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July 1, 2019

—Via Electronic Filing—

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

RE: 2020-2034 UPPER MIDWEST INTEGRATED RESOURCE PLAN
DOCKET NO. E002/RP-19-368

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, is pleased to submit our 2020-2034 Upper Midwest Integrated Resource Plan to the Minnesota Public Utilities Commission. This plan identifies the resources we will need to serve our customers over the next 15 years.

This Resource Plan charts the path toward achieving some of the most ambitious decarbonization goals of any utility in the U.S. Specifically, we aim to reduce carbon emissions from 2005 levels by 80 percent by 2030, and provide 100 percent carbon-free energy by 2050. This Resource Plan sets out our plan to reach the 2030 goal through retirement of our coal fleet, extension of nuclear, aggressive renewable additions and demand-side management including both energy efficiency and demand response, and a mix of load-supporting, firm dispatchable resources. Not only does this Resource Plan achieve these goals, it does so reliably and affordably.

We look forward to discussing this Resource Plan with the Commission, stakeholders, and the community.

Request for Protection of Trade Secret Information

The Company recognizes and supports the need for transparency in review of our Resource Plan. We also take seriously our responsibility to maintain the security of

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the information and systems involved in the delivery of safe, reliable energy to our customers.

Appendix J3: Y2 Study: King & Sherco Unit 3 Coal

Attachment J3 is marked as “Non-Public” in its entirety and is provided with Critical Energy Infrastructure Information (CEII) redacted. Attachment J3 contains information regarding the MISO area grid, including specific information about the Xcel Energy and other transmission owner systems as it relates to the potential retirement of Xcel Energy’s Allen S. King and Sherburne County Generating Plant (Sherco) Unit 3. While MISO has redacted all CEII from the report, Xcel Energy maintains that the balance of the information is “security information” as defined by Minn. Stat. § 13.37, subd. 1(a).

Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Prepared study.
2. **Authors:** The study was prepared by MISO.
3. **Importance:** The study contains security information.
4. **Date the Information was Prepared:** The study was finalized November 14, 2018

Appendix J4: Y2 Study: Monticello, Prairie Island, & All Coal & Nuclear

Attachment J4 is marked as “Non-Public” in its entirety and contains redactions to CEII for the same reasons noted for Attachment J3. Xcel Energy maintains that the balance of the information is “security information” as defined by Minn. Stat. § 13.37, subd. 1(a).

Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Prepared study.
2. **Authors:** The study was prepared by MISO.
3. **Importance:** The study contains security information.
4. **Date the Information was Prepared:** The study was finalized November 27, 2018

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Appendix N1: NSP 2013 Annual Electric Utility Forecast Report

Certain portions of Appendix N1 are marked as “Non-Public” as it contains private data on individual customers, including names, addresses, and energy usage data for our largest electric customers. This information is maintained by the Company as “nonpublic data” and “private data on individuals” pursuant to Minn. Stat. §§ 13.02 and 13.03. This report also contains forecast data of annual system consumption and generation. This information is trade secret information as defined by Minn. Stat. §13.37(1)(b). This information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from its use.

Appendix N3: 10-Year Plan: South Dakota

Certain portions of Appendix N3 have been designated as Trade Secret information pursuant to Minnesota Statute § 13.37, subd. 1(b). In particular, the information includes confidential pricing and other contract terms, as well as confidential forecast data. The information designated as Trade Secret derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Appendix N5: Biennial Report: Renewable Energy Obligation-Renewable Energy Standard Compliance Report

Certain portions of Appendix N5 have been designated as Trade Secret information pursuant to Minnesota Statute § 13.37, subd. 1(b). In particular, this report contains forecast data of annual system consumption and generation. The information designated as Trade Secret derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Appendix N7: Annual Report: Solar Energy Standard

Certain portions of Appendix N7 contain information we have marked as “Non-Public” including information identifying customer names, locations, energy usage or bill credits. This information is maintained by the Company as “nonpublic data” and “private data on individuals” pursuant to Minn. Stat. §§ 13.02 and 13.03. We have also marked as “Non-Public” capacity factor information relating to specific Purchase Power Agreements (PPAs). The terms of the Commission approved PPAs require that this information be non-public. Further, this is considered to be “nonpublic data” pursuant to Minn. Stat. §13.02, Subd.9, and is

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also “Trade Secret” information pursuant to Minn. Stat. §13.37, subd. 1(b) as it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

Appendix R: Study: Interconnection Cost Estimates-CC (Excel Engineering)

Appendix R is marked as “Not Public” in its entirety as it includes information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). As set forth below, the information designated as Trade Secret derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Prepared study.
2. **Authors:** The study was prepared by Excel Engineering.
3. **Importance:** The study contains competitively sensitive data related to project costs.
4. **Date the Information was Prepared:** The study was prepared during the fourth quarter of 2018.

Copies of the filing have been served on Commission staff, the Department of Commerce, and the Office of the Attorney General – Residential Utilities Division. We have also provided a copy to the Minnesota Environmental Quality Board. Interested parties will be able to obtain copies from our web site at xcelenergy.com/UpperMidwestEnergyPlan

Please contact Bria Shea at (612) 330-6064 or bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

/s/

CHRISTOPHER B. CLARK
PRESIDENT
NORTHERN STATES POWER COMPANY MINNESOTA

Enclosures
c: Service Lists