, gives consumers more protection, and gives 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,

Mallory Mitchell