



414 Nicollet Mall
Minneapolis, MN 55401

December 29, 2025

—Via Electronic Filing—

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

RE: COMPLIANCE FILING - PROPOSED REPORTING MODIFICATIONS
COMMISSION INVESTIGATION INTO SELF-COMMITMENT AND SELF-
SCHEDULING OF LARGE BASELOAD GENERATION FACILITIES
DOCKET NO. E999/CI-19-704

Dear Ms. Bergman:

The Minnesota Department of Commerce, Division of Energy Resources (Department), Minnesota Power, Otter Tail Power Company, and Northern States Power Company, doing business as Xcel Energy, collectively the “Joint Parties,” respectfully submit to the Minnesota Public Utilities Commission the following proposed reporting modifications of the Self-Commitment and Self-Scheduling Annual Report (Annual Report) in compliance with Order Point 9 of the Commission’s October 29, 2025 Order in the above-referenced docket.

Order Point 9 requires parties to discuss how to refine 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. It also requires 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.

The Joint Parties met to discuss the reporting requirements of the Annual Report. The Joint Parties agreed that utilities should continue to provide reporting of the best case/worst case scenarios. To clarify what information is being examined in the scenarios, the Joint Parties propose a minor modification to update the labeling of the scenarios from “best case/worst case” to “economic/must-run.” This refinement of the labeling will better describe the scenarios presented regardless of the results of the analysis. The Joint Parties believe this proposal enables the Commission to continue to receive information they may find valuable while making clearer what information is being presented.

The Joint Parties also propose to include the entirety of the Annual Report within each utilities' Annual Fuel Forecast True-Up Report (True-Up Report) due on March 1, rather than filing that as a stand-alone report. Utilities would eliminate any portions of the Annual Report already contained in the True-Up Report to eliminate duplication. Combining the two reports will allow plant operations discussed in the Annual Report to be evaluated in the context of other relevant data points included in the True-Up Report and fuel proceedings.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Sincerely,

/s/

PETER TEIGLAND
MINNESOTA DEPARTMENT OF COMMERCE

STEVE RAKOW
MINNESOTA DEPARTMENT OF COMMERCE

ANALEISHA VANG
MINNESOTA POWER

AMBER GRENIER
OTTER TAIL POWER COMPANY

REBECCA EILERS
XCEL ENERGY

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 NOS. E999/CI-19-704

Dated this 29th day of December 2025

/s/

Victor Barreiro
Regulatory Administrator

#	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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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