MINNESOTA
PUBLIC UTILITIES COMMISSION

PREFERRED DECISION OPTIONS
Proposed by Commissioner Sullivan
July 2, 2026

DOCKET NUMBER	**E002/M-24-432**
ANALYST	**Isabel Ricker, Kit Gomez**
DATE/TIME SUBMITTED	**July 1, 2026, 2pm**
TITLE	**Sullivan Preferred Decision Options**
ATTACHMENT	No
SUBJECT	In the Matter of a Peak Time Rebate Program for Xcel Energy to Further the Commission's Advanced Rate Design Efforts in Docket No. E-002/CI-24-115

Commissioner Sullivan supports the following decision options, with modifications marked in red.

Sullivan Modified 6. Take no action on the PTR proposal at this time due to lack of clarity around the program's capacity value and value to participants, and require Xcel to continue operating the EAD program until further notice ~~a final decision on PTR is reached~~.

19. Require Xcel to seek Commission approval for proposed programs intended for inclusion in the Company's ECO portfolio if the program will result in a tariff or rate change, prior to filing such proposals for approval under ECO.

Sullivan Modified 28 (includes 4C and 11): Require Xcel to submit a compliance filing [by June 1, 2027] that clearly articulates how it plans to ~~capture capacity~~ deliver system value with a peak time rebate ~~from this~~ program. Xcel must consult with stakeholders, including commenters in Docket No. 24-432 and others with relevant experience, to develop refinements to the program proposal. This filing must include the following:

Capacity Value

A. The results of the Company's evaluation of whether the PTR program could be incorporated into its load forecast to reduce its MISO capacity obligation (i.e., planning reserve margin requirement). This should include the Company's interpretation of MISO Tariff Module E-1, 69A.1.1b.

B. An explanation of whether unaccredited demand response resources contribute to the total MW of capacity offset by Demand Response Bundles in the IRP planning process.

C. An explanation of the data Xcel would need to collect in order to register the program with MISO in the future and a general timeline for collecting this data.

Potential Opt-Out Program Design

D. A detailed explanation of what billing system upgrades would be necessary to support an opt-out PTR program;
E. The timeline that would be required to implement these upgrades; and
F. A detailed cost estimate for these upgrades and related implementation work.

Dual Enrollment

G. A description of how the Company will adjust baselines or performance data to enable residential customers participating in existing demand response programs to also participate in a PTR program.

Sullivan Modified 29. In this compliance filing, require Xcel to propose a procedural schedule for re-submitting a PTR program proposal that:

A. Adequately captures generation capacity value,
B. Maximizes customer enrollment,
C. Sets the rebate (and control event frequency) at a level that will incentivize customer engagement and peak-reduction actions,
D. Uses historical data from the prior three years to identify the dates of control events that could have been called, had PTR been in effect, and for each hypothetical event provides:
  a. The peak system demand (MW) during the hypothetical control event compared to Xcel's total and coincident peaks in that season; and
  b. MISO day-ahead and real-time energy prices for the Minnesota hub during the hypothetical control event.

30. Require Xcel to include in its next integrated resource plan an evaluation of the results of modeling DSM bundles, including a detailed explanation of: (a) in which scenarios DSM bundles were selected by the model, and (b) whether DSM bundles displaced other resources.