

From: [Wufoo](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Submitted Public Comment Form
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Provide the docket's number. E002/CN-23-212; E002/RP-24-67

Leave a comment on the docket. *

April 15, 2026

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket Nos. E002/CN-23-212; E002/RP-24-67

Dear Ms. Bergman:

The Renewable Thermal Collaborative (RTC) respectfully submits these comments in response to the Minnesota Public Utility Commission's March 11, 2026 Notice of Comment Period regarding whether the Commission should direct Northern States Power Company, d/b/a Xcel Energy (Xcel), to work with interested parties to develop a customer tariff to support customer-owned thermal batteries and file such a proposal within 90 days. RTC supports the Department of Commerce's recommendation and would welcome the opportunity to participate constructively in any stakeholder process that may follow.

About the Renewable Thermal Collaborative (RTC): The Renewable Thermal Collaborative (RTC) is a U.S.-headquartered, globally focused nonprofit dedicated to decarbonizing industrial thermal energy use with renewable solutions. RTC convenes a community of more than 100 major industrial heat users and leading clean heat solution providers to accelerate renewable thermal technology deployment and decarbonize industry by catalyzing peer learning, developing technical resources, analyzing markets, and advocating for policy advocacy. Together, our members operate more than 60 facilities in Minnesota, many of whom are actively pursuing or exploring the electrification of thermal processes to enhance operational efficiency, improve price stability, and reduce emissions. RTC's prior filing in this proceeding supported collaborative tariff development processes for customer-owned thermal batteries.

1. The Commission should direct Xcel to work with interested parties to develop a customer tariff for customer-owned thermal batteries and file a proposal within 90 days. RTC supports the Department's recommendation that Xcel work with interested parties to develop a customer tariff for customer-owned thermal batteries and submit a proposal within 90 days. A collaborative tariff-development process would create a more transparent, scalable mechanism for evaluating future customer investment in electrified thermal storage.

Customer-owned thermal batteries can provide system value under appropriate rate design. Because these resources can shift when electricity is consumed to produce and store heat, they may help align industrial energy demand with periods of higher renewable output and reduce the likelihood that new electrified thermal load contributes to system peaks. A thoughtfully designed customer tariff can create a structured pathway for customer-owned industrial electrification technologies to participate in Minnesota's energy system in a manner that supports reliability, affordability, and economic development.

Developing a dedicated tariff through a collaborative stakeholder process would establish clear participation rules and price signals that appropriately value the flexibility attributes to the grid as well as the benefits to industrial customers. It would provide the regulatory clarity needed to position Minnesota to attract and retain industrial investment by offering modern rate structures that reflect evolving grid conditions.

2. The Commission should require Xcel's initial filing to include key tariff design information. RTC recommends that Xcel's initial filing should clearly describe the proposed purpose and scope of the tariff, eligibility criteria and intended use cases for customer-owned thermal batteries, a proposed rate structure and key price signals, an explanation of how the tariff would recognize the flexibility value of thermal batteries, and a proposed stakeholder engagement process and timeline for further development.

A helpful reference point already exists in the region. The South Dakota Public Utilities Commission recently approved Otter Tail Power Company's Thermal Market Energy Pricing Rider to support customer-owned thermal energy storage. This Rider is a helpful example of how a thermal battery rate can promote better utilization of grid assets and conform to generally agreed upon cost allocation principles. In exchange for exposure to the MISO wholesale energy market the Rider features price penalties for drawing load during peak events, requires the asset to be curtailable during events called by grid or utility operators, and sets the thermal battery's baseline capacity to compliment a nearby DER. Adding asset-backed flexible loads improves affordability for all ratepayers and can reduce energy costs for the industrial customers they serve. While any Minnesota tariff should be tailored to Xcel's system and regulatory context, the Otter Tail rider offers a relevant regional precedent for the Commission to consider as it evaluates the contents of Xcel's initial filing.

3. Other issues or concerns related to this matter
RTC also notes that thermal batteries are one part of a broader suite of flexible industrial electrification technologies, including industrial heat pumps, electric boilers, and hybrid systems, that can align large thermal loads with periods of abundant or low-cost generation. The deployment of these industrial electrification technologies similarly depend on modern rate designs that reward flexibility. While this proceeding is appropriately focused on customer-owned thermal batteries, lessons from any stakeholder process or tariff development here could help inform future consideration of rate pathways for other flexible industrial electrification loads as Minnesota's power system and industrial demand continue to evolve.

RTC stands ready to engage with Xcel Energy, the Department, and other stakeholders to support development of a custom tariff for industrial electrification, including customer-owned thermal batteries, that appropriately balances customer opportunity with system reliability and affordability considerations.

Thank you for the opportunity to provide these comments.

Sincerely,

/s/ David Gardiner
Interim Executive Director
Renewable Thermal Collaborative

Attach a File



[rtc_mn_puc_comments_custom_industrial_tariff_0409.pdf](#)

141.13 KB • PDF



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RTC supports the Department's recommendation that Xcel work with interested parties to develop a customer tariff for customer-owned thermal batteries and submit a proposal within 90 days. A collaborative tariff-development process would create a more transparent, scalable mechanism for evaluating future customer investment in electrified thermal storage.



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Developing a dedicated tariff through a collaborative stakeholder process would establish clear participation rules and price signals that appropriately value the flexibility attributes to the grid as well as the benefits to industrial customers. It would provide the regulatory clarity needed to position Minnesota to attract and retain industrial investment by offering modern rate structures that reflect evolving grid conditions.

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