Direct Testimony and Schedules
Diedra K. Howard

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company
for Authority to Increase Rates for Natural Gas Service in Minnesota

Docket No. G002/GR-25-356
Exhibit___(DKH-1)

Customer Care and Bad Debt Expense

October 31, 2025

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Schedules

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Diedra K. Howard. I am the Director of Customer Policy and Regulatory Compliance within Customer Care for Xcel Energy Services Inc. (XES), which provides services to the Xcel Energy Inc. operating companies including Northern States Power Company – Minnesota (NSPM or the Company).

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

A. I have been employed with Xcel Energy for 18 years. Prior to 2012, I held various positions within Xcel Energy's Customer Advocate department and our Colorado Regulatory area, assisting in customer complaint investigations and managing renewable energy cases in front of the Colorado Public Utilities Commission. From 2012 to 2020, I served as Supervisor, Personal Accounts, developing and implementing programs for vulnerable customers and assisting in regulatory matters involving income-qualified and vulnerable customers. From 2020 to 2022, I served as Manager, Residential Credit and Collections for Xcel Energy, developing and implementing policies, tools and the teams needed to assist in customer arrears management. From mid 2022 to early 2025, I served as Manager, Customer Assistance and Advocacy where I was responsible for managing, developing, and implementing policies and processes to ensure increased adoption of energy and medical assistance for our customers, creation and management of the Company's internal affordability programs across our service territory, and management of our Customer Advocacy processes and procedures for our eight state territory. This work included involvement in regulatory proceedings to support these departmental goals and meetings with

external regulatory parties to drive policy improvements and regulatory compliance on behalf of the Customer Care organization. Beginning in February 2025, I became the Director, Customer Policy and Regulatory Compliance, which involves driving policy advocacy and strategy for Customer Care and Xcel Energy as it relates to all customers and our interactions with them My statement of qualifications is provided as Exhibit___(DKH-1), Schedule 1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. My testimony provides an overview of the Customer Care organization and its budgeted operation and maintenance (O&M) expenses for the 2026 test year. I share ways we measure customer satisfaction for the work Customer Care performs. My testimony also discusses affordability or the ability of customers to pay for their natural gas service and the Company's programs to assist customers that have affordability challenges. I also present and discuss the Company's commodity and non-commodity bad debt expense, and the actions we have taken to minimize and manage it to the benefit of our customers.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The Customer Care organization has achieved strong customer satisfaction results, controlled its O&M expenses, and outperformed other utilities in managing bad debt expense. The 2026 test year O&M expense for the Customer Care organization is $5.8 million for the State of Minnesota Gas Jurisdiction. I discuss the key components of Customer Care's O&M budget below, along with key drivers for the 2026 test year O&M budget.

Affordability of natural gas service is an important consideration for the Company that factors into all aspects of our service to customers. The Company has a number of initiatives and programs to assist customers facing affordability challenges, particularly those eligible for income qualified assistance.

The 2026 test year bad debt ratio we propose is 0.50 percent, which results in a 2026 test year commodity bad debt expense of $3.5 million, and approximately $43,000 for non-commodity bad debt expense for the State of Minnesota Gas Jurisdiction. The Company's bad debt ratio increased compared to our 2022-2024 average actual performance levels due to higher billed commodity revenue and no COVID-19 incremental entry reversal offset by anticipated savings attributed to improved credit and collections performance by the Company.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. I present the remainder of my testimony in the following sections:

- Section II: *Customer Care Organization*. I discuss my organization in terms of the business functions it provides to the Company and its customers. I also discuss the improvements we have made to various aspects of our service and the research we have done to understand our customers and to measure their satisfaction with the service we provide. In addition, I summarize the Company's service quality results. In this section, I also present the overall Customer Care test year O&M budget and the budgets by business area function.
- Section III: *Affordability*. I discuss the importance of customer affordability and the various initiatives and programs offered by the Company to help those customers that are struggling with paying their

natural gas bills, along with recommendations for future modifications to existing programs and potential new offerings.

- Section IV: *Commodity Bad Debt Expense*. This is billed commodity revenue for electric and natural gas service that is considered uncollectible from customers. I discuss the test year expense and propose bad debt ratios, as well as how we determine our bad debt ratios and manage our bad debt expense.
- Section IV: *Non-Commodity Bad Debt Expense*. This is billed revenue that is considered uncollectible for everything other than electric and natural gas service. I discuss the Company's test year level of expense, the various components of non-commodity bad debt expense, and what the various business functions do to manage non-commodity bad debt expense.

II. CUSTOMER CARE ORGANIZATION

A. Overview

Q. PLEASE SUMMARIZE THIS SECTION OF YOUR TESTIMONY.

A. In this section, I discuss the structure of the Customer Care organization and describe the various functions involved in providing service to the Xcel Energy organization, including NSPM and our other operating companies and their customers. I also present Customer Care's 2026 test year O&M expense budget and discuss how we have managed to decrease O&M expenses every year since 2022. The decrease in Customer Care's O&M expense for the 2026 test year as compared to 2024 actuals is due to the ending of our contract with our meter vendor that included costs for meter reads and service and trip charges. Beginning in 2022, we began exchanging gas modules for drive-by Automated Meter Reading (AMR) meters, simultaneously switching to internal Distribution

and Gas department employees completing drive-by readings on gas meters. This decision has contributed to reduced O&M expenses associated with ending the external vendor contract. This decrease is partially offset by annual merit increases, annual postage rate increases, and the absorption of credit card fees on behalf of our customers, as discussed below.

Q. PLEASE DISCUSS THE FUNCTIONS OF THE CUSTOMER CARE ORGANIZATION AND HOW THEY RELATE TO THE COMPANY'S OVERALL BUSINESS GOALS.

A. The Customer Care organization performs essential functions that help the Company effectively provide its customers energy products and services with a high level of customer service. We ensure energy use is measured and billed accurately, collect and process customer payments, and assist our customers with questions, concerns, or requests about their energy services. We understand customer needs and expectations are evolving in the energy marketplace. We strive to meet those changing needs through improved communication, consultation, education, and automated functionality where appropriate, to improve our customers' experience. Our organization is critical to the Company's vision of being customer-centric, and we strive to be instrumental in supporting our customers through the numerous energy and customer products and services we offer, such as personalized billing options, proactive outage notifications, and energy assistance programs for vulnerable populations.

Q. PLEASE PROVIDE AN OVERVIEW OF THE CUSTOMER CARE ORGANIZATION AND HOW THE ORGANIZATION SUPPORTS THESE COMPANY EFFORTS.

A. The Customer Care organization provides support services to approximately 2.17 million gas customers and 3.8 million electricity customers served by Xcel

Energy across its service territory in eight states. We support customers starting from when they initiate their energy service and continue to support them as we collect ongoing meter readings and issue bills and then post their payments to their accounts. We are available to customers via phone, web, mobile application, and various social media platforms. We consider customer survey data and other feedback and use it to assess our performance and opportunities for improvement. Below is a brief description of the various business functions that comprise the Customer Care organization:

- *Billing Services*. Responsible for the production and delivery of billing statements, researching billing and payment inquiries and resolving customer billing and payment issues, billing quality assurance, and receiving and posting all customer payments.
- *Contact Center*. Responsible for interacting with our customers through our customer Contact Centers, mailed correspondence, and social media and online inquires to answer their questions, resolve their concerns, and fulfill their requests.
- *Credit and Collections*. Responsible for accounts receivable management, minimizing customer receivable write-offs, and operation of credit Contact Centers.
- *Measurement and Analytics*. Responsible for staff training, quality assurance, planning and forecasting, operational management, workforce management, performance reporting, advanced analytics, vendor management, and budget oversight.
- *Customer Policy and Assistance.* Responsible for process efficiencies, resolving customer complaints, communications within the organization, customer policy, along with income-qualified and energy assistance programs.

- *Meter Reading, Field Collections, and Revenue Assurance*. Responsible for reading customer meters, performing field disconnection and collection activities, and investigating energy theft and revenue loss situations.

Q. IS THE COMPANY WITNESSING ANY CHANGES IN CUSTOMER EXPECTATIONS RELATED TO HOW THEY INTERACT WITH THE COMPANY?

A. Yes. Customers expect choices when it comes to how they interact with the Company about both their gas and electric service. They appreciate receiving notifications and status updates to keep them informed of matters impacting their service, such as during outage events. Customers are increasingly interacting with us using digital channels and look to their utility provider to use technology to help them save money, learn about renewable energy options, and maintain safety.

Q. DOES THE COMPANY USE ONLINE OR TECHNOLOGY TOOLS TO INTERACT WITH CUSTOMERS?

A. Yes. Our Interactive Voice Response (IVR) automated phone system is an important tool customers use to conduct quick and easy transactions without the need for customers to speak with a customer service representative. We actively manage this tool, making enhancements to ensure customers are satisfied and their issues are resolved efficiently. Our customers use the IVR system extensively and are very satisfied with it, as shown in Table 3 later in my Direct Testimony. We also respond to customer comments or requests through social media. Customers also interact with the Company through our website, including MyAccount online account management, as well as through our

mobile application.[1] We also implemented Live Agent Chat (Live Chat) in April 2025. Live Chat offers a scalable and flexible channel that enhances customer experience and agent efficiency. Live Chat offers customers a convenient, desirable, and accessible alternative to getting inquiries resolved without the need for a traditional phone call. Increased use of these digital self-service channels has translated into an increase in the number of customers receiving electronic versions of their bill. Currently, more than half of the Company's bills are delivered through this option, which reduces paper, eliminates postage costs, and allows customers to receive their bills more quickly.

Q. WHAT PAYMENT OPTIONS ARE AVAILABLE TO CUSTOMERS TO PAY THEIR UTILITY BILLS?

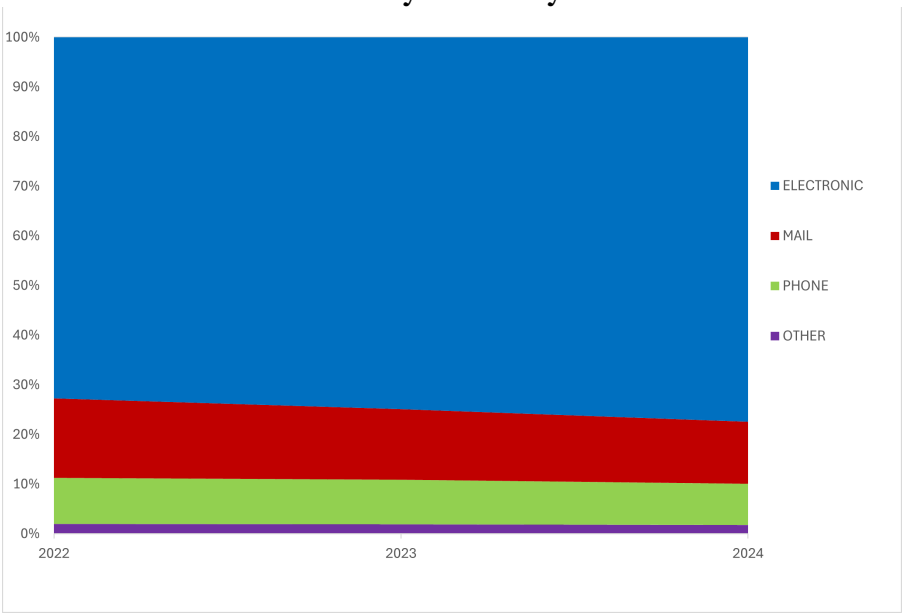
A. We currently offer several payment alternatives to our customers, which we group into four payment channels: mail, phone, electronic, and other. Customers can pay their bills by phone and either complete the payment using our IVR system, or by talking to a customer service representative. They may use the MyAccount portal to pay their bill electronically, use our mobile application, or they can pay their bill at designated pay stations.[2] They may also use a credit or debit card to make a payment through our credit card vendor. We currently waive transaction fees for residential customers that they would otherwise pay to the credit card vendor when paying their bill with a credit or debit card. Business customers have an additional option to pay their bills through Electronic Funds Transfer.

[1] Information on the mobile application can be found at: https://mn.my.xcelenergy.com/s/billing-payment/mobile-app

[2] Information on designated pay stations can be found at: https://www.xcelenergy.com/billing_and_payment.

number of customers, this shift creates efficiencies for the Company as the use of any electronic channel helps reduce overall billing costs through reduced printing and postage as discussed in the next section of my testimony.

Figure 1
Customer Payments by Channel



B. Test Year O&M Budget – Overall Customer Care

Q. HOW DOES THE CUSTOMER CARE ORGANIZATION DEVELOP ITS O&M BUDGETS?

A. We assess the needs of the Customer Care organization, and the various operating companies we support, and plan and budget at the business function level. This is necessary given the variety of services provided by the different business functions that make up the Customer Care organization.

Q. PLEASE PROVIDE AN OVERVIEW OF THE CUSTOMER CARE O&M BUDGET.

A. Table 1 below summarizes Customer Care's O&M expense levels since 2022. Please see Exhibit___(DKH-1), Schedule 2 for additional details regarding

Customer Care O&M expense levels. Unless otherwise noted, this discussion relates to Customer Care O&M at the State of Minnesota Gas Jurisdiction level.[3]

Overall, the Customer Care 2026 test year O&M budget reflects a continued decrease in O&M expense levels for each year since 2022. The total 2026 Customer Care test year O&M expense of $5.8 million is almost $2 million lower than 2024 actual O&M expense levels of $7.5 million partially due to the cancellation of our external contract for meter reading services, partially offset by annual merit increase, annual postage rate increase, and the absorption of credit card fees on behalf of our customers.

Table 1
Customer Care O&M Expense Trends
State of Minnesota Gas Jurisdiction
($ millions)

2022 Actual	2023 Actual	2024 Actual	2025 Forecast	2026 Test Year
$7.82	$7.60	$7.49	$6.46	$5.83

Q. HAVE YOU COMPARED THE COMPANY'S HISTORICAL O&M EXPENSE TO OTHER COMPANIES' CUSTOMER CARE-RELATED O&M EXPENSES?

A. Yes. The Federal Energy Regulatory Commission (FERC) cost data from the S&P Global Intelligence Platform compares Customer Care-related O&M expenses for more than 100 regulated energy companies representing gas and electric utilities, including combination gas and electric utilities like NSPM. This data represents Customer Care-related O&M expense for all customers

[3] Company witness Nicole L. Doyle explains how the Company allocates and assigns XES costs to NSPM. Company witness Benjamin C. Halama explains the utility and jurisdictional allocation process that assigns NSPM operating company costs to the State of Minnesota Gas Jurisdiction.

regardless of utility type. The total population, on average, consisted of approximately 127 companies annually in 2023 and 2024.

Q. HOW DOES NSPM'S HISTORICAL O&M EXPENSES COMPARE TO THAT OF OTHER COMPANIES?

A. Overall, NSPM continues to compare favorably when looking at mean performance in total costs captured in FERC accounts 901 through 905, which include the majority of costs managed by Customer Care, as shown in Exhibit___(DKH-1), Schedule 3. Table 2 below shows total Customer Accounts Expense, including bad debt expense, per retail customer for FERC accounts 901 through 905. NSPM Total Company consistently shows substantially lower cost per retail customer than the Competitor Group (mean) during the last three years of reported data. In addition, the difference between the NSPM Total Company and Competitor Group (mean) has increased substantially, reflecting the fact that our costs have grown much less during this period than those of other utilities.

Table 2
Customer Accounts Expense per Retail Customer
Comparison (FERC Accounts 901-905)

	2022	2023	2024
NSPM Total Company	$40.1	$45.1	$42.1
Competitor Group (mean)	$58.6	$66.0	$70.9

Q. IN LIGHT OF THE FACT THAT NSPM'S CUSTOMER CARE O&M EXPENSES WERE LOWER THAN OTHER UTILITIES' O&M EXPENSES OVER THE LAST THREE YEARS, WHAT INFORMATION DO YOU HAVE ABOUT CUSTOMER SATISFACTION WITH THE NATURAL GAS SERVICE PROVIDED BY THE COMPANY?

A. The Company's Customer Experience Survey is the most direct measure of customer satisfaction with the services provided by the Customer Care organization. As seen in Table 3 below, survey results remain high; however, results in 2024 were slightly lower due to staffing issues. We are seeing a return to higher customer satisfaction in 2025 as a result of increased hiring and lower wait times for call answering.

Table 3
Customer Satisfaction Survey Results

	Agent Survey		IVR Survey	
Year	**Business**	**Residential**	**Business**	**Residential**
2023	77%	76%	67%	78%
2024	76%	72%	64%	70%
2025	74%	76%	72%	80%

** 2025 scores are August 2025 YTD*

I provide more information regarding customer satisfaction in Exhibit___(DKH-1), Schedule 4. While customer satisfaction remains high relative to the work Customer Care performs, the Company continues to enhance its customer service in other areas, such as the Company's digital platform for customer information. One thing to note is that the final table in Schedule 4 shows a drop from the 700s to 500s in Customer Satisfaction Regional Benchmarking but this drop is seen broadly as part of the methodological scoring change introduced in Q1 2025.

Q. ARE THERE ANY SIGNIFICANT STRATEGIES OR INITIATIVES CUSTOMER CARE IS IMPLEMENTING TO INCREASE CUSTOMER SATISFACTION?

A. In 2025, Xcel Energy launched Live Chat, a new digital customer service channel designed to enhance accessibility and satisfaction by assisting customers with most tasks that are available through a phone call. This initiative directly responds to customer feedback requesting a non-phone method to connect with support. This digital channel is available via My Account or Xcel Energy's website.

Another initiative that began in late 2024 was a focus on increased Contact Center hiring and retention. The following actions were taken to recruit and/or retain qualified employees particularly in our Eau Claire, Wisconsin Contact Center:

- Increased the starting wage, based on market research, which was enacted in December 2024 (increased from $18 to $20 per hour in Wisconsin) to attract more candidates.
- Adjusted our advertising for open positions to drive more applicants into our hiring pool. Particularly in Wisconsin, an increase in candidate pool was attributed to updated advertising strategies. This involves a sponsorship with Indeed that puts our job postings at the top of the job board with a goal to get more traction.
- Leveraged research and partnership with the Xcel Energy Human Resource and Recruiting group to better understand reasons why employees stay, and enacted strategies on those lessons learned, which has led to a reduction in attrition in 2025.
- Continued providing employees the option to work from home, which has proven to be an attractive choice for enhancing engagement and retention.

Q. WHAT IS THE CREDIT CARD FEE WAIVER PROGRAM AND WHAT IS THE ESTIMATED COST OF THE CREDIT CARD FEE WAIVER PROGRAM FOR THE 2026 TEST YEAR?

A. The credit card waiver program waives the third-party processing fee for customers that pay their utility bill using a credit or debit card. This program was approved by the Commission as part of its decision on reconsideration in the Company's electric rate case (Docket No. E002/GR-21-630). As a result, the Company began implementing this credit card fee waiver program on January 1, 2024. The actual amount incurred in 2024 was $298,626 and the Company's proposed 2026 test year budget is $618,488 due to higher anticipated utilization of the credit card fee waiver program. Currently, the credit card fee waiver program is only available for customers using the one-time payment option. The Company anticipates that the credit card fee waiver program will be available in 2026 for customers using our Auto Pay program. Inclusion of the Auto Pay program would increase the total cost of the credit card fee waiver program to $6.9 million on a Total NSPM Company basis with $1.4 million directly attributed to the State of Minnesota Gas Jurisdiction. The additional $0.8 million associated with the Auto Pay program is not reflected in our 2026 test year O&M expenses due to timing but the Company plans to include it as an adjustment in Rebuttal Testimony.

Q. PLEASE SUMMARIZE KEY FACTORS IMPACTING CUSTOMER CARE O&M EXPENSE LEVELS FROM 2024 AS COMPARED TO THE 2026 TEST YEAR.

A. Customer Care expects an overall decrease in O&M expenses in 2026 as compared to 2024 actual O&M expenses primarily due to the ending of our contract with our meter vendor that included costs for meter reads, service, and trip charges. The ability to end this contract is a direct result of the nearly

complete AMI deployment and the subsequent decision for our gas meter reading and maintenance to be performed via AMR meters and Company employees in our Distribution and Gas business area. This decrease is offset by annual merit increases, annual postage rate increases, and the absorption of credit card fees waived on behalf of customers.

Q. PLEASE EXPLAIN WHY CUSTOMER CARE'S 2025 FORECASTED O&M EXPENSES ARE LOWER THAN 2024 ACTUAL O&M EXPENSE LEVELS.

A. From 2024 to 2025, Customer Care's O&M expenses are forecasted to decrease by approximately $1 million dollars. In Outside Services, we anticipate a decrease of approximately $1.7 million, partially due to lower meter reading costs, and service and trip charges as a part of bringing these duties in-house. These savings are partially offset by a labor cost increase of approximately $391,000 due to annual performance-based wage increases in most business areas. A postage increase of approximately $58,000 is also anticipated due to rising postage rates. In addition, the absorption of credit card fees on behalf of our customers increases O&M expenses by $185,000.

Q. PLEASE EXPLAIN WHY CUSTOMER CARE'S 2026 TEST YEAR O&M EXPENSES ARE LOWER THAN 2025 FORECASTED LEVELS.

A. From 2025 to 2026, we anticipate a decrease of approximately $622,000 in Customer Care's O&M expenses. The decrease in O&M expenses in 2026 is partially due to meter reading contract savings of $942,000 offset by an increase in labor costs of approximately $174,000 due to annual wage increases and increases in employee headcounts. This increase in headcount is needed to respond to the increasingly complex customer interactions related to maintaining service levels, addressing billing issues, in addition to meter readings

being performed by drivers, precipitated by AMR gas meter deployment. In addition, we anticipate an increase in postage costs of $24,000 associated with anticipated increases in postage rates for billing and customer outreach that will be partially offset by customer adoption of electronic billing and payment methods. In addition, the absorption of credit card fees waived on behalf of customers increased by $135,000.

C. O&M Budgets by Business Function

Q. PLEASE SUMMARIZE CUSTOMER CARE O&M EXPENSE BY BUSINESS FUNCTION.

A. Table 4 below provides an overall view of Customer Care O&M expense levels since 2022. Please see Schedule 2 for additional details regarding Customer Care O&M expenses. As discussed above, overall Customer Care O&M levels have declined each year from 2022 to 2026. Below are some of the variations that have occurred across the functional areas of Customer Care specifically when comparing 2024 actuals to the 2026 test year.

Table 4
Customer Care O&M Expense by Business Area
State of Minnesota Gas Jurisdiction ($ millions)

	2022 Actuals	2023 Actuals	2024 Actuals	2025 Forecast	2026 Test Year
Billing Services	$1.6	$1.7	$2.0	$2.3	$2.5
Contact Center	$1.2	$1.1	$1.0	$1.2	$1.2
Credit and Collections	$0.6	$0.6	$0.5	$0.6	$0.7
Customer Care, Measurement, and Analytics	$0.4	$0.4	$1.1	$0.4	$0.4
Customer Policy and Assistance	$0.2	$0.1	$0.1	$0.2	$0.2
Meter Reading and Field Collections	$4.0	$3.6	$2.7	$1.7	$0.8
Total Customer Care O&M Expense	**$7.8**	**$7.6**	**$7.5**	**$6.5**	**$5.8**

**Due to rounding, there may be differences between the sum of the individual category amounts and total amounts.*

1. Billing Services

Q. PLEASE DESCRIBE ANY CHANGES IN THE BILLING SERVICES' O&M EXPENSES FOR THE 2026 TEST YEAR.

A. Billing Services O&M expenses will increase by $500,000 as compared to 2024 actuals. This increase is primarily due to the absorption of credit card fees on behalf of customers, increased postage rates, and increase in outside services to further stabilize our billing operations.

2. Customer Contact Center

Q. PLEASE DESCRIBE ANY CHANGES IN CUSTOMER CONTACT CENTER O&M FOR THE 2026 TEST YEAR.

A. The Customer Contact Center O&M budget is budgeted to increase from 2024 actuals to the 2026 test year by $200,000 due to annual wage increases and increased headcounts to maintain service level offset by the efficiencies implemented through increased customer use of automated interaction channels including the upgraded IVR system.

3. Credit and Collections

Q. PLEASE DISCUSS ANY CHANGES IN CREDIT AND COLLECTIONS O&M EXPENSES FOR THE 2026 TEST YEAR.

A. The 2026 test year O&M budget for Credit and Collections is expected to increase from the 2024 actuals by $200,000 due to annual wage increases and increased headcounts to maintain service level. This increase is offset by anticipated lower collection agency commissions due to better in-house collection efforts. In addition, this increase is offset by increased use of more cost-effective and efficient customer outreach methods, such as email, calls, and text for proactive outbound credit campaigns to the Company's past-due customers. These campaigns integrate with our upgraded IVR system to facilitate more automated customer payments and payment arrangements, which allows disconnected customers to establish a service reconnection more efficiently.

4. Customer Care, Measurement, and Analytics

Q. PLEASE DISCUSS ANY CHANGES IN CUSTOMER CARE, MEASUREMENT, AND ANALYTICS O&M EXPENSES IN THE 2026 TEST YEAR.

A. The 2026 test year O&M expenses for Customer Care, Measurement and Analytics are projected to decrease by $700,000 from 2024 actuals. Overall, Customer Care, Measurement, and Analytics O&M expenses are relatively flat

from 2022 to 2026 except for 2024. In 2024, expenses were higher due to consulting service payments incurred to realize optimal Contact Center staffing, billing outsourcing, and improvement.

5. Customer Policy and Assistance

Q. PLEASE DISCUSS THE CHANGES IN CUSTOMER POLICY AND ASSISTANCE O&M EXPENSES FOR THE 2026 TEST YEAR.

A. The Customer Policy and Assistance 2026 test year O&M expense level is expected to increase by $100,000 compared to 2024 actuals as a result of annual wage increases.

6. Meter Reading and Field Collections

Q. PLEASE DISCUSS ANY CHANGES IN METER READING AND FIELD COLLECTIONS O&M EXPENSES FOR THE 2026 TEST YEAR.

A. In the 2026 test year, we expect that Meter Reading and Field Collections O&M expenses will decrease compared to 2024 actuals. Overall, O&M expenses for Meter Reading and Field Collections have declined each year from 2022 to 2026. The Meter Reading and Field Collections O&M budget is projected to decline by $1.9 million from 2024 to 2026. This decrease is partially due to the ending of our contract with our meter vendor that included costs for meter reads and service and trip charges, no longer needed due to this work now being completed in-house using AMR meters and employees in our Distribution and Gas operations area.

III. CUSTOMER AFFORDABILITY

A. Overview of Customer Affordability

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. In this section, I highlight the Company's strong commitment to energy affordability to ensure that customers can reasonably pay for the natural gas service they use. Affordability is a guiding principle that influences every aspect of how we serve our customers. I also outline the Company's efforts to support those experiencing financial hardship, with a particular focus on programs designed for income-qualified customers.

Q. HOW DOES THE COMPANY DEFINE CUSTOMER AFFORDABILITY, BROADLY SPEAKING?

A. Customer affordability is generally understood as the proportion of a household's income that goes toward paying for energy. This is also often termed household "energy burden." In the United States, a common benchmark is that energy costs should not exceed six percent of a household's gross income. This standard aligns with the guidelines used by the Minnesota Department of Commerce (Department) for administering the federal Low-Income Home Energy Assistance Program (LIHEAP). The threshold for what is considered affordable can vary depending on the context of customer situations, weather, geography or viewpoints of policy makers.

Q. IS AFFORDABILITY A SIMPLE FUNCTION OF AN INCREASE IN GAS SERVICE RATES TO CUSTOMERS?

A. No, affordability is not determined solely by utility rates and costs. It also depends on a customer's income, financial obligations, and overall household expenses. This broader view is essential because many of the same economic pressures, such as inflation, can impact both the utility's operating costs and any individual customer's budget. For example, rising labor costs may increase utility expenses, but they can also lead to higher wages for customers, improving their financial position and ability to pay. Every customer's financial situation is

unique; while some may struggle with changes in natural gas rates, others may be less affected. By considering these differences, the Company can better focus its support on those who truly need help managing their energy bills.

Q. HAVE THERE BEEN RECENT SIGNIFICANT EVENTS THAT HAVE HIGHLIGHTED THE ISSUE OF AFFORDABILITY FOR UTILITY CUSTOMERS?

A. Yes. In 2025, affordability remained a central concern for utility customers due to a combination of persistent inflationary pressures and rising costs for essential goods such as housing and groceries. While natural gas commodity prices stabilized compared to the spikes seen in prior years, the lingering economic effects of the pandemic, economic uncertainties and potential inflationary impacts of federal policies, and broader macroeconomic conditions continued to impact household budgets.

Throughout 2024 and 2025, identifying affordability challenges in communities with higher concentrations of income-qualified customers has been a focus. External studies and internal data also pointed to disparities in disconnections across different census block groups within the Company's service territory. Additionally, the Company observed elevated levels of customer engagement with energy assistance programs. Participation in programs such as PowerON, the Medical Affordability Program (MAP), and the Gas Affordability Program (GAP) increased, supported by expanded outreach efforts including in-person events, digital campaigns, and proactive customer identification strategies. GAP enrollment also continued to be significantly higher than prior to the Company's implementation of auto-enrollment for LIHEAP-enrolled customers, as discussed further below.

The Company also participated in national advocacy efforts, including the annual LIHEAP Action Day in Washington, D.C., which has observed record-breaking attendance recently and has supported efforts to secure federal funding increases for local energy assistance programs.

The Company remains committed to supporting customers in need. It continues to monitor trends, enhance outreach, and connect customers with available resources. These efforts reflect the Company's broader commitment to ensuring that energy remains affordable and accessible, particularly for vulnerable populations.

B. Company Affordability Programs

Q. WHAT ARE POWERON, MAP, AND GAP?

A. PowerON, MAP, and GAP are customer-funded energy assistance programs that the Company administers and oversees in accordance with Minnesota Statutes, Commission Orders, and the Company's approved tariffs. These programs are available to residential customers who qualify for and receive support through the EAP.

PowerON and GAP provide additional support to households experiencing high energy burden. This is achieved by capping monthly utility payments at a percentage of the household's income, helping to cover the portion of energy costs not addressed by other means. These programs are structured to help customers remain connected to service and actively participate in managing their energy bills. Enrolled customers are encouraged to make consistent payments, which also helps reduce any outstanding balances they may have.

Q. WHAT ARE SOME OF THE SPECIFIC ACTIONS THE COMPANY HAS IN PLACE AND HAS TAKEN RECENTLY IN THESE PROGRAMS TO HELP ADDRESS AFFORDABILITY FOR CUSTOMERS THAT MAY BE STRUGGLING TO PAY THEIR NATURAL GAS BILLS?

A. The Company has long maintained a strong commitment to supporting customers facing affordability challenges through a variety of programs and partnerships. These include flexible payment plans and targeted assistance programs such as PowerON (Electric Affordability), MAP, and GAP and more recently, the Automatic Bill Credit Pilot (ABC) which began providing benefits to customers in June 2025.

In 2024, the Company intensified its outreach efforts to identify income-qualified customers and connect them with available resources, including the federally funded Energy Assistance Program (EAP) administered by the Minnesota Department of Commerce.

A key advancement in 2023 was the implementation of an automatic enrollment pathway for GAP participants, developed in collaboration with stakeholders and peer utilities. This automatic enrollment process proved to be successful and continues through 2025. This streamlined process eliminated the need for separate applications, lessening the administrative burden, and allowed eligible customers to be enrolled by default, with the option to opt out. As a result, the Company successfully enrolled over 5,800 additional combination gas and electric customers into its PowerON and GAP programs in 2024. Auto enrollment in these programs is near a total of 13,000 customers over the course of the first two years of automatic enrollment.

Q. DOES THE COMPANY OFFER ANY OTHER AFFORDABILITY PROGRAMS?

A. Yes. The Company has also implemented a program called the "Low Use Affordability Credit" (LUAC), in an effort to assist income-qualified customers who may not typically qualify for other programs such as PowerON and GAP. This program allows self-attestation of income at or below 50 percent of the State Median Income, which reflects the income eligibility criteria utilized by the Department's EAP program. Customers who meet eligibility criteria may be enrolled in this program either by receiving a LIHEAP benefit or completing a self-attestation form. The Company can anecdotally advise that this process has been well received by customers who have experienced an improvement in their household's energy burden and for its simple process to confirm eligibility. In 2024 there were over 15,000 program recipients. Looking at current results through August 2025, there are now over 23,000 unique customers who have received benefits through this program.

These efforts reflect the Company's broader strategy to reduce administrative barriers for customers and ensure those in need receive timely and effective support.

Q. WHY ARE YOU INCLUDING ELECTRIC AFFORDABILITY PROGRAMS IN THIS TESTIMONY?

A. I discuss electric affordability programs such as PowerON, Medical Affordability, and LUAC here primarily because gas and electricity are both part of the overall energy burden experienced by a household. While GAP is the only program that is specifically providing a bill credit and/or arrearage forgiveness on the gas portion of a household's bill, the overall energy cost experienced by a household is simply their total energy bill, with most

households not distinguishing between the gas and electric parts of that bill in terms of whether the overall bill is affordable for them. In this way, all forms of assistance, including electric, are relevant from the customer's perspective and result in reduced energy burden for customers overall.

Q. HOW DOES THE COMPANY IDENTIFY CUSTOMERS THAT MAY NEED ASSISTANCE WITH PAYING THEIR NATURAL GAS BILL?

A. The Company leverages a combination of United States Census data, internal account analytics, and predictive modeling to identify customers who have a propensity to apply for and receive benefits from available assistance programs. Using these insights, the Company delivers timely outreach through a variety of channels such as emails, phone calls, social media posts, direct mail, and in-person community events to raise awareness and encourage enrollment in available programs. A larger focus on in-person events will be part of our future enrollment strategy as we move into 2026.

Q. DOES THE COMPANY KNOW HOW MANY OF ITS CUSTOMERS MEET THIS DEFINITION OF AFFORDABILITY?

A. No, not entirely. The Company does not retain individual household income data. However, the Company does track participation in income-qualified programs such as LIHEAP and its own internal affordability offerings, to reduce burden on a customer's requirement to perform duplicative efforts in determining financial eligibility.

The Company recognizes that there may be a subset of eligible customers who may choose not to participate in available programs, dependent upon their personal views or outlook on obtaining assistance.

The Company will continue the proactive outreach approach with customers to normalize the availability and ease of enrollment into Energy Assistance programs.

Q. HAS THE COMPANY TAKEN OTHER STEPS TO SUPPORT CUSTOMERS WHO MAY EXPERIENCE AFFORDABILITY CHALLENGES?

A. Yes. The Company engages in a range of initiatives to support customers who may be facing affordability challenges. This includes offering flexible access to payment arrangements through our automated phone system (IVR) and the MyAccount portal on XcelEnergy.com. These tools empower customers to manage their accounts on their own schedule.

In addition, our call center representatives receive continuous training to help them assess each customer's unique circumstances when discussing payment options, consistent with the requirements of Minn. Stat. § 216B.096 to take into consideration the customer's financial circumstances and any other extenuating circumstances of the household when discussing payment arrangements. This training includes enhanced empathy and soft skills; both skills equip call center staff to better support customers regardless of income level.

For customers with more complex needs, such as those involving medical conditions or limited income, the Company has a dedicated team of Personal Account Representatives (PAR). This team is dedicated to assisting customers in navigating internal programs and external resources, including those households with medical equipment. The PAR team also works closely with nonprofit and community partners to ensure customers are connected with the full range of support services available to them.

By helping customers more easily access and manage their accounts and communicate energy assistance options, the Company not only reduces energy burden but also helps control arrearages. These supportive efforts are directly tied to the goal of keeping rates affordable for all customers.

The Company has also worked with the Minnesota Citizens Utility Board (CUB) and Energy Cents Coalition (ECC) during the 2023 Service Quality filing in Docket No. E002/M-24-27 to establish additional measures to assist gas and electric customers experiencing financial challenges including increasing the threshold for service disconnections to a minimum of $300, increasing the time of disconnect notice receipt and physical disconnection to a minimum of ten days year-round, along with significant modifications to our down payment requirements for payment arrangements. Details of our new payment arrangement down payment guidelines are provided in more detail in a later section of my testimony.

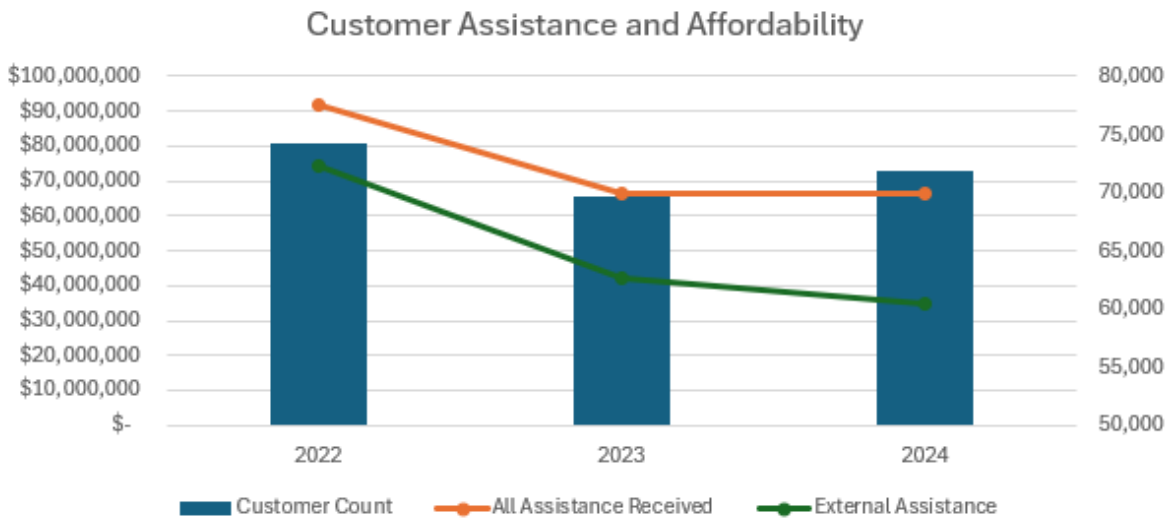
Q. HAVE YOU SEEN INCREASED PARTICIPATION IN AFFORDABILITY PROGRAMS AS A RESULT OF THE COMPANY'S INCREASED OUTREACH?

A. Yes, and no. As illustrated in Figure 2 below, the Company saw a notable decrease in customer participation in income-qualified programs EAPs following a marked decrease in annual Federal LIHEAP funding, post-pandemic. Although the Company outreach efforts continued to grow and evolve each year thereafter, there were some additional hurdles that began in 2024 with the uncertainty around the federal LIHEAP funding which resulted in suggestions from the Department to pause outreach efforts until appropriations were complete. For GAP, the year 2024 saw our highest participation with 16,273 customers enrolled and receiving a benefit, which is an increase of 8,603

additional customers enrolled in GAP over our 2022 recipient count. The increased participation helped keep customer bills affordable despite a decrease in LIHEAP funding. Over $66 million was provided in total assistance, including an increase of nearly $35 million in energy assistance funds distributed to the Company's customers during this period, as shown on the left side of the figure. These figures represent total participation across all customer types, regardless of the specific utility service received, and the total energy assistance funds distributed to the Company's customers during that period, as reflected on the left side of the figure.

The Company's evolving outreach strategy and ability to adapt to hurdles reflects a broader commitment to sustaining energy assistance access—even amid federal funding uncertainty. While funds appropriated to, and the administration of, LIHEAP is largely outside the Company's control, we are working to ensure we can keep delivering assistance through GAP and simultaneously supporting national advocacy efforts for full appropriations to LIHEAP.

Figure 2
Minnesota Customer Participation in EAP



Q. HAS THE COMPANY OFFERED ANY DIRECT ASSISTANCE TO CUSTOMERS IN ADDITION TO THE INCOME QUALIFIED PROGRAMS DISCUSSED ABOVE?

A. Yes. In addition to its established income-qualified programs, the Company launched the Minnesota ABC Pilot Program in 2025 to provide direct assistance to customers facing high energy burdens. This program delivers monthly bill credits automatically to customers residing in eligible census block groups, those where the median electric energy burden exceeds four percent of household income. Importantly, customers do not need to apply for this assistance; eligibility and credit amounts are determined using census-level income data, and credits are applied directly to billing statements.

The credit amount varies by census block group and is calculated to bring the average energy burden down to four percent for the median household in that area. This approach ensures that the credit is both equitable and data driven. Approximately 17,000 customers in 63 Census Block Groups are eligible. Bill

credits began to appear on eligible customer bills on June 1, and the ABC Pilot will run for two years. The ABC Pilot reflects the Company's broader commitment to reducing energy burden, eliminating barriers to enrollment, and improving accessibility to assistance for all customers.

Q. HAS THE COMPANY CONTEMPLATED ANY MODIFICATIONS OR ADDITIONS TO THEIR INCOME-QUALIFIED PROGRAMMING?

A. Yes. The Company recognizes that recent uncertainty in funding for the federal LIHEAP program, currently the only way customers can be enrolled in our GAP program, for instance, could have very dramatic impact on customers we currently serve through our programs. This uncertainty presents concerns regarding how we can continue to assist those customers who would otherwise qualify for GAP benefits but would have no avenue for enrollment if LIHEAP funding were eliminated or drastically reduced. The Company also recognizes that recent legislation modifications in Minnesota have expanded the Commission's authority to allow other avenues for customer enrollment in income-qualified utility assistance programs. One such opportunity is to allow customers to self-attest to their income directly to their utility or provide the utility with copies of enrollment letters from other state and federal programs such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF), and similar programs that indicate they are income-qualified, what is termed, "categorical eligibility." In support of such enrollment options, the Company points to the fact that self-attestation of income is currently approved for use in our LUAC program. We believe this is an option that would allow our income-qualified programs to continue to serve those customers who experience a higher energy burden and need this assistance, in the event there are changes to LIHEAP funding.

Additionally, the Company has proposed a Residential Arrears Management Program (RAMP) in our most recent electric rate case filed in November 2024 (Docket No. E002/GR-24-320). RAMP would utilize residential late payment fees to help customers avoid a service disconnection, with the intent to assist customers who self-attest to income that is at or below 80 percent of the area median income for their county. For customers who qualify, the Company would work with customers ensuring that when customers are most likely to experience a disconnection of service, they are able to avoid such action through this program.

Q. IS THE IMPACT OF INCOME-QUALIFIED PROGRAMS REFLECTED IN THE COMPANY'S 2026 TEST YEAR BAD DEBT EXPENSE?

A. Generally, yes. Income-qualified programs (i.e., LIHEAP and GAP) help customers pay amounts due for energy services, thereby reducing outstanding balances. To the extent the remaining balance of these customer accounts are later written off per the current Company write-off policy (Exhibit___(DKH-1), Schedule 5, income-qualified payment programs help reduce the amount of the write-off, and thus bad debt expense. As discussed, we work closely with our customers and agencies to try to maximize customer participation in energy assistance funding and programs. While funding appears relatively consistent for the 2026 test year, federal funding is reviewed annually and subject to change – including the added uncertainty from the federal government shut-down that began October 1, 2025. Table 5 below shows historical customer participation in Total Energy Assistance which includes LIHEAP, County Assistance, and Fuel Funds 2022 through 2024.

Table 5
LIHEAP and EAP
Historical Participation
($ millions)

Year	NSPM LIHEAP Households	NSPM GAP Program Participants	NSPM Gas Affordability Program Disbursement	Total Energy Assistance (LIHEAP, County Assistance, Fuel Funds)	Total Energy Assistance and GAP Distributions
2022	70,291	7,668	$2,143,896	$74,031,246	$76,175,142
2023	62,416	13,620	$4,177,927	$42,038,786	$46,216,713
2024	59,134	16,273	$4,071,058	$34,794,035	$38,865,093

**Discount and PowerON Disbursements are January to December.*
** Totals may not match sum of components due to rounding.*

Q. HAS THE COMPANY ALSO INCREASED OUTREACH RELATED TO PRODUCTS AND SERVICES FOR CUSTOMERS WHO MAY NOT MEET INCOME QUALIFICATIONS FOR GAP?

A. Yes. The Company recognizes that there are affordability challenges for some customers beyond those that meet the income qualifications for GAP. To assist our customers at those income levels, we have also increased outreach, including emails, calls (automated and personal), physical mailings and letters, and social media, for products and services that might assist them in managing their gas bill, including flexible payment arrangements, Average Monthly Payment or "Budget Billing," and the Company's Custom Due Date product. Most recently, the Company has initiated the hiring process for two dedicated resources to attend in-person events in Minnesota. These agents will be trained to assist customers with any customer service questions and concerns, medical and energy assistance enrollment, education and application as well as billing or

payment questions. This team will also visit medical facilities to educate on available medical and assistance options for their patients and provide resource materials and applications. We expect our hiring process for these new positions to be concluded before year-end 2025.

Q. WHAT ARE THE FLEXIBLE PAYMENT ARRANGEMENT, BUDGET BILLING, AND CUSTOMER DUE DATE PRODUCTS?

A. Each of these programs provides a different option for customers based on their specific needs. Specifically:

- Flexible Payment: These plans allow customers who may need extra time to catch up on their bill to make a partial down payment towards their balance and spread the remaining balance out into monthly installments for up to 13 additional months.
- Budget Billing: A plan where customers pay an agreed-upon fixed amount each month, based on the average energy costs over 12 months. This makes it easier for some households to plan for and manage energy costs in the home and reduces the impact of seasonal variations due to hot and cold weather.
- Custom Due Date: An option that allows a customer to select the customer's own monthly due date, instead of the one assigned based on the meter reading date. Some households find this option assists with planning for when expenses will be due.

Q. HOW HAVE THESE PROGRAMS ASSISTED CUSTOMERS EXPERIENCING AFFORDABILITY CHALLENGES?

A. These programs provide both flexibility and control to customers, allowing them to customize the billing experience to their individual needs. Budget billing

is particularly suited to assisting customers in avoiding significant spikes during peak usage months. Additionally, it provides stability and predictability, making it easier for customers to plan and allocate funds for utility expenses. Custom Due Dates also provide a high level of control to customers by providing the option of aligning utility bill payments with household cash flow. By selecting a due date that corresponds to income, customers are able to reduce the risk of missed or late payments.

In regard to flexible payment plans, the Company worked with the CUB and ECC during the course of the 2023 Safety, Reliability and Service Quality filing (Docket No. E002/M-24-27) to develop new, significantly reduced down payment guidelines. These down payments start at 10 percent and increase only if prior payment arrangements have been set and broken. Our Credit representatives always ask customers if there is any extenuating or financial hardship as part of their payment arrangement conversations with customers, which could result in an even lower down payment. This approach is beneficial to customers who may be facing temporary financial hardships or unexpected expenses. Instead of facing immediate payment demands, they can work with the Company to develop a customized plan to get caught back up; these plans ensure that customers can maintain their utility services while working towards resolution of the past due balance.

Table 6 below shows the graduated down payments, implemented in Docket No. E002/M-24-27, which help contact center agents guide customers into a payment arrangement that works for them.

Table 6
Minnesota Payment Arrangement Down Payment Guidelines

Graduated Down Payment Structure for Payment Plans						
Payment Arrangement Offered	1st	2nd	3rd	4th	5th	6th
Normal Payment Agreements	10% down	25% down	35% down	50% down	50% down	50% down
Extenuating Circumstances Payment Agreement	10% down	15% down	25% down	40% down	50% down	50% down

IV. COMMODITY BAD DEBT EXPENSE

A. Overview of Commodity Bad Debt Expense

Q. WHAT IS COMMODITY BAD DEBT EXPENSE?

A. Commodity bad debt expense is billed commodity revenue for natural gas and electric service that is considered uncollectible from customers. Commodity revenue refers to the revenue billed to the Company's customers for the cost of utility service, including fuel charges and all regulated charges to customers, such as riders. This definition represents virtually all of the Company's billed retail customer revenue. It does not include comparatively minor ancillary charges such as damage claims, which are considered "non-commodity" revenue, discussed in Section IV of my testimony. For this section, we are providing Total NSPM Company 3s because commodity bad debt ratios for NSPM are calculated based on the Total Company, including both the electric and natural gas utilities.

Q. PLEASE SUMMARIZE THE COMPANY'S PROPOSED TEST YEAR COMMODITY BAD DEBT EXPENSE.

A. For the 2026 test year, we propose a 0.50 percent of revenue ratio. On a State of Minnesota Gas Jurisdiction level, this represents commodity bad debt expense of $3.5 million. I discuss the bad debt expense budget and forecast process in Section B; the methodology we use to determine our bad debt ratios and proposed bad debt expense levels and trends in Section C; and the allocation methodology for commodity bad debt expense between electric and gas operations in Section D.

Q. HOW DO THE 2026 PROPOSED TEST YEAR BAD DEBT EXPENSE LEVELS COMPARE TO PREVIOUS LEVELS?

A. As shown in Table 7 below, for the 2026 test year, the Company bad debt expense level is higher than 2024 actuals due to the exclusion of the COVID-19 reversals from the 2026 test year budget. The 2026 test year bad debt expense is higher than the 2024 actuals due to increased billed commodity revenue, exclusion of the COVID-19 reversal, which is offset by anticipated savings attributed to improved credit and collections performance by the Company.

Table 7
Commodity Bad Debt Expense Trend –
State of Minnesota Gas Jurisdiction
($ millions)

2022 Actual	2023 Actual	2024 Actual	2025 Forecast	2026 Test Year
$2.08	$3.58	$2.68	$3.37	$3.52

B. Bad Debt Expense Budget and Forecast Process

Q. HOW DOES THE COMPANY BUDGET AND FORECAST COMMODITY BAD DEBT EXPENSE?

A. In general, we recognize commodity bad debt expense through a combination of: (1) estimating an amount of accounts receivable reserve (or provision) associated with outstanding receivables that will be unrecoverable; and (2) writing-off uncollectible accounts not previously reflected in this reserve. From the combination of these amounts, we derive a weighted average ratio of bad debt to overall billed commodity revenue. To determine a forecasted bad debt expense, as is necessary for budgeting purposes and for a rate case, the Company applies this bad debt ratio to forecasted commodity revenues and allocates it between its electric and natural gas operations.

Q. WHY IS IT REASONABLE TO ESTIMATE BAD DEBT EXPENSE BASED UPON A RATIO OF BAD DEBT EXPENSE TO COMMODITY REVENUE?

A. Using a ratio of billed commodity revenue is reasonable because there is a direct relationship between billed commodity revenue and bad debt expense. In particular, as billed commodity revenue increases and decreases, bad debt proportionately increases and decreases. This practice is commonly used by industry groups, as verified by the Edison Electric Institute, and this trend is also supported by historical data.

Q. WHAT FACTORS IMPACT COMMODITY BAD DEBT EXPENSE?

A. All else being equal, commodity bad debt expense varies directly with billed commodity revenues. Other factors affecting bad debt expense include changes in credit policy, external considerations such as the economy, income qualified energy assistance programs, levels of business bankruptcies, as well as the efficiency of the Company's supporting processes and operations.

Q. HOW DOES THE GAS REVENUE FORECAST IMPACT COMMODITY BAD DEBT EXPENSE?

A. The gas revenue forecast is a primary input to the bad debt expense forecast, and the gas fuel cost forecast is used in developing the revenue forecast. Therefore, the relationship of gas cost increases and decreases are directly correlated to changes in revenues, and ultimately bad debt expense budgets and forecasts. Once the revenue forecast is complete, the bad debt expense model uses that forecast as an input so that the bad debt expense forecast directly reflects forecasted changes in revenue.

Q. HOW DOES THE COMPANY CALCULATE THE ACCOUNTS RECEIVABLE RESERVE PORTION OF BAD DEBT EXPENSE?

A. We calculate the reserve by applying provisioning factors to various aging categories of outstanding arrears for both active and inactive customers. A provisioning factor is the percentage of the accounts receivable estimated to eventually prove uncollectible. In general, as arrears age, and as they move with our customers from active to inactive status, we apply a higher provisioning factor to reflect the declining likelihood that we will collect the full outstanding balance. These reserve amounts are updated monthly and are combined with net write-offs to become the total bad debt expense for the period.

Q. HOW DOES THE COMPANY KNOW THAT ITS PROVISIONING FACTORS ARE REASONABLE?

A. The provisioning factors we apply to outstanding arrears are developed from annual reserve studies in which we analyze historical customer payment behavior data and consider contributing factors such as the sales forecast and underlying fuel forecast, any changes in credit policy, and external

considerations such as the economy. Our most recent reserve study was completed in July 2025.

Q. WHAT DOES THE COMPANY DO TO MANAGE BAD DEBT EXPENSE, PARTICULARLY WHEN REVENUES ARE INCREASING?

A. We continue to use a combination of approaches to manage bad debt expense, including:

- Proactive contact of delinquent residential customers through targeted contacts, including emails and outbound calls.
- Close monitoring of commercial accounts and industry trends, and work to keep these customers as current as possible to minimize potential bankruptcy impacts.
- Focused management of collection agency practices to help improve collections from customers whose debt had previously been written off.
- Development of advanced analytical methods to ensure the most efficient and effective credit activities are used.
- Strong support of energy assistance programs that help the Company's most at-risk customers.

We continually monitor our level of bad debt expense and the factors that influence it and take action to respond. I discuss specific activities that Customer Care has implemented in an effort to manage bad debt expense in conjunction with my discussion of our bad debt expense trend in the following section of my testimony.

C. Test Year Bad Debt Calculation

1. Bad Debt Ratios and Trend

Q. HOW WAS THE 2026 TEST YEAR BAD DEBT RATIO CALCULATED?

A. As I have discussed, while the acute portion of the COVID-19 pandemic is now over, customers are still experiencing challenges with paying their utility bills. To calculate the 2026 test year bad debt ratio, the Company looked to 2024 actual bad debt ratios and included anticipated savings due to improved credit and collections performance by the Company and excluded COVID-19 reversals which impacted 2024 performance. This cost was then proportionately allocated to the Company based on the actual bad debt experienced in 2024.

Q. ARE THE COMMODITY BAD DEBT RATIOS THE COMPANY PROPOSES FOR THE 2026 TEST YEAR REASONABLE?

A. Yes. The 2026 test year bad debt forecast ratio of 0.50 percent is anticipated to be higher than the average 2022-2024 bad debt actual ratio of 0.45 percent. The increase is due to higher billed commodity revenue and the lack of incremental COVID-19 entry reversal, offset by various anticipated savings such as forecasted lower arrears balances and new affordability program options for customers. We believe this forecast recognizes what can reasonably be anticipated to occur with best efforts to control bad debt, while taking into account actual year-end 2024 results.

Table 8
Commodity Bad Debt Ratio –
NSPM Total Company

Actuals				Forecast	Test Year
2022	2023	2024	Average 2022-2024	2025	2026
0.35%	0.56%	0.45%	0.45%	0.53%	0.50%

2. Bad Debt Expense and Trend

Q. WHAT IS THE PROPOSED 2026 COMMODITY BAD DEBT EXPENSE?

A. We propose a commodity bad debt expense of $4.1 million for NSPM Total Gas Company, which translates to a 2026 test year commodity bad debt expense of $3.5 million for the State of Minnesota Gas Jurisdiction. We provide detailed calculations supporting the 2026 test year commodity bad debt expense as Exhibit___(DKH -1), 6.

Q. HOW WAS THE TEST YEAR BAD DEBT EXPENSE CALCULATED?

A. We calculate the commodity bad debt expense level by applying the bad debt ratio for each year to each year's total Company forecasted commodity revenues. We then allocate the proposed bad debt expense to the State of Minnesota Gas Jurisdiction through an allocation process that I discuss in Section IV.D of my testimony.

Q. HOW DO 2026 BAD DEBT EXPENSE LEVELS COMPARE TO HISTORICAL BAD DEBT EXPENSE LEVELS?

A. Commodity bad debt expense was elevated in 2026 due to increasing billed gas commodity revenue and no incremental COVID-19 entry reversals, originally placed in our forecast as an offset to increased arrears due to the pandemic emergency disconnection moratorium and other COVID-19 related expenses. However, these adjustments were partially offset by various anticipated savings such as bad debt decreases, as previously mentioned in this testimony.

Q. PLEASE DISCUSS TRENDS IN THE COMPANY'S COMMODITY BAD DEBT EXPENSE SINCE 2022.

A. Table 8 above shows the Company's bad debt expense has generally increased since 2022. The primary reason for this is there was a significant incremental COVID-19 reversal that was recorded in 2022 since it passed the 24-month credit cycle. Also, there is an increase of approximately $93.3 million in NSPM Total Company billed commodity revenue from 2022 (approximately $5.2 billion) to 2026 (approximately $5.3 billion) as reflected in Schedule 6. This increase in revenue has been compounded by the increase in bad debt as a percent of revenue.

Q. HOW DOES THE COMPANY'S TOTAL BAD DEBT EXPENSE COMPARE TO OTHER UTILITIES?

A. The Company's bad debt expense compares favorably to other utilities as reflected in FERC account 904 expenses.[4] For the 2022-2024 period, which is the most current information available, the combination of the Company's total commodity and non-commodity bad debt expense has been substantially lower than the mean expense level of other utilities and that difference continues to become more pronounced as the Company continues to analyze new options for expense decreases . We provide a summary of this expense level comparison in 9[5] below.

Table 9
Customer Records and Uncollectible Expense per Retail Customer Comparison

	2022	2023	2024
NSPM Total Company	$11.1	$15.7	$11.4
Competitor Group (mean)	$16.0	$21.1	$22.7

[4] FERC account 904 is "charged with amounts sufficient to provide for losses from uncollectible utility revenues."
[5] Source: S&P Global, Market Intelligence Platform, https://www.spglobal.com/marketintelligence/en/

D. Allocation Methodology

Q. HOW DOES THE COMPANY ALLOCATE COMMODITY BAD DEBT EXPENSE BETWEEN ITS ELECTRIC AND NATURAL GAS OPERATIONS?

A. We allocate bad debt expense to our natural gas and electric operations consistent with the process by which debt is written off. Total bad debt expense is assigned at a total Operating Company level because customer payments and write-offs are recorded to the customer's overall account – not separately for electric and gas service. Therefore, because we have combined electric and gas customers who pay for utility service on an integrated basis, the bad debt expense is also integrated at a customer account level.

To differentiate bad debt expense between gas and electric service, we use an allocation to reasonably approximate the proportions of electric and gas utilities' bad debt expense. After applying the bad debt ratio to total NSPM commodity revenue, the resulting amount is allocated to the Minnesota jurisdiction and between the electric and gas utilities by using a rolling four-year total of revenues to utility and jurisdiction. The allocator in the 2026 test year is developed based on the four previous calendar years' actual operating revenues from the corporate income statement, which we update every April.

Using this methodology, the amount of bad debt expense allocated to the State of Minnesota Gas Jurisdiction for 2024 is 86.6 percent of the total bad debt expense for the NSPM Gas Company. Essentially, this reflects the fact that Minnesota gas commodity revenues equaled 86.6 percent of NSPM Gas commodity revenues during the January 2021 through December 2024 period.

Q. HAS THE COMPANY USED THIS ALLOCATION METHODOLOGY IN ITS PREVIOUS RATE CASES?

A. Yes. This is the same methodology used in all of the Company's recent rate cases, including the Company's most recent natural gas rate case (Docket No. G002/GR-23-413).

V. NON-COMMODITY BAD DEBT EXPENSE

Q. WHAT IS NON-COMMODITY BAD DEBT EXPENSE?

A. Non-commodity bad debt expense is billed revenue that is considered uncollectible for everything other than electric and natural gas service. The non-commodity bad debt budget categories align with functional business areas and include the miscellaneous charges such as returned checks and connection-related fees.

Q. WHAT IS THE 2026 TEST YEAR AMOUNT FOR NON-COMMODITY BAD DEBT?

A. The 2026 test year non-commodity bad debt expense for the State of Minnesota Gas Jurisdiction is $43,000. Detailed calculations supporting the test year non-commodity bad debt expense are provided in Exhibit___(DKH -1), Schedule 7.

Q. HOW DO THESE AMOUNTS COMPARE TO PAST YEARS?

A. Table 10 below provides actual non-commodity bad debt expense amounts for the 2022-2024 period, the 2025 forecast, and the 2026 test year. The increase from 2022 to 2026 is mainly due to higher connection related fees.

Table 10
Non-Commodity Bad Debt Expense
State of Minnesota Gas Jurisdiction
($ millions)

	2022 Actual	2023 Actual	2024 Actual	2025 Forecast	2026 Test Year
Customer Care	$0.02	$0.04	$0.05	$0.04	$0.04

Q. HOW DID THE COMPANY DEVELOP THE 2026 NON-COMMODITY BAD DEBT EXPENSE LEVELS?

A. The non-commodity bad debt for the 2026 test tear is calculated by using the average of actual non-commodity bad debt for the two most recent years of 2023 and 2024.

VI. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The Customer Care organization continues to effectively manage its O&M expense levels to mitigate impacts to customers while remaining well below the national average amongst peer utilities. It continues to perform favorably to other gas utilities across the country in managing bad debt expense and the cost to perform overall Customer Care functions. Therefore, the Customer Care organization's overall O&M expenses, including commodity and non-commodity bad debt expense, are reasonable and should be approved. Finally, the Customer Care Organization is keenly aware of the importance of customer affordability and supports many functions and products specifically designed to assist customers of all income levels in managing their monthly utility expense.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

Statement of Qualifications

Diedra K. Howard

As Director of Customer Policy and Regulatory Compliance within the Customer Care organization, I serve as the primary liaison between Customer Care and our regulatory partners across Xcel Energy's eight-state service territory. In this role, I provide strategic oversight for Customer Care data, reporting, and regulatory filings, including the sponsorship of testimony and discovery responses as needed. I also lead the Personal Accounts and Customer Advocacy teams, which manage critical programs such as energy assistance and affordability, medical and account confidentiality, and customer complaint resolution initiatives.

Since joining Xcel Energy in December 2005, I have held a variety of roles that have deepened my expertise in customer operations and regulatory compliance. In February 2025, I was appointed to my current role after serving as Manager of Customer Assistance and Advocacy from June 2023 to February 2025. In that position, I oversaw the operational management of the Personal Accounts and Customer Advocacy teams and supported the development, reporting, and execution of Customer Care regulatory initiatives.

From 2021 to 2023, I served as Residential Credit Manager, where I led the Credit contact center. Prior to that, I was the Personal Accounts Supervisor from 2012 to 2021. Earlier in my career, I worked in the Public Service Regulatory department as a Case Specialist (2010–2012), contributing to renewable energy proceedings, and began my tenure at Xcel Energy as a Customer Advocate (2005–2010), resolving customer complaints across our service territory.

I hold a Bachelor of Arts in Leadership and Organizational Studies from the University of Denver. I currently serve on the Board of the National Energy and Utility Affordability Coalition (NEUAC), a national organization dedicated to advocating for federal LIHEAP funding and policies that support income-qualified customers.

($s)

Total NSP Gas	Historical Actuals				
Cost Element	2022 Actual	2023 Actual	2024 Actual	2025 July Forecast	2026 Test Year
Labor	3,285,308	3,402,864	3,027,945	3,468,921	3,687,618
Contract Labor	12,352	12,083	6,859	15,880	102
Outside Services	4,209,214	3,899,915	3,812,144	1,818,821	888,165
Employee Expenses	47,646	32,463	37,872	25,189	46,323
O&M Credits	(24,290)				
Postage	973,870	1,028,860	1,055,664	1,122,707	1,150,006
Credit Card Fees			298,626	483,733	618,488
Net Other*	192,445	157,615	172,115	191,966	167,257
Grand Total	8,696,544	8,533,800	8,411,225	7,127,217	6,557,960

* All other accounts with less than $250,000 annually average for the years listed above

Total MN Gas Jurisdiction	Historical Actuals				
Cost Element	2022 Actual	2023 Actual	2024 Actual	2025 July Forecast	2026 Test Year
Labor	2,907,999	2,995,880	2,660,319	3,051,759	3,226,490
Contract Labor	1,183	5,983	6,718	9,999	90
Outside Services	3,854,670	3,521,744	3,402,562	1,724,451	782,016
Employee Expenses	43,172	28,326	32,316	22,089	41,918
O&M Credits	(24,290)				
Postage	862,402	910,210	933,168	990,749	1,014,744
Credit Card Fees			298,626	483,733	618,488
Net Other*	171,828	140,457	155,122	175,086	151,167
Grand Total	7,816,964	7,602,601	7,488,832	6,457,866	5,834,913

	Total NSP Gas					Total MN Gas Jurisdiction				
	Historical Actuals					Historical Actuals				
Cost Element	2022 Actual	2023 Actual	2024 Actual	2025 July Forecast	2026 Test Year	2022 Actual	2023 Actual	2024 Actual	2025 July Forecast	2026 Test Year
Labor	528,647	534,641	279,409	269,385	274,117	468,145	472,991	246,990	237,753	241,929
Contract Labor			1,215	8,138				1,074	7,183	
Outside Services	326,341	392,710	563,868	623,854	640,880	288,992	347,426	498,943	550,598	565,625
Employee Expenses	1,720	2,222	4,468	1,079	1,751	1,523	1,966	3,949	952	1,545
Postage	958,425	1,025,797	1,053,937	1,121,284	1,148,043	848,737	907,510	931,650	989,617	1,013,234
Credit Card Fees			298,626	483,733	618,488			298,626	483,733	618,488
Net Other*	17,680	19,493	42,561	42,000	45,065	15,656	17,245	37,633	37,068	39,774
	1,832,813	1,974,862	2,244,084	2,549,473	2,728,345	1,623,055	1,747,137	2,018,866	2,306,903	2,480,595
Labor	1,271,610	1,230,087	1,117,674	1,355,726	1,395,923	1,126,079	1,088,243	987,992	1,196,530	1,232,007
Outside Services	16,177	12,440	17,030	15,528	14,102	14,326	11,006	15,054	13,705	12,446
Employee Expenses	6,917	5,069	4,458	4,030	7,037	6,125	4,485	3,941	3,557	6,211
Postage	597	740	622	889	1,060	528	655	550	785	936
Net Other*	6,773	1,024	888	(4,918)	(11,162)	5,998	906	785	(4,341)	(9,851)
	1,302,074	1,249,361	1,140,672	1,371,255	1,406,961	1,153,056	1,105,295	1,008,322	1,210,235	1,241,749
Labor	504,590	565,363	475,288	578,786	654,529	446,841	500,170	420,142	510,822	577,671
Outside Services	117,444	110,077	123,416	126,869	123,428	104,003	97,384	109,097	111,971	108,935
Employee Expenses	5,465	1,811	1,057	2,108	5,531	4,840	1,602	934	1,861	4,881
Postage	66	17	24	195	369	59	15	21	172	326
Net Other*	3,171	2,438	1,531	1,653	1,908	2,808	2,157	1,353	1,459	1,684
	630,736	679,706	601,317	709,611	785,766	558,551	601,328	531,547	626,285	693,497
Labor	329,732	345,639	348,228	352,115	382,882	291,995	305,782	307,824	310,768	337,922
Contract Labor		377					334			
Outside Services	69,043	62,337	899,272	95,762	87,897	61,141	55,149	794,931	84,517	77,576
Employee Expenses	11,386	3,881	5,330	2,924	4,376	10,083	3,433	4,711	2,581	3,862
Postage	4	37	651	43	84	3	33	576	38	74
Net Other*	12,598	17,531	10,849	26,396	3,338	11,156	15,510	9,590	23,296	2,946
	422,762	429,803	1,264,330	477,240	478,576	374,379	380,241	1,117,632	421,200	422,379

Northern States Power Company
Customer Care O and M Expense Levels

Labor	113,240	139,224	124,395	132,189	182,657	100,280	123,170	109,962	116,666	161,208
Contract Labor		17		51	102		15		45	90
Outside Services	12,156	12,316	12,176	12,748	11,688	10,764	10,896	10,763	11,251	10,316
Employee Expenses	871	1,163	2,173	662	1,313	771	1,029	1,921	584	1,159
Postage	14,304	2,106	292	6	13	12,667	1,863	258	6	11
Net Other*	37,426	4,180	688	28,969	15,855	33,143	3,698	608	25,568	13,993
	177,997	159,005	139,723	174,625	211,628	157,626	140,670	123,511	154,120	186,778
Labor	537,490	587,911	682,951	780,720	797,509	474,658	505,524	587,410	679,220	675,753
Contract Labor	12,352	11,689	5,644	7,691		1,183	5,635	5,644	2,771	
Outside Services	3,668,054	3,310,034	2,196,382	944,060	10,169	3,375,444	2,999,884	1,973,775	952,409	7,118
Employee Expenses	21,286	18,317	20,386	14,386	26,315	19,829	15,812	16,859	12,555	24,260
O&M Credit	(24,290)					(24,290)				
Postage	474	163	138	290	438	407	134	113	131	163
Net Other*	114,797	112,949	115,598	97,867	112,252	103,066	100,941	105,153	92,037	102,621
	4,330,162	4,041,063	3,021,098	1,845,013	946,684	3,950,297	3,627,931	2,688,953	1,739,123	809,915
	8,696,544	8,533,800	8,411,225	7,127,217	6,557,960	7,816,964	7,602,601	7,488,832	6,457,866	5,834,913

(904) Uncollectible Accounts per Retail Customer

	Mean	NSPM
2008	$ 14.50	$ 13.95
2009	$ 13.66	$ 10.52
2010	$ 12.98	$ 8.49
2011	$ 12.24	$ 9.04
2012	$ 11.44	$ 6.33
2013	$ 12.36	$ 7.96
2014	$ 13.35	$ 9.97
2015	$ 12.90	$ 8.33
2016	$ 12.70	$ 8.61
2017	$ 10.11	$ 8.87
2018	$ 11.74	$ 9.28
2019	$ 11.14	$ 7.83
2020	$ 17.49	$ 13.23
2021	$ 12.95	$ 14.45
2022	$ 16.00	$ 11.10
2023	$ 21.11	$ 15.68
2024	$ 22.67	$ 11.44

(901-905 less 904) Customer Care Accts Exp per Retail Customer

	Mean	NSPM
2008	$ 38.33	$ 34.11
2009	$ 38.62	$ 34.09
2010	$ 39.08	$ 34.58
2011	$ 39.34	$ 33.29
2012	$ 38.26	$ 31.82
2013	$ 37.75	$ 31.02
2014	$ 38.06	$ 30.64
2015	$ 38.86	$ 30.06
2016	$ 37.92	$ 29.90
2017	$ 38.07	$ 28.91
2018	$ 37.35	$ 28.45
2019	$ 37.35	$ 30.36
2020	$ 36.24	$ 44.72
2021	$ 41.94	$ 30.84
2022	$ 42.62	$ 28.99
2023	$ 44.90	$ 29.38
2024	$ 48.25	$ 30.63

(902) Meter Reading Exp per Retail Customer

	Mean	NSPM
2008	$ 8.16	$ 15.15
2009	$ 8.36	$ 14.90
2010	$ 8.14	$ 15.41
2011	$ 7.93	$ 14.18
2012	$ 7.37	$ 12.95
2013	$ 6.83	$ 12.96
2014	$ 6.51	$ 13.00
2015	$ 6.66	$ 13.23
2016	$ 6.35	$ 13.42
2017	$ 6.11	$ 13.48
2018	$ 5.84	$ 14.36
2019	$ 5.64	$ 14.64
2020	$ 5.53	$ 19.06
2021	$ 5.37	$ 15.52
2022	$ 5.03	$ 13.06
2023	$ 5.10	$ 12.75
2024	$ 4.84	$ 13.29

(903) Customer Records & Collection Exp per Retail Customer

	Mean	NSPM
2008	$ 26.98	$ 18.68
2009	$ 27.05	$ 18.94
2010	$ 28.12	$ 19.00
2011	$ 28.26	$ 18.97
2012	$ 27.80	$ 18.73
2013	$ 27.68	$ 17.93
2014	$ 28.31	$ 17.54
2015	$ 28.95	$ 16.75
2016	$ 28.57	$ 16.39
2017	$ 28.74	$ 15.35
2018	$ 28.69	$ 14.04
2019	$ 28.82	$ 15.64
2020	$ 27.94	$ 13.85
2021	$ 32.91	$ 15.15
2022	$ 32.68	$ 15.66
2023	$ 34.82	$ 16.38
2024	$ 35.88	$ 17.11

(901 - 905) Total Customer Accounts Expense per Retail Customer

	Mean	NSPM
2008	$ 52.82	$ 48.06
2009	$ 52.39	$ 44.61
2010	$ 52.22	$ 43.07
2011	$ 51.57	$ 42.33
2012	$ 49.70	$ 38.15
2013	$ 50.11	$ 38.98
2014	$ 51.41	$ 40.61
2015	$ 51.76	$ 38.39
2016	$ 50.62	$ 38.50
2017	$ 48.18	$ 37.78
2018	$ 49.08	$ 37.73
2019	$ 51.68	$ 38.20
2020	$ 52.50	$ 57.95
2021	$ 54.89	$ 45.29
2022	$ 58.62	$ 40.09
2023	$ 66.01	$ 45.05
2024	$ 70.93	$ 42.07

* 2019 data was not impacted by the pandemic

Data Source:

Company – S&P Global (www.spglobal.com/en)
Product – S&P Global Market Intelligence (https://www.spglobal.com/marketintelligence/en/)
Solution – S&P Capital IQ Pro (www.capitaliq.spglobal.com/web/client?auth=inherit#news/home)

Data Methodology:

Regarding the data contained within this schedule. The Company uses the "Screener" application found in the above referenced solution to compile and export publicly available date for regulated energy companies at the operating company level. To provide the most relevant peer set the Company excludes gas-only companies and parent company level aggregate results, in addition to exclusions for compannies with no reported results.

Uncollectible Accounts per Retail Customer (904)				
	Mean	NSPM	MN Power	Otter
2008	$ 14.50	$ 13.95	$ 2.13	N/A
2009	$ 13.66	$ 10.52	$ 5.02	$ 6.70
2010	$ 12.98	$ 8.49	$ 3.65	$ 6.40
2011	$ 12.24	$ 9.04	$ 4.90	$ 3.14
2012	$ 11.44	$ 6.33	$ 4.67	$ 4.62
2013	$ 12.36	$ 7.96	$ 4.28	$ 5.85
2014	$ 13.35	$ 9.97	$ 5.12	$ 5.83
2015	$ 12.90	$ 8.33	$ 5.10	$ 5.96
2016	$ 12.70	$ 8.61	$ 6.55	$ 7.08
2017	$ 10.11	$ 8.87	$ 6.12	$ 5.69
2018	$ 11.74	$ 9.28	$ 5.83	$ 8.59
2019	$ 11.14	$ 7.83	$ (2.40)	$ 7.53
2020	$ 17.49	$ 13.23	$ 12.67	$ 22.51
2021	$ 12.95	$ 14.45	$ 4.80	$ 0.08
2022	$ 16.00	$ 11.10	$ 8.83	$ 5.17
2023	$ 21.11	$ 15.68	$ 4.09	$ 9.65
2024	$ 22.67	$ 11.44	$ 4.81	$ 8.94

Customer Care Accts Exp per Retail Customer (901-905 less 904)				
	Mean	NSPM	MN Power	Otter
2008	$ 38.33	$ 34.11	$ 39.36	N/A
2009	$ 38.62	$ 34.09	$ 38.57	$ 79.56
2010	$ 39.08	$ 34.58	$ 41.09	$ 84.48
2011	$ 39.34	$ 33.29	$ 43.98	$ 87.71
2012	$ 38.26	$ 31.82	$ 35.31	$ 91.91
2013	$ 37.75	$ 31.02	$ 36.00	$ 97.41
2014	$ 38.06	$ 30.64	$ 33.50	$ 96.65
2015	$ 38.86	$ 30.06	$ 32.64	$ 91.81
2016	$ 37.92	$ 29.90	$ 33.29	$ 87.90
2017	$ 38.07	$ 28.91	$ 38.78	$ 92.24
2018	$ 37.35	$ 28.45	$ 35.31	$ 90.81
2019	$ 37.35	$ 30.36	$ 33.49	$ 93.44
2020	$ 36.24	$ 44.72	$ 26.29	$ 90.66
2021	$ 41.94	$ 30.84	$ 32.49	$ 91.26
2022	$ 42.62	$ 28.99	$ 33.18	$ 98.96
2023	$ 44.90	$ 29.38	$ 34.88	$ 98.65
2024	$ 48.25	$ 30.63	$ 34.53	$ 82.66

Meter Reading Exp per Retail Customer (902)				
	Mean	NSPM	MN Power	Otter
2008	$ 8.16	$ 15.15	$ 4.01	N/A
2009	$ 8.36	$ 14.90	$ 3.70	$ 37.41
2010	$ 8.14	$ 15.41	$ 4.37	$ 39.36

2011	$ 7.93	$ 14.18	$ 4.59	$ 41.72
2012	$ 7.37	$ 12.95	$ 4.12	$ 43.19
2013	$ 6.83	$ 12.96	$ 4.60	$ 46.61
2014	$ 6.51	$ 13.00	$ 3.36	$ 45.57
2015	$ 6.66	$ 13.23	$ 2.59	$ 43.43
2016	$ 6.35	$ 13.42	$ 2.22	$ 43.72
2017	$ 6.11	$ 13.48	$ 3.68	$ 45.33
2018	$ 5.84	$ 14.36	$ 3.73	$ 46.53
2019	$ 5.64	$ 14.64	$ 3.32	$ 47.10
2020	$ 5.53	$ 19.06	$ 2.26	$ 44.63
2021	$ 5.37	$ 15.52	$ 2.10	$ 45.33
2022	$ 5.03	$ 13.06	$ 1.86	$ 44.91
2023	$ 5.10	$ 12.75	$ 2.29	$ 44.77
2024	$ 4.84	$ 13.29	$ 2.00	$ 33.09

Customer Records & Collection Exp per Retail Customer (903)

	Mean	NSPM	MN Power	Otter
2008	$ 26.98	$ 18.68	$ 35.34	N/A
2009	$ 27.05	$ 18.94	$ 34.86	$ 38.83
2010	$ 28.12	$ 19.00	$ 36.72	$ 41.67
2011	$ 28.26	$ 18.97	$ 39.39	$ 42.41
2012	$ 27.80	$ 18.73	$ 31.20	$ 45.23
2013	$ 27.68	$ 17.93	$ 31.40	$ 47.25
2014	$ 28.31	$ 17.54	$ 30.14	$ 47.41
2015	$ 28.95	$ 16.75	$ 30.06	$ 44.53
2016	$ 28.57	$ 16.39	$ 31.07	$ 39.82
2017	$ 28.74	$ 15.35	$ 35.10	$ 42.31
2018	$ 28.69	$ 14.04	$ 31.58	$ 39.92
2019	$ 28.82	$ 15.64	$ 29.98	$ 41.97
2020	$ 27.94	$ 13.85	$ 23.72	$ 42.04
2021	$ 32.91	$ 15.15	$ 29.66	$ 42.06
2022	$ 32.68	$ 15.66	$ 30.51	$ 47.50
2023	$ 34.82	$ 16.38	$ 32.30	$ 46.15
2024	$ 35.88	$ 17.11	$ 32.49	$ 41.32

* 2019 data was not impacted by the pandemic

X	**Northern States Power Company - MN**	**14.45**	**30.84**	**15.52**	**15.15**	**23,635**	**23,065**	**22,002**	**130**	**1,522,746**
	Competitor Group - Mean	**12.95**	**41.94**	**5.37**	**32.91**	**4,100**	**24,699**	**11,116**	**2,543**	**912,345**

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	AES Indiana	6.61	27.45	3.76	21.91	1,942	11,314	3,411	29	516,323
	Alabama Power Company	2.45	51.75	1.35	46.86	2,039	70,758	3,695	0	1,510,098
	Alaska Electric Light and Power Company	4.79	71.52	5.99	65.53	105	1,149	84	0	17,533
	ALLETE, Inc. (MN Power)	4.80	32.49	2.10	29.66	346	4,890	792	0	164,858
	Ameren Illinois Company	2.75	21.66	0.69	20.57	850	25,273	3,375	94	1,228,564
	Appalachian Power Company	5.83	29.93	4.08	25.21	3,934	24,315	5,626	136	964,442
	Arizona Public Service Company	16.89	38.65	1.16	32.56	1,528	42,890	22,251	569	1,317,266
	Atlantic City Electric Company	35.84	97.83	12.44	85.40	7,027	48,243	20,248	0	564,929
	Avangrid, Inc.	29.24	64.54	9.82	34.18	22,554	78,526	67,190	42,181	2,297,679
	Baltimore Gas and Electric Company	6.60	34.71	0.81	31.63	1,076	41,772	8,715	789	1,320,806
	Berkshire Hathaway Energy Company	8.34	28.92	6.07	21.48	25,233	89,287	34,654	233	4,157,479
	Black Hills Colorado Electric, Inc.	4.25	20.82	1.69	17.82	168	1,774	423	43	99,535
	Black Hills Power, Inc.	4.45	22.79	1.79	16.41	133	1,217	330	274	74,150
	CenterPoint Energy Houston Electric, LLC	0.00	7.61	0.90	6.71	2,383	17,804	1	0	2,651,537
	Central Hudson Gas & Electric Corporation	18.74	74.11	10.38	59.87	2,589	14,936	4,675	965	249,483
	Central Maine Power Company	11.88	50.21	2.29	33.01	1,496	21,566	7,758	7,410	653,222
	CH Energy Group, Inc.	18.74	74.11	10.38	59.87	2,589	14,936	4,675	965	249,483
	Cheyenne Light, Fuel and Power Company	3.45	16.72	1.69	13.70	74	600	151	19	43,781
	Cleco Power LLC	13.74	45.42	0.00	42.28	0	12,320	4,003	13	291,370
	Commonwealth Edison Company	4.39	43.03	5.34	37.50	21,867	153,563	17,969	0	4,095,261
	Consolidated Edison Company of New York, Inc.	13.84	52.32	8.80	36.78	31,053	129,870	48,859	16,052	3,530,570
	Consolidated Water Power Company	36.04	360.36	9.01	360.36	1	40	4	0	111
	Consumers Energy Company	6.35	30.45	3.73	21.49	6,974	40,183	11,872	2	1,870,123
	Delmarva Power & Light Company	8.31	83.81	2.06	81.75	1,113	44,120	4,487	0	539,708
	Dominion Energy South Carolina, Inc.	5.05	32.49	1.77	24.75	1,354	18,956	3,866	4,112	765,965
	DTE Electric Company	16.03	65.02	0.78	38.82	1,748	87,143	35,983	55,259	2,244,945
	Duke Energy Carolinas, LLC	8.97	34.19	0.42	33.56	1,151	92,799	24,812	316	2,764,820
	Duke Energy Florida, LLC	6.96	23.78	0.96	22.59	1,872	43,891	13,521	16	1,943,012
	Duke Energy Indiana, LLC	0.02	24.29	1.65	22.29	1,419	19,195	17	1	860,972
	Duke Energy Kentucky, Inc.	1.53	33.44	2.01	30.78	295	4,510	224	0	146,514
	Duke Energy Ohio, Inc.	0.25	27.60	1.31	26.09	966	19,199	186	1	735,922
	Duke Energy Progress, LLC	6.69	32.22	1.36	30.75	2,237	50,560	11,000	52	1,644,179

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Duquesne Light Company	7.93	25.72	1.09	0.83	663	505	4,807	0	606,085
	Duquesne Light Holdings, Inc.	7.93	25.72	1.09	0.83	663	505	4,807	0	606,085
	Empire District Electric Company	16.25	51.09	11.44	36.06	2,047	6,454	2,909	488	178,984
	Entergy Arkansas, LLC	10.91	41.31	8.69	32.03	6,325	23,309	7,941	133	727,743
	Entergy Louisiana, LLC	7.88	39.64	8.94	29.86	9,895	33,039	8,716	186	1,106,510
	Entergy Mississippi, LLC	8.03	49.70	6.92	42.10	3,178	19,322	3,684	103	458,987
	Entergy New Orleans, LLC	8.01	35.87	2.08	33.13	436	6,930	1,676	54	209,159
	Entergy Texas, Inc.	6.81	36.75	5.23	30.78	2,521	14,832	3,280	71	481,816
	Evergy Kansas Central, Inc.	0.54	52.24	4.60	43.09	3,357	31,442	391	105	729,721
	Evergy Kansas South, Inc.	0.61	48.99	1.55	42.89	525	14,490	207	43	337,830
	Evergy Metro, Inc.	0.05	11.15	7.72	22.36	4,398	12,744	30	173	570,013
	Evergy Missouri West, Inc.	0.02	59.84	7.38	49.03	2,486	16,507	6	35	336,644
	Fitchburg Gas and Electric Light Company	89.84	60.27	1.34	58.93	41	1,800	2,744	0	30,544
	Florida Power & Light Company	1.08	15.44	1.49	12.58	7,764	65,590	5,621	0	5,214,245
	Georgia Power Company	5.81	52.55	9.84	38.56	26,146	102,493	15,435	330	2,657,945
	Green Mountain Power Corporation	4.01	20.55	3.19	15.94	861	4,301	1,083	22	269,867
	Idaho Power Company	3.96	28.03	3.14	23.47	1,872	14,000	2,363	0	596,393
	Indiana Michigan Power Company	0.18	27.90	1.60	24.73	970	14,951	106	80	604,549
	Interstate Power and Light Company	11.45	16.19	3.11	13.08	1,542	6,486	5,677	0	496,003
	Jersey Central Power & Light Company	3.42	26.62	12.15	13.20	13,979	15,183	3,934	1,345	1,150,247
	Kentucky Power Company	0.22	37.25	3.36	33.60	555	5,558	37	27	165,416
	Kentucky Utilities Company	13.99	59.56	16.36	36.07	9,245	20,384	7,909	0	565,153
	Kingsport Power Company	0.06	26.26	0.74	24.86	36	1,208	3	12	48,597
	Liberty Utilities (Granite State Electric) Corp.	6.19	34.08	7.59	24.77	346	1,129	282	30	45,575
	Lockhart Power Company	0.81	61.98	7.42	54.55	46	338	5	0	6,196
	Louisville Gas and Electric Company	8.65	27.61	7.52	16.73	3,212	7,148	3,696	3	427,163
	Madison Gas and Electric Company	7.30	44.86	2.14	41.13	344	6,621	1,175	255	160,976
	Massachusetts Electric Company	9.38	61.42	6.82	48.41	4,530	32,152	6,229	2,326	664,095
	Metropolitan Edison Company	15.85	13.61	0.25	12.20	143	7,095	9,218	618	581,453
	MidAmerican Energy Company	9.37	35.60	10.53	22.97	8,467	18,475	7,538	230	804,312
	Minnesota Power Enterprises, Inc.	3.43	32.51	2.05	30.03	307	4,494	513	0	149,660
	Mississippi Power Company	6.30	47.98	0.55	35.83	105	6,832	1,202	1,408	190,660
	Monongahela Power Company	3.62	38.92	24.28	13.45	9,593	5,314	1,431	468	395,031

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Nantucket Electric Co.	91.00	220.03	2.89	196.92	6	409	189	22	2,077
	Narragansett Electric Company	23.89	34.14	1.98	28.89	881	12,855	10,629	795	444,908
	Nevada Power Company	13.33	26.85	1.98	23.62	1,952	23,265	13,132	0	984,947
	New York State Electric & Gas Corporation	17.65	62.61	9.10	29.95	8,310	27,366	16,125	20,124	913,611
	Niagara Mohawk Power Corporation	37.12	32.86	3.02	23.77	4,412	34,705	54,184	6,089	1,459,832
	Northern Indiana Public Service Company	10.74	22.58	2.30	17.63	1,109	8,481	5,169	0	481,132
	Northern New England Energy Corp.	4.01	20.55	3.19	15.94	861	4,301	1,083	22	269,867
X	**Northern States Power Company - MN**	**14.45**	**30.84**	**15.52**	**15.15**	**23,635**	**23,065**	**22,002**	**130**	**1,522,746**
X	Northern States Power Company - WI	11.31	24.00	8.01	13.41	2,125	3,556	2,999	665	265,235
	NSTAR Electric Company	26.68	38.53	4.96	33.31	7,215	48,471	38,813	379	1,455,014
	Ohio Edison Company	11.56	21.72	8.74	11.64	9,280	12,367	12,275	1,328	1,062,269
	Ohio Power Company	40.28	27.63	1.90	24.61	2,868	37,202	60,888	225	1,511,444
	Oklahoma Gas and Electric Company	2.60	21.75	0.01	19.49	10	17,046	2,278	1,417	874,592
	Oncor Electric Delivery Company LLC	0.20	5.17	0.03	5.13	125	19,520	777	0	3,802,319
	Orange and Rockland Utilities, Inc.	10.42	61.90	4.16	56.00	994	13,373	2,489	415	238,798
	Otter Tail Power Company	0.08	91.26	45.33	42.06	6,093	5,654	11	499	134,424
	Pacific Gas and Electric Company	20.25	35.12	1.13	33.29	6,342	187,172	113,848	1,631	5,623,301
	PacifiCorp	6.33	28.73	6.95	20.65	13,919	41,366	12,680	3	2,002,780
	PECO Energy Company	21.96	49.21	0.48	46.60	805	78,348	36,921	3,595	1,681,439
	Pennsylvania Electric Company	17.45	15.22	0.70	11.96	413	7,033	10,266	1,452	588,261
	Pennsylvania Power Company	13.02	13.82	1.31	11.33	222	1,919	2,206	183	169,371
	Potomac Electric Power Company	15.69	80.51	0.85	79.67	774	72,840	14,349	0	914,279
	PPL Electric Utilities Corporation	8.70	32.15	0.95	27.31	1,395	40,041	12,762	4,607	1,466,253
X	Public Service Company of Colorado	16.90	25.40	13.15	12.06	20201	18528	25948	173	1535755
	Public Service Company of New Hampshire	12.56	34.17	3.63	30.42	1924	16122	6654	62	529986
	Public Service Company of New Mexico	6.60	25.70	10.27	15.97	5546	8622	3565	0	540035
	Public Service Company of Oklahoma	0.42	26.08	0.40	23.92	229	13592	241	151	568226
	Public Service Electric and Gas Company	27.98	77.67	8.09	29.36	18802	68236	65014	93457	2323747
	Puget Energy, Inc.	15.63	29.77	10.57	19.11	12645	22866	18706	0	1196851
	Puget Sound Energy, Inc.	15.63	29.77	10.57	19.11	12645	22866	18706	0	1196851
	Rochester Gas and Electric Co	25.16	74.02	6.54	28.76	2542	11179	9780	14641	388685
	Rockland Electric Company	5.52	78.98	3.92	53.37	291	3964	410	1611	74275
	San Diego Gas & Electric Company	8.19	50.12	1.62	48.31	2246	67041	11370	262	1387773
	SCANA Corporation	5.05	32.49	1.77	24.75	1354	18956	3866	4112	765965
	Sierra Pacific Power Company	3.57	20.85	2.45	16.92	895	6182	1304	0	365440
	Southern California Edison Company	25.50	25.81	0.57	21.29	2962	110579	132414	2654	5192912
	Southern Indiana Gas and Electric Company	11.85	9.54	1.60	6.83	245	1048	1818	171	153433
	Southwestern Electric Power Company	0.04	36.40	4.45	30.38	2430	16594	21	65	546238
X	Southwestern Public Service Company	17.87	36.49	13.31	22.82	5325	9133	7152	108	400209

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Superior Water, Light and Power Company	18.36	32.24	2.57	26.06	39	396	279	0	15198
	Tampa Electric Company	7.31	40.69	1.42	33.93	1141	27215	5862	0	802049
	TECO Energy, Inc.	7.31	40.69	1.42	33.93	1141	27215	5862	0	802049
	The Cleveland Electric Illuminating Company	8.16	20.96	8.33	11.18	6294	8442	6159	1023	755210
	The Connecticut Light and Power Company	44.04	55.52	3.69	32.40	4697	41213	56024	24719	1272110
	The Dayton Power and Light Company	14.21	29.33	6.26	23.06	3345	12321	7592	0	534192
	The Potomac Edison Company	0.43	25.45	13.08	11.15	5622	4789	186	525	429677
	The Toledo Edison Company	14.74	24.26	9.31	13.24	2927	4163	4636	507	314440
	The United Illuminating Company	97.98	86.27	29.83	53.82	10206	18415	33525	7	342161
	Tucson Electric Power Company	0.30	46.90	0.78	46.13	341	20220	130	0	438357
	UGI Utilities, Inc.	18.03	32.96	0.42	30.56	26	1914	1129	10	62627
	UIL Holdings Corporation	97.98	86.27	29.83	53.82	10206	18415	33525	7	342161
	Union Electric Company	3.89	35.27	9.76	24.69	12147	30721	4836	142	1244260
	Unitil Energy Systems, Inc.	8.89	43.13	1.16	41.97	93	3372	714	0	80339
	UNS Electric, Inc.	2.05	36.84	1.28	32.96	128	3299	205	0	100078
	UNS Energy Corporation	0.14	45.03	0.87	43.68	468	23519	75	0	538435
	Upper Michigan Energy Resources Corporation	44.72	14.73	2.90	11.19	107	413	1651	11	36921
	Upper Peninsula Power Company	3.77	48.66	19.58	19.88	1038	1054	200	0	53017
	Vectren Corporation	11.85	9.54	1.60	6.83	245	1048	1818	171	153433
	West Penn Power Company	9.69	12.84	1.88	9.93	1380	7287	7109	752	733761
	Westar Energy (KPL)	0.47	55.05	7.23	43.25	2832	16951	184	61	391891
	Wheeling Power Company	9.16	26.63	4.44	21.95	185	915	382	6	41685
	Wisconsin Electric Power Company	18.29	17.72	2.62	14.60	2994	16710	20940	325	1144822
	Wisconsin Power and Light Company	10.13	13.81	2.18	11.62	1060	5640	4915	0	485194
	Wisconsin Public Service Corporation	7.61	18.19	3.21	11.93	1461	5429	3461	711	454892

X	**Northern States Power Company - MN**	**11.10**	**28.99**	**13.06**	**15.66**	**20,096**	**24,102**	**17,081**	**279**	**1,538,707**
	Competitor Group - Mean	**16.00**	**42.62**	**5.03**	**32.68**	**3,918**	**25,706**	**13,517**	**3,907**	**929,170**

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	AES Indiana	11.27	32.16	3.70	25.96	1,920	13,480	5,852	0	519,319
	Alabama Power Company	2.81	50.32	1.33	45.26	2,032	69,107	4,286	1,231	1,526,836
	Alaska Electric Light and Power Company	3.05	73.67	4.63	69.09	82	1,223	54	0	17,701
	ALLETE, Inc. (MN Power)	8.83	33.18	1.86	30.51	308	5,056	1,464	0	165,706
	Ameren Illinois Company	12.10	25.15	2.77	21.96	3,407	26,994	14,873	92	1,229,379
	Appalachian Power Company	5.98	31.50	3.75	27.12	3,614	26,135	5,763	108	963,755
	Arizona Public Service Company	12.65	40.24	1.06	33.31	1,422	44,786	17,006	217	1,344,359
	Atlantic City Electric Company	33.66	101.93	13.62	88.32	7,724	50,094	19,093	0	567,212
	Avangrid, Inc.	26.28	88.34	11.49	35.89	26,478	82,728	60,589	89,241	2,305,243
	Baltimore Gas and Electric Company	13.51	33.98	0.75	30.87	999	41,025	17,959	943	1,329,040
	Bear Valley Electric Service	4.09	26.26	3.08	7.62	76	188	101	383	24,679
	Berkshire Hathaway Energy Company	9.72	26.92	4.42	20.98	18,656	88,588	41,042	126	4,222,024
	Black Hills Colorado Electric, Inc.	14.26	20.50	1.28	17.98	130	1,827	1,449	42	101,621
	Black Hills Power, Inc.	5.55	22.08	1.29	16.72	97	1,256	417	242	75,135
	CenterPoint Energy Houston Electric, LLC	0.00	7.28	0.52	6.75	1,417	18,260	2	0	2,703,618
	Central Hudson Gas & Electric Corporation	23.71	87.05	12.20	67.91	3,321	18,486	6,454	1,891	272,231
	Central Maine Power Company	9.36	73.10	3.36	34.29	2,201	22,453	6,132	20,880	654,808
	CH Energy Group, Inc.	23.71	87.05	12.20	67.91	3,321	18,486	6,454	1,891	272,231
	Cheyenne Light, Fuel and Power Company	13.76	15.72	1.28	13.17	57	585	611	18	44,415
	Cleco Power LLC	11.26	42.60	0.00	40.61	0	11,882	3,296	13	292,615
	Commonwealth Edison Company	5.91	47.58	4.44	43.05	18,245	176,981	24,306	0	4,111,174
	Consolidated Edison Company of New York, Inc.	15.81	55.61	7.97	39.68	28,628	142,600	56,823	21,146	3,593,840
	Consolidated Water Power Company	58.25	349.51	0.00	349.51	0	36	6	0	103
	Consumers Energy Company	9.86	30.50	3.86	21.29	7,232	39,918	18,483	6	1,875,019
	Delmarva Power & Light Company	18.93	84.38	1.63	82.74	888	45,087	10,314	0	544,897
	Dominion Energy South Carolina, Inc.	7.47	29.99	1.51	23.73	1,174	18,440	5,806	3,214	776,995
	DTE Electric Company	15.59	78.22	0.91	40.56	2,051	91,572	35,199	80,900	2,257,415
	Duke Energy Carolinas, LLC	12.43	33.41	0.57	32.81	1,595	91,601	34,706	28	2,791,711
	Duke Energy Florida, LLC	28.15	29.34	0.54	28.72	1,048	55,516	54,421	16	1,933,053
	Duke Energy Indiana, LLC	2.72	24.99	1.20	23.66	1,056	20,852	2,400	1	881,328
	Duke Energy Kentucky, Inc.	4.48	34.02	1.52	31.83	226	4,740	667	0	148,901
	Duke Energy Ohio, Inc.	0.03	26.77	1.44	25.20	1,072	18,821	19	1	746,993
	Duke Energy Progress, LLC	9.05	34.23	1.28	32.91	2,168	55,568	15,289	18	1,688,590
	Duquesne Light Company	15.13	28.57	1.05	1.67	641	1,018	9,214	0	609,008
	Duquesne Light Holdings, Inc.	15.13	28.57	1.05	1.67	641	1,018	9,214	0	609,008
	Entergy Arkansas, LLC	11.68	41.37	3.18	37.50	2,307	27,198	8,471	111	725,187
	Entergy Louisiana, LLC	17.53	40.64	3.57	36.26	3,932	39,975	19,325	143	1,102,550

X	**Northern States Power Company - MN**	**11.10**	**28.99**	**13.06**	**15.66**	**20,096**	**24,102**	**17,081**	**279**	**1,538,707**
	Entergy Mississippi, LLC	15.02	48.74	2.07	46.01	950	21,149	6,903	82	459,673
	Entergy New Orleans, LLC	24.31	36.09	0.83	34.43	173	7,191	5,077	65	208,865
	Entergy Texas, Inc.	10.95	38.43	0.69	36.86	339	18,192	5,406	62	493,592
	Evergy Kansas Central, Inc.	0.47	56.06	4.52	47.00	3,317	34,493	342	115	733,971
	Evergy Kansas South, Inc.	0.86	52.93	1.59	46.81	542	15,914	293	51	339,987
	Evergy Metro, Inc.	0.96	25.23	6.63	35.16	3,812	20,226	555	130	575,301
	Evergy Missouri West, Inc.	0.53	65.10	6.70	55.19	2,281	18,780	182	35	340,298
	Fitchburg Gas and Electric Light Company, Inc.	110.30	63.32	1.70	61.62	52	1,886	3,376	0	30,607
	Florida Power & Light Company	1.90	15.98	1.23	13.68	7,105	79,023	10,962	0	5,775,824
	Georgia Power Company	7.70	46.20	9.65	31.61	26,001	85,132	20,734	9,513	2,693,353
	Green Mountain Power Corporation	9.54	21.54	2.77	17.35	751	4,711	2,591	31	271,463
	Idaho Power Company	5.02	28.95	2.98	24.59	1,820	15,042	3,069	3	611,597
	Indiana Michigan Power Company	0.13	26.95	1.76	23.88	1,067	14,512	78	47	607,734
	Interstate Power and Light Company	12.44	16.36	2.88	13.47	1,436	6,711	6,194	0	498,042
	Jersey Central Power & Light Company	9.68	30.73	13.46	16.14	15,555	18,651	11,182	1,217	1,155,415
	Kentucky Power Company	20.10	34.55	2.77	31.58	454	5,185	3,300	18	164,184
	Kentucky Utilities Company	10.44	58.59	15.86	36.21	8,990	20,522	5,917	2	566,736
	Kingsport Power Company	0.06	25.65	0.45	24.66	22	1,204	3	9	48,820
	Liberty Utilities (Granite State Electric) Corp.	5.92	31.81	7.65	22.73	353	1,049	273	20	46,148
	Lockhart Power Company	2.08	68.51	8.80	59.71	55	373	13	0	6,247
	Louisville Gas and Electric Company	10.71	27.68	8.00	16.67	3,444	7,173	4,608	3	430,394
	Madison Gas and Electric Company	7.71	50.55	2.17	47.21	354	7,715	1,260	192	163,413
	Massachusetts Electric Company	72.16	56.74	6.06	43.88	4,113	29,799	49,010	2,916	679,142
	Metropolitan Edison Company	21.91	15.80	0.37	14.51	214	8,486	12,818	502	585,024
	MidAmerican Energy Company	9.70	28.49	2.26	23.97	1,841	19,489	7,885	125	813,017
	Minnesota Power Enterprises, Inc.	7.88	33.33	1.86	31.09	280	4,678	1,185	0	150,464
	Mississippi Power Company	9.08	46.61	7.29	33.35	1,395	6,384	1,738	632	191,431
	Monongahela Power Company	1.19	38.82	22.58	15.25	8,938	6,037	472	390	395,813
	Nantucket Electric Co.	89.29	138.50	0.87	120.64	2	277	205	26	2,296
	Nevada Power Company	13.70	25.45	2.14	22.10	2,145	22,126	13,710	0	1,001,006
	New York State Electric & Gas Corporation	19.43	79.36	10.24	34.69	9,387	31,792	17,805	30,083	916,521
	Niagara Mohawk Power Corporation	10.18	29.90	3.07	21.43	4,618	32,188	15,294	5,908	1,502,305
	Northern Indiana Public Service Company, LLC	13.91	22.51	2.53	17.39	1,228	8,429	6,740	0	484,586
	Northern New England Energy Corp.	9.54	21.54	2.77	17.35	751	4,711	2,591	31	271,463
X	**Northern States Power Company - MN**	**11.10**	**28.99**	**13.06**	**15.66**	**20,096**	**24,102**	**17,081**	**279**	**1,538,707**
X	Northern States Power Company - WI	15.74	29.86	10.60	16.63	2,829	4,439	4,202	684	266,952
	NSTAR Electric Company	28.15	40.04	5.03	34.76	7,387	51,047	41,338	364	1,468,705
	Ohio Edison Company	1.53	22.80	8.38	13.27	8,934	14,147	1,635	1,149	1,065,866
	Ohio Power Company	51.94	27.26	1.90	24.38	2,882	37,032	78,893	135	1,519,057
	Oklahoma Gas and Electric Company	3.14	21.72	0.01	19.85	9	17,563	2,776	1,290	884,781
	Oncor Electric Delivery Company LLC	0.04	5.73	0.03	5.70	100	22,053	168	0	3,867,910
	Orange and Rockland Utilities, Inc.	11.59	64.49	3.33	58.10	800	13,956	2,784	734	240,208

X	**Northern States Power Company - MN**	**11.10**	**28.99**	**13.06**	**15.66**	**20,096**	**24,102**	**17,081**	**279**	**1,538,707**
	Otter Tail Power Company	5.17	98.96	44.91	47.50	6,049	6,398	696	851	134,701
	Pacific Gas and Electric Company	19.45	36.91	1.43	35.00	8,036	196,167	109,014	1,690	5,604,442
	PacifiCorp	8.69	28.12	6.63	20.09	13,511	40,915	17,702	0	2,037,048
	PECO Energy Company	24.53	50.43	0.33	48.05	559	81,237	41,465	3,457	1,690,627
	Pennsylvania Electric Company	18.42	17.16	0.47	14.24	279	8,376	10,833	1,399	588,187
	Pennsylvania Power Company	17.78	15.49	1.44	13.01	246	2,215	3,028	164	170,274
	Potomac Electric Power Company	38.07	84.30	0.86	83.44	795	77,388	35,309	0	927,425
	PPL Electric Utilities Corporation	18.44	31.65	0.64	25.82	947	38,030	27,164	4,502	1,472,759
X	Public Service Company of Colorado	17.08	27.87	15.51	12.12	24,072	18,811	26,509	266	1,551,732
	Public Service Company of New Hampshire	10.08	40.44	3.90	31.51	2080	16823	5382	2686	533904
	Public Service Company of New Mexico	6.91	32.14	11.89	20.79	6465	11300	3758	0	543647
	Public Service Company of Oklahoma	0.44	27.12	0.34	25.03	193	14333	254	83	572734
	Public Service Electric and Gas Company	32.39	96.83	7.70	32.52	18080	76314	76015	132818	2346606
	Puget Energy, Inc.	15.32	30.15	10.03	20.01	12142	24224	18549	0	1210394
	Puget Sound Energy, Inc.	15.32	30.15	10.03	20.01	12142	24224	18549	0	1210394
	Rochester Gas and Electric Corporation	6.27	135.38	9.13	26.46	3564	10331	2447	38264	390454
	Rockland Electric Company	7.30	89.23	3.12	55.06	233	4118	546	2322	74786
	San Diego Gas & Electric Company	32.62	31.10	3.36	27.46	3072	25108	29826	241	914421
	Sierra Pacific Power Company	4.71	20.82	3.12	16.33	1159	6057	1746	0	370953
	Southern California Edison Company	20.99	23.93	0.43	19.98	2229	104437	109699	2128	5226509
	Southern Indiana Gas and Electric Company	19.59	6.54	0.89	5.03	137	777	3027	97	154505
	Southwestern Electric Power Company	1.08	37.48	4.55	31.59	2503	17364	591	65	549651
X	Southwestern Public Service Company	21.26	40.50	14.28	25.75	5765	10393	8581	154	403677
	Superior Water, Light and Power Company	18.30	31.69	1.77	24.80	27	378	279	0	15242
	Tampa Electric Company	4.98	37.66	1.08	35.91	886	29436	4086	0	819766
	TECO Energy, Inc.	4.98	37.66	1.08	35.91	886	29436	4086	0	819766
	The Cleveland Electric Illuminating Company	16.31	22.43	8.15	12.94	6160	9775	12320	959	755417
	The Connecticut Light and Power Company	40.01	61.80	3.53	33.96	4501	43341	51068	31027	1276313
	The Dayton Power and Light Company	30.01	34.44	6.58	27.82	3531	14919	16096	0	536317
	The Empire District Electric Company	0.00	0.00	0.00	0.00	439	6401	855	465	181326
	The Narragansett Electric Company	0.00	0.00	0.00	0.00	632	13212	31086	1280	454687
	The Potomac Edison Company	6.48	24.93	10.98	12.94	4789	5643	2825	439	436089
	The Toledo Edison Company	3.85	24.69	8.99	14.39	2821	4514	1208	387	313654
	The United Illuminating Company	99.58	87.86	32.98	52.85	11326	18153	34203	14	343460
	Tucson Electric Power Company	9.62	48.79	0.61	48.18	269	21333	4260	0	442751
	UGI Utilities, Inc.	42.10	34.20	0.69	33.13	43	2077	2639	13	62689
	UIL Holdings Corporation	99.58	87.86	32.98	52.85	11326	18153	34203	14	343460
	Union Electric Company	6.65	35.54	8.27	26.66	10348	33340	8310	109	1250553
	Unitil Energy Systems, Inc.	14.60	43.91	1.35	42.57	109	3440	1180	0	80799
	UNS Electric, Inc.	6.81	37.53	0.82	34.38	84	3501	694	0	101847
	UNS Energy Corporation	9.10	46.68	0.65	45.60	352	24833	4954	0	544598
	Upper Michigan Energy Resources Corporation	26.04	16.19	3.08	12.28	114	455	965	18	37063
	Upper Peninsula Power Company	6.87	51.72	20.84	19.97	1110	1064	366	0	53267
	Vectren, LLC	19.59	6.54	0.89	5.03	137	777	3027	97	154505
	Virginia Electric and Power Company	18.55	22.07	2.97	18.05	8090	49186	50546	0	2725288
	West Penn Power Company	13.31	14.45	2.07	11.48	1522	8444	9789	663	735509
	Westar Energy (KPL)	0.12	58.75	7.04	47.16	2775	18579	49	64	393984
	Wheeling Power Company	8.37	26.54	2.86	23.44	119	974	348	5	41558
	Wisconsin Electric Power Company	22.08	18.33	2.46	15.10	2830	17341	25356	560	1148141
	Wisconsin Power and Light Company	15.64	11.97	2.69	9.28	1319	4552	7673	0	490592
	Wisconsin Public Service Corporation	12.85	18.91	3.41	13.10	1567	6014	5896	813	458948

X	**Northern States Power Company - MN**	**15.68**	**29.38**	**12.75**	**16.38**	**19,849**	**25,494**	**24,400**	**251**	**1,556,301**
	Competitor Group - Mean	**21.11**	**44.90**	**5.10**	**34.82**	**4,002**	**28,436**	**20,465**	**4,190**	**961,612**

Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	Alabama Power Company	8.38	64.90	1.15	57.30	1,768	88,075	12,873	5,375	1,537,035
	Alaska Electric Light and Power Company	3.41	76.95	4.37	72.58	78	1,297	61	0	17,869
	Ameren Illinois Company	22.92	26.72	3.17	22.78	3,889	27,932	28,105	99	1,226,027
	Appalachian Power Company	7.31	31.59	3.21	27.77	3,102	26,815	7,062	143	965,517
	Arizona Public Service Company	17.07	42.39	0.89	36.21	1,218	49,646	23,399	94	1,370,930
	Atlantic City Electric Company	25.21	109.02	13.40	95.62	7,637	54,502	14,370	0	569,973
	Avangrid, Inc.	45.60	95.36	12.54	43.51	29,113	100,983	105,841	84,502	2,321,099
	Baltimore Gas and Electric Company	15.09	39.02	0.77	35.62	1,034	47,612	20,177	1,012	1,336,794
	Berkshire Hathaway Energy Company	14.32	27.84	4.43	21.95	18,951	93,973	61,320	126	4,280,660
	Black Hills Colorado Electric, Inc.	18.19	22.15	1.72	19.24	174	1,945	1,839	29	101,100
	Black Hills Power, Inc.	5.12	22.53	1.71	16.89	130	1,284	389	230	76,036
	CenterPoint Energy Houston Electric, LLC	0.00	6.19	0.42	5.77	1,157	15,899	0	0	2,753,976
	Central Hudson Gas & Electric Corp.	22.35	87.72	12.75	70.07	3,597	19,768	6,306	1,383	282,115
	Central Maine Power Company	7.70	66.39	3.99	37.89	2,660	25,244	5,128	13,428	666,319
	CH Energy Group, Inc.	22.35	87.72	12.75	70.07	3,597	19,768	6,306	1,383	282,115
	Cheyenne Light, Fuel and Power Company	6.07	16.79	1.70	13.91	76	623	272	13	44,791
	Cleco Power LLC	18.19	37.97	0.00	36.43	0	10,728	5,357	18	294,508
	Commonwealth Edison Company	10.84	51.77	3.98	47.71	16,441	197,074	44,780	0	4,130,538
	Consolidated Edison Company of New York, Inc.	7.65	60.51	6.90	43.13	25,145	157,212	27,874	27,759	3,645,153
	Consolidated Water Power Company	58.25	349.51	0.00	349.51	0	36	6	0	103
	Consumers Energy Company	10.19	28.85	5.84	19.08	11,010	35,956	19,210	0	1,884,290
	Delmarva Power & Light Company	16.36	91.90	1.99	89.91	1,094	49,426	8,993	0	549,745
	Dominion Energy South Carolina, Inc.	10.61	33.23	1.06	27.96	835	22,098	8,381	2,906	790,221
	DTE Electric Company	16.54	73.98	0.82	33.22	1,853	75,290	37,477	89,473	2,266,460
	Duke Energy Carolinas, LLC	8.67	27.30	0.33	26.95	937	76,700	24,682	3	2,845,809
	Duke Energy Florida, LLC	17.07	30.38	0.44	29.85	869	58,748	33,607	3	1,968,213
	Duke Energy Indiana, LLC	0.17	24.60	0.75	23.84	671	21,315	155	1	894,160
	Duke Energy Kentucky, Inc.	4.51	26.13	1.25	24.52	189	3,705	682	0	151,127
	Duke Energy Ohio, Inc.	1.27	27.90	1.55	26.23	1,168	19,748	958	1	752,909
	Duke Energy Progress, LLC	6.34	29.45	0.85	28.58	1,463	49,102	10,895	2	1,718,128
	Duquesne Light Company	25.41	25.82	2.74	1.33	1,672	812	15,532	0	611,282
	Duquesne Light Holdings, Inc.	25.41	25.82	2.74	1.33	1,672	812	15,532	0	611,282
	El Paso Electric Company	9.67	39.34	5.71	33.23	2,605	15,164	4,412	182	456,323
	Entergy Arkansas, LLC	13.10	39.29	3.57	34.44	2,606	25,126	9,558	155	729,557
	Entergy Louisiana, LLC	12.64	38.19	3.81	33.12	4,210	36,584	13,963	216	1,104,472
	Entergy Mississippi, LLC	15.88	44.40	1.89	41.38	868	19,039	7,306	98	460,082
	Entergy New Orleans, LLC	21.38	34.92	1.45	32.30	303	6,753	4,470	49	209,071
	Entergy Texas, Inc.	13.28	35.95	1.07	33.43	541	16,927	6,723	100	506,334
	Evergy Kansas Central, Inc.	0.18	60.04	4.07	51.79	3,006	38,255	130	139	738,636
	Evergy Kansas South, Inc.	0.17	56.56	1.12	51.27	385	17,582	59	66	342,905
	Evergy Metro, Inc.	0.77	35.45	5.69	43.73	3,301	25,365	445	154	579,977
	Evergy Missouri West, Inc.	1.26	71.41	5.30	63.65	1,824	21,887	432	41	343,879
	Fitchburg Gas and Electric Light Company, Inc.	97.15	62.21	1.43	60.78	44	1,868	2,986	0	30,736
	Florida Power & Light Company	3.41	16.49	1.33	13.95	7,790	81,530	19,951	0	5,845,147
	Georgia Power Company	9.50	56.96	9.27	43.66	25,345	119,409	25,996	8,951	2,735,261
	Green Mountain Power Corporation	11.88	22.98	2.73	18.91	746	5,162	3,244	1	273,006
	Idaho Power Company	6.12	30.64	3.39	25.81	2,123	16,142	3,830	0	625,440
	Indiana Michigan Power Company	0.13	27.06	2.10	23.54	1,280	14,375	82	62	610,647
	Interstate Power and Light Company	19.42	15.71	3.12	12.59	1,561	6,297	9,711	0	500,038
	Jersey Central Power & Light Company	0.15	26.06	11.63	13.61	13,528	15,833	180	862	1,163,141
	Kentucky Power Company	2.91	32.87	2.30	30.20	375	4,915	473	44	162,742
	Kentucky Utilities Company	4.46	55.69	13.94	34.53	7,939	19,670	2,542	0	569,612
	Kingsport Power Company	0.06	27.11	0.33	26.23	16	1,289	3	11	49,139

	Lockhart Power Company	3.65	69.20	5.55	63.48	35	400	23	0	6,301
	Louisville Gas and Electric Company	7.79	27.98	7.24	17.21	3,143	7,473	3,380	6	434,120
	Madison Gas and Electric Company	7.72	44.75	2.59	40.76	423	6,656	1,260	229	163,278
	Massachusetts Electric Company	71.23	61.42	6.70	47.51	4,252	30,171	45,229	2,810	635,003
	Metropolitan Edison Company	8.24	13.49	0.31	12.43	184	7,314	4,850	393	588,329
	MidAmerican Energy Company	7.29	31.01	6.41	22.33	5,260	18,323	5,985	126	820,668
	Minnesota Power Enterprises, Inc.	4.09	34.88	2.29	32.30	348	4,899	620	0	151,679
	Mississippi Power Company	9.92	63.38	7.81	48.63	1,497	9,323	1,902	617	191,697
	Monongahela Power Company	8.34	36.04	20.99	14.20	8,328	5,635	3,307	304	396,728
	Nevada Power Company	17.12	28.33	1.63	25.25	1,656	25,637	17,375	0	1,015,168
	New York State Electric & Gas Corporation	36.51	97.29	12.14	44.79	11,162	41,168	33,557	35,536	919,140
	Niagara Mohawk Power Corporation	42.66	30.25	2.77	22.45	4,277	34,636	65,805	5,294	1,542,713
	Northern Indiana Public Service Company, LLC	12.14	23.14	2.87	17.77	1,397	8,653	5,914	0	487,079
	Northern New England Energy Corporation	11.88	22.98	2.73	18.91	746	5,162	3,244	1	273,006
X	Northern States Power Company - WI	23.19	31.07	11.06	17.41	2,973	4,679	6,234	682	268,830
X	**Northern States Power Company - MN**	**15.68**	**29.38**	**12.75**	**16.38**	**19,849**	**25,494**	**24,400**	**251**	**1,556,301**
	NSTAR Electric Company	59.21	42.74	4.63	34.84	6,837	51,499	87,517	4,832	1,477,991
	Ohio Edison Company	0.41	21.52	8.24	12.32	8,817	13,178	436	949	1,069,766
	Ohio Power Company	115.44	27.63	1.75	24.90	2,669	37,942	175,901	146	1,523,794
	Oklahoma Gas and Electric Company	5.90	19.30	0.00	17.35	2	15,481	5,261	1,182	892,274
	Oncor Electric Delivery Company LLC	0.37	6.89	0.01	6.88	24	27,090	1,456	0	3,936,106
	Orange and Rockland Utilities, Inc.	6.68	73.85	3.78	63.49	916	15,386	1,618	1,596	242,331
	Otter Tail Power Company	9.65	98.65	44.77	46.15	6,064	6,250	1,307	1,018	135,435
	Pacific Gas and Electric Company	71.21	38.11	1.34	36.00	7,579	203,361	402,317	1,333	5,649,612
	PacifiCorp	16.59	27.40	5.31	20.94	10,977	43,316	34,325	0	2,069,044
	PECO Energy Company	24.75	58.07	0.37	55.51	622	94,383	42,082	3,726	1,700,223
	Pennsylvania Electric Company	10.81	14.48	0.45	12.22	265	7,189	6,358	1,016	588,213
	Pennsylvania Power Company	3.03	13.65	1.00	11.86	171	2,028	518	122	171,046
	Potomac Electric Power Company	34.38	92.81	0.91	91.89	858	86,218	32,259	0	938,263
	PPL Electric Utilities Corporation	35.39	41.87	0.48	36.34	713	53,512	52,112	4,803	1,472,437
X	Public Service Company of Colorado	14.54	26.46	13.61	12.63	21,357	19,825	22,825	250	1,569,461
	Public Service Company of New Hampshire	21.58	46.06	3.43	34.94	1,845	18,771	11,594	4,127	537,201
	Public Service Company of New Mexico	6.48	35.86	14.57	21.84	7,985	11,971	3,549	0	548,019
	Public Service Company of Oklahoma	0.62	28.36	0.33	26.33	192	15,161	356	110	575,846
	Public Service Electric and Gas Company	30.40	98.20	6.98	33.89	16,543	80,296	72,035	135,846	2,369,557
	Puget Energy, Inc.	15.10	33.88	10.35	23.23	12,675	28,439	18,488	188	1,224,326
	Puget Sound Energy, Inc.	15.10	33.88	10.35	23.23	12,675	28,439	18,488	188	1,224,326
	Rochester Gas and Electric Corporation	39.27	126.33	12.90	35.38	5,052	13,856	15,378	29,119	391,614
	Rockland Electric Company	11.76	100.08	3.56	60.66	269	4,579	888	2,707	75,487
	San Diego Gas & Electric Company	186.56	77.01	5.04	71.76	2,583	36,786	95,636	108	512,632
	Sierra Pacific Power Company	9.67	21.94	2.82	17.82	1,058	6,697	3,635	0	375,780
	Southern California Edison Company	21.42	26.15	0.46	21.84	2,441	114,979	112,733	2,966	5,263,405
	Southern Indiana Gas and Electric Company	11.97	10.10	0.84	8.61	131	1,336	1,858	100	155,182
	Southwestern Electric Power Company	0.01	37.69	4.67	32.25	2,576	17,803	6	84	552,060
X	Southwestern Public Service Company	25.85	42.06	15.12	26.46	6,146	10,756	10,507	156	406,427
	Superior Water, Light and Power Company	19.72	32.13	2.09	25.66	32	393	302	0	15,315
	Tampa Electric Company	10.75	41.52	3.94	37.07	3,283	30,921	8,964	0	834,144
	TECO Energy, Inc.	10.75	41.52	3.94	37.07	3,283	30,921	8,964	0	834,144
	The Cleveland Electric Illuminating Company	8.86	21.10	7.88	11.76	5,962	8,898	6,701	1,046	756,673
	The Connecticut Light and Power Company	100.76	60.48	3.74	36.13	4,793	46,309	129,138	26,416	1,281,654
	The Dayton Power and Light Company	80.49	38.11	5.68	33.21	3,064	17,907	43,397	0	539,127
	The Empire District Electric Company	12.62	37.20	2.53	32.03	465	5,893	2,322	360	183,990
	The Narragansett Electric Company	40.44	43.28	0.55	36.69	222	14,825	16,338	1,784	404,034
	The Potomac Edison Company	4.46	23.11	10.50	11.80	4,639	5,213	1,971	323	441,657
	The Toledo Edison Company	0.01	22.33	8.15	13.17	2,569	4,149	4	292	315,061
	The United Illuminating Company	150.51	111.08	29.76	60.21	10,238	20,715	51,779	6,419	344,026
	Tucson Electric Power Company	15.59	51.68	0.41	51.27	183	22,906	6,967	0	446,762
	UGI Utilities, Inc.	52.83	44.67	0.54	43.38	34	2,722	3,315	15	62,743
	UIL Holdings Corporation	150.51	111.08	29.76	60.21	10,238	20,715	51,779	6,419	344,026
	Union Electric Company	7.78	36.13	6.48	28.94	8,130	36,297	9,752	117	1,254,162
	Unitil Energy Systems, Inc.	14.51	45.30	1.42	43.88	115	3,548	1,173	0	80,854
	UNS Electric, Inc.	10.41	39.64	0.87	36.27	90	3,754	1,077	0	103,494
	UNS Energy Corporation	14.62	49.42	0.50	48.45	274	26,660	8,044	0	550,256
	Upper Michigan Energy Resources Corporation	35.93	13.42	2.36	10.28	88	383	1,338	19	37,244
	Upper Peninsula Power Company	9.05	55.77	22.06	22.94	1,180	1,227	484	0	53,483
	Vectren, LLC	11.97	10.10	0.84	8.61	131	1,336	1,858	100	155,182
	Virginia Electric and Power Company	23.65	25.68	2.72	21.82	7,481	60,064	65,092	504	2,752,726
	West Penn Power Company	4.99	12.70	1.43	10.48	1,055	7,731	3,679	524	737,355
	Westar Energy (KPL)	0.18	63.07	6.62	52.24	2,621	20,673	71	73	395,731
	Wheeling Power Company	12.00	23.45	1.67	21.52	69	891	497	6	41,401
	Wisconsin Electric Power Company	20.79	15.16	2.11	12.24	2,450	14,192	24,105	635	1,159,300
	Wisconsin Power and Light Company	14.14	10.05	2.65	7.40	1,313	3,666	7,002	0	495,097
	Wisconsin Public Service Corporation	8.33	14.53	2.33	9.88	1,079	4,574	3,860	871	463,129

X	**Northern States Power Company - MN**	**11.44**	**30.63**	**13.29**	**17.11**	**20,966**	**26,997**	**18,042**	**232**	**1,577,476**
	Competitor Group - Mean	**22.67**	**48.25**	**4.84**	**35.88**	**3,685**	**29,257**	**24,229**	**5,374**	**979,291**
Xcel Energy	Company Name	Uncollectible Accounts per Retail Customer (904)	Customer Care Accts Exp per Retail Customer (901-905 less 904)	Meter Reading Exp per Retail Customer (902)	Customer Records & Collection Exp per Retail Customer (903)	Cust Accts-Meter Reading Exp ($000)	Cust Accts-Cust Rec & Coll Exp ($000)	Cust Accts-Uncollectible Accts ($000)	Cust Accts-Cust Acct Exp ($000)	Ult Consumer Electric Customers
	AES Indiana	51.61	32.32	3.41	22.34	1,809	11,860	27,393	0	530,802
	Alabama Power Company	15.13	66.92	1.27	57.78	1,960	89,388	23,415	7,555	1,547,153
	Alaska Electric Light and Power Company	3.61	79.20	2.67	76.53	48	1,378	65	0	18,005
	Ameren Illinois Company	17.63	27.09	3.57	22.13	4,387	27,170	21,638	96	1,227,657
	Appalachian Power Company	13.93	31.31	2.04	28.94	1,970	27,995	13,480	112	967,408
	Arizona Public Service Company	25.57	43.07	0.74	39.35	1,030	55,095	35,799	132	1,400,036
	Atlantic City Electric Company	24.68	107.73	7.99	99.73	4,579	57,125	14,135	0	572,774
	Avangrid, Inc.	61.41	117.27	11.88	46.87	27,702	109,310	143,226	128,884	2,332,269
	Baltimore Gas and Electric Company	18.49	46.70	0.81	38.61	1,081	51,839	24,821	7,519	1,342,757
	Bear Valley Electric Service, Inc.	14.14	19.74	-4.15	9.15	-103	227	351	366	24,817
	Berkshire Hathaway Energy Company	12.39	28.99	3.51	22.04	15,289	95,894	53,892	152	4,350,360
	Black Hills Colorado Electric, Inc.	12.21	19.88	2.04	16.51	207	1,679	1,242	37	101,717
	Black Hills Power, Inc.	5.78	21.37	2.08	14.91	161	1,156	448	261	77,523
	CenterPoint Energy Houston Electric, LLC	0.32	6.58	0.40	6.19	1,120	17,395	900	0	2,812,185
	Central Hudson Gas & Electric Corporation	27.68	117.02	18.79	93.48	5,038	25,069	7,423	1,275	268,174
	Central Maine Power Company	11.31	84.91	3.34	40.63	2,245	27,333	7,610	24,396	672,682
	CH Energy Group, Inc.	27.68	117.02	18.79	93.48	5,038	25,069	7,423	1,275	268,174
	Cheyenne Light, Fuel and Power Company	5.55	15.73	2.00	12.38	91	562	252	16	45,391
	Cleco Power LLC	6.35	41.89	0.00	39.73	0	11,736	1,876	20	295,385
	Commonwealth Edison Company	17.10	56.04	3.93	52.04	16,223	214,978	70,649	0	4,130,749
	Consolidated Edison Company of New York, Inc.	16.75	64.76	6.87	49.05	25,845	184,430	62,968	21,543	3,759,848
	Consolidated Water Power Company	20.83	375.00	0.00	375.00	0	36	2	0	96
	Consumers Energy Company	10.67	22.60	3.59	15.66	6,801	29,660	20,210	0	1,893,531
	Delmarva Power & Light Company	17.21	95.94	3.60	92.34	1,996	51,230	9,549	0	554,789
	Dominion Energy South Carolina, Inc.	8.85	34.67	1.27	30.24	1,027	24,388	7,139	2,266	806,434
	DTE Electric Company	21.72	79.63	1.02	35.45	2,325	80,797	49,506	96,979	2,279,071
	Duke Energy Carolinas, LLC	11.32	29.07	0.30	28.72	871	83,480	32,900	3	2,907,066
	Duke Energy Florida, LLC	11.45	32.32	0.38	31.89	764	64,076	23,013	2	2,009,463
	Duke Energy Indiana, LLC	7.29	26.13	0.94	25.18	858	22,889	6,624	2	909,011
	Duke Energy Kentucky, Inc.	3.78	28.10	1.07	26.55	165	4,091	583	0	154,073
	Duke Energy Ohio, Inc.	16.86	27.65	1.21	26.34	916	20,016	12,809	1	759,800
	Duke Energy Progress, LLC	11.79	30.08	0.68	29.23	1,199	51,264	20,676	2	1,753,575
	Duquesne Light Company	24.04	27.03	2.82	1.48	1,732	910	14,753	0	613,787
	Duquesne Light Holdings, Inc.	24.04	27.03	2.82	1.48	1,732	910	14,753	0	613,787
	El Paso Electric Company	10.19	48.01	5.17	42.09	2,374	19,339	4,683	345	459,472
	Entergy Arkansas, LLC	14.86	36.42	3.18	32.18	2,328	23,575	10,886	105	732,671
	Entergy Louisiana, LLC	9.62	35.62	3.44	30.99	3,817	34,368	10,667	146	1,109,156
	Entergy Mississippi, LLC	15.27	47.35	2.37	43.95	1,092	20,223	7,029	64	460,181
	Entergy New Orleans, LLC	37.46	38.49	0.69	36.23	144	7,567	7,823	27	208,845
	Entergy Texas, Inc.	22.05	31.70	0.72	29.71	372	15,428	11,447	67	519,216
	Evergy Kansas Central, Inc.	0.01	64.23	4.46	54.63	3,315	40,626	5	101	743,720
	Evergy Kansas South, Inc.	-0.02	61.32	1.59	54.45	550	18,866	-7	48	346,494
	Evergy Metro, Inc.	2.03	-37.31	5.11	-45.02	2,986	-26,333	1,189	79	584,892
	Evergy Missouri West, Inc.	-1.49	72.43	5.02	64.90	1,740	22,505	-515	29	346,783
	FirstEnergy Pennsylvania Electric Company	18.86	12.65	0.95	10.95	1,994	22,890	39,429	1,434	2,090,443
	Fitchburg Gas and Electric Light Company, Inc.	54.76	63.69	1.46	62.24	45	1,922	1,691	0	30,882
	Florida Power & Light Company	3.47	14.05	1.20	12.00	7,122	71,506	20,699	0	5,959,738
	Georgia Power Company	18.32	54.76	10.34	39.35	28,748	109,381	50,924	11,346	2,779,760
	Green Mountain Power Corporation	6.76	24.42	2.91	20.32	800	5,581	1,856	0	274,636
	Idaho Power Company	7.22	31.66	3.25	26.98	2,086	17,312	4,631	0	641,566
	Indiana Michigan Power Company	0.26	26.86	1.58	24.34	973	14,957	158	52	614,578
	Interstate Power and Light Company	22.91	16.04	3.32	12.73	1,666	6,395	11,511	0	502,520
	Jersey Central Power & Light Company	3.91	22.49	8.71	13.27	10,207	15,551	4,579	518	1,171,836
	Kentucky Power Company	0.12	32.16	2.14	29.82	347	4,846	20	20	162,506
	Kentucky Utilities Company	6.26	50.30	9.71	33.20	5,573	19,061	3,595	4	574,094
	Kingsport Power Company	0.14	26.31	0.38	25.62	19	1,268	7	9	49,488
	Liberty Utilities (Granite State Electric) Corp.	23.52	28.91	8.57	19.16	401	896	1,100	-2	46,769

	Lockhart Power Company	3.47	69.80	6.62	63.18	42	401	22	0	6,347
	Louisville Gas and Electric Company	6.62	28.14	6.16	18.18	2,695	7,956	2,897	3	437,737
	Madison Gas and Electric Company	33.79	50.12	3.73	45.00	619	7,476	5,614	233	166,128
	Massachusetts Electric Company	127.36	85.00	9.05	63.62	5,279	37,119	74,309	5,198	583,453
	MidAmerican Energy Company	7.00	28.53	4.43	21.39	3,671	17,740	5,805	152	829,293
	Minnesota Power Enterprises, Inc.	4.81	34.53	2.00	32.49	305	4,949	733	0	152,342
	Mississippi Power Company	10.76	64.36	7.50	49.44	1,444	9,513	2,070	582	192,416
	Monongahela Power Company	11.50	34.89	21.23	13.15	8,433	5,224	4,569	175	397,165
	Nantucket Electric Company	-60.28	89.33	0.87	66.78	2	154	-139	34	2,306
	National Grid USA	77.94	42.46	3.67	32.02	9,774	85,193	207,344	12,990	2,660,288
	Nevada Power Company	17.73	28.73	1.36	25.89	1,408	26,795	18,353	0	1,035,146
	New York State Electric & Gas Corporation	46.18	110.80	11.89	47.41	10,954	43,683	42,553	45,492	921,367
	Niagara Mohawk Power Corporation	62.58	32.19	2.72	23.53	4,248	36,700	97,612	6,908	1,559,866
	Northern Indiana Public Service Company, LLC	12.92	23.81	3.17	18.15	1,556	8,907	6,340	0	490,666
	Northern New England Energy Corporation	6.76	24.42	2.91	20.32	800	5,581	1,856	0	274,636
X	**Northern States Power Company - MN**	**11.44**	**30.63**	**13.29**	**17.11**	**20,966**	**26,997**	**18,042**	**232**	**1,577,476**
X	Northern States Power Company - WI	11.20	34.02	12.50	18.94	3,391	5,139	3,040	680	271,318
	NorthWestern Energy Public Service Corporation	1.51	21.92	0.75	20.39	49	1,325	98	50	64,971
	NSTAR Electric Company	36.69	41.22	4.34	33.38	6,480	49,787	54,724	5,216	1,491,561
	Ohio Edison Company	11.17	20.80	8.46	11.74	9,089	12,608	12,000	577	1,074,067
	Ohio Power Company	123.85	27.84	1.54	25.43	2,357	38,984	189,901	183	1,533,265
	Oklahoma Gas and Electric Company	4.60	16.51	0.00	12.79	1	11,544	4,148	2,632	902,714
	Oncor Electric Delivery Company LLC	0.51	7.65	0.02	7.60	67	30,492	2,062	0	4,010,972
	Orange and Rockland Utilities, Inc.	9.27	78.57	4.06	69.99	995	17,133	2,269	1,106	244,791
	Otter Tail Power Company	8.94	82.66	33.09	41.32	4,484	5,599	1,212	1,025	135,519
	Pacific Gas and Electric Company	41.41	39.48	1.27	37.11	7,254	212,497	237,082	1,768	5,725,428
	PacifiCorp	12.07	30.57	4.35	21.15	9,146	44,504	25,389	0	2,104,050
	PECO Energy Company	49.71	61.90	0.08	59.53	128	101,444	84,711	3,908	1,704,093
	Pennsylvania Electric Company	18.86	12.65	0.95	10.95	1,994	22,890	39,429	1,434	2,090,443
	Potomac Electric Power Company	40.12	95.47	1.06	94.41	1,005	89,666	38,099	0	949,732
	PPL Electric Utilities Corporation	37.41	33.07	0.46	25.19	684	37,466	55,638	8,137	1,487,306
X	Public Service Company of Colorado	13.58	24.32	11.21	12.89	17,821	20,490	21,593	243	1,589,710
	Public Service Company of New Hampshire	15.12	47.71	3.47	35.75	1,881	19,378	8,197	4,602	542,057
	Public Service Company of New Mexico	7.54	35.62	14.87	21.44	8,219	11,847	4,059	0	552,638
	Public Service Company of Oklahoma	0.29	28.59	0.14	26.62	83	15,459	171	108	580,734
	Public Service Electric and Gas Company	45.49	78.95	6.35	36.35	15,183	86,874	108,734	86,656	2,390,225
	Rochester Gas and Electric Corporation	73.81	105.83	8.53	38.01	3,346	14,911	28,958	21,760	392,343
	Rockland Electric Company	9.68	114.73	3.87	67.56	294	5,137	736	3,292	76,040
	San Diego Gas & Electric Company	94.40	108.73	6.55	102.07	2,248	35,056	32,421	38	343,438
	Sierra Pacific Power Company	11.38	21.98	2.79	17.95	1,064	6,855	4,345	0	381,871
	Southern California Edison Company	53.78	27.98	0.59	24.25	3,149	128,594	285,220	2,707	5,303,072
	Southern Indiana Gas and Electric Company	16.97	6.75	0.71	5.39	111	844	2,659	103	156,686
	Southwestern Electric Power Company	0.13	36.85	3.92	31.99	2,172	17,741	72	85	554,530
X	Southwestern Public Service Company	22.68	43.68	18.47	24.79	7,549	10,134	9,270	133	408,769
	Superior Water, Light and Power Company	19.66	34.31	4.69	27.28	72	419	302	0	15,362
	Tampa Electric Company	10.18	41.93	5.23	36.28	4,447	30,837	8,652	0	849,877
	TECO Energy, Inc.	10.18	41.93	5.23	36.28	4,447	30,837	8,652	0	849,877
	The Cleveland Electric Illuminating Company	9.17	19.86	7.80	11.13	5,917	8,438	6,953	663	758,454
	The Connecticut Light and Power Company	62.18	106.27	3.79	38.00	4,894	49,057	80,265	83,228	1,290,879
	The Dayton Power and Light Company	60.15	46.47	4.77	28.26	2,564	15,185	32,322	0	537,339
	The Empire District Electric Company	22.06	45.15	1.91	40.98	357	7,674	4,131	311	187,269
	The Narragansett Electric Company	68.87	25.26	0.48	22.02	245	11,332	35,443	805	514,663
	The Potomac Edison Company	5.27	21.98	10.67	10.81	4,786	4,848	2,365	195	448,460
	The Toledo Edison Company	10.47	22.72	9.05	12.75	2,859	4,029	3,310	274	316,086
	The United Illuminating Company	185.35	210.42	32.26	67.61	11,158	23,384	64,109	37,236	345,877
	Tucson Electric Power Company	12.81	52.99	0.27	52.72	124	23,824	5,790	0	451,936
	UGI Utilities, Inc.	57.63	39.29	0.44	38.25	28	2,407	3,626	0	62,922
	UIL Holdings Corporation	185.35	210.42	32.26	67.61	11,158	23,384	64,109	37,236	345,877
	Union Electric Company	7.77	33.84	4.66	27.80	5,892	35,153	9,827	123	1,264,469
	Unitil Energy Systems, Inc.	14.13	43.89	1.30	42.59	106	3,469	1,151	0	81,451
	UNS Electric, Inc.	13.38	41.23	0.70	37.97	74	3,985	1,404	0	104,965
	UNS Energy Corporation	12.92	50.78	0.36	49.94	199	27,809	7,194	0	556,901
	Upper Michigan Energy Resources Corporation	13.25	13.87	2.17	10.86	81	405	494	19	37,284
	Upper Peninsula Power Company	11.41	57.91	21.56	24.54	1,158	1,318	613	0	53,704
	Vectren, LLC	16.97	6.75	0.71	5.39	111	844	2,659	103	156,686
	Virginia Electric and Power Company	15.72	30.35	2.27	25.61	6,326	71,286	43,765	522	2,783,257
	Westar Energy (KPL)	0.03	66.78	6.96	54.78	2,765	21,761	12	53	397,226
	Wheeling Power Company	12.66	20.32	0.39	19.71	16	813	522	5	41,242
	Wisconsin Electric Power Company	24.79	15.26	2.00	12.45	2,341	14,570	29,014	580	1,170,318
	Wisconsin Power and Light Company	20.40	14.64	2.36	12.27	1,181	6,130	10,186	0	499,391
	Wisconsin Public Service Corporation	11.38	14.67	2.31	10.09	1,083	4,721	5,323	830	467,910

Measuring the Voice of our Customers with J.D. Power Satisfaction

Xcel Energy participates in the J.D. Power Electric Utility Residential Customer Satisfaction study to capture the voice of our customers across a broad spectrum of satisfaction categories.

J.D. Power is an independent global research firm that provides services to several industries, including the energy industry. As it pertains to the energy industry, J.D. Power performs ongoing benchmarking studies that assess how utilities have performed compared to one another in several customer service-related categories.

The Company does not retain J.D. Power to perform its surveys; rather, J.D. Power performs the surveys and makes the results available annually via subscription. The Company subscribes to the J.D. Power survey because the Company finds value in understanding the issues that are important to customers nationally and regionally, as well as how its customers rate its service performance compared to other utilities.

The J.D. Power study uses a ratings scale of 1 to 10, where 10 represents very satisfied and 1 represents very dissatisfied. J.D. Power uses an index to combine customer scores to create a single overall satisfaction score, which is on a 1,000 point scale.

J.D. Power has historically identified through ongoing analysis the top drivers of customer satisfaction. Utilities use this information to understand and prioritize activities to improve satisfaction. J.D. Power results are shared with business areas so they have timely information from which to make necessary changes to better serve customers.

The following table summarizes our performance from 2020 to 2024. It also includes some examples of what J.D. Power collects regarding each of these categories.

J.D. Power Utility Residential Study Results: Xcel Energy NSPM Index score on 1,000 point scale as calculated by J.D. Power

Factor	2022	2023	2024
Price (i.e., total monthly cost, fairness, options, easy to understand, help in managing usage)	652	652	652
Power Quality & Reliability (i.e., quality power, avoiding outages, reliable during extreme weather, prompt restoration, outage communications)	784	783	773
Billing & Payment (i.e., reasonableness of billing cycle, clarity of bill, ease, variety of methods to pay)	781	784	773
Corporate Citizenship (i.e., community involvement, environmental stewardship, energy efficiency focused, develops future energy plans)	680	686	687
Communications (i.e., variety of communications used, safety, communicating changes, messages that get attention)	701	713	704
Customer Care (i.e., phone ease of use, rep clarity, promptness, courteousness, knowledge, concern, clarity, timeliness, online appearance, clarity, ease, timeliness, helpfulness, in-person promptness, courtesy, knowledge, concern, clarity, timeliness)	781	776	757

In 2025, J.D. Power transitioned the customer satisfaction index to a new methodology based on 8 dimensions instead of the previously used 6 factors:

- Safety & Reliability
- Problem Resolution
- Ease of Doing Business
- Digital Channels
- People
- Cost
- Trust
- Information Provided

Rating scales were also shifted, moving from a 10-pt to 6-pt scale with anchors of "Poor" and "Perfect" – the new six-point scale is: 1-Poor, 2-Just OK, 3-Good, 4-Great, 5-Excellent, 6-Perfect; the prior scale for overall satisfaction was: 1-Unacceptable, 2, 3 ,4 ,5-Average, 6, 7, 8, 9, 10-Outstanding. Overall customer satisfaction and all dimensions index scores are created using an 1,000-point scale. The table below summarizes our performance over in 2025 in these new dimensions as well as examples of what each dimension includes

2025 J.D. Power Utility Residential Study Results: Xcel Energy NSPM Index score on 1,000 point scale as calculated by J.D. Power

Dimension	2025 Q2 YTD
Safety & Reliability (i.e., consistency and dependability of electric services, including outage management)	599
Problem Resolution (i.e., effectiveness in resolving customer issues)	557
Ease of Doing Business (i.e., simplicity and convenience of interactions with the utility)	581
Digital Channels (i.e., experience with online tools, apps, and digital communications)	527
People (i.e. customer service and interactions with utility staff)	557
Cost (i.e., perceived value and affordability of electric service)	396
Trust (i.e., confidence in the utiliti's integrity and reliability)	535
Information Provided (i.e., quality and clarity of communications from the utility)	535

J.D. Power reports satisfaction performance based on region by utility. J.D. Power additionally provides a summary capable of breakouts between NSPM and NSPW within the Midwest Large region.

As mentioned, the J.D. Power study measures customer satisfaction with utilities nationally, which includes over 152 utilities as of 2025. The table below provides a five and a half year history over our overall satisfaction index score and how that compares to the average score in our region as well as our quartile performance in the Midwest Large region. Note that the Midwest Large region contains fifteen brands; although scores can bunch together, quartile ranking forces the utilities apart by sorting.

Again, J.D. Power fundamentally changed their survey methodology for 2025 for capturing overall satisfaction in an effort to force utility scores apart, using a new 6-pt scale and moving away from the previously used 10-pt scale.

J.D. Power Utility Residential Customer Satisfaction Study
Regional Benchmarks

J.D. Power Study	Indicators	2022	2023	2024	2025 Q2 YTD
Residential Customers[1]	Xcel Energy NSPM Quartile Achievement	4	1	1	1
	NSPM Customer Satisfaction Index Score	729	731	725	530
	Midwest Large Segment - Average Index Score	737	718	716	519

[1] This study includes electric customers and electric/gas combination customers.

XCEL ENERGY WRITE-OFF POLICY

MN / PSCO / WI Operating Companies

Once an account is finaled and has aged **139** working days past the final bill due date or an account is settled in full, the following events take place:

SPS Operating Company

Once an account is finaled and has aged **119** working days past the final bill due date or the account is settled in full, the following events take place:

- Debtors with a balance of $1000 or less go directly to write-off in Daily Processing in the Customer Resource System (CRS).

- Accounts with a balance of over $1000 need to be worked manually.
    - A *'Pending Write-offs'* report is created for all debtors that are ready to be written-off but have not been written-off by CRS. This Webi report is reviewed by skiptracers to search for an active account for the same debtor to transfer the past due amount to, and/or to collect money if possible. If they are unable to find a current account for the same debtor the past due amount is manually written-off. (Refer to *Write-off Requests, Manual Approval Procedures* for process steps).

- For debt meeting the criteria above for manual processing, (MN, PSCo, WI **139** working days past the final bill due date over $1000, and SPS **119** working days past the final bill due date over $1000) items will be processed for up to 30 days from the Pending Write Off report with one of the following actions taking place by day 30 of the item being in the queue:
  1-Transfer balance to new using account 2-Collection of debt 3-Write off.

- Enforcement of the 30-day processing will be managed with a new report to identify and track all accounts aged later than the **119/139** date, and ensure any uncollectible account is written off by the cutoff date unless there is evidence of collectibility to the contrary (collections incoming or a legitimate promise to pay in place). Changes will be minimized as much as possible and any changes will require the approval of the Vice President CES.

Commodity Bad Debt Expense

Actual Bad Debt Gross Write-offs	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	$ 23,915,036	$ 30,253,790	$ 34,041,087		
Total Company NSP MN Gas (MN, ND)	$ 3,129,414	$ 4,359,527	$ 5,126,161		
MN Jurisdiction Gas (MN only)	$ 2,737,039	$ 3,788,952	$ 4,440,813		

Gross Recoveries of Bad Debt & Other	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	$ (4,683,797)	$ (4,566,798)	$ (6,686,573)		
Total Company NSP MN Gas (MN, ND)	$ (612,901)	$ (658,069)	$ (1,006,914)		
MN Jurisdiction Gas (MN only)	$ (536,053)	$ (571,941)	$ (872,294)		

Reserve for Bad Debt	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	$ (1,020,444)	$ 2,876,227	$ (6,782,044)		
Total Company NSP MN Gas (MN, ND)	$ (133,531)	$ 414,460	$ (1,021,291)		
MN Jurisdiction Gas (MN only)	$ (116,788)	$ 360,215	$ (884,748)		

Total Bad Debt Expense	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	$ 18,210,795	$ 28,563,219	$ 20,572,471	$ 25,569,820	$ 26,611,292
Total Company NSP MN Gas (MN, ND)	$ 2,382,983	$ 4,115,918	$ 3,097,956	$ 3,891,611	$ 4,062,027
MN Jurisdiction Gas (MN only)	$ 2,084,197	$ 3,577,227	$ 2,683,772	$ 3,371,252	$ 3,518,882

Billed Commodity Revenue	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	$ 5,249,301,436	$ 5,142,938,274	$ 4,563,149,900	$ 4,845,529,024	$ 5,342,559,933

Bad Debt Expense / Commodity Revenue	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Total Company NSP MN (MN, ND & SD)	0.35%	0.56%	0.45%	0.53%	0.50%

NSP MN Commodity Bad Debt Jurisdictional Allocators	2022 Actual	2023 Actual	2024 Actual	2025 YE July Forecast	2026 Test Year
Minnesota Gas	87.46%	86.91%	86.63%	86.63%	86.63%

(Amounts in $'s)

	2022 Actual		2023 Actual		2024 Actual		2025 July Forecast		2026 Plan Year	
	Total Gas	Mn Jurisdiction	Total Gas	Mn Jurisdiction	Total Gas	Mn Jurisdiction	Total Gas	Mn Jurisdiction	Total Gas	Mn Jurisdiction
Customer Care Non-Commodity (1)	21,285	18,616	42,392	36,843	54,794	47,468	49,252	42,667	49,250	42,665
Distribution Operations (2)	276,303	241,659	(52,412)	(45,553)	11,773	10,199	8,222	7,123	-	-
	297,588	260,276	(10,021)	(8,709)	66,567	57,667	57,474	49,789	49,250	42,665

(1) Miscellaneous charges such as returned check and connection-related fees

(2) Distribution Contributions In Aid Of Construction, and charges for requests made by customers for non-standard equipment or set-up; claims against third parties that damage the Company's electric and gas facilities.