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STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of Xcel Energy's 2024-2040 Upper Midwest Integrated Resource Plan

REPORT SUMMARIZING PUBLIC MEETINGS AND COMMENTS

On February 1, 2024, Northern States Power Company, doing business as Xcel Energy (Xcel Energy), filed its 2024-2040 Upper Midwest Integrated Resource Plan (IRP) with the Minnesota Public Utilities Commission (Commission). On February 22, 2024, the Commission issued an Order referring this matter to the Office of Administrative Hearings (OAH) for the assignment of an administrative law judge to conduct one or more public meetings to provide information to the public regarding the proposed IRP.[1] The Commission requested that a summary of the public meetings be filed within 60 days of the final public meeting.[2] The final public meeting was held on June 20, 2024. The Commission also received written comments which have been filed into the docket for this matter.

I. Notice and Public Meeting Schedule

The Commission required Xcel Energy to provide individual written notice of the IRP to each Minnesota customer through a bill insert.[3] Xcel Energy was also required to submit its notice for approval by the Commission.[4] On March 29, 2024, the Commission approved Xcel Energy's public meeting notice.[5] The notice indicated eight public meetings would be held as follows:

Date	Location	Time
June 10, 2024	Eden Prairie Community Center Cambria Room 16700 Valley View Road Eden Prairie, MN 55346	6:00-9:00 p.m. (Presentation beginning at 7:00 p.m.)
June 11, 2024	Monticello Community Center Mississippi Room 505 Walnut Street Monticello, MN 55362	5:30-8:30 p.m. (Presentation beginning at 6:30 p.m.)

[1] Order Requiring Bill Insert and Referring Matter to Office of Administrative Hearings for Public Meeting (Feb. 2, 2024) (eDocket No. 20242-203714-01).
[2] *Id.*
[3] *Id.*
[4] *Id*.
[5] Notice of Approval of Public Meeting Notice (Mar. 29, 2024) (eDocket No. 20243-204771-01).

Date	Location	Time
June 13, 2024	Wellstone Center Ferber Room 179 Robie Street East St. Paul, MN 55107	5:00-8:00 p.m. (Presentation beginning at 6:00 p.m.)
June 17, 2024	Virtual Hearing: WebEx	2:30-4:30 p.m. (Presentation beginning at 2:30 p.m.)
June 17, 2024	Virtual Hearing: WebEx	7:00-9:00 p.m. (Presentation beginning at 7:00 p.m.)
June 18, 2024	Treasure Island Resort & Casino Barbados Room 5734 Sturgeon Lake Road Welch, MN 55089	6:00-9:00 p.m. (Presentation beginning at 7:00 p.m.)
June 20, 2024	Sabathani Community Center Auditorium 310 East 38th Street Minneapolis, MN 55409	1:30-4:30 p.m. (Presentation beginning at 2:30 p.m.)
June 20, 2024	Sabathani Community Center Auditorium 310 East 38th Street Minneapolis, MN 55409	6:00-9:00 p.m. (Presentation beginning at 7:00 p.m.)

Consistent with the notice to customers, the Administrative Law Judge held eight public meetings at the dates, times, and locations indicated.

II. Public Meeting Attendance, Speakers, and Written Comments

At each public meeting, Commission staff used sign-in sheets to record meeting attendance and to permit individuals to indicate an interest in speaking.[6] The Administrative Law Judge also encouraged those attending the meetings to offer comments even if they had not signed up to do so on the sign-in sheet. All eight meetings were transcribed by a court reporter.[7] Additionally, the Administrative Law

[6] The sign-in sheets were retained by Commission staff or by the court reporter. *See* Sign-in Sheets (eDocket Nos. 20247-208675-01, 20247-208675-02, 20247-208675-03, 20247-208675-04).

[7] Transcript (Tr.) of Eden Prairie Meeting (June 10, 2024) (eDocket No. 20247-208657-01) (Eden Prairie Tr.); Tr. of Monticello Meeting (June 11, 2024) (eDocket No. 20247-208657-02) (Monticello Tr.); Tr. of Wellstone Center/St. Paul Meeting (June 13, 2024) (eDocket No. 20247-208657-03) (Wellstone Tr.); Tr. of Afternoon Virtual Meeting (June 17, 2024) (eDocket No. 20247-208657-04) (Virtual Afternoon Tr.); Tr. of Evening Virtual Meeting (June 17, 2024) (eDocket No. 20247-208657-05) (Virtual Evening Tr.); Tr. of Treasure Island/Welch Meeting (June 18, 2024) (eDocket No. 20247-208657-06) (Treasure Island Tr.); Tr. of Afternoon Sabathani/Minneapolis Meeting (June 20, 2024) (eDocket No. 20247-208657-07) (Sabathani Afternoon Tr.); Tr. of Evening Sabathani/Minneapolis Meeting (June 20, 2024) (eDocket No. 20247-208657-08) (Sabathani Evening Tr.).

Judge collected written comments from persons attending the meeting, which were labeled as exhibits to the transcript. The Commission has received numerous written comments into the record from members of the public who were unable to attend a public meeting, or who wished to offer additional comments beyond those made at the public meetings.[8] The Commission also noted that it would accept video comments via Flipgrid, but no video comments were submitted using this platform.

III. Presentations by Commission Staff, Agencies, and Xcel Energy

At the public meetings, a member of the Commission's staff, a representative of the Minnesota Department of Commerce (DOC), a representative of the Office of the Attorney General's Residential Utilities Commission (OAG RUD), and a representative from Xcel Energy spoke to the attendees.[9] At some public meetings, a representative of the Minnesota Department of Employment and Economic Development was present to provide information to members of the public, but did not make a presentation.

Sophie Nikitas, staff person with the Commission, offered background information about the Commission. She also explained the Commission's process for review of the IRP and noted the extension of the comment period in this matter.[10] She explained that the Commission relies on a robust public record in making its decision and encouraged attendees to comment.

The DOC was represented at the public meetings by Rates Analysts and Analyst Coordinators Danielle Winner, Steve Rakow, Mateus Santos, and Michael Zajicek, and Peter Teigland, the Division of Energy Resources supervisor. These speakers explained the DOC's role in evaluating Xcel's IRP, the standards the DOC will use in its review, and that the DOC will be providing a recommendation regarding the IRP to the Commission in the future.

On behalf of the OAG RUD, Assistant Attorneys General Katherine Hinderlie and Joey Cherney and Financial Analyst Chad Stevenson, explained the work of the Attorney General's Office in public utility matters, as well as other consumer protection areas, and encouraged members of the public to make themselves heard regarding the IRP.

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[8] The Administrative Law Judge has reviewed written comments filed into this docket. Some comments relate to billing and customer service issues. Such comments are outside the scope of this matter. Other comments relate to the issues presented in this docket and many echo the issues raised during the public meetings. This summary primarily addresses comments made at the public meetings, but also cites some written comments from the public raising issues not addressed at the meetings, in order to present a more complete picture of the comments in this matter. Further, this summary addresses comments submitted by members of the public, and it does not summarize comments from governmental entities or intervenors, as those may require further analysis by Commission staff.

[9] Due to severe weather, some agency representatives did not attend the hearing at Treasure Island in Welch, Minnesota. The Administrative Law Judge provided an overview of information related to these agencies. Treasure Island Tr. at 16-19.

[10] Notice of Extended and Modified Comment Period (eDocket No. 20246-207751-01).

Finally, at each public meeting, Patti Leaf, Regulatory Policy Specialist for Xcel Energy, made a presentation explaining the IRP. She noted that Xcel Energy continues to reduce its dependence on coal. Xcel Energy plans to replace coal resources with renewable energy sources like wind and solar, along with "always available" electric generation. Xcel Energy has initially identified that "always available" generation as coming from natural gas plants. Xcel further explained that it seeks to extend the life of its Red Wing and Wilmarth power plants to 2037, and to extend the lives of its nuclear plants at Prairie Island and in Monticello until the 2050s. Xcel Energy's proposal plans for 480 megawatts of battery storage and incorporates requirements for community solar, distributed solar generation, energy efficiency standards, demand response mandates, and standards for the transition to carbon-free energy. Xcel Energy believes it will manage to fulfill these plans while obtaining average annual rate increases of less than one percent.

IV. Summary of Comments

This report summarizes certain significant issues raised in comments in this docket and identifies some specific, representative comments on the key issues raised. It does not summarize every comment made in this proceeding. For an extensive review of the comments made, the Administrative Law Judge refers the Commission to the transcripts and the record in this docket.

A. Decarbonization and the Transition to Renewable Energy Sources

Commenters expressed support for and opposition to Xcel Energy's plan to eliminate coal from its generation portfolio by 2030. Many commenters offered praise for the transition to renewable resources like wind and solar power. Others expressed concern about an over-reliance on renewable sources and the potential impact on energy reliability.

Joanne Schubert is concerned about the future of her children and grandchildren, and she urged Xcel Energy to increase its use of renewables and to end its use of fossil fuels.[11] Alice Madden maintains that Xcel Energy's transition away from coal is "not a sealed deal," that Xcel Energy should move up the dates of its coal facility retirements.[12] Bonnie Beckel believes that "[w]hat Minnesota and our world needs, and we need this urgently and not by 2040, is huge expansion of solar and wind-generated power, [and] geothermal energy options."[13]

Steven Smith maintains that "[w]e need to do everything we can to reduce CO2 right now. We need to turn away from all fossil fuels . . . [i]t can't happen next week, but we've got to do everything."[14] Satish Desai contends that Minnesota "needs to avoid

[11] Virtual Evening Tr. at 51.
[12] Sabathani Afternoon Tr. at 40.
[13] *Id.* at 68.
[14] Sabathani Evening Tr. at 33.

baking in reliance on new long-lived fossil fuel powered infrastructure" and should expand reliance on large scale energy storage and geothermal.[15]

Hobson Carroll believes that some forms of carbon-based energy generation sources should be used if technological advances can be made that reduce or eliminate carbon's harmful effects.[16] Dan Gassler maintains that Minnesota's planned transition to carbon-free energy is too aggressive, and he advocated for continuing reliance on conventional power generation sources.[17] Don Tomann owns a precision machining company in Monticello, Minnesota, and he noted that the presence of the Monticello nuclear power facility was one of the factors that drew him to the area 20 years ago.[18] He is concerned about energy reliability because power outages can be expensive to his business and damage his equipment, and he is concerned that the transition to more solar and wind resources will reduce reliability.[19]

Rachel Bogacz is "deadly set against" ending the fossil fuel industry, fears rolling blackouts or brownouts, and doesn't want energy consumers to be nickel-and-dimed by time-of-use rates.[20] Minnesota Representative Pam Altendorf of District 20A believes that Minnesota's energy policies are being driven by single-party government and that additional checks and balances are required to ensure the health of Minnesota's energy system.[21]

Gerald Kritzeck submitted a written comment opposing the closure of Xcel Energy's coal plants, in part due to the negative impact on jobs and the local tax base in Becker, Minnesota and Sherburne County.[22] Matthew Pietrzak wrote: "[w]ith the current economic situation, I could not care less about reducing carbon emissions as long as my bill stays the same or goes down while maintaining a maximum reliability."[23]

B. Solar Power

Some commenters supported expansion of community and rooftop solar options. For example, Lee Samelson noted that utility-scaled solar makes sense in areas that already have transmission corridors, but that distributed and community rooftop solar would help Minnesota to meet its renewable goals more quickly.[24] He noted that cities, schools, and businesses can participate positively in community solar projects.[25] Jennifer Olson is a wildlife biologist who encouraged the use of existing utility

[15] Sabathani Afternoon Tr. at 69.
[16] Wellstone Tr. at 27-28.
[17] Monticello Tr. at 48-49.
[18] *Id.* at 30-31.
[19] *Id.* at 31-34.
[20] Virtual Evening Tr. at 42-44.
[21] Treasure Island Tr. at 28
[22] Comment of Gerald Kritzeck (20246-207345-05) (June 3, 2024).
[23] Comment of Matthew Pietrzak (eDocket No. 20246-207369-01) (June 3, 2024).
[24] Virtual Afternoon Tr. at 24.
[25] Sabathani Evening Tr. at 50.

infrastructure to support the expansion of rooftop solar resources, rather than building large-scale solar on the landscape.[26]

Katherine Schaefer believes that Xcel Energy should do more to promote and facilitate rooftop solar, noting that "[i]t's off-putting and frustrating for homeowners to try to put a solar array on their home and then not have it happen because Xcel is slow-walking the process."[27] She also stated that Xcel Energy has no process for homeowners to improve and update their old panels to better ones.[28] Roger Cuthbertson also voiced concerns about the way Xcel Energy manages rooftop solar generation, noting that when he installed solar at his home, Xcel Energy would not authorize him to install very many panels because he was not allowed to sell more power to Xcel Energy than it sold to him.[29]

Patty O'Keefe, who is a staff member of the Sierra Club, advocated for more rooftop and community solar in addition to the utility-scale solar Xcel Energy incorporated into the IRP.[30] She noted that rooftop and community solar can decrease demand on the grid and that it is a way to make clean energy more accessible to renters.[31] Andrew Blake wrote that Xcel Energy has not done enough to support the efforts of its customers to adopt multiple positive energy strategies, noting that its customers can have residential solar or time-of-day charging for electric vehicles, but not both.[32]

Paula Braun wrote to express her concern about the impact of solar arrays on wildlife in her area, and she advocated for placing solar panels on closed down malls and shopping centers with empty parking lots.[33] Minnesota Representative Pam Altendorf is an advocate for solar power, but she believes that removing land from agricultural production to build solar farms could be devastating to Minnesota's economy.[34]

C. Nuclear Power

Across all the public meetings, numerous commenters expressed positions regarding nuclear power generation and Xcel Energy's plan to extend its reliance on its Prairie Island and Monticello plants.

Jesse Cook with Generation Atomic contends that nuclear power must be part of the solution for Minnesota's energy transition.[35] He noted advances in nuclear power in

[26] Virtual Afternoon Tr. at 34-35.
[27] Sabathani Afternoon Tr. at 65.
[28] *Id.*
[29] Sabathani Evening Tr. at 41.
[30] *Id.* at 35.
[31] *Id.* at 35-36.
[32] Comment of Andrew Blake (eDocket No. 20246-207375-01) (June 3, 2024).
[33] Comment of Paula Braun (eDocket No. 20245-207062-06) (May 23, 2024).
[34] Treasure Island Tr. at 30-31.
[35] Sabathani Evening Tr. at 28.

France and that the county burns "virtually zero coal."[36] He maintained that "[n]uclear has proven itself to be the most efficient form of energy, both in terms of space and overall output."[37] He also noted that utilities should invest in advanced nuclear technologies and modernize their reactors, and stated that "there exist reactors that can burn through fuel and then again and again and reuse waste until spent fuel is no more radioactive than a piece of limestone."[38]

David Rolf stated that, "[i]f you think that we're going to reduce our CO2 footprint by reducing our energy use, you're kidding yourself," and he opined that "the only real, practical solution is nuclear power."[39] Bruce Anderson believes that Minnesota should end its moratorium on the construction of new nuclear power plants.[40] Joe Schwartz supports Xcel Energy's plan to extend the operation of the Prairie Island and Monticello plants, and asked if there is any way to increase the capacity of those plants without violating Minnesota's nuclear moratorium.[41]

Kelly Lundeen considers it a mischaracterization to call nuclear power renewable, safe, or green and she cited studies finding particular harms to children near nuclear plants.[42] Lindsay Potter wants Minnesota to maintain its moratorium on the construction of new nuclear power plants, stating that even Xcel Energy's own modeling software did not support new nuclear as an option.[43] She also noted concerns about extending the operation of the Prairie Island and Monticello nuclear plants, and expressed her belief that Xcel Energy had engaged in "shady and sort of disreputable behavior," regarding the leak of radioactive coolant water from the Monticello plant.[44] Marcus Mills stated that "the one thing we generally know about nuclear power is that we don't know enough to make it safe…. All of the safeguards that we have used in the past are failing."[45]

Carol Walker spoke against extending the life of the Monticello nuclear power plant, and contended that Xcel Energy mishandled the leak of radioactive coolant water containing tritium.[46] Sarah Martin stated: "Renewing the license of Monticello Nuclear Power Plant is a terrible and unnecessary idea and this reactor needs to be shut down sooner rather than later."[47] She maintains that "[n]uclear power is dangerous and deadly from beginning to end," and that radioactive pollution has poisoned "sacred lands and waterways and humans and animals that rely on them for sustenance."[48] Jean Ross also expressed concerns about the extension of the Monticello plant, maintaining that

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[36] *Id.* at 29.
[37] *Id.* at 28.
[38] *Id.* at 74.
[39] Eden Prairie Tr. at 35-36.
[40] Monticello Tr. at 36.
[41] Virtual Afternoon Tr. at 36-37.
[42] *Id.* at 28-29.
[43] Virtual Evening Tr. at 25-26.
[44] *Id.* at 58-59.
[45] Sabathani Evening Tr. at 64.
[46] Wellstone Tr. at 34-36.
[47] Sabathani Afternoon Tr. at 32.
[48] *Id.*

Xcel Energy intends to operate the plant until it is 80 years old, and opining that doing so is reckless and ignores safety concerns.[49] Susu Jeffrey called Monticello a ”zombie nuke.”[50]

D. “Always Available” Generation Resources

Some commenters expressed concerns about Xcel Energy’s plan to use “always available” resources not yet determined to meet additional demand. Penelope Burleson questioned Xcel Energy’s plan to rely on “always available” generation sources, asking, “What’s that code for?”[51] Peter Langr also questioned the resources that will serve as “always available” generation assets, and believes that concept is a cover for adding or continuing gas generation.[52] He would like for the Commission to require that the “always available” resources designated to meet Xcel Energy’s generation needs do not generate carbon emissions.[53]

Dawn Georgieff agrees that Xcel’s “always available” resources are “obviously fossil fuel gas plants.”[54] She believes that using gas plants as a resource is inconsistent with legislative directives that Minnesota be carbon free by 2040.[55] Dale Lutz opposes the use of gas peaking plants, stating, “[g]as peakers will become stranded assets… We should invest in energy storage and additional renewables instead of gas peakers.”[56] Sean Gosiewski urged that, instead of adding gas peaking plants, Xcel Energy should expand distributed generation, demand response, and energy storage.[57]

E. Equity Issues

Brian Krohnke encouraged the Commission to engage in the most open, rigorous, and transparent process possible for a review of the IRP, asking the PUC to consider the social cost of carbon and the “upside equity gains” that could come from distributed generation alternatives.[58] Kyle Samejima with Cooperative Energy Futures urges a transition to energy democracy in which the transition is not just in the hands of people who profit from the status quo and that renewable energy projects should be available to people who are the most affected by and least able to afford them.[59]

Michelle Frost wants equity to be a “front and center” issue for Xcel Energy, and is particularly concerned that rates be set so that customers are not disincentivized from

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[49] Sabathani Evening Tr. at 30-31.
[50] *Id.* at 44.
[51] Eden Prairie Tr. at 46.
[52] Virtual Evening Tr. at 29.
[53] *Id.* at 30.
[54] *Id.* at 31.
[55] *Id.* at 31-32.
[56] Virtual Evening Tr. at 24.
[57] Sabathani Evening Tr. at 57.
[58] Wellstone Tr. at 39-40.
[59] Sabathani Evening Tr. at 47-48.

switching to electrified homes.[60] Patty O'Keefe expressed that she understands the challenge of decarbonizing while keeping rates affordable, but she notes that the burden of additional costs for the energy transition should not be placed on the backs of low income utility customers.[61] Alice Madden is concerned that the uranium to support nuclear power generation is sourced non-consensually from locations in Kazakhstan and Canada near indigenous communities.[62]

Salma Said expressed that the "Prairie Island Community historically has never agreed to store nuclear waste extending the lives of the plant. It is a blatant disregard for the community needs."[63] Susu Jeffrey maintains that Xcel Energy plans to bring additional nuclear waste to Prairie Island, indicating "[i]t's not fair. Prairie Island has, among other things, 500 burial mounds in the area. It's sacred turf. It is so racist. It's embarrassing."[64]

Michael Childs, Jr., a Prairie Island Indian Community member, stated that the tribe was not consulted about the nuclear plant in violation of law.[65] He expressed that the energy experience of indigenous communities in the United States is: "We feed it and we are the ones where the waste is dumped on."[66] He encouraged the Commission to make decisions based on science.[67] Tribal member Darelynn Leto also expressed that the community should not forget how the tribe was treated when Xcel Energy placed nuclear facilities at Prairie Island.[68] She stated that, "while the [Commission] was having closed door meetings at the capit[o]l, we sat in the hallways on marble benches waiting to be heard. . . . We weren't invited into the meetings and we weren't heard."[69] She further expressed that "these are our lives and we are the only tribe that lives closest to nuclear waste."[70]

F. Other Comments

Bruce Anderson advocated for the use of advanced reconductoring to expand the capacity of existing transmission lines.[71] Pamela Dedrick asked that the Commission consider sand silos used in Finland rather than lithium batteries to store energy.[72]

Thomas Taillefer submitted a written comment maintaining that the Commission should ensure all dams are producing hydroelectric power before coal plants are

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[60] Eden Prairie Tr. at 29.
[61] Virtual Evening Tr. at 54.
[62] Treasure Island at 34.
[63] Sabathani Afternoon at 43.
[64] Sabathani Evening Tr. at 45.
[65] Treasure Island at 40.
[66] *Id.* at 41-42.
[67] *Id.* at 44.
[68] *Id.* at 45.
[69] *Id.* at 46.
[70] *Id.*
[71] Monticello Tr. at 38-39.
[72] Comment of Pamela Dedrick (eDocket No. 20245-207062-06) (May 23, 2024).

retired.[73] Zachary Schreiner believes that hydroelectric power should be further developed and sees hydro power as more reliable than wind.[74]

Several commenters who submitted written comments expressed opposition to developing resources to support electric vehicle charging. For example, Timothy Angstman wrote that he did not intend to have an electric vehicle, and he was reducing his payment to Xcel Energy as an offset to increased costs for charging resources.[75] Gary Hukriede contends that the marketplace has rejected electric vehicles, and that any expansion of resources should be for initiatives that have market acceptance.[76]

Dated: August 19, 2024

JESSICA A. PALMER-DENIG
Administrative Law Judge

[73] Comment of Thomas Taillefer (eDocket No. 20246-207428-06) (June 5, 2024).
[74] Comment of Zachary Schreiner (eDocket No. 20246-207435-07) (June 15, 2024).
[75] Comment of Timothy Angstman (eDocket No. 20246-207345-05 (June 13, 2024).
[76] Comment of Gary Hukriede (eDocket No. 20245-207217-02) (May 30, 2024).