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SUBMITTED VIA ELECTRONIC MAIL

June 25, 2019

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

RE: *In the Matter of Acquisition of the Mankato Energy Center (MEC)*
Docket No. IP6949, E002/PA-18-702

Dear Secretary Wolf:

On behalf of the Advanced Energy Management Alliance (“AEMA”),¹ I am writing to address a concern that our consumer and provider members have in the Mankato Energy Corporation/IRP Settlement Agreement. While AEMA is not a party to the settlement or intervenor in this docket, we wanted to bring our view to the attention of the Commission. This letter represents the opinions of AEMA as an organization rather than those of any individual member.

Primarily, the resources in the settlement have been taken out of the context of the overarching Integrated Resource Plan (“IRP”) process. AEMA believes those generation resources should instead be considered in the larger discussion of resource planning. AEMA fully supports efforts by Xcel to reduce carbon emissions, including increased solar development, and in no way do we want to delay deployment of clean energy, but we believe these resources should be looked at holistically in the new IRP, which is scheduled to be docketed with the Commission within the next week.

¹ AEMA is a trade association whose members include national distributed energy resource companies and advanced energy management service and technology providers, including demand response providers, as well as some of the nation’s largest demand response and distributed energy resources.

As an organization focused on opening new opportunities for customer-sited distributed energy resources, including demand response, we believe that supply-side decisions should not be made in isolation from demand side resources. We believe that demand response, distributed energy resources, customer-sited energy storage, and other advanced energy management technologies, should be fully considered as part of the resource mix as Xcel considers its long term resource needs. Grid scale renewable energy can be more effectively and efficiently integrated in a complementary manner with demand side resources, obviating the need for incremental fossil generation. We think those options can be more fully addressed in the IRP process.

Thank you for the consideration of this position. Please feel free to reach out should you have any questions at katherine@aem-alliance.org or +1-202-524-8832. We look forward to continuing to engage in the IRP process to ensure that we can productively contribute to Xcel's goals of moving to a carbon-free electric grid.

Best regards,

A handwritten signature in black ink, appearing to read "Katherine Hamilton".

Katherine Hamilton
Executive Director, AEMA

Cc: Service List