

August 13, 2024

PUC Docket No. 13-867

Objection to Xcel Compliance Filing Dated 07/31/2024

Filed by Cooperative Energy Futures on behalf of its members

In the Compliance Filing (Document ID 20247-209150-01) Xcel is confirming its bill credit rates calculations originally filed on 2/1/24. The document states that these rates would be effective 8/1/24. Cooperative Energy Futures, on behalf of its over 1,000 member subscribers, objects to this effective date being 8/1 but instead should be retroactive to 4/1, when the tariff filing was, by PUC rule, supposed to be filed.

The PUC order dated 7/22/2022 established a 30-day negative check off process in which Xcel **must** file their proposed ARR if no party files an objection within 30 days of Xcel's original 2/1 filing. As there was no objection filed this year, by rule the effective date is to be the first day of the calendar month following the end of that 30-day period. This would always make the effective date 4/1 each year if no objections are filed. Thus, Xcel is obligated to update its tariff effective 4/1 even with no explicit approval by the PUC. Xcel acknowledges this point in a similar manner in its own filing.

Cooperative Energy Futures requests the PUC follow its own order and require Xcel to retroactively restore the difference in bill credits all subscribers should have gotten and proceed with the bill credit rates as filed for 2024-25.

/s/ Mary Kay Olson, Cooperative Energy Futures

Mary Kay Olson