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Minneapolis, MN 55401

December 2, 2025

—Via Electronic Filing and U.S. Mail —

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

RE: REPLY COMMENTS
CHANGES IN CONTRACT DEMAND ENTITLEMENTS
DOCKET NO. E002/M-25-67

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the November 19, 2025 Comments of the Minnesota Department of Commerce (Department) in the above-referenced docket. We appreciate the Department's thorough review and recommendation of approval of our Petition. Below, we provide additional information regarding the Sibley facility as requested by the Department and propose a modification to the reporting requirements recommended by the Department.

A. Project Timing, Outage Timeframe, and Expected Return to Service

Initial work on the Sibley project began in summer 2024 to upgrade the facility and ensure continued safe and reliable gas supply to the system during design day scenarios. Planned improvements for the plant included the complete replacement of all tank bank gas piping and valves, electrical systems, fire and gas detection and suppression, and instrumentation and measurement devices for each of the 37 propane tanks in the plant. To do so, the tanks at the plant were de-inventoried, beginning with two of the five tank banks in 2024. During this time, the plant was in-service, available, and dispatched for vaporization into the system several times during the 2024-2025 heating season.

In April 2024, after the heating season concluded, the plant was taken out of service with the intention of completing the project prior to the start of the 2025-2026 heating season. Unfortunately, due to some project delays, the Sibley facility is unavailable to start the 2025-2026 heating season.

As of November 24, 2025, construction activities on all piping, valves, and propane tanks have been completed. Plant commissioning has been delayed due to extensive flange coating degradation that required recoating. Quality assurance of that work is expected to be completed by the third week of December. Once compliance inspection of the rework is completed, all plant piping will be pressure tested and purged of oxygen to remove moisture prior to bringing in propane. The Plant is scheduled to be available for use by January 15, 2026.

B. Company Communications

The Company first discussed this fire detection and suppression work in our last natural gas rate case in Docket No. G002/GR-23-413. Company witness Alicia Berger discussed investments for fire detection/suppression system upgrade work at our Wescott and Maplewood plants, and she noted that similar work was planned for the Sibley plant.¹ She later stated that work at the Sibley plant was expected to begin in the fall of 2024 with an in-service date in 2025.²

In the Company's currently pending natural gas rate case, Company witness Randy Capra describes the fire detection/suppression work at the Sibley plant and that the work is expected to be in-serviced in 2025.³ He also indicated that the Company's plans account for potential schedule impacts, but there are factors that may impact the in-service date.

As mentioned above, the Sibley plant was available for use during the 2024/25 heating season and taken out of service in April 2025. When the Company made its initial filing in the current docket on August 1, 2025, the plant was anticipated to be available prior to the start of the 2025/26 heating season. Because the Company expected the plant to be available prior to the heating season covered in the Petition, we did not mention the outage.

The Company acknowledges that it would have been appropriate to discuss the outage at the Sibley plant in our status update filings providing updates of similar

¹ *In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-23-413 (November 1, 2023), Exhibit____(AEB-1), Berger Direct Testimony at 60.

² *In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-23-413 (November 1, 2023), Exhibit____(AEB-1), Berger Direct Testimony at 70.

³ *In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G002/GR-25-356 (October 31, 2025), Exhibit____(RAC-1), Capra Direct Testimony at 7 and 23.

work being done at our Maplewood plant. It would have also been appropriate to provide information on this project in our August 1, 2025 Contract Demand Entitlement Petition filed in the current docket. As discussed below, the Company commits to providing this type of information in future Contract Demand Entitlement filings.

C. Reporting Recommendations

The Department recommends that the Commission require the Company to discuss peaking facility maintenance outages in future demand entitlement filings.

The Company notes that planned maintenance outages are regularly scheduled during the non-heating season to repair known issues and or complete capital upgrades, and thus it is common for the plant to be unavailable during the summer when the capacity from the peaking facilities is not necessary to meet customer demands. These projects are generally completed timely and do not warrant additional reporting.

However, the Company acknowledges that in the past two years some projects took longer than expected to be completed, and the delays had the potential to impact winter operations. To balance those conditions, we would propose a modification to the Department's proposed reporting requirement that would narrow the range of maintenance outages to be discussed in future August 1 Contract Demand Entitlement filings to those at the Company's peaking facilities in process on August 1 whose delay would impact winter operations.

The Company also agrees with the Department recommendation that the Company provide monthly updates on the state of the Sibley facility until such time as it returns to service at its full capacity, similar to the updates the Company has been regularly filing with regards to the Maplewood facility. The Company commits to providing the next monthly update for Maplewood and Sibley on or before January 6, 2025.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-7681 or lisa.r.peterson@xcelenergy.com or Megan Spear at megan.spear@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

LISA PETERSON
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. G002/M-25-0067

Dated this 2nd day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

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