



March 4, 2026

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: CEO support for comments of the Minnesota Department of Commerce
Docket Nos. E002/CN-23-212 and E002/RP-24-67

Dear Ms. Bergman:

On March 2, 2026, the MN Department of Commerce (Commerce) filed a letter in the above-referenced docket, recommending the Minnesota Public Utilities Commission (Commission) order Xcel Energy to develop a customer tariff to support customer-owned thermal batteries. Clean Grid Alliance, Minnesota Center for Environmental Advocacy, and Fresh Energy (collectively, “the CEOs”) support this approach.

The CEOs supported the settlement in Xcel Energy’s latest integrated resource plan, including Order Point 23 directing Xcel Energy to explore the options for a thermal battery pilot that would “provide learning opportunities for scalability of the thermal battery technology and potential for optimization of any renewable resources that provide energy for storage in the thermal battery.”¹ The CEOs are disappointed that the utility is not moving forward with a pilot at this time, but we believe that Commerce’s proposed alternative will provide an appropriate alternative pathway to facilitate the deployment of thermal battery technology on the grid.

As stated in the CEOs’ December 4, 2024, Initial Comments in support of the proposed settlement in this docket, thermal batteries are an important technology that can provide grid flexibility, mitigate the impacts of renewable energy curtailments, reduce industrial-source emissions, and make progress toward satisfying Minnesota’s 100% carbon-free standard. If Xcel cannot move forward with a pilot to demonstrate these benefits to the system, facilitating customer investment in the technology through an appropriate tariff provides another pathway for deployment of this innovative technology.

For these reasons, the CEOs support Commerce’s proposal and request the Commission order Xcel to develop a tariff addressing customer-owned thermal energy systems consistent with Commerce’s request.

¹ April 21, 2025 Order Approving Settlement Agreement with Modifications in Docket Nos. E002/CN-23-212/RP-24-67.

Respectfully submitted this 4th day of March, 2026,

/s/ Amelia Vohs

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CERTIFICATE OF SERVICE

I, Akilah Sanders-Reed, hereby certify that I have this day served copies of the following document on the attached list of persons via electronic filing.

CEO Letter in Support for Comments of the Minnesota Department of Commerce

Docket Nos. E002/CN-23-212 and E002/RP-24-67

Dated this 4th day of March, 2026

/s/ Akilah Sanders-Reed
Akilah Sanders-Reed
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This list is subject to change until the submission has been completed.

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Stalberger	Michael	michael.stalberger@blueearthcountymn.gov	Blue Earth County		24-67	No
Stalpes	Sean	sean.stalpes@state.mn.us		Public Utilities Commission	23-212Official	No
Staples Fairbanks III	LeRoy	leroy.fairbanks@llojbwe.net	Leech Lake Band of Ojibwe		24-67	No
Starns	Byron E.	byron.starns@stinson.com	STINSON LLP		23-212Official	No
					24-67	No
Strohfus	Mark	mstrohfus@greenergy.com	Great River Energy		24-67	No
Strong	Samuel	sam.strong@redlakenation.org	Red Lake Nation		24-67	No

Last Name	First Name	Email	Organization	Agency	Service List	View Trade Secret
Sullivan	Timothy	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		24-67	No
Sunderman	David	daves@benco.org	BENCO (DUPLICATE)		24-67	No
Tanhoff	Camille	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		24-67	No
Thompson	Tim	tthompson@lrec.coop	Lake Region Electric Cooperative		24-67	No
Tolley	Geoffrey	geoff.tolley@gmail.com			24-67	No
Trusty	Jayne	execdir@swrdc.org	SWRDC		23-212Official	No
Trutna	Caralyn	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		24-67	No
Tyler	Jen	tyler.jennifer@epa.gov	US Environmental Protection Agency		23-212Official	No
Van Norman	Jackie	jvannorman@grenergy.com	Great River Energy		24-67	No
Villella	Sam	sdvillella@gmail.com			24-67	No
Vita	Carla	carla.vita@state.mn.us	MN DEED		23-212Official	No
					24-67	No
Voeck	Julie	julie.voeck@nee.com	NextEra Energy Resources, LLC		23-212Official	No
Vohs	Amelia	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		23-212Official	No
					24-67	No
Waite	Trent	twaite@grenergy.com			24-67	No
Warzecha	Cynthia	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		23-212Official	No
Wei	Julianna	julianna.wei@rondo.com	Rondo Energy, Inc.		23-212Official	No
Westra	Heather	heather.westra@piic.org	Prairie Island Indian Community		24-67	No
Whipple	Alan	sa.property@state.mn.us		Minnesota Department Of Revenue	23-212Official	No
White	Steve	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		24-67	No
Whitebear	Cody	cody.whitebear@piic.org	Prairie Island Indian Community		24-67	No
Williams	John	jwilliams@grenergy.com	Great River Energy		24-67	No
Williams	Laurie	laurie.williams@sierraclub.org	Sierra Club		23-212Official	No
Wind	Virgil	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		24-67	No
Windler	Joseph	jwindler@winthrop.com	Winthrop & Weinstine		23-212Official	No
					24-67	No
Witwer	Rob	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		23-212Official	No
Wolfgram	Jonathan	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	23-212Official	No
Wulling	Tim	t.wulling@earthlink.net			23-212Official	No
York	Laurie	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		24-67	No
Zaun	Curtis	czaun@mnseia.org	MnSEIA		24-67	No
Zimmerman	Kurt	kwz@ibew160.org	Local Union #160, IBEW		23-212Official	No
					24-67	No
Ziring	Emily	eziring@stlouispark.org	City of St. Louis Park		23-212Official	No
Zomer	Patrick	pzomer@cozen.com	Cozen O'Connor		23-212Official	No
					24-67	No
Zoppo	David	david.zoppo@huschblackwell.com	American Transmission Company LLC		23-212Official	No