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Xcel Energy	Information Request No.	9
Docket No.:	E002/M-25-142	
Response To:	Minnesota Public Utilities Commission	
Requestor:	Hanna Terwilliger, Sophie Nikitas	
Date Received:	May 4, 2026	

Question:

After the Company's March 19, 2026 Reply Comments, the Department modified its recommendation for the Commission to order Xcel to provide a cost-benefit analysis of at least three discretionary programs with a goal of reviewing a total five-year budget of at least \$250 million by adding:

C.6: Xcel shall meet its \$250 million goal unless the Company can demonstrate that no portfolio of projects can meet the goal under the following screening criteria:

- a. Clear, quantifiable benefit streams (such as avoided Customer Minutes Out (CMOs) or targeted operations and maintenance (O&M) savings),
- b. Stable and reliable data inputs, and
- c. No mandatory components are triggered by inspection thresholds or safety requirements.

Could you please now clarify if you support, oppose, or wish to modify this recommendation further?

Response:

The Company opposes the modified recommendation because it effectively imposes a conditional requirement to prove a negative regarding all distribution projects and programs and may distort project prioritization, undermining the purpose of discretionary planning. As the Company explained in its Reply Comments, setting a dollar threshold could inadvertently incentivize the selection of programs based on meeting an accounting target rather than addressing system needs.

Preparer:	Mike Renman
Title:	Manager, Electric System
Department:	Electric Distribution System
Telephone:	651-229-2509
Date:	May 18, 2026