



ENVIRONMENTAL LAW & POLICY CENTER

June 8, 2026

VIA E-Filing

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota*

Docket No. E-002/GR-24-320

Dear Ms. Bergman:

After reviewing the briefing papers file in this proceeding, I write on behalf of Cooperative Energy Futures, Environmental Law & Policy Center, Minnesota Interfaith Power & Light, and Vote Solar (together, “Joint Intervenors”) to clarify our positions and preferred decision options on two issues.

1. Low-Income Rate (Vol. 5, pp. 22-25)

Joint Intervenors clarify that we have never proposed a specific low-income rate in this case. Rather, we proposed a process to develop a universal low-income rate. We emphasize that this process should address concerns raised by Xcel and the Department, and otherwise develop evidence related to the benefits, costs, behavior impacts, cost allocation, and rate implications of such a rate, as well as examine examples and processes used in other states.

In his report, the Administrative Law Judge recognized our proposal “for a process to develop a rate, and not to implement a specific, fully-developed proposal...,” ¶ 1158, and agreed that such a process was warranted, ¶¶ 1159-61.

Therefore, Joint Intervenors recommend the following revisions to decision options 5020 and 5022:

~~5020. Approve the Joint Intervenors' universal low-income rate proposal providing income-qualified customers a discounted base rate. [Joint Intervenors]~~

5022. Initiate a separate proceeding to develop and evaluate a potential universal low-income rate, allowing for further analysis of program design, cost, eligibility

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criteria, and legal considerations before any final decision on implementation.
[ALJ, Joint Intervenors]

2. Virtual Power Plants (VPPs) (Vol. 1, pp. 222-24)

Similarly, Joint Intervenors clarify that we did not make a specific VPP program proposal in this case. Rather, we recommended that the Commission condition its approval of cost recovery for the Company's Advanced Grid Intelligence and Security (AGIS) initiative on Xcel's development and filing of a behind-the-meter VPP program in a separate proceeding in order to maximize customer benefits of those AGIS investments.

While Joint Intervenors continue to disagree with the ALJ's and Staff's denial of our recommendation, we appreciate Staff's discussion and agreement with our broader points around transparency with respect to the Company's grid modernization investments, including its Advanced Distribution Management System (ADMS), and support Staff's related decision option (Briefing Papers, Vol. 1, p. 224).

For these reasons, Joint Intervenors recommend the following revisions to decision options 1102 and 1104:

1102. Require Xcel Energy to file a behind-the-meter Virtual Power Plant program in a separate proceeding ~~adopt the Joint Intervenors' proposed Virtual Power Plants.~~
(Joint Intervenors)

1104. Require Xcel to include the forecasted lifetime budget for multi-year grid modernization investments in future rate cases and a description of any future associated investments outside the scope of the current rate case that will be needed to fully implement the proposed grid modernization technology. (Staff, Joint Intervenors)

Joint Intervenors look forward to further discussion of these and other issues in the case later this week.

Sincerely,

/s/ Erica S. McConnell

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