

STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Audrey Partridge	Commissioner
Hwikwon Ham	Commissioner
John Tuma	Commissioner

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In the Matter of the Petition of the City of  
Slayton for the Determination of  
Compensation for City Acquisition of  
Xcel Energy Electric Service Territory

MPUC DOCKET NO. E002, PT7157/SA-25-129

**INITIAL COMMENTS OF THE  
CITY OF SLAYTON**

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**INTRODUCTION**

The City of Slayton (“City”) submits these initial comments in response to the Commission’s Notice of Comment questions of March 6, 2025.

**COMMENTS**

**A. Question 1: Should the Commission refer this matter to the Office of Administrative Hearings for a contested case hearing under Minn. R. 7829.1000 to develop a record, make findings of fact and a recommendation as to the amount of just compensation?**

Yes. As requested and discussed in its Petition, the City believes that the Commission’s previous practice to refer contested municipal utility territory acquisition compensation matters under Minnesota Statutes, Section 216B.44 to the Office of Administrative Hearings, and the presence of contested issues in this unprecedented Section 216B.45 proceeding fully justify such a referral.

**B. Question 3: Are there other issues or concerns related to this matter?**

The City believes that a Rule 7829.1000 contested case process will provide a full and fair opportunity for the parties to raise and be heard on issues affecting the Commission’s determination of just compensation under Section 216B.45. The City recognizes that the Commission may request that an issue or issues of concern to it be addressed in the contested case.

Respectfully, the City defers, at this stage, on potential issues the City believes can be adequately raised to the ALJ and ultimately addressed by the Commission after the ALJ report and recommendations.

Respectfully submitted,

Dated: April 7, 2025

KENNEDY & GRAVEN, CHARTERED

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