

May 1, 2026

PUBLIC DOCUMENT

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

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E-999/CI-19-704

Dear Ms. Bergman,

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of an Investigation into Self-Commitment and Self-Scheduling
of Large Baseload Generation Facilities.*

The annual reports were filed by Minnesota Power, Xcel Energy and Otter Tail Power by March 5, 2026.

The Department recommends the Commission **accept the utilities' reports** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ar
Attachment

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Acronyms and Abbreviations

King	Allen S. King Generating Plant
Big Stone	Big Stone Plant
Boswell	Boswell Energy Center
CO2	Carbon Dioxide
Coyote	Coyote Station
DA	Day Ahead
EFDG	Equivalent Forced Derated Hours
EFDHRS	Equivalent Forced Derated Hours During Reserve Shutdowns
EFOR	Equivalent Forced Outage Rate
FOH	Forced Outage Hours
LMP	Locational Marginal Prices
MWh	Megawatt hours
MISO	Midcontinent Independent System Operator, Inc.
Department	Minnesota Department of Commerce
Commission	Minnesota Public Utilities Commission
MP	Minnesota Power
NERC	North American Electricity Reliability Corporation
O&M	Operations and Maintenance
OTP	Otter Tail Power Company
RT	Real Time
SH	Service Hours
Sherco	Sherburne County Generating Station
Xcel	Northern States Power Company d/b/a Xcel Energy

Definitions

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E999/CI-19-704

I. INTRODUCTION

The Minnesota Public Utilities Commission (Commission) has issued orders directing Minnesota Power (MP), Otter Tail Power Company (OTP), and Northern States Power Company d/b/a Xcel Energy (Xcel) to make annual compliance filings containing an analysis of the impacts of self-committing and self-scheduling their generators in the Midcontinent Independent System Operator, Inc.'s (MISO) energy market, including the annual difference between production costs and corresponding prevailing market prices.^{1,2} The annual compliance filings are due March 1 of each year.

II. PROCEDURAL BACKGROUND

By March 5, 2026	MP, ³ OTP, ⁴ and Xcel ⁵ filed their annual compliance filings, containing data regarding the impacts of self-committing and self-scheduling their generators.
March 9, 2026	The Commission posted a notice of comment period (Notice) regarding the utilities' annual compliance filing. ⁶

¹ *In the Matter of the Review of the 2016-2017 Annual Automatic Adjustment Reports for All Electric Utilities and In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities, Order Accepting 2016-2017 Reports and Setting Additional Requirements*, February 7, 2019, Docket Nos. E999/AA-17-492 and E999/AA-18-373, (eDockets) [20192-150080-01](#) at Order Point 4.

² *In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities, Order Accepting 2017-2018 Reports and Setting Additional Requirements*, November 13, 2019, Docket No. E999/AA-18-373, (eDockets) [201911-157516-01](#) at Order Points 8, 9, and 10, (hereinafter "2019 Order").

³ MP, Annual Compliance Filing, March 2, 2026, Docket No. E999/CI-19-704, (eDockets) [20263-228818-01](#) (hereinafter "MP Report").

⁴ OTP, Annual Compliance Filing, March 5, 2026, Docket No. E999/CI-19-704, (eDockets) [20263-228978-02](#) (hereinafter "OTP Report").

⁵ Xcel, Annual Compliance Filing, February 27, 2026, Docket No. E999/CI-19-704, (eDockets) [20262-228783-01](#) (hereinafter "Xcel Report").

⁶ *Notice of Comment Period*, March 9, 2026, Docket No. E-999/CI-19-704, (eDockets) [20263-229054-01](#) (hereinafter "Notice").

According to the Notice the following topics are open for comment:

- Are the 2026 filings by the utilities adequate and in compliance with prior Commission orders?
- What conclusions can be drawn from the data filed by the utilities in conjunction with what has been learned earlier in this investigation?
- How should the Commission use the information provided by the utilities in this docket going forward?
- Should the Commission order any further analysis for future reports, or any additional reports by the utilities?
- Should the filing of this report be combined with the annual fuel-true up reporting, as recommended by Joint Parties in the December 29, 2025 letter?
- Are there other issues or concerns related to this matter?

Below are the comments of the Minnesota Department of Commerce (Department) regarding the issues specified in the Notice.

III. DEPARTMENT ANALYSIS

A. *MISO MARKET BACKGROUND*

A.1. *Capacity Market Operations*

For purposes of this proceeding, there are two stages to MISO's market construct. The first stage is the Planning Resource Auction (PRA), an annual capacity auction. According to MISO, the PRA is a way for market participants to meet resource adequacy (capacity) requirements and allows market participants with excess to sell that capacity, via the auction, to other market participants that expect a shortfall.⁷ Resources that clear in the annual PRA—stage 1 of MISO's market—must be offered into MISO's energy market, which is stage 2 of the market process. This must-offer requirement does not allow utilities to de-commit. In other words, once a unit is cleared in the PRA, the utility cannot make a unit unavailable to MISO for dispatch, on a seasonal basis or otherwise, except for when the unit is on mechanical outage, overhaul, testing, etc.

A.2. *Energy Market Operations*

MISO's energy markets identify both the supply of electric generation available throughout the MISO regions and the anticipated (and, in the real-time market, the actual) demand for electricity in each area. Generators are selected for dispatch in a manner designed to minimize overall costs to the system while meeting reliability requirements. MISO unit commitment is the process that determines which generators (and other resources) will operate to meet the upcoming need for electricity. MISO scheduling and dispatch sets the hourly output for each committed resource, using simultaneously co-optimized Security Constrained Unit Commitment and Security Constrained Economic Dispatch to clear and dispatch the energy and reserve markets. MISO's energy market has both a day ahead (DA) market

⁷ See [MISO PRA Website](#).

and a real time (RT) market.⁸ Essentially, the DA market is a forward market for energy and operating reserves. Transactions in the DA market occur the day before the operating day. The DA market creates binding results for next operating day and sets the DA locational marginal prices (LMP).

Transactions in the RT market occur throughout the operating day. Essentially, the RT market is a spot market for energy and operating reserves. The RT market balances supply and demand under actual system conditions, dispatches the least-cost resources every five minutes, and thus provides transparent economic signals, especially RT LMPs.

A participating generation owner can specify the operating parameters—including production cost of its generator—and MISO will refrain from dispatching the resource until market prices meet or exceed that level, again, subject to reliability requirements. However, under some circumstances a participant will prefer to commit its generator to be available for MISO dispatch (self-commit) and unilaterally set the generator's output level (self-schedule), accepting whatever market price results rather than awaiting economic dispatch by MISO.

The concern in this proceeding is that the utilities may over-use self-commitment and self-scheduling, which results in higher costs for ratepayers.

B. ADEQUACY REVIEW

The first issue specified in the Notice is “Are the 2026 filings by the utilities adequate and in compliance with prior Commission orders?” The Department reviewed the utilities’ annual reports for compliance with the following orders:

- February 7, 2019 *Order Accepting 2016-2017 Reports and Setting Additional Requirements* in Docket No. E999/AA-17-492;⁹
- November 13, 2019 *Order Accepting 2017-2018 Electric Reports and Setting Additional Requirements* in Docket No. E999/AA-18-373;¹⁰
- July 15, 2020 *Order Approving Plan and Requiring Filing* in Docket No. E002/AA-19-293;¹¹

⁸ For information on how MISO's markets work, see [MISO Training Courses](#).

⁹ *In the Matter of the Review of the 2016-2017 Annual Automatic Adjustment Reports for All Electric Utilities and In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities, Order Accepting 2016-2017 Reports and Setting Additional Requirements*, Docket Nos. E999/AA-17-492 and E999/AA-18-373, (eDockets) [20192-150080-01](#).

¹⁰ *In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Report for All Electric Utilities, Order Accepting 2017-2018 Electric Reports and Setting Additional Requirements*, Docket No. E999/AA-18-373, (eDockets) [201911-157516-01](#).

¹¹ Note: review for compliance with this Order is specific to Xcel. *In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis, and In the Matter of the Petition of Northern States Power Company for Approval of the 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges, Order Approving Plan and Requiring Filing*, July 15, 2020, Docket Nos. E002/M-19-809 and E002/M-19-293, (eDockets) [20207-164928-02](#).

- January 11, 2021 *Order Evaluating Self-Commitment and Self-Scheduling Reports and Establishing Additional Filing Requirements* in Docket No. E999/CI-19-704;¹²
- February 22, 2021 *Notice of Approval of Annual Compliance Filing Template* in Docket No. E999/CI-19-704;¹³
- December 1, 2021 *Order Accepting Reports and Setting Additional Requirements*, in Docket No. E999/CI-19-704;¹⁴
- November 17, 2022 Order in Docket No. E999/CI-19-704;¹⁵
- November 8, 2023 *Order Accepting Annual Filings and Requiring Additional Filing* in Docket Nos. E999/CI-19-704 and E002/M-19-809;¹⁶ and
- October 29, 2025, Order in Docket Nos. E999/CI-19-704.¹⁷

The utilities' filings are largely set up to address the filing requirements of the above Orders. The Department appreciates the utilities' references to specific Order Points where the content of their annual report addresses a Commission requirement from a past Order.

In its comments on last year's reports, the Department requested that MP add a column to its annual Excel spreadsheet to indicate plant start up conditions (e.g. cold, warm, or hot) as required by the Commission's December 1, 2021 Order.¹⁸ MP has added the column to its spreadsheets.

Also in last year's comments, the Department asked Xcel to more clearly discuss instances where greater economic commitment led to lost revenue and the strategy to weigh those lost revenues with the environmental benefits of lower emissions, as required by the Commission's November 17, 2022.¹⁹ The Department was able to find the discussion required by the November 2022 Order in Xcel's present filing. Xcel states that there were no instances when greater economic commitment, at King or

¹² *In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis, and In the Matter of the Petition of Northern States Power Company for Approval of the 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges, Order Evaluating Self-Commitment and Self-Scheduling Reports and Establishing Additional Filing Requirements*, January 11, 2021, Docket Nos. E999/CI-19-704 and E002/M-19-809, (eDockets) [20211-169710-01](#).

¹³ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities, Notice of Approval of Annual Compliance Reporting Template*, February 22, 2021, Docket No. E999/CI-19-704, (eDockets) [20212-171197-01](#).

¹⁴ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities, Order Accepting Reports and Setting Additional Requirements*, December 1, 2021, Docket No. E999/CI-19-704, (eDockets) [202112-180308-01](#) (hereinafter: "December 2021 Order").

¹⁵ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities, Order*, November 17, 2022, Docket No. E999/CI-19-704, (eDockets) [202211-190727-01](#) (hereinafter: "November 2022 Order").

¹⁶ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities and In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis, Order Accepting Annual Filings and Requiring Additional Filing*, November 8, 2023, Docket Nos. E999/CI-19-704, (eDockets) [202311-200354-02](#).

¹⁷ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities, Order Accepting Reports and Setting Additional Requirements, Order*, October 29, 2025, Docket No. E999/CI-19-704, (eDockets) [202510-224383-01](#) (hereinafter: "October 2025 Order").

¹⁸ December 2021 Order, at Order Point 8.c.

¹⁹ November 2022 Order, at Order Point 2.

Sherco, led to lost revenue and because of that, there was no need to implement strategies to weigh potential lost revenues against environmental benefits from lower emissions during the annual reporting period.²⁰

The Commission's most recent Order required:

Required parties to discuss how to refine the reporting on best case/worst case scenarios and how to ensure the data is useful and relevant, including potential uses of the information and possible discontinuance of the requirement. Required the parties to make a compliance filing 60 days before the 2026 annual reports in this docket explaining if and how they propose to update the best case/worst case reporting in their 2026 annual reports.²¹

The Department participated in this required discussion and joined in the joint letter filed on December 29, 2025.²² The Department discusses the joint letter further in section F of the present comments.

The Department concludes that the utilities' annual reports are adequate.

C. DATA ANALYSIS

The Department begins by noting that OTP's units are co-owned with other utilities in multiple RTOs, which makes commitment and dispatch decisions somewhat complicated. The Big Stone Plant is a 474 MW plant, of which Otter Tail is a 53.9 percent owner. The Coyote Station is a 427 MW plant, of which Otter Tail is a 35 percent owner. For both generators NorthWestern Energy is a co-owner and is a member of Southwest Power Pool.²³

C.1. Commitment Data

As stated in the 2019 Order, unit commitment is the first step in MISO's energy market and determines which generators (and other resources) will operate to meet the demand. The units involved in this proceeding generally use a commitment status of Economic, Must Run, or Outage. Table 1 below summarizes the commitment data for each unit in 2025.

²⁰ Xcel Report at 15.

²¹ October 2025 Order, at Order Point 9.

²² *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*, Joint Parties Letter, Department of Commerce, MP, OTP, Xcel, December 29, 2025, Docket No. E999/CI-19-704, (eDockets) [202512-226242-01](#) (hereinafter: "Joint Parties Letter").

²³ The other co-owners are Montana-Dakota Utilities Company and Minnkota Power Cooperative; both are members of MISO.

Table 1: Distribution of Commitment Status in 2025 (Hours)²⁴

	(a)	(b) = (a)/(h)	(c)	(d) = (c)/(h)	(e)	(f) = (e)/(h)	(g)	(h) = (a) + (c) + (e) + (g)
Unit	Economic (hours)	Economic (%)	Must Run (hours)	Must Run %	Outage (hours)	Outage %	Other (hours)	Total (hours)
Big Stone	[TRADE SECRET DATA HAS BEEN EXCISED]							
Coyote								
Boswell 3	[TRADE SECRET DATA HAS BEEN EXCISED]							
Boswell 4								
King	[TRADE SECRET DATA HAS BEEN EXCISED]							
Sherco 1								
Sherco 2								
Sherco 3								
Monticello								
Prairie Island 1								
Prairie Island 2								
COAL TOTAL	12,255	19.99%	36,002	58.71%	13,063	21.30%	0	61,320

Table 2 shows a summary of the annual commitment data for the coal units since 2019, the first full year for this proceeding.

²⁴ MP Report at Attachment 1 and 2, OTP Report at Attachment 2 and 3, Xcel Report at Attachment A and B.

Table 2: Summary of Commitment Status for Coal Units, 2019-2025 (Hours)^{25, 26}

	(a)	(b) = (a)/(h)	(c)	(d) = (c)/(h)	(e)	(f) = (e)/(h)	(g)	(h) = (a) + (c) + (e) + (g)
COAL TOTAL	Economic (hours)	Economic %	Must Run (hours)	Must Run %	Outage (hours)	Outage %	Other (hours)	Total (hours)
2019	5,681	10.8%	38,160	72.6%	8,719	16.6%	0	52,560
2020	12,953	18.4%	47,601	67.7%	6,509	9.3%	3,209	70,272
2021	15,382	21.9%	38,139	54.4%	12,681	18.1%	3,878	70,080
2022	19,742	28.2%	36,069	51.5%	13,874	19.8%	395	70,080
2023	16,194	23.1%	36,558	52.2%	17,328	24.7%	0	70,080
2024	12,203	19.8%	38,571	62.7%	10,714	17.4%	0	61,488
2025	12,255	20.0%	36,002	58.7%	13,063	21.3%	0	61,320

Table 2 shows that, on average, use of the Must Run designation during the commitment process has decreased—from around 70 percent the first two years to a little over 50 percent the next three years. For 2024 and 2025, use of Must Run was still lower than the first year, but increased to around 60 percent. Use of the Economic designation during the commitment process increased from around 10 percent the first year to around 20 percent in the subsequent years, with the exception of 2022 (at 28 percent).

C.2. Dispatch Data

As stated in the 2019 Order, dispatch is the second step in MISO’s energy market and sets the hourly output for each committed resource. Data on uneconomic DA dispatch for the individual units subject to this proceeding is available in Table 3. The following definitions apply to the data presented in Table 3:

- Total DA Dispatch: sum of the MWh Cleared in the Day Ahead Market for all hours;
- Total Uneconomic DA Dispatch: sum of the MWh Cleared in the Day Ahead Market for hours where the DA LMP was less than Unit Fuel Cost plus Unit Variable O&M Costs;
- Uneconomic DA Dispatch Minimum: sum of the Minimum MW Level the unit can be dispatched in the Day Ahead market for hours where the DA LMP was less than Unit Fuel Cost plus Unit Variable O&M Cost.

²⁵ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*, Department, Comments, June 8, 2020, Docket No. E999/CI-19-704, (eDockets) [20206-163795-02](#). Department, Comments, April 30, 2021, Docket No. E999/CI-19-704, (eDockets) [20214-173727-02](#). Department, Comments, May 2, 2022, Docket No. E999/CI-19-704, (eDockets) [20225-185438-02](#). Department, Comments, May 31, 2023, Docket No. E999/CI-19-704, (eDockets) [20235-196234-02](#). Department, Comments, May 1, 2024, Docket No. E999/CI-19-704, (eDockets) [20245-206285-02](#). Department, Comments, May 1, 2025, Docket No. E999/CI-19-704 (eDockets) [20255-218431-02](#). (Collectively, “Prior Department Comments”)

²⁶ Note that 2019 data was calculated from the information provided in the utilities’ 2020 filings. Note that OTP’s 2020 filing did not provide commitment data for 2019 and thus OTP’s units are excluded 2019.

Analyst(s) assigned: Steve Rakow, Bhavin Pradhan, Rachel Wiedewitsch

Table 3: Distribution of Dispatch Status by Unit in 2025 (MWh)²⁷

	(a)	(b)	(c)	(d) = (c)/(a)	(e) = (b)-(c)	(f)=(e)/(a)	(g)=(d)+(f)
Unit	Total DA Dispatch	Total Uneconomic DA Dispatch	Uneconomic DA Dispatch Minimum	Uneconomic DA Dispatch Minimum %	Uneconomic DA Dispatch Above Minimum	Uneconomic DA Dispatch Above Minimum %	Uneconomic DA Dispatch %
Big Stone	[TRADE SECRET DATA HAS BEEN EXCISED]						
Coyote							
Boswell 3	[TRADE SECRET DATA HAS BEEN EXCISED]						
Boswell 4							
King	[TRADE SECRET DATA HAS BEEN EXCISED]						
Sherco 1							
Sherco 2							
Sherco 3							
Monticello							
Prairie Island 1							
Prairie Island 2							
COAL TOTAL	13,730,479	2,599,156	1,915,575	13.95%	683,581	4.98%	18.93%

Table 4 shows a summary of the dispatch data for the coal units since the proceeding began.

²⁷ MP Report at Attachments 1 and 2, OTP Report at Attachments 2 and 3, and Xcel Report at Attachments A and B.

Table 4: Summary of Dispatch Status for Coal Units, 2019-2025 (MWh)²⁸

	(a)	(b)	(c)	(d) = (c)/(a)	(e) = (b)-(c)	(f)=(e)/(a)	(g)=(d)+(f)
Calendar Year	Total DA Dispatch	Total Uneconomic DA Dispatch	Uneconomic DA Dispatch Minimum	Uneconomic DA Dispatch Minimum %	Uneconomic DA Dispatch Above Minimum	Uneconomic DA Dispatch Above Minimum %	Uneconomic DA Dispatch %
2019	18,117,211	8,039,070	6,027,191	33.30%	2,011,879	11.10%	44.40%
2020	14,943,438	5,825,575	4,641,341	31.10%	1,184,234	7.90%	39.00%
2021	15,974,270	3,075,470	2,260,695	14.20%	814,775	5.10%	19.30%
2022	16,975,300	2,788,773	1,956,519	11.50%	832,254	4.90%	16.40%
2023	13,466,748	4,297,101	2,954,284	21.90%	1,342,817	10.00%	31.90%
2024	11,951,183	5,229,761	3,510,505	29.40%	1,719,256	14.40%	43.80%
2025	13,730,479	2,599,156	1,915,575	13.95%	683,581	4.98%	18.93%

Table 4 shows that uneconomic DA dispatch returned to fairly low levels seen in 2021 and 2022, less than 15 percent of total dispatch. Also, uneconomic DA dispatch above the DA minimum also returned to the fairly low levels seen in 2021 and 2022.

C.3. Economic Outcomes

In past years the economic outcomes appear to have been largely driven by LMPs. Table 5 shows the Real Time LMPs at the Minnesota hub to illustrate the different prices faced by the units over time. Table 5 shows that LMPs were substantially higher in 2021, 2022, and 2025 than the other years, driving a greater number of hours of operation at a net benefit in those years.

Table 5: Minnesota Hub RT LMPs²⁹

Year	Average Price	Average Off-Peak Price	Average On-Peak Price
2018	\$26.57	\$23.02	\$30.65
2019	\$21.97	\$19.06	\$25.31
2020	\$17.58	\$14.71	\$20.84
2021	\$36.63	\$30.77	\$43.37
2022	\$44.10	\$35.12	\$54.47
2023	\$28.75	\$22.49	\$35.99
2024	\$27.40	\$22.95	\$32.54
2025	\$40.19	\$32.38	\$49.15

²⁸ MP Report at Attachments 1 and 2, OTP Report at Attachments 2 and 3, Xcel Report at Attachments A and B and Prior Department Comments.

²⁹ While Table 4 shows real time LMPs, over a long duration real time LMPs are comparable to day ahead LMPs since real time LMPs converge to the day ahead LMPs.

C.3.1. MP

Table 6 shows the number of hours MP's units operated at a net benefit or net cost during 2025.

Table 6: 2025 Hours at Net Benefit/Breakeven/Net Cost for MP³⁰

Unit	Net Benefit	Breakeven	Net Cost	TOTAL
Boswell 3	6,309	1,311	1,140	8,760
	72.02%	14.97%	13.01%	100%
Boswell 4	6,501	758	1,501	8,760
	74.21%	8.65%	17.13%	100%

Table 7 summarizes the historical data for Boswell 3 and Table 8 summarizes the historical data for Boswell 4.

Table 7: Boswell 3—History of Hours at Net Benefit/Breakeven/Net Cost^{31, 32}

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	49.3%	22.1%	28.6%	100.0%
2020	30.8%	9.2%	60.1%	100.0%
2021	73.2%	13.0%	13.8%	100.0%
2022	74.1%	12.1%	13.8%	100.0%
2023	65.1%	10.8%	24.0%	100.0%
2024	42.5%	32.0%	25.5%	100.0%
2025	72.0%	15.0%	13.0%	100.0%

Table 8: Boswell 4—History of Hours at Net Benefit/Breakeven/Net Cost³³

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	52.3%	11.6%	36.1%	100.0%
2020	31.1%	11.3%	57.6%	100.0%
2021	84.6%	2.0%	13.4%	100.0%
2022	57.3%	27.9%	14.8%	100.0%
2023	44.0%	24.7%	31.3%	100.0%
2024	46.6%	5.4%	48.0%	100.0%
2025	74.2%	8.7%	17.1%	100.0%

Tables 7 and 8 show that both Boswell units had a greater percentage of hours at net benefit than in the prior two years, consistent with the 2025 LMPs which were elevated.

³⁰ MP Report at Attachments 1 and 2.

³¹ The first filings covered the period July 1, 2018 to December 31, 2019. For this section the Department did not recalculate the data to show a single year.

³² See Table 6 and Prior Department Comments.

³³ See Table 6 and Prior Department Comments.

C.3.2. OTP

Table 9 shows the number of hours OTP's units operated at a net benefit or net cost during 2025.

Table 9: 2025 Hours at Net Benefit/Breakeven/Net Cost for OTP^{34, 35}

Unit	Net Benefit	Breakeven	Net Cost	TOTAL
Big Stone	3,880	1,131	3,749	8,760
	44.29%	12.91%	42.80%	100%
Coyote (Production Cost)	5,617	2,264	879	8,760
	64.12%	25.84%	10.03%	100%
Coyote (Total Production Cost)	4,176	2,264	2,320	8,760
	47.67%	25.84%	26.48%	100%

Table 10 summarizes the historical data for Big Stone and Tables 11 and 12 summarize the historical data for Coyote.

Table 10: Big Stone—History of Hours at Net Benefit/Breakeven/Net Cost³⁶

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	44.1%	16.7%	39.2%	100.0%
2020	15.6%	23.2%	61.2%	100.0%
2021	26.9%	34.9%	38.3%	100.0%
2022	37.5%	25.4%	37.1%	100.0%
2023	25.0%	23.0%	52.0%	100.0%
2024	23.2%	14.1%	62.7%	100.0%
2025	44.3%	12.9%	42.8%	100.0%

Table 11: Coyote—History of Hours at Net Benefit/Breakeven/Net Cost³⁷

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	63.6%	23.0%	13.4%	100.0%
2020	44.0%	6.2%	49.8%	100.0%
2021	61.5%	11.6%	26.9%	100.0%
2022	62.1%	23.0%	14.9%	100.0%
2023	65.8%	9.1%	25.1%	100.0%
2024	46.4%	11.8%	41.8%	100.0%
2025	64.1%	25.8%	10.0%	100.0%

³⁴ The difference between "Production Cost" and "Total Production Cost" is that total production cost includes what is classified as "Remaining Unit Fuel Cost." The remaining unit fuel costs are fixed costs associated with fuel. The utilities with such fixed fuel costs provide two sets of analysis to comply with the Commission's January 11, 2021 order in this proceeding, which required: "If a utility excludes any fuel costs from its MISO offer curves, the utility should also provide an analysis that includes all fuel costs, including those currently treated as fixed costs due to contractual terms."

³⁵ OTP Report at Attachments 2 and 3.

³⁶ See Table 9 and Prior Department Comments.

³⁷ See Table 9 and Prior Department Comments.

Table 12: Coyote—History of Hours at Net Benefit/Breakeven/Net Cost with Total Production Cost³⁸

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	63.6%	23.0%	13.4%	100.0%
2020	8.8%	6.2%	85.0%	100.0%
2021	36.8%	11.6%	51.6%	100.0%
2022	54.2%	22.8%	23.0%	100.0%
2023	38.2%	9.1%	52.8%	100.0%
2024	25.1%	11.8%	63.1%	100.0%
2025	47.7%	25.8%	26.5%	100.0%

As with MP, Tables 10 to 12 show that OTP's units had a greater percentage of hours at net benefit than last year, consistent with the LMPs.

C.3.3. Xcel

Table 13 below shows the number of hours Xcel's units operated at a net benefit or net cost during 2025.

Table 13: 2025 Hours at Net Benefit/Breakeven/Net Cost for Xcel³⁹

Unit	Net Benefit	Breakeven	Net Cost	TOTAL
King	1,786 20.4%	6,622 75.6%	352 4.0%	8,760 100.0%
Sherco 1	2,779 31.7%	4,826 55.1%	1,155 13.2%	8,760 100.0%
Sherco 2	Retired			
Sherco 3	5,609 64.0%	635 7.2%	2,516 28.7%	8,760 100.0%
Monticello (Production Cost)	7,278 83.1%	1,175 13.4%	307 3.5%	8,760 100.0%
Prairie Island 1 (Production Cost)	8,210 93.7%	514 5.9%	36 0.4%	8,760 100.0%
Prairie Island 2 (Production Cost)	7,856 89.7%	876 10.0%	28 0.3%	8,760 100.0%
Monticello (Total Production Cost)	7,088 80.9%	1,175 13.4%	497 5.7%	8,760 100.0%
Prairie Island 1 (Total Production Cost)	8,030 91.7%	514 5.9%	216 2.5%	8,760 100.0%
Prairie Island 2 (Total Production Cost)	7,708 88.0%	876 10.0%	176 2.0%	8,760 100.0%

³⁸ See Table 9 and Prior Department Comments.

³⁹ Xcel Report at Attachments A and B.

Tables 14 to 20 summarize the historical data for Xcel's generating units.

Table 14: King—History of Hours at Net Benefit/Breakeven/Net Cost⁴⁰

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	37.8%	0.0%	62.2%	100.0%
2020	18.0%	0.0%	82.0%	100.0%
2021	27.7%	64.6%	7.7%	100.0%
2022	28.7%	0.0%	71.3%	100.0%
2023	14.6%	73.4%	12.0%	100.0%
2024	10.8%	83.7%	5.5%	100.0%
2025	20.4%	75.6%	4.0%	100.0%

Table 15: Sherco 1—History of Hours at Net Benefit/Breakeven/Net Cost⁴¹

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	42.5%	18.4%	39.2%	100.0%
2020	43.6%	21.0%	35.4%	100.0%
2021	49.2%	36.5%	14.4%	100.0%
2022	65.5%	16.2%	18.4%	10.0%
2023	44.6%	27.8%	27.6%	100.0%
2024	45.0%	32.0%	23.0%	100.0%
2025	31.7%	55.1%	13.2%	100.0%

Table 36: Sherco 2—History of Net Benefit/Breakeven/Net Cost⁴²

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	48.1%	19.2%	32.7%	100.0%
2020	36.3%	34.7%	29.0%	100.0%
2021	56.1%	25.5%	18.4%	100.0%
2022	58.6%	28.5%	12.9%	100.0%
2023	17.1%	67.8%	15.2%	100.0%
2024	Retired			
2025	Retired			

⁴⁰ See Table 13 and Prior Department Comments.

⁴¹ See Table 13 and Prior Department Comments.

⁴² See Table 13 and Prior Department Comments.

Table 4 Sherco 3—History of Hours at Net Benefit/Breakeven/Net Cost⁴³

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	48.5%	7.8%	43.7%	100.0%
2020	46.0%	32.3%	21.7%	100.0%
2021	46.2%	32.0%	21.8%	100.0%
2022	51.8%	32.4%	15.8%	100.0%
2023	33.1%	45.3%	21.6%	100.0%
2024	40.4%	20.6%	39.0%	100.0%
2025	64.0%	7.2%	28.7%	100.0%

Tables 14 and 15 show that Xcel's King and Sherco 1 coal units had very low percentage of hours at a net cost. Table 17 shows that, while Sherco 3 had a lower percentage of hours at a net cost than 2024, it was still elevated compared to 2020 to 2023. Overall, Xcel's coal units have no consistent result in terms of percentage of operating at a net benefit or net cost.

Table 5: Monticello—History of Hours at Net Benefit/Breakeven/Net Cost with Total Production Cost^{44, 45}

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	93.8%	6.1%	0.1%	100.0%
2020	96.1%	0.0%	3.9%	100.0%
2021	89.6%	9.1%	1.3%	100.0%
2022	96.6%	0.9%	2.5%	100.0%
2023	85.8%	11.7%	2.5%	100.0%
2024	94.8%	2.2%	3.0%	100.0%
2025	80.9%	13.4%	5.7%	100.0%

Table 19: Prairie Island 1—History of Hours at Net Benefit/Breakeven/Net Cost with Total Production Cost⁴⁶

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	92.8%	6.4%	0.8%	100.0%
2020	84.2%	7.5%	8.4%	100.0%
2021	96.0%	0.0%	4.0%	100.0%
2022	90.7%	2.1%	7.1%	100.0%
2023	73.6%	19.7%	6.7%	100.0%
2024	57.9%	35.8%	6.3%	100.0%
2025	91.7%	5.9%	2.5%	100.0%

⁴³ See Table 13 and Prior Department Comments.

⁴⁴ Even with consideration of total production costs (which are larger than production costs) Xcel's nuclear units operate at a net benefit most hours. Thus, to reduce the number of tables production cost data is not presented.

⁴⁵ See Table 13 and Prior Department Comments.

⁴⁶ See Table 13 and Prior Department Comments.

Table 6: Prairie Island 2—History of Hours at Net Benefit/Breakeven/Net Cost with Total Production Cost⁴⁷

Year	Net Benefit	Breakeven	Net Cost	TOTAL
2018-2019	95.4%	4.2%	0.4%	100.0%
2020	92.5%	0.0%	7.5%	100.0%
2021	88.7%	7.6%	3.7%	100.0%
2022	97.4%	0.0%	2.6%	100.0%
2023	67.2%	25.4%	7.4%	100.0%
2024	73.3%	19.5%	7.3%	100.0%
2025	88.0%	10.0%	2.0%	100.0%

As in prior years, Tables 18 through 20 show that Xcel’s nuclear units tend to have relatively few hours operating at a net cost regardless of fluctuations in the average LMP.

C.3.4. Summary

Overall, the data continues to show that the Commission’s proceeding appears to have had an impact in reducing the use of must run designation during commitment and on uneconomic dispatch for the coal units. However, since the initial impact, for many units, the changes in the LMPs appear to be the driving factor in the net benefit/net cost outcome rather than the details of the commitment and dispatch process.

C.4. Impact on Outage Rate

The Commission’s November 17, 2022 Order at Point 7b required the utilities to provide the equivalent forced outage rates (EFOR) to be tracked over time for each unit. The Department proposed this requirement to track the operating conditions of the units and identify impacts of additional wear and tear. Flexible operations put more stress on the equipment. The calculation of EFOR is defined in the North American Electricity Reliability Corporation (NERC) GADS Data Reporting Instructions as follows:

$$EFOR = \frac{FOH + EFDH}{FOH + SH + Synchronous\ Condensing\ Hours + Pumping\ Hours + EFDHRS} \times 100\%$$

Where,

- FOH – Forced Outage Hours;
- EFDH – Equivalent Forced Derated Hours;
- SH – Service Hours; and
- EFDHRS – Equivalent Forced Derated Hours During Reserve Shutdowns

⁴⁷ See Table 13 and Prior Department Comments.

Tables 21 to 23 show the EFOR data from the filings made since the data was required.

Table 21: MP EFOR Data⁴⁸

Month	Boswell 3				Boswell 4			
	2022	2023	2024	2025	2022	2023	2024	2025
January	[TRADE SECRET DATA HAS BEEN EXCISED]							
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
Average								

Table 22: OTP EFOR Data⁴⁹

Month	Big Stone				Coyote			
	2022	2023	2024	2025	2022	2023	2024	2025
January	[TRADE SECRET DATA HAS BEEN EXCISED]							
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
Average								

⁴⁸ MP Report at Attachments 1 and 2

⁴⁹ OTP Report at 15.

Table 23: Xcel Coal EFOR Data⁵⁰

Month	King				Sherco 1				Sherco 3			
	2022	2023	2024	2025	2022	2023	2024	2025	2022	2023	2024	2025
January	[TRADE SECRET DATA HAS BEEN EXCISED]											
February												
March												
April												
May												
June												
July												
August												
September												
October												
November												
December												
Average												

Table 24: Xcel Nuclear EFOR Data⁵¹

Month	Monticello				Prairie Island 1				Prairie Island 2			
	2022	2023	2024	2025	2022	2023	2024	2025	2022	2023	2024	2025
January	[TRADE SECRET DATA HAS BEEN EXCISED]											
February												
March												
April												
May												
June												
July												
August												
September												
October												
November												
December												
Average												

The Department is unable to draw any conclusions regarding EFOR from the data in Tables 21 to 24.

⁵⁰ Xcel Report at Attachment E.

⁵¹ Xcel Report at Attachment E.

C.5. Impact on Emissions

The Commission's December 1, 2021 Order at Point 8a required utilities to provide Carbon Dioxide emissions data for each unit. The Commission's November 17, 2022 Order at Point 7a extended this requirement by requiring the utilities to provide avoided Carbon Dioxide emissions due to economic commitment, using the Department's recommended method. Tables 25 and 26 show the overall emissions and the avoided emissions available in this proceeding.

Table 25: Carbon Dioxide Emissions Data⁵²

Unit	2021	2022	2023	2024	2025
Boswell Unit 3	2,543,828	2,604,917	2,464,473	1,617,259	2,176,518
Boswell Unit 4	2,636,159	2,618,437	2,574,516	2,688,734	3,375,688
Big Stone	2,066,415	2,390,422	2,094,916	2,210,266	2,656,747
Coyote	3,058,364	2,787,970	3,209,506	2,942,752	2,636,218
King	1,545,215	1,385,510	1,094,107	654,948	1,078,016
Sherco Unit 1	3,051,380	3,955,004	3,205,467	2,841,521	2,075,019
Sherco Unit 2	3,898,059	3,416,090	1,390,671	Retired	Retired
Sherco Unit 3	2,224,536	2,423,237	1,925,692	2,319,249	3,636,104
Total	21,023,956	21,581,587	17,959,348	15,274,729	17,634,310

Table 7: Avoided Carbon Dioxide Emissions Data⁵³

Unit	2022	2023	2024	2025
Boswell Unit 3	2,087	27,632	33,972	-
Boswell Unit 4	-	-	-	-
Big Stone	24,033	65,346	90,400	Not reported
Coyote	-	4,482	4,012	Not reported
King	476,869	1,728,499	2,205,256	1,325,342
Sherco Unit 1	69,911	405,743	97,336	667,095
Sherco Unit 2	66,640	463,488	Retired	Retired
Sherco Unit 3	119,360	107,850	141,625	1,525
Total	758,900	2,803,040	2,572,601	1,993,962

OTP did not report its avoided Carbon Dioxide emissions:

Although the above data [Table 2 Plant CO₂ Emissions Data] was used to calculate each plant's annual average rate of CO₂ emitted per MWh, the rate produced for any given hour is dependent on several variable operating conditions, such as load level and coal quality. Therefore, although a high-level estimate of avoided CO₂ emissions will be made by

⁵² MP Report at 10, OTP Report at 12, and Xcel Report at 12.

⁵³ MP Report at 10, OTP Report at 18, and Xcel Report at 12.

multiplying the annual average CO2 rates by economic commitment hours, an exact number cannot be determined.⁵⁴

Table 25 shows Carbon Dioxide emissions were lower in 2024 and 2025 than in prior years, largely due to the retirement of Sherco 2. Table 26 shows Avoided Carbon Dioxide emissions were lower than the prior two years and, from the historical data, OTP not reporting avoided Carbon Dioxide emissions would not significantly impact this conclusion.

C.6. Curtailment

The utilities reported curtailment data for 2025 as follows: **XX UPDATE**

- MP—**[TRADE SECRET DATA HAS BEEN EXCISED]**
- OTP—**[TRADE SECRET DATA HAS BEEN EXCISED]**
- Xcel—**[TRADE SECRET DATA HAS BEEN EXCISED]**⁵⁵

The historic data on curtailment is summarized in Table 27.

Table 27: Historic Curtailment Percentage⁵⁶

Utility	Curtailment Percentage					
	2020	2021	2022	2023	2024	2025
MP	[TRADE SECRET DATA HAS BEEN EXCISED]					
OTP						
Xcel						

Overall, the utilities experienced significant curtailment in the past year.

D. CONCLUSIONS FROM DATA

The second issue specified in the Notice is “What conclusions can be drawn from the data filed by the utilities in conjunction with what has been learned earlier in this investigation?”

⁵⁴ OTP Report at 12.

⁵⁵ Xcel Report at Attachment F.

⁵⁶ MP Report at Attachment 3, OTP Report at Attachment 7, Xcel Report at Attachment F, and Prior Department Comments.

Based upon the analysis above the Department concludes that:

- Table 2 shows that, on average, use of the Must Run designation during the commitment process has decreased; from around 70 percent the first two years to a little over 50 percent the next three years. For 2024 and 2025 use of Must Run was still lower than the first year, but increased to around 60 percent. Use of the Economic designation during the commitment process increased from around 10 percent the first year to around 20 percent in the subsequent years, with the exception of 2022 (at 28 percent).
- Table 4 shows that uneconomic DA dispatch returned to fairly low levels seen in 2021 and 2022, less than 15 percent of total dispatch. Also, uneconomic DA dispatch above the DA minimum also returned to the fairly low levels seen in 2021 and 2022.
- Table 5 shows that LMPs were substantially higher in 2021, 2022, and 2025 than the other years, driving a greater number of hours of operation at a net benefit in those years.
- Tables 7 and 8 show that both Boswell units had a greater percentage of hours at net benefit than in the prior two years, consistent with the 2025 LMPs which were elevated.
- Tables 10 to 12 show that OTP's units had a greater percentage of hours at net benefit than last year, consistent with the LMPs.
- Tables 14 and 15 show that Xcel's King and Sherco 1 coal units had very low percentage of hours at a net cost. Table 17 shows that, while Sherco 3 had a lower percentage of hours at a net cost than 2024, it was still elevated compared to 2020 to 2023. Overall, Xcel's coal units have no consistent result in terms of percentage of operating at a net benefit or net cost.
- Tables 18 through 20 show that Xcel's nuclear units tend to have relatively few hours operating at a net cost regardless of fluctuations in the average LMP.
- The Department is unable to draw any conclusions regarding EFOR from the data in Tables 21 to 24.
- Table 25 shows Carbon Dioxide emissions were lower in 2024 and 2025 than in prior years, largely due to the retirement of Sherco 2. Table 26 shows Avoided Carbon Dioxide emissions were lower than the prior two years and, from the historical data, OTP not reporting avoided Carbon Dioxide emissions would not significantly impact this conclusion.

E. FUTURE USE

The third issue specified in the Notice is "How should the Commission use the information provided by the utilities in this docket going forward?"

The Department recommends that the Commission track the historical data and use the information and resulting trends to ensure that the utilities do not engage in practices that increase costs unnecessarily.

F. FURTHER ANALYSIS

The fourth issue specified in the Notice is “Should the Commission order any further analysis for future reports, or any additional reports by the utilities?”

The Department does not recommend any further analysis or reporting.

G. JOINT PARTIES RECOMMENDATIONS

The fifth issue specified in the Notice is “Should the filing of this report be combined with the annual fuel-true up reporting, as recommended by Joint Parties in the December 29, 2025 letter?”

As mentioned above in section B of the present comments, the Department participated in the discussion required by the Commission’s October 2025 Order:

Required parties to discuss how to refine the reporting on best case/worst case scenarios and how to ensure the data is useful and relevant, including potential uses of the information and possible discontinuance of the requirement. Required the parties to make a compliance filing 60 days before the 2026 annual reports in this docket explaining if and how they propose to update the best case/worst case reporting in their 2026 annual reports.⁵⁷

The Department joined a letter with MP, OTP, and Xcel recommending that the Commission Order the utilities to include the entirety of the Annual Compliance Filings within each utilities’ Annual Fuel Forecast True-Up Reports due on March 1, rather than continuing to file the Self-Commitment and Self-Scheduling Annual Compliance filing as stand-alone reports.⁵⁸ The Department continues to support migrating the Annual Compliance filings into the Annual Fuel Forecast True-Up Report and the elimination of any duplicative reporting once combined. The Department continues to support combining the two reports to allow plant operations to be evaluated in the context of all the relevant data points reported in each docket, rather than in two silos.⁵⁹ Further, the Department supports the proposal to rename the scenarios from “best case/worse case” to “economic/must run” as discussed in the joint letter.⁶⁰ The Department agrees that the new naming convention will better reflect what is being presented, regardless of the results of the analysis.⁶¹

H. OTHER ISSUES

The sixth issue specified in the Notice is “Are there other issues or concerns related to this matter?”

The Department recommends the Commission accept the utilities’ reports.

⁵⁷ October 2025 Order, at order point 9.

⁵⁸ Joint Parties Letter.

⁵⁹ Id., at pdf 2.

⁶⁰ Joint Parties Letter, at pdf 1.

⁶¹ *Ibid.*

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the utilities' annual reports and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

E. FUTURE USE

- The Department recommends that the Commission track the historical data and use the information and resulting trends to ensure that the utilities do not engage in practices that increase costs unnecessarily.

F. FURTHER ANALYSIS

- The Department does not recommend any further analysis or reporting.

H. OTHER ISSUES

- The Department recommends the Commission accept the utilities' reports.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. E999/CI-19-704

Dated this 5th day of **May 2026**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	19-704Official
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	19-704Official
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	19-704Official
4	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	19-704Official
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	19-704Official
6	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	19-704Official
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	19-704Official
8	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	19-704Official
9	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	19-704Official
10	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	19-704Official
11	Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	19-704Official
12	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	19-704Official
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	19-704Official
14	Shane	Stennes	stennes@umn.edu	University of Minnesota		319 15th Avenue SE Minneapolis	Electronic Service		No	19-704Official

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						MN, 55455 United States				
15	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	19-704Official
16	Brian	Tulloh	btulloh@misoenergy.org	MISO		2985 Ames Crossing Rd Eagan MN, 55121-2498 United States	Electronic Service		No	19-704Official
17	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	19-704Official