



**Xcel Energy Integrated Resource Plan 2020-2034
Sustainable Growth Coalition Comment Letter to the MPUC**

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Re: Docket No. E002/RP-19-368

Dear Secretary Seuffert:

Thank you for the opportunity to comment on Xcel Energy's proposed Integrated Resource Plan (IRP). Long-term utility resource planning is an important vehicle for protecting the public interest through the shaping of the energy system for the coming decades. As large commercial and industrial customers of Xcel Energy, we support more clean energy and think this transition can be done affordably, reliably, and increasingly in a just and equitable manner. Our members have been supportive of Xcel Energy's announcements to move towards carbon-free energy.

The Sustainable Growth Coalition (the Coalition), a business-led partnership, works to advance growth and prosperity to keep the region, communities, and companies competitive. Xcel Energy's Preferred Plan has many opportunities to advance the Coalition's member-adopted Energy Vision:

- Achieve a substantial reduction in Minnesota's greenhouse gas emissions and ensure a thriving economy and healthy equitable communities.
- Advance beyond the current greenhouse gas emission reduction targets of 80% by 2050, as research from the United Nations Intergovernmental Panel on Climate Change indicates is necessary.
- Work towards increasing access to affordable, reliable, clean energy to improve racial, economic, social and public health outcomes and fueling economic growth for all Minnesotans.

Coalition members include: 3M, Ackerberg, Allianz Life Insurance Company of North America, Andersen Corporation, Antea Group, Aveda, Barr, Best Buy, Blue Cross Blue Shield of Minnesota, Ecolab, Ever-Green Energy, Great Plains Institute, Great River Energy, Greater MSP, HealthPartners, HGA, Metropolitan Airports Commission, Metropolitan Council, Minnesota Department of Administration, Mortenson, National Grid Renewables, Target, Tennant, University of Minnesota, Uponor, Wenck, Xcel Energy (although these comments are submitted on behalf of non-utility members).

We support Xcel Energy's IRP to accelerate the clean energy transition for regional prosperity and recognize this requires new investments, especially in renewables. Coalition members support a very low-carbon system that remains reliable and affordable for their business operations, sustainability and community goals. Moving forward, several systemic challenges require additional attention - the need for additional transmission infrastructure to reach Xcel Energy's customer goals and an increased emphasis on working with communities to advance equitable outcomes.

Clean energy and regional prosperity

We are pleased to see the continued pursuit of carbon-free energy in a cost-conscious way in the proposed IRP. The region's resilience depends on the jobs and services our members and other employers provide and requires that we work to reduce greenhouse gas emissions. Access to affordable, reliable clean energy is critical to promoting efficient growth and a prosperous region.

In addition to mitigating climate risk, the business case for clean energy includes reducing operational and supply chain costs and risks, fueling economic growth, expanding job opportunities for all, attracting and retaining talent in Minnesota and improving quality of life. The transition to clean energy results in better air quality and advances social justice by improving environmental health for marginalized communities. We look forward to continuing to work with Xcel Energy, other businesses, and stakeholders to place a greater emphasis on clean energy solutions that advance equity, address how our grid is managed, make long term plans to reduce reliance on fossil fuels, and improve quality of life and our environment.

Transmission

As the regional power generation portfolio evolves, transmission investments will help advance our region's competitiveness and meet customer needs. Transmission grid capacity is critical for ensuring organizations and individuals can reach their energy goals while ensuring safe, reliable and affordable clean energy access for all customers.

We are concerned that these goals may not be met due to insufficient transmission capacity, which Xcel Energy stated in their IRP is a constraint preventing new utility-scale renewables from coming online over the next six years. We support addressing near-term transmission planning challenges and investing in future planning to account for customer support to increase renewable energy. Ambitious renewable energy expansion plans are included in the IRP which help increase the renewable share of electricity in the system mix for all customers; realizing these plans will require addressing transmission constraints.

We support energy system leadership regarding transmission barriers threatening further development of renewable energy. We understand that barriers to transmission planning exist at the regional level and will require collaboration among energy system leaders, decisionmakers and various entities for planning reforms. This collaboration between different perspectives is important because working through the clean energy transition is complex and requires that stakeholders coordinate to solve these societal-level challenges. We support optimizing the energy system to increase efficiencies and leverage the necessary associated infrastructure to achieve our energy vision.

Community and Equity

The Coalition is a program area of Environmental Initiative. As an organization, Environmental Initiative is committed to catalyzing collaboration across perspectives, power and systems for social equity and environmental health. Communities of color, rural communities, Tribal Nations, and economically disadvantaged communities too often disproportionately bear the negative consequences of environmental impacts, while having been marginalized or excluded from the decisions that affect their health and well-being. Minnesota has a proud civic leadership history and addressing these challenges requires us to center community needs, health, well-being, and safety throughout this multi-year planning process. This IRP could set the energy system in a direction that addresses company, community and customer preferences.

We appreciate that Xcel Energy shared some ideas in the IRP Supplement on Inclusion, Diversity, and Equity. As Xcel Energy moves towards its goal of carbon-free electricity, the company will continue to make a significant investment in clean energy in Minnesota. This presents an opportunity to help address racial and economic injustices in our energy system. While many aspects of these complex

challenges can be addressed outside the IRP process, for example in dockets around low-income energy efficiency, solar programs, access to electrified transportation, and workforce development, we have significant opportunities to advance these efforts with resource planning. A few ideas include:

- Identify how feedback from local communities with different priorities will be gathered and included in decision-making and how individuals will be compensated for their time and knowledge, building on Xcel Energy’s robust stakeholder engagement process.
- Ensure the benefits of the system – economic, health, or environmental – do not perpetuate existing or create new inequities.
- Implement solutions that work in this moment and are adaptable to changing circumstances and future disruptions.
- Support communities and workers in the transition away from fossil fuel and ensure that clean energy benefits are shared equitably, including plans to ensure economic development opportunities in communities where coal power plants are being retired. In this regard we commend Xcel Energy’s efforts to work towards the goal of bringing new infrastructure, jobs and economic opportunities to those communities.
- Advance equitable access to clean energy benefits by ensuring fair access to the jobs and opportunities created by this transition. For example, the IRP could include plans to increase investments in workforce training programs that prioritize low-income community members, Black, Indigenous and people of color, women, and displaced workers.

The IRP is an important foundation to promote the prosperity of our region to address multifaceted environmental, economic and social concerns. We look forward to continued dialog with the MN Public Utilities Commission, other stakeholders, and Xcel Energy.

Sincerely,

/s/ Amy Fredregill

Amy S. Fredregill
Managing Director

**APPENDIX A:
OVERVIEW OF THE COALITION:**

- We represent members from the private, public and nonprofit sectors, including Fortune 500 companies and other regional businesses headquartered in Minnesota.
- Our members collectively have more than 100,000 employees in Minnesota.
- Our members have strong enterprise-wide corporate sustainability goals in energy, carbon, greenhouse gas emission reductions and renewable energy (see Appendix B).
- Coalition members comprise almost 13% of the total annual electricity consumption of all managed key account customers in Minnesota at Xcel Energy. We are primarily large industrial and commercial utility end users.
- Our membership includes 3M, Ackerberg, Allianz Life Insurance Company of North America, Andersen Corporation, Antea Group, Aveda, Barr, Best Buy, Blue Cross Blue Shield of Minnesota, Ecolab, Ever-Green Energy, Great Plains Institute, Great River Energy, Greater MSP, HealthPartners, HGA, Metropolitan Airports Commission, Metropolitan Council, Minnesota Department of Administration, Mortenson, National Grid Renewables, Target, Tennant, University of Minnesota, Uponor, Wenck, Xcel Energy (although these comments are submitted on behalf of non-utility members).
 - As listed above, Xcel Energy is a member of the Coalition and as such is participating in this and our other energy-related dialogs, but they have been respectful in ensuring that these comments come from non-utility Coalition members.



**APPENDIX B:
SAMPLING OF MEMBER ENERGY-RELATED CORPORATE SUSTAINABILITY GOALS**



SAMPLING OF MEMBER ENERGY-RELATED CORPORATE SUSTAINABILITY GOALS

All Coalition members have committed to our collective Clean Energy Vision, which includes surpassing the State of Minnesota's current economy-wide greenhouse gas emissions targets of 30 percent reduction by 2025 and 80 percent reduction by 2050; increasing access to affordable, reliable, clean energy to improve racial, economic, social and public health outcomes; and fueling economic growth for all Minnesotans.



3M

3M is committed to the RE100 Initiative to source 100 percent renewable electricity for their global operations by 2050, with an interim goal of 50 percent by 2025. Additionally, 3M is helping customers reduce their greenhouse gas emissions by 250 million tons of carbon dioxide equivalent emissions through use of 3M products.



Blue Cross Blue Shield

Blue Cross Blue Shield of Minnesota has committed to reducing Scope 1 and Scope 2 carbon emissions at their Eagan and northern office campuses by 25 percent by 2025 from their 2018 baseline.



Ecolab

Ecolab aims to halve their carbon emissions by 2030 and reduce them to net-zero by 2050. To meet their 1.5° C commitment, they will electrify their fleet of service vehicles, move to 100 percent renewable energy in their global operations, expand energy efficiency projects at their plants, offices and operations around the world; and work with their supply chain partners to adopt similarly ambitious climate goals.



Anderson Corporation

Andersen Corporation is working to reduce normalized (based on production rates) solid waste, water and energy use by 20 percent by 2020, using 2013 as a baseline.



Aveda

All of Aveda's products are managed with 100 percent wind power through renewable energy credits and carbon offsets balancing their electrical and natural gas usage. They also are working toward a goal of zero emissions from manufacturing.



Great River Energy

Great River Energy is working to provide 50 percent renewable energy to its all requirements member-owner cooperatives by 2030.



Best Buy

Best Buy has committed to reducing carbon emissions in their operations by 75 percent by 2030 (over a 2009 baseline) and to be carbon neutral by 2050. Additionally, they have committed to helping their customers reduce the carbon emissions associated with the use of products sold 20% by 2030, saving them \$5 billion in energy costs.



Metropolitan Airports Commission

The Metropolitan Airports Commission has committed to an 80 percent reduction in total greenhouse gas emissions from a 2014-15 baseline, by 2030.



Mortenson

Mortenson is working toward being Net Zero Energy Ready by 2030, and all of their U.S. offices are currently powered by clean energy from emissions-free wind farms.



State of Minnesota Members: Metropolitan Council & Department of Administration



Leading from the public sector, the Metropolitan Council and Department of Administration have a goal for a 30 percent reduction in consumption of energy per square foot by 2027 relative to a 2017 adjusted baseline, as well as a 30 percent reduction of greenhouse gas emissions by 2025 relative to a 2005 calculated baseline.



Target

Target plans to reduce its absolute Scope 1, 2 and 3 greenhouse gas emissions by 30 percent below 2017 levels by 2030, and has committed that 80 percent of their suppliers will set science-based reduction targets on their Scope 1 and 2 emissions by 2023. Furthermore, Target is committed to the RE100 Initiative, with a goal to source 100 percent renewable electricity across its global operations by 2030 with an interim goal to achieve 60 percent by 2025.



Tennant

Tennant Company has a goal to reduce absolute Scope 1 and 2 emissions 25 percent by 2030 from a 2016 base year, as well as reduce their Scope 3 use of sold products emissions 50 percent per dollar of equipment revenue by 2030, also from a 2016 base year.



University of Minnesota

The University of Minnesota is working toward carbon neutrality by 2050 and a 50 percent emissions reduction by 2020. Additionally, divisions and units of the University, including the Institute on the Environment, have set additional sustainability-related goals.

Uponor Uponor

Uponor has a goal to reduce Scope 1 and Scope 2 greenhouse gas emissions by 20 percent per net sales by 2020, from 2015 levels.



Xcel Energy

Xcel Energy is working to provide 100 percent carbon-free electricity by 2050 and reduce carbon emissions 80 percent by 2030, from 2005 levels. Furthermore, all of their pool and passenger vehicles will be plug-in hybrid electric or electric vehicles by 2025.



About the Minnesota Sustainable Growth Coalition

Nearly 30 businesses and organizations formed the Minnesota Sustainable Growth Coalition, a business led partnership harnessing their expertise to advance the next frontier of corporate sustainability – the circular economy. Our members are: 3M, Ackerberg, Allianz Life Insurance Company of North America, Andersen Corporation, Antea Group, Aveda, Barr, Best Buy, Blue Cross Blue Shield of Minnesota, Ecolab, Ever-Green Energy, Great Plains Institute, Great River Energy, Greater MSP, HealthPartners, HGA, Metropolitan Airports Commission, Metropolitan Council, Minnesota Department of Administration, Mortenson, National Grid Renewables, Target, Tennant, University of Minnesota, Uponor, Wenck, Xcel Energy.