



April 29, 2026

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

RE: **CEOs' Reply Comments In Support of Thermal Battery Tariff**
Docket Nos. E002/CN-23-212 and E002/RP-24-67

Dear Ms. Bergman:

Clean Grid Alliance, Fresh Energy, Minnesota Center for Environmental Advocacy, and Sierra Club (collectively, "the CEOs") respectfully submit these reply comments on the Department of Commerce's proposal for Xcel Energy to develop a tariff to support customer-owned thermal batteries. We expressed our support for the development of such a tariff in our March 4, 2026, letter, and after reviewing the initial comments of the parties, we continue to support the development of the tariff.

We appreciate Xcel's initial comments, which explain the Company's recent thermal battery pilots, including: 1) the Commercial Thermal Storage Pilot which was part of the load flexibility portfolio, 2) the Commercial Air-Source Heat Pump and Thermal Energy Storage Pilot which was part of Xcel's NGIA plan, and 3) the exploration of a thermal battery pilot with Rondo Energy that was part of this docket. We applaud the Company for continuing to explore this technology and strongly support that continued exploration. However, we note that the Company has encountered challenges in implementing these pilots, particularly the Commercial Thermal Storage Pilot and the project with Rondo Energy, which has slowed deployment and learnings.

Given the challenges the Company has faced, we believe it makes sense to facilitate customer-driven deployment of this technology in addition to deployment through Xcel's existing pilot programs. Developing a tariff to support customer-owned thermal batteries will enable industries that are motivated to decarbonize to work with thermal battery companies to find the right company and the right project to suit their needs. This could create a much more efficient pathway than the utility partnering with a thermal battery company and then looking for the right industrial customer, as with the Rondo pilot. In addition, given the support of the Minnesota Large Industrial Group for the creation of a tariff, we think this is the right approach. When thermal batteries 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 there is customer interest to explore this technology, it makes sense to create a pathway for them to do so.

Moreover, given the parties who have expressed support for the creation of the tariff, including the Minnesota Large Industrial Group, the Renewable Thermal Collaborative, and the Thermal Battery Alliance, we believe there is a strong group of stakeholders that could provide meaningful input on how best to design a tariff.

For these reasons, the CEOs continue to 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 and initial comments.

Respectfully submitted this 29th day of April, 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 Reply Comments in Support of Thermal Battery Tariff

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

Dated this 29th day of April, 2026

/s/ Akilah Sanders-Reed

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Smith	Ken	ken.smith@districtenergy.com	District Energy St. Paul Inc.		23-212 Official	No
					24-67	No
Smith	Nizhoni	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		24-67	No
Smith, Sr.	Roger	rogermsmithsr@fdlrez.com			24-67	No
Soholt	Beth	bsoholt@cleangridalliance.org	Clean Grid Alliance		23-212 Official	No
					24-67	No
Sommer	Anna	asommer@energyfuturesgroup.com	Energy Futures Group		23-212 Official	No
Spry	Marie	mariespry@grandportage.com			24-67	No
Spurr	Mark	mspurr@fvbenergy.com	International District Energy Association		23-212 Official	No
Stalberger	Michael	michael.stalberger@blueearthcountymn.gov	Blue Earth County		24-67	No
Stalpes	Sean	sean.stalpes@state.mn.us		Public Utilities Commission	23-212 Official	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		23-212 Official	No
					24-67	No
Strohufus	Mark	mstrohufus@grenergy.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		23-212 Official	No
Trutna	Caralyn	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		24-67	No
Tyler	Jen	tyler.jennifer@epa.gov	US Environmental Protection Agency		23-212 Official	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		23-212 Official	No
					24-67	No
Voeck	Julie	julie.voeck@nee.com	NextEra Energy Resources, LLC		23-212 Official	No
Vohs	Amelia	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		23-212 Official	No
					24-67	No
Waite	Trent	twaite@grenergy.com			24-67	No
Warzecha	Cynthia	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		23-212 Official	No
Wei	Julianna	julianna.wei@rondo.com	Rondo Energy, Inc.		23-212 Official	No
Westra	Heather	heather.westra@piic.org	Prairie Island Indian Community		24-67	No
Wheeler	Elizabeth	ewheeler@cleangridalliance.org	Clean Grid Alliance		24-67	No
Whipple	Alan	sa.property@state.mn.us		Minnesota Department Of Revenue	23-212 Official	No
White	Steve	steve.white@llojbwe.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		23-212 Official	No
Wind	Virgil	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		24-67	No
Windler	Joseph	jwindler@winthrop.com	Winthrop & Weinstine		23-212 Official	No
					24-67	No
Witwer	Rob	rob.witwer@onwardenergy.com	Onward Energy Holdings, LLC		23-212 Official	No
Wolfgram	Jonathan	jonathan.wolfgram@state.mn.us		Office of Pipeline Safety	23-212 Official	No
Wulling	Tim	t.wulling@earthlink.net			23-212 Official	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		23-212 Official	No
					24-67	No
Ziring	Emily	eziring@stlouispark.org	City of St. Louis Park		23-212 Official	No
Zomer	Patrick	pzomer@cozen.com	Cozen O'Connor		23-212 Official	No
					24-67	No

Last Name	First Name	Email	Organization	Agency	Service List	View Trade Secret
Zoppo	David	david.zoppo@huschblackwell.com	American Transmission Company LLC		23-212 Official	No