414 Nicollet Mall
Minneapolis, MN 55401

February 18, 2026

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—Via Electronic Filing—

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

RE: REPLY COMMENTS IN SUPPORT OF CERTIFICATE OF NEED
COMBINED APPLICATION – LYON COUNTY GENERATING STATION PROJECT
DOCKET NOS. E002/CN-25-145, G002/GS-25-154, E002/TL-25-161 &
G002/GP-25-163

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission in response to the Comments of the Department of Commerce, Division of Energy Resources (Department), the Office of the Attorney General, Residential Utilities Division (OAG), LIUNA, and two public comments that were received regarding the merits of the Certificate of Need for the Lyon County Generating Station Project (Project). On January 14, 2026, the Commission issued its NOTICE OF COMMENT PERIOD ON THE MERITS OF THE CERTIFICATE OF NEED APPLICATION (Notice). The Notice requested comments on the following topics:

- Should the Commission grant a certificate of need for the proposed project?
- If granted, what additional conditions or requirements, if any, should be included in the certificate of need?
- Are there other issues or concerns related to this matter?

We appreciate the Department's, OAG's and LIUNA's review of the Application and our February 4, 2026 Comments. We respond and provide requested additional information in our enclosed Reply. The record continues to demonstrate that the Project is necessary to reliably and cost-effectively serve our customers. We continue to request that the Commission issue a Certificate of Need, Site Permit, and Route Permits for the Project.

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Portions of the enclosed Reply Comments and Attachment B are marked "Not-Public" as they contain information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential pricing and other commercially-sensitive contract terms and vendor information related to the Project, which, if released, would have a detrimental effect on Xcel Energy by providing potential competitors, commercial parties and others with valuable information not otherwise readily ascertainable and from which these persons would obtain economic value.

Attachments C, D, and E to the Company's supplemental OAG IR No. 2 response, provided as Attachment B to this filing, are marked as "Not-Public" in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachment C is an Excel spreadsheet containing cost breakdowns by category for the project. Attachment D contains PDF copies of documentation supporting project cost proposals. Attachment E is a pdf copy of a waterfall summary illustrating cost progression from the Settlement Agreement cost, to the Certificate of Need Application estimate, and finally to the current Project budget

2. **Authors:** Attachments C and E were drafted by Company project management personnel. The documents included in Attachment D were drafted by vendor and Company project management personnel.

3. **Importance:** Attachments C, D and E include confidential contract and pricing terms and vendor information Xcel Energy maintains as trade secret.

4. **Date the Information was Prepared:** Attachments C and E were created for purposes of the supplemental OAG IR No. 2 response. See individual documents in Attachment D for creation dates.

We have electronically filed this document with the Minnesota Public Utilities Commission. Copies have been served on parties on the attached service lists. Please contact me at jody.l.londo@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

JODY L. LONDO
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosures
c: Service Lists

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE APPLICATION OF XCEL ENERGY FOR A CERTIFICATE OF NEED, SITE PERMIT, ROUTE PERMIT, AND PIPELINE ROUTE PERMIT FOR THE LYON COUNTY GENERATING STATION IN LYON COUNTY, MINNESOTA	DOCKET NOS. E002/CN-25-145, G002/GS-25-154, E002/TL-25-161 & G002/GP-25-163 **REPLY COMMENTS**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments to the Minnesota Public Utilities Commission in response to the Comments of the Department of Commerce, Division of Energy Resources (Department), the Office of the Attorney General, Residential Utilities Division (OAG), LIUNA, and two public comments that were received regarding the merits of the Certificate of Need for the Lyon County Generating Station Project (Project). On January 14, 2026, the Commission issued its NOTICE OF COMMENT PERIOD ON THE MERITS OF THE CERTIFICATE OF NEED APPLICATION (Notice). The Notice requested comments on the following topics:

- Should the Commission grant a certificate of need for the proposed project?
- If granted, what additional conditions or requirements, if any, should be included in the certificate of need?
- Are there other issues or concerns related to this matter?

We appreciate the Department's, OAG's and LIUNA's review of the Application and our February 4, 2026 Comments. We respond and provide requested additional information below.

The record continues to demonstrate that the Project is necessary to reliably and cost-effectively serve our customers. We continue to request that the Commission issue a Certificate of Need, Site Permit, and Route Permits for the Project.

REPLY COMMENTS

I. RESPONSE TO THE DEPARTMENT

The Department's comments include a detailed analysis of the Project and the underlying record, and the Department concludes that the Project meets the applicable legal criteria for the issuance of a Certificate of Need. For example, the Department concluded that "the Company has substantial peaking capacity needs and the more recent forecasts do not change that conclusion," noting that the Project "can fulfill at least some of the peaking needs." The Department recommends that the Commission grant a Certificate of Need for the Project. We appreciate the Department's comprehensive review of the record in this proceeding and agree that the record supports granting a Certificate of Need.

II. RESPONSE TO THE OAG

The OAG's comments focus primarily on the Company's cost estimate for the Project, which—without offering any contrary evidence—it contends is too high.

The OAG goes on to argue for order points that go beyond the scope of this Certificate of Need proceeding. First, the OAG contends the Commission can and should limit rate recovery to less than the Project cost, and with a "hard cap," rather than the soft cap the Commission has applied thus far. Second, the OAG misstates the Project need as being driven by data center demand and contends that very large customers, who are not represented in this docket, should bear certain costs. Overall, the OAG's comments misunderstand the fundamental underlying need for the Project—a need that the Commission has already affirmed multiple times.

Neither the law nor the record supports the OAG's position.

A. Need

The Commission determined the need for the Project as a resource through approval of a settlement agreement in the E002/CN-23-212 and E002/RP-24-27 dockets.[1] The Commission directed the filing of a Certificate of Need application and ordered that "[t]he Commission approved settlement agreement can be used as material evidence to support the petition."[2] In addition to the Settlement Agreement, Xcel Energy supported the need for the Project through a 100+-page application, Direct Testimony, and multiple rounds of comments in this informal proceeding.

[1] 2024 IRP Docket and Firm Dispatchable Docket, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications at Ordering ¶ 11 (Apr. 21, 2025).
[2] *Id.* at 9 and Ordering ¶ 1(a).

The OAG does not provide any of its own evidence; instead, it repeatedly and baselessly asserts that the need for the Project is primarily due to data centers. That is not the case, nor has it been in the half a decade in which it has been the subject of proceedings in front of the Commission. The firm dispatchable generation need was first identified in our 2020-2034 Integrated Resource Plan (2019 IRP) in Docket No. E002/RP-19-368. In its 2019 IRP Order, the Commission found that "it is more likely than not that Xcel Energy will need up to 800 MW of firm dispatchable resources between 2027 and 2029" to reliably transition our system away from central station fossil fuel plants to a regional system that increasingly relies on renewable and other carbon-free generation.[3]

Consistent with the Commission's 2019 IRP Order, Xcel Energy initiated the Firm Dispatchable Docket in May 2023 and, later, the 2024 IRP in February 2024. In October 2024, the Company entered into a comprehensive settlement agreement with other settling parties to resolve issues related to both the Firm Dispatchable Docket and the 2024 IRP. Among other things, the Settlement Agreement included the selection of this Project in the Firm Dispatchable Docket. The Commission approved the Settlement Agreement, with modifications, including the selection of this Project, and directed the Company to obtain a Certificate of Need "in light of the potential litigation risk that would lead to additional delay, and to ensure participation of affected communities and robust record development."[4]

The evidence from these two prior proceedings, with the additional analysis reflected in the Application and this docket more generally, continues to demonstrate that the Company needs firm dispatchable resources to reliably serve customers, and that the Project is a reasonable alternative to meet that need. The OAG's comments do not contradict or refute the need for reliable firm dispatchable generation, nor do they identify an alternative that could meet this need for the Project.

The OAG bases its mistaken assertion that the need for the Project is driven by data centers on the Company's narrative supporting the updated forecast it was required to submit into this proceeding. While the Company expects substantial increases in demand due to large data center additions, that is not driving the need for the Project. Instead, and as discussed above, the need for this Project stems from the 2019 IRP (before the recent data center boom), which has been affirmed by the Commission multiple times, and the Company's more recent forecasts do not change that underlying need.

[3] Application at 8-11.
[4] *Id.*

B. Cost

The OAG then asserts that the Company has not adequately demonstrated the cost of the Project. However, the OAG does not argue that the legal criteria for granting a Certificate of Need are unmet. The record demonstrates that the Project meets the statutory criteria for the issuance of a Certificate of Need. With respect to cost, more specifically, Minn. Stat. § 216B.243 requires:

- The applicant must show that "demand for electricity cannot be met more cost effectively through energy conservation and load management measures."[5] Here, the Application includes a detailed alternatives analysis. Both the Company and the Department concluded that conservation and load management are not substitutes for the firm dispatchable need that will be met by the Project.[6]
- For nonrenewable generators, the applicant assesses "the risk of environmental costs and regulation" on the proposed facility.[7] The Company provided detailed information regarding our analysis and the Department concluded that this requirement has been adequately addressed.[8]
- The Commission may not issue a Certificate of Need for a nonrenewable generator unless the applicant demonstrates it has "explored the possibility of generating power by means of renewable energy sources and has demonstrated that the alternative selected is less expensive. . . ."[9] Section 5 of the Application discusses the alternatives (including renewable generation) we considered for the Project before concluding that renewable generation, on its own, does not meet the capacity need for firm dispatchable generation.[10] The Department agreed that "renewable generation is not a reasonable alternative."[11]

The OAG's criticisms of the Project's cost estimate fail to refer to an applicable statute or rule or to address the evidence in this record. The OAG makes two broad criticisms of the Company's cost estimate, for which it provides no support. First, the

[5] Minn. Stat. § 216B.243, subd. 3.
[6] *E.g.*, Application § 5.5; Department Comments at 15. Minn. R. 7849.0120(B)(2) similarly requires an alternatives analysis that includes cost as one of its considerations. Here, too, the Department concluded that that there is no alternative or combination of alternatives that would meet the identified need that would be expected to have a lower cost. Department Comments at 15.
[7] Minn. Stat. § 216B.243, subd. 3(12).
[8] Department Comments at 23.
[9] Minn. Stat. § 216B.243, subd. 3a.
[10] Application § 5.3.2.
[11] Department Comments at 19.

OAG criticizes the overall increase to the Project costs. Second, the OAG suggests that the Company has not been transparent about various aspects of its costs. These criticisms are meritless, and the Company responds to them below.

1. Overall Project Cost Increase

Initial proposals for the Project were required in January 2024—nearly two and a half years before the Project could potentially receive its Certificate of Need. Since that time, the power market has experienced unprecedented cost escalation, particularly in the demand for simple-cycle combustion turbines, engineering services, and construction labor necessary to place projects into service. Independent industry consultants have reported that simple-cycle project $/kW costs have nearly doubled over this same period. As evidence of these increases, Xcel Energy includes a white paper study discussing the cost challenges of similar sized simple cycle CT projects from 2022-2025 as Attachment A to this filing.

As also shown in Attachment A to the Company's February 4, 2026 Comments, Lyon County's updated cost estimate is within the range of similar projects being built across the country, despite these industry-wide pressures.

The OAG asserts that the two most "comparable" projects are cheaper on a $/kW basis. However, these comparisons overlook four significant differences:

a. In-Service Dates

The two projects cited by the OAG have in-service dates 12 to 35 months earlier than Lyon County. Earlier delivery materially reduces exposure to inflationary pressures in equipment, materials, and labor markets.

b. Equipment Procurement Timing and Price Escalation

To meet these earlier in-service dates, those projects would have secured turbine equipment well in advance of Lyon County. Over the past four years, Xcel Energy has seen turbine pricing increase dramatically, as shown per unit in Table 1 below.

Table 1
Turbine Pricing Escalation Over Time

Facility	Equipment Ordered	Type	Cost
[PROTECTED DATA BEGINS			

PROTECTED DATA ENDS]

Earlier procurement therefore translates into more than $100 million in avoided costs that Lyon County could not reasonably realize.

c. Brownfield Development Advantages

The OAG's cited projects are brownfield/redeveloped existing generating sites, benefiting from:

- Existing site utilities
- Established operations and maintenance facilities
- Onsite warehouse capacity
- Construction efficiency from sequential unit installation

As a greenfield site, Lyon County lacks these structural cost advantages, making direct cost comparisons inaccurate.

d. Synchronous Condenser Capability

Lyon County includes clutch-enabled synchronous condenser capability, resulting in a modest cost premium for the turbines and balance of plant. This capability is projected to *avoid* approximately $120 million in costs for two standalone synchronous condensers at the Garvin Substation. The projects cited by OAG do not provide this system-critical function.

2. Alleged Lack of Transparency

The OAG suggests the record lacks information regarding cost drivers and the Company's efforts to control costs. We disagree with that characterization and provide further explanation and support, below.

a. AFUDC

Xcel Energy acknowledges that its January 2024 materials did not specifically call out AFUDC. However, contrary to the OAG's characterization, AFUDC was explicitly identified in Appendix K to the Certificate of Need application, and Xcel Energy has continued to provide updated AFUDC estimates, including in its supplemental response to OAG Information Request (IR) No. 2, provided as Attachment B to this filing.

b. Geotechnical Costs

Deep foundation requirements were specifically described in Attachment C to the supplemental OAG IR No. 2 response. As reflected in Xcel Energy's November filings, deep foundations were initially listed as $0 in the May cost estimate, because a site-specific geotechnical study had not yet been performed. Since the time of application, we received the geotechnical study from the neighboring Garvin Substation site, which indicated that deep foundations were likely. This was confirmed when the Project completed geotechnical investigations in November 2025.

c. Tariff Impacts

Federal tariff volatility in Q1–Q2 2025 created significant uncertainty for turbine suppliers and Engineering, Procurement and Construction (EPC) contractors.

- Suppliers would not commit to tariff-inclusive pricing.
- Material origin was uncertain, making tariff exposure difficult to quantify.
- Xcel Energy was required to make reasonable assumptions regarding tariff risk.

Regarding the CT pricing specifically, the Company's Application reflected a higher preliminary estimate, which ultimately decreased at contract execution once tariff risk language was finalized.

d. Contingency

As documented in the waterfall included as Attachment E to the supplemental OAG IR No. 2 response, overall Project contingency has been reduced, not increased, because:

- Key equipment contracts (turbines, transformers, breakers) were executed by Xcel Energy in 2025.
- Xcel Energy and its EPC contractor have established a stable, expected contract value.

With major risks now contracted, contingency has responsibly been lowered.

e. Clutch System Development

GE Vernova expects that the Lyon County turbines will be the first F Class CT units in the country to operate with integrated clutch-enabled synchronous condenser capability. This is an industry-first deployment. As the design has progressed, previously unknown requirements have been identified, including:

- An additional transformer and related materials
- Increased cooling loads requiring larger air-cooled heat exchangers-cooled heat exchangers

This functionality continues to be essential to support the addition of hundreds of megawatts of renewable generation on the Minnesota Energy Connection (MNEC) transmission line and avoids approximately $120 million in separate transmission equipment costs.

In short, the Application included the estimated Project cost and described the components of that estimate. Our Comments then explained the Company's ongoing analysis regarding the cost of the Project, including the results of a detailed bottoms-up cost estimate and the factors influencing Project costs. In addition, we provided additional information to the OAG regarding the cost estimate identified in our Comments in our supplemental response to OAG IR No. 2.

The record evidence satisfies the applicable legal criteria and, contrary to the OAG's assertion otherwise, the evidence supporting the Project's cost estimate is more robust than most Certificate of Need proceedings. There is no evidence in this record contradicting or refuting this information, and the record contains substantial evidence supporting the updated cost estimate.

3. Cost Recovery and Cap

Finally, the OAG proposes three potential cost recovery conditions that are outside the scope of a Certificate of Need proceeding. First, the OAG proposes that the

Commission impose a hard cost cap of **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. We oppose this proposed condition. Such a cap is outside the scope of a Certificate of Need proceeding; the OAG has not cited any authority, and we could find none, that would allow for the Commission to conclude that a Project is needed and then arbitrarily limit cost recovery to something less than what was found as the cost in the Certificate of Need docket. To the extent the OAG may be relying on cost "caps" from prior Certificate of Need proceedings, the OAG's reliance is misplaced. For example, cost caps have been imposed in transmission line dockets but do not limit what costs can be recovered by a utility; rather, it limits the recovery of cost over and above the Certificate of Need costs through the transmission rate rider to the costs approved in the Certificate of Need proceeding.[12] Moreover, Xcel Energy has fully supported the updated costs.

Second, and in the alternative, the OAG proposes an alternative to its hard cap that would limit the Company's return on equity for costs only up to a portion of the total estimated costs of the Project. Again, the OAG is making an arbitrary proposal and asking the Commission to use this Certificate of Need docket for ratemaking, which we do not support. Third, the OAG asserts that the Commission should "condition the Certificate of Need on Xcel Energy assigning the incremental costs of Lyon County to very large customers in any cost recovery proceedings." As discussed earlier in this Reply, the OAG misconstrues the need for this Project. Further, the determination of how rate recovery is assigned across customer classes is an issue for a rate case (Minn. Stat. § 216B.16), not a Certificate of Need proceeding (Minn. Stat. § 216B.243). We, likewise, do not support this condition and note that very large customers are not represented in this proceeding.

4. Summary

Overall, the Commission directed Xcel Energy to apply for a Certificate of Need for the Project "in light of the potential litigation risk that would lead to additional delay, and to ensure participation of affected communities and robust record development."[13] At that time, the Commission clearly contemplated that the Company would include and support the Project's costs in the Certificate of Need proceeding.[14] This process

[13] 2024 IRP Docket and Firm Dispatchable Docket, MPUC Docket Nos. E002/RP-24-67 and E002/CN-23-212, Order Approving Settlement Agreement with Modifications at Ordering, at 9 and Ordering ¶ 1(a) (Apr. 21, 2025).

[14] The Commission's deliberations on the Settlement Agreement and 2024 IRP recognized that Project costs would be updated in this docket, so any implication by the OAG that the Company providing those updates here is not well-taken. https://minnesotapuc.granicus.com/player/clip/2494?view_id=2&redirect=true.

also provided affected communities with the opportunity to participate. There continues to be strong evidence that the Project is needed to meet the Company's firm dispatchable needs. Despite offering criticisms, the OAG does not offer record evidence that the Project is not needed, provide evidence refuting the Project costs, nor does the OAG identify any alternative to the Project. The OAG's criticism is unfounded and unpersuasive, and its proposed conditions go well beyond a Certificate of Need proceeding and should be rejected.

III. RESPONSE TO LIUNA

In its comments, LIUNA supports the issuance of a Certificate of Need and other required Commission approvals for the Project, noting that the Project "will be a critical reliability tool" and create employment and career opportunities. We appreciate LIUNA's support of the Project and look forward to continuing to work with the Minnesota Building and Construction Trades.

IV. RESPONSE TO PUBLIC COMMENTS

Two members of the public submitted comments generally expressing support for Minnesota's 100 percent by 2040 law and questioning whether the Project furthers the goals of that law. As detailed in the Application, the Project is designed to minimize carbon emissions, support the reliable integration of renewable energy generation, and ensure the Company will be in compliance with the 100 percent by 2040 standard. Further, after the Project is in-service, we will conduct a feasibility study to evaluate pathways to convert the Project to combust 100 percent carbon-free generation, including hydrogen, by January 1, 2040, or identify another pathway to transition the unit to zero emissions by January 1, 2040.

CONCLUSION

We appreciate the Commission's consideration of these Reply Comments. The record continues to demonstrate that the Project is necessary to reliably and cost-effectively serve our customers. We continue to request that the Commission issue a Certificate of Need, Site Permit, and Route Permits for the Project.

Dated: February 18, 2026

Northern States Power Company

1898 & CO.
PART OF BURNS McDONNELL

SCGT COST ESCALATION WHITE PAPER

XCEL ENERGY

REVISION 0

JUNE 27, 2025

Disclaimer

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CONTENTS

APPENDICES

FIGURES

Background

Xcel Energy, Inc. ("Xcel") is working to submit a Certificate of Public Convenience and Necessity ("CPCN") for the Fort St. Vrain simple cycle facility located in Weld County, Colorado to the Colorado Public Utility Commission ("PUC"). The Fort St. Vrain facility is planned to be a 2x General Electric ("GE") 7F.05 simple cycle gas turbine ("SCGT") facility. Xcel requested support from 1898 & Co., a part of Burns & McDonnell, ("1898 & Co.") to provide market insight into cost trends over the last two years for an F-class SCGT project.

Technology Assessments

1898 & Co., a part of Burns & McDonnell, has over 125 years of power industry experience. We leverage our market knowledge and EPC contractor experience to support our clients in developing new power generation assets. This includes evaluating various generation technologies for long term resource planning. These technology assessments include developing screening level cost and performance information to support integrated resource plans ("IRP"), project development activities, and technology selection. Our recent experience is provided in Appendix A.

Technology assessment capital cost estimates are typically based on Association for the Advancement of Cost Engineering ("AACE") Class 5 estimates that are factored from more detailed bottom up estimates from Burns & McDonnell's design and construction teams. These capital cost estimates are adjusted for regional labor rates (based on RSMeans construction labor rate) and major scope adjustments (such as inclusion of selective catalytic reduction ("SCR"), buildings, or dual fuel). They are not typically site specific or sufficient for project budgeting. They are intended for relative differential costs for decision making.

1898 & Co. will leverage information developed through historical technology assessments to show cost trends for a 2x F-class SCGT over the last two years.

Market Trends

The power market has experienced significant demand for additional capacity over the last two years. This capacity demand has been driven by a number of factors, the biggest of which include evolving resource adequacy requirements, substantial load growth, and coal unit retirements.

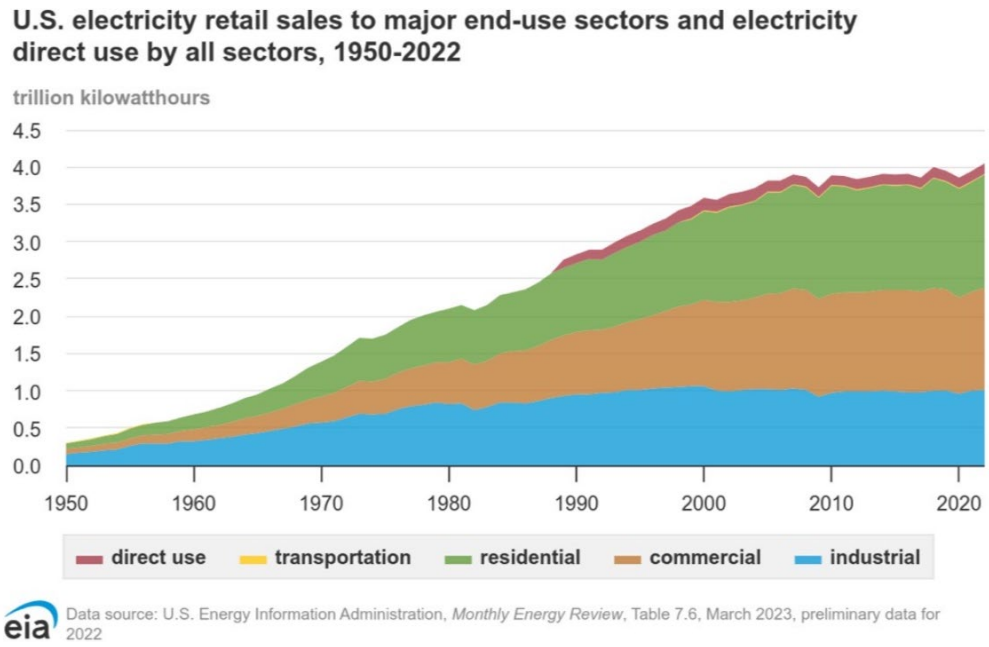
Resource Adequacy Requirements

Independent System Operators ("ISO") and Regional Transmission Operators ("RTO") require that load serving entities maintain reserve margins in order to maintain system reliability and resilience. This planning reserve margin requirement ("PRMR") is defined as installed accredited capacity above the peak load demand on the system. As higher percentages of intermittent resources (non-dispatchable resources such as wind and solar generation) are installed on the system and extreme weather events become more common, these PRMR are needing to increase in order to maintain system reliability. Southwest Power Pool ("SPP") increased PRMR from 12% to 15% in 2023. In 2026, SPP is increasing the summer PRMR from 15% to 16% and adding a winter PRMR. Similarly, California Public Utility Commission ("CPUC") increased PRMR from 16% to 17% in 2024. These PRMR are based on unforced capacity ("UCAP") and not installed capacity ("ICAP"). Accredited capacities for intermittent resources continue to decrease, requiring firm dispatchable resounces to meet peak demands. PJM also experienced this with their 2024 capacity auction. For the majority of the PJM region, capacity prices for 2025/2026 delivery year increased to $269.92/MW-day from $28.92/MW-day in the last action.

Load Growth

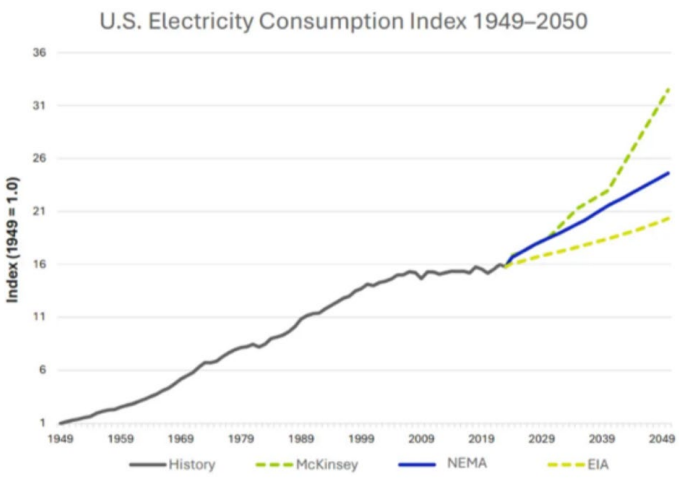
Over the last twenty years, the majority of the U.S. has experienced minimal load growth. Figure 1 shows the historical electricity usage from 1950 through 2022 according to Energy Information Administration ("EIA"). As you can see, energy usage has been relatively flat over the last 15 to 20 years.

Figure 1: Historical Electricity Usage



The relatively flat load growth has been driven by industries moving overseas and an emphasis in energy efficiency improvements. However, energy efficiency improvements have begun to plateau and there has been a renewed interest in bring manufacturing industries back to the U.S. This has lead to an increase in large industrial loads. Further, decarbonization efforts have lead to electrification of industrial processes and vehicles which lead to an increase in electiricty usage. Finally, the demand for data centers, driven by artificial Intelligence and cloud services, has exploded over the past few years, leading to very large load growth. Figure 2 shows forecasted electricity through 2050 according to McKinsey, National Electric Manufacturer's Association ("NEMA"), and EIA. This figure is from utilitydive.com and shows forecasted load through 2050.

Figure 2: Forecasted Electricity Consumption

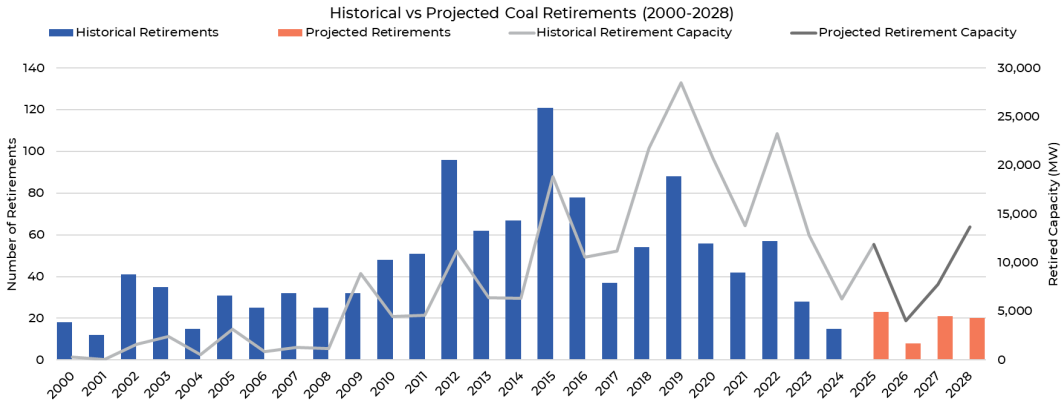


While there is variation in the forecasts, they are all consistent with showing significantly more load growth over the next 20 years than we have seen for the last 20 years.

Coal Retirements

While the power market experiences increasing load growth, the electric utility industry capacity demands are even further amplified by the retirement of coal generation assets. We have experienced significant loss in firm dispatchable generation that will need to be replaced. Figure 3 shows the number and capacity of coal units retired since 2000 along with projected retirements through 2028.

Figure 3: Coal Retirements



The combination of these factors; increasing PRMR, load growth, and coal retirements; are causing high demand for new gas generation across the country. This has lead to increasing equipment lead times and a resulting increase in cost.

Cost Trends

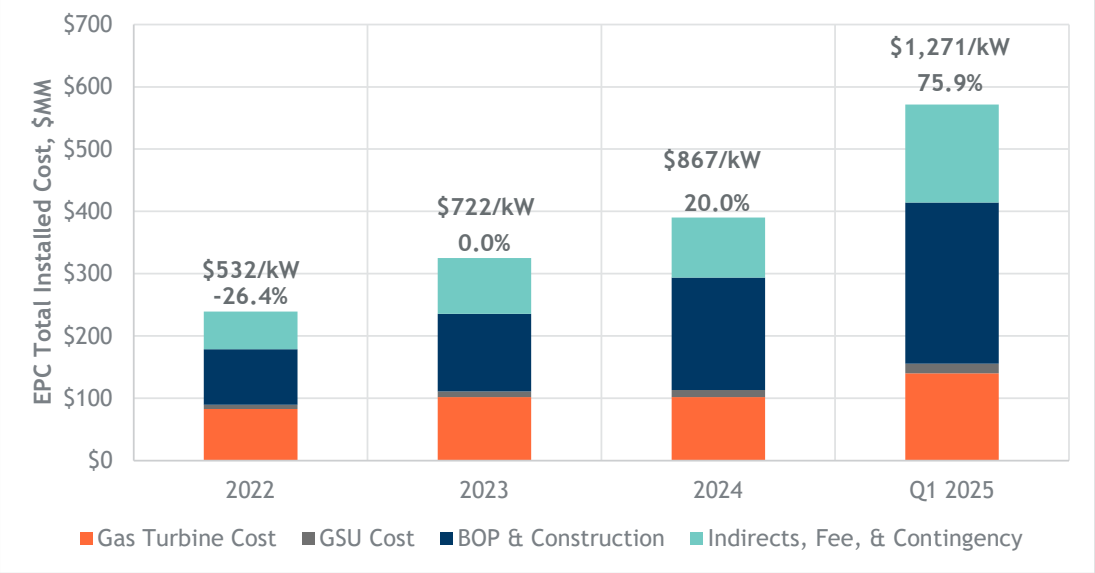
Supply and demand is a fundamental princinpal of economics. As noted above, the industry has experienced significant nation wide demand for gas generation to meet firm capacity needs. Furthermore, the North American gas generation market experienced low demand from 2018 thorugh 2023. This coupled with supply chain challenges created during the COVID pandemic in 2020, resulted in gas turbine OEMs downsizing production capabilities. The combined results have been significant increases in equipment lead times and costs. This white paper is going to focus on four major categories to illustrate these increases:

- Total Installed Capital Cost (EPC Cost)
- Major Equipment Supply Cost (focus on Gas Turbine and GSU costs)
- Overall Labor Cost
- EPC Contractor Risk Mitigation Cost

Total Installed Capital Cost (EPC Cost)

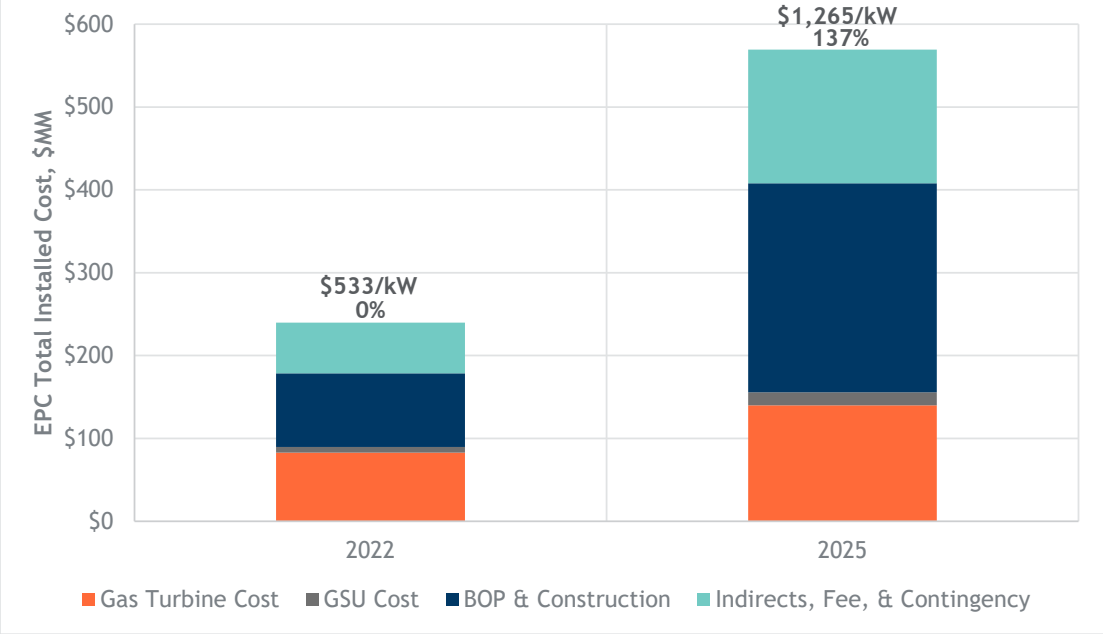
This section will focus on the overall total installed EPC cost. These cost do not account for offsite infrastructure costs (transmission interconnection, natural gas laterals, water supply, transmission system upgrades) or Owner's cost (development costs, Owner's project personnel, Owner's engineer, land cost, permitting costs,etc.). To illustrate overall capital cost increases experienced in the industry, 1898 & Co. has compared several technology assessments that were completed from early 2023 through early 2025. Figure 4 shows the trend of 2x F-class SCGT facility from early Q1 2023, Q1 2024, and Q1 2025 for a potential facility in the Midwest.The scope of the three estimates is very similar and provides a great comparison of overall cost trends over the last 2 years. The Technology Assessment costs show a 75% increase in total EPC cost over the time period.

Figure 4: Technology Assessment Trend #1



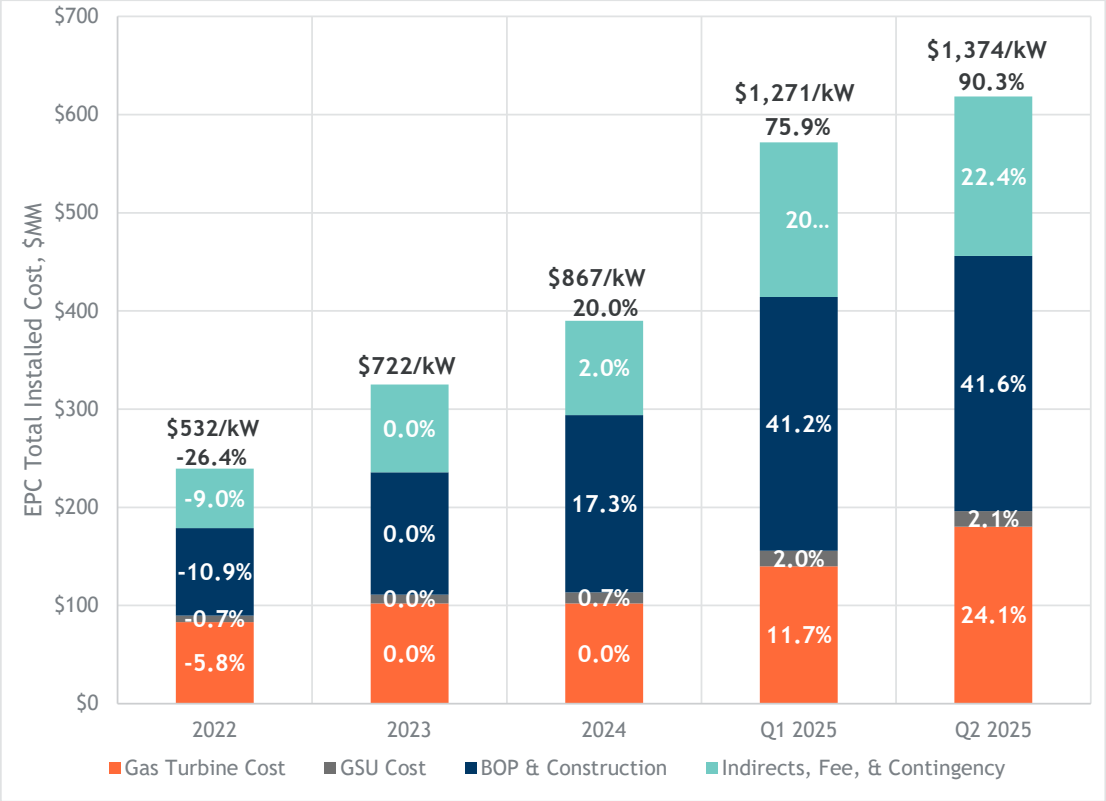
Similarly, Figure 5 shows a similar comparison of technology assesment costs for another potential plant from Q3 2022 to Q1 2025 for a 2x F-class SCGT facility. The overall cost increase is even higher (longer period of time), but you can see a similar estimated cost in early 2025.

Figure 5: Technology Assessment Trend #2



To further emphasize the continued trend of cost increases, Figure 6 shows another more recent technology assessment that was completed at the end of Q2 2025 shown compared to the technolody assessment trend #1 costs.

Figure 6: Q2 2025 Technology Assessment Cost



Major Equipment Cost

As you can see from the trends in the figures above, gas turbine costs have increased substantially since the end of 2023. From 2018 through 2022, F-class gas turbine pricing was relatively stable at around $40 million per turbine. Due to some large orders and overall increase in demand (specifically associated with data center demand), pricing has soared to $90-$100 million per turbine in today's market. This accounts for a substantial piece of the total cost increases. It is important to understand that the gas turbine market is an international market and that some of these large orders have been from sovereign wealth funds and been upwards of fifty (50) gas turbines in a single order.

Similarly, Generator Step-Up ("GSU") transformers have seen similar price increases. GSU pricing has seen a 70%-80% price increase from early 2023 to 2025.

Equipment lead times have also impacted project risk and financing costs. Historically, gas turbine lead times were 12-15 months. GSU lead times were similar. Currently, F-class gas turbine lead times are around 36 months from award to delivery. GSU transformers have a similar lead time. This forces owners to invest significant project dollars early in the project to procure the equipment in order for it to be delivered in three years.

Labor Costs

The construction industry is facing a shortage of skilled labor as a whole. This is driven by an aging workforce, fewer individuals entering the trades, and an increasing demand not only in power generation projects but other industries such as data centers. This not only results in an increase in raw labor costs (wages) but also increases in per diems, benefits, and incentives to keep those skilled laborers at your site. These incentives typically dwarf the raw labor cost increases. Furthermore, the shortage of skilled labor has also led to anoverall labor productivity decline. It is harder to intice quality craft labor to your project and keep them. Turnover rates have increased as competition for skilled labor increases. There is an especially high demand on electricians as they are in demand not only for new gas genearation but also renewable projects and data centers. Higher turnover impacts productivity as new craft labor has to be trained and onboarded. Additionally, not inticing or keeping high quality skilled labor can impact overall project quality and result in rework. These productivity impacts lead to more project labor hours and overall higher costs to the project. On average, 1898 & Co. has seen in increase in total labor costs of about 120% from 2023 to 2025 for a 2x F-class SCGT project. This is a combination of raw labor rates, incentives, and productivity. This results in about a 10% increase in the overall project cost over that time period.

EPC Contractor Risk Mitigation Cost

Similar to the high demand on major equipment and skilled labor, qualified EPC contractors are in high demand as well. This increase in demand for EPC contractors has resulted in a increase in premiums for qualified EPC contractors.

EPC contracts are also having to combat risk associated with labor shortages (which impact labor productivity and project schedule) and escalation of equipment and material pricing (which impact total direct costs). If the EPC is responsible for delivering a project for fixed price or defined schedule, this leads to risk that the EPC's cost would increase or schedule may not be able to be maintained. This has lead to different contracting strategies that allow for shared risk between the owner and the contractor, but it has also resulted in higher premiums. These premimums can come in a number of different forms:

- Increased contingency
- Increased engineer, construction management, and startup hourly rates
- Increased EPC fee

Each EPC contractor will approach these three buckets differently and it will be dependent on the contracting methodology, but the end result is similar. The overall project cost has increased between 15% - 25% from 2023 to 2025 due to increases in these premiums to manage overall project risk.

Conclusions

The cost to build a 2x F-class SCGT facility has increased substantially over the last two years. These cost increases are driven by macro economic drivers that impact the entire country. Demand on major equipment has significantly increased equipment lead times and costs. Skilled labor shortages have increased all-in labor rates and reduced productivity. EPC Contractors have increased risk premiums to account for the market conditions. The overall impact is a 70%+ increase on total installed cost of a project of this type since 2023. This increase could be even higher depending on scope , contracting strategy, major equipment procurement timing, and other very fluid factors. Market pricing is changing faster than we've seen in the last 20 years and it can make planning and building a much-needed new gas generation asset very challenging.

APPENDIX A – STATEMENT OF QUALIFICATIONS

1898 & CO.
PART OF BURNS McDONNELL

STATEMENT OF QUALIFICATIONS

NATURAL GAS GENERATION PROJECT DEVELOPMENT

2025

1898andco.com

How Can We Help

How Can We Help

As the world changes, transformation is essential. To stay ahead, you need a partner who understands your challenges and has the vision to see where the industry is heading. You also need a partner who can respond quickly to develop strategies that drive progress. With more than 125 years of power industry experience at Burns & McDonnell, we turn data into action that enables smarter decision-making for your business.

We understand the complexities of developing new power generation and the trends shaping your industry. We also recognize the need to ground big ideas in operational realities.

Industry-Leading Experience

You need a partner with the qualifications and experience that understand gas power generation facilities from site selection and technology evaluation through construction. 1898 & Co. is that partner, having earned Engineering News-Record's No. 1 ranking for firms serving the electrical power industry. We have a diverse portfolio of successful generation projects nationwide. Our recent experience in technology evaluations, site selection, generation interconnection applications, permitting support, and EPC execution provides direct value to your team during the early engineering stages of a project.

Full-Service Capabilities

By partnering with 1898 & Co., you gain access to more than 14,000 professionals at Burns & McDonnell, making us a preferred full-service provider. Our breadth of expertise allows us to answer complex technical questions that other firms may not have the resources to address.

Client Success

As an EPC contractor for large, complex projects, we understand how critical early-stage project development is to ensuring success through each phase of execution. We have a proven record of delivering schedule and budget certainty from project development through construction. Our strong track record results in a 90% client retention rate — a key differentiator that drives project success and customer satisfaction.

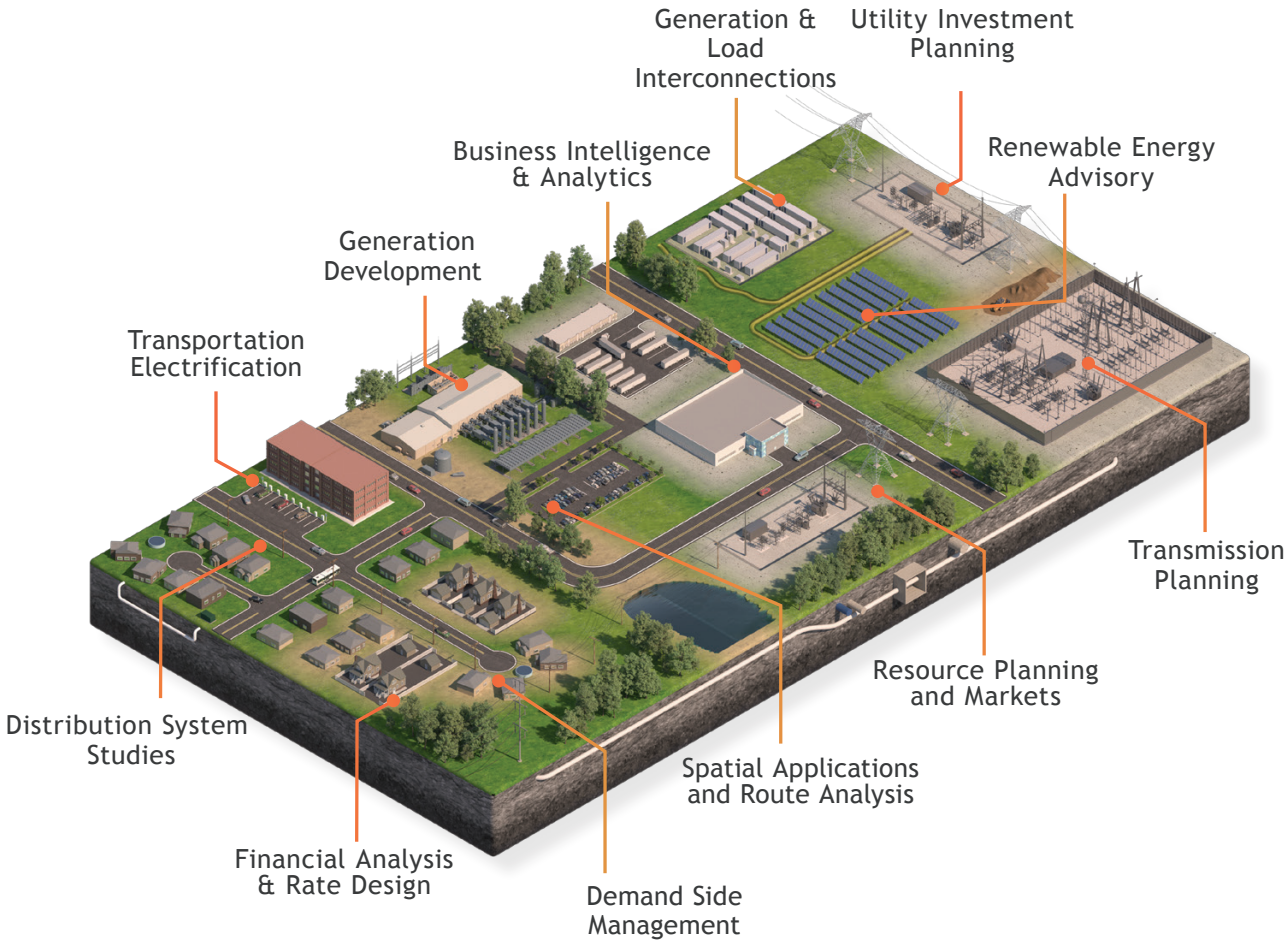
Access to
14K
Professionals

Ranked
#1
In Power | *ENR*

Client
90%
Retention Rate

Services We Provide

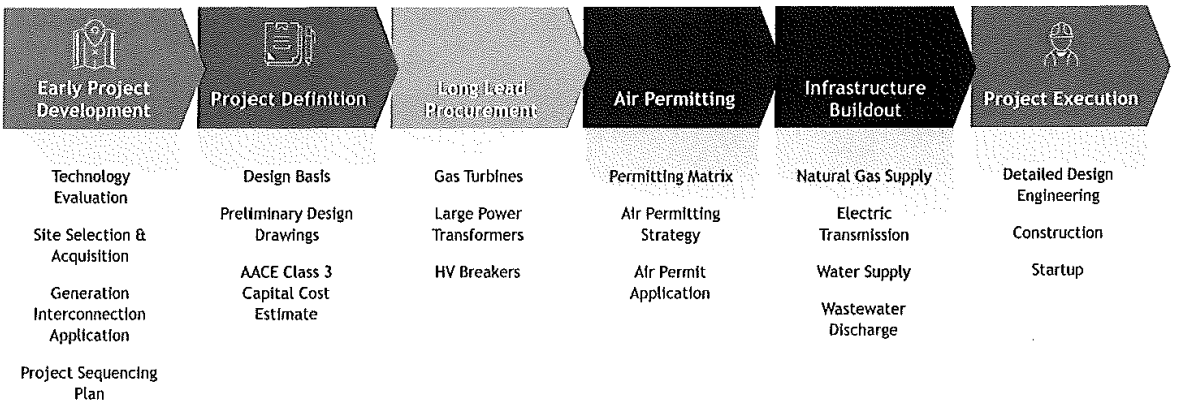
1898 & Co. works alongside clients to navigate the development of natural gas generation projects from concept to execution. We support technology selection, site evaluation, permitting strategies, and project sequencing, all tailored to the client's goals and constraints. With a practical understanding of industry drivers, we help teams make informed decisions that confidently keep projects moving forward.



Execution Approach

While every project is unique, the following graphic provides a high-level overview of the necessary steps from project origination through commercial operation. Burns & McDonnell offers full-service support to guide clients through the entire process from start to finish.

1898 & Co. primarily focuses on the early phases of project development but frequently partners with Burns & McDonnell engineering, construction, and environmental teams to support the entire process and drive project success.



Technology Assessments

1898 & Co. supports technology evaluation and selection by developing project-specific technical data and identifying key risks, such as technology maturity, schedule impacts, permitting, and space requirements, that could impact your technology selection.

1898 & Co. partners with our detail design and construction teams to provide up-to-date cost and performance information for project planning. This includes factored estimates reflecting real projects under current market conditions. Whether for integrated resource planning, project-specific technology selection, or project feasibility assessments, 1898 & Co. provides the necessary technical information for a wide range of generation technologies, including simple-cycle gas turbines, reciprocating internal combustion engines, combined cycles, carbon capture, advanced nuclear, wind, solar, energy storage, and retrofits to support technology evaluations.

Capital Cost
AACE Class 4/5 Estimates

O&M Cost
Fixed O&M, Variable O&M, and Major Maintenance

Performance
Net Output, Net Heat Rate, Minimum Turndown

Emissions
NOx, CO, VOC, CO_2

Dispatch Parameters
Startup Times, Ramp Rates, Availibility

Site Selection

1898 & Co. uses a proven, systematic, and defendable approach to identify and evaluate potential sites for your next power generation asset.

Our team of GIS specialists investigates and assesses a number of site attributes, including critical infrastructure (transmission, gas, water), site development (accessibility, topography, community conflicts), environmental considerations (wetlands, floodplains, threatened and endangered species, cultural resources), and permitting factors (attainment or nonattainment areas, Class I areas, and Federal Aviation Administration (FAA) regulations). These GIS layers are used to identify and screen potential candidate sites.

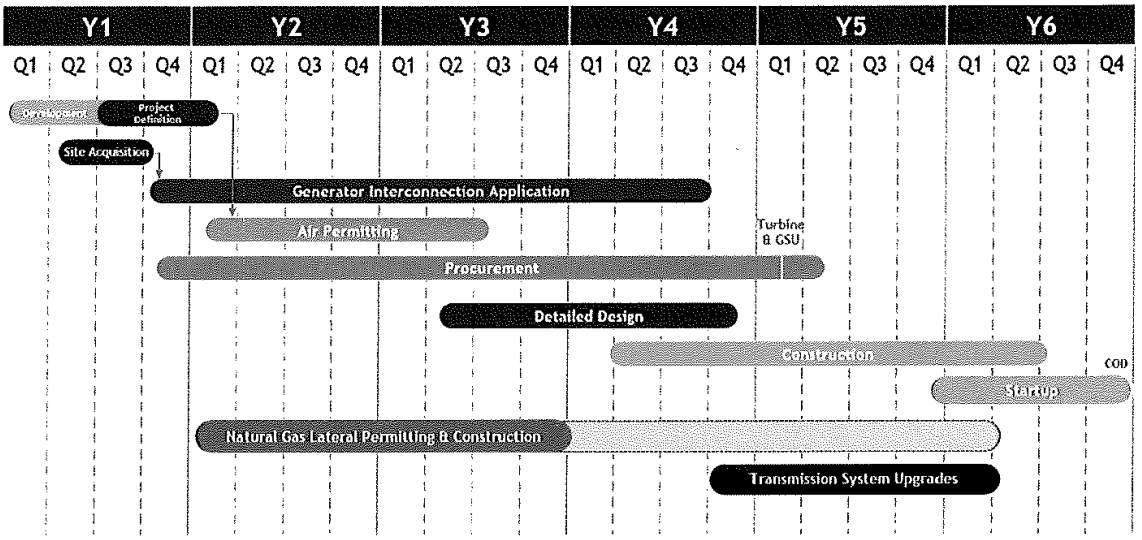
We then utilize a quantitative scoring matrix to evaluate each site relative to others. While 1898 & Co. can provide a proven list of evaluation criteria based on numerous siting efforts, each evaluation is customized to meet the client's specific needs and ensure project success.

Field reconnaissance is conducted after the draft evaluation to confirm GIS data and validate assessments with boots on the ground. Ultimately, the result is a preferred site ranking that supports site acquisition and necessary approvals (Board, Public Service Commission (PSC), Rural Utilities Service (RUS), etc.).

Site Selection Study | Identify and rank potential sites

Project Sequencing Plan

1898 & Co. can support early project schedule development and activity sequencing to help clients understand activity durations, identify major project milestones, identify decision points, and recognize owner responsibilities for planning. The schedule will address items such as the generation interconnect process, air permitting, long-lead equipment, natural gas lateral permitting and construction, and project execution phases (engineering, construction, and startup). We customize the schedule for the client to account for contract methodology and execution approach, client-specific approvals, and project-specific risks. The goal is to facilitate dialogue to understand schedule risks and owner responsibilities to efficiently progress the project.



Other Supporting Services

Fuel Availability Analysis

1898 & Co. can evaluate potential natural gas capacity and system pressure in a region. This analysis can help the client understand whether the existing gas infrastructure can support the new generation facility and gather schedule and cost information associated with interconnection to the gas system.

Transmission Injection Study

To evaluate available electric transmission capacity, 1898 & Co. can perform a transmission injection study at identified points of interconnection. This analysis helps determine the preferred location for injecting additional megawatts (MW), identify the MW injection level at which initial constraints may occur, and estimate a screening-level cost for transmission upgrades needed to accommodate the new generation facility.

Permitting Support

Partnering with our Environmental Services group, 1898 & Co. can assist in evaluating permitting risks, schedule implications, and developing a permitting strategy to support early project development activities. This typically includes a permitting matrix that outlines required federal, state, and local permits, approvals, and environmental studies needed to develop, construct, and operate a power generation facility. The matrix includes estimated fees and review times to support timeline and risk assessments.

Burns & McDonnell can then collaborate with your team to refine the permitting strategy. This may include evaluating emissions control equipment requirements, major vs. minor source permits, netting, air dispersion modeling protocols and risks, Best Available Control Technology (BACT) analysis, and more.

Project Experience

2x F-class SCGT

Tennessee Power Distribution Company

Tennessee / May 2024 - Oct 2024

Project Summary

1898 & Co. supported TPDC with early project development activities for a new natural gas generation facility to supply capacity to the Tennessee Valley Authority (TVA) through a power purchase agreement (PPA). 1898 & Co. completed a technology assessment, providing capital cost, operations and maintenance (O&M) cost, and performance data for multiple technology options to help evaluate the value of capacity. The assessment also included developing Level 1 schedules to guide project development and execution. In addition, 1898 & Co. conducted a site selection study to identify and evaluate potential sites in Tennessee. A permitting matrix was developed for the top site, outlining the required permits for the new facility. TPDC used the information to select a preferred generation technology and site. With additional support from 1898 & Co., TPDC developed a PPA term sheet to submit a bid to a TVA request for proposals (RFP) for capacity.

100 MW SCGT

McPherson Board of Public Utilities

McPherson, Kansas / Dec 2024 - Apr 2025

Project Summary

MBPU provides contracted capacity to Evergy. With Evergy's growing need for capacity and several MBPU units nearing the end of their useful life, MBPU decided to develop new gas generation at one of its existing facilities. 1898 & Co. supported MBPU with a technology assessment and project sequencing plan. The team evaluated six gas generation technologies to provide approximately 100 megawatts (MW) of capacity. Additionally, 1898 & Co. collaborated with MBPU to develop a project sequencing plan that leveraged MBPU's unique ability to self-perform large portions of the construction. MBPU used this information to support contract negotiations for new capacity.

Natural Gas Generation for Data Center

Williams Companies

Tulsa, Oklahoma / September 2024 - May 2024

Project Summary

1898 & Co. supported the evaluation of various generation technologies to supply electricity to digital infrastructure customers along Williams' pipeline network. The technologies evaluated included three aeroderivative/light industrial simple-cycle gas turbine options, one reciprocating internal combustion engine option, one frame simple-cycle gas turbine option, and four combined-cycle gas turbine options. 1898 & Co. developed screening-level cost and performance information for each option. The team also conducted a screening-level feasibility assessment of two sites identified by Williams. The purpose of the feasibility assessment was to identify critical infrastructure needs and schedule considerations for hosting power generation resources and a representative data center campus.

Project Experience

200 MW RICE & 400 MW 1x1 CCGT

Utah Associated Municipal Power Systems

Utah / Feb 2024 - May 2024

Project Summary

UAMPS had identified a need for additional energy and capacity by their members. 1898 & Co. supported UAMPS with early project development activities to determine the appropriate generation technologies and preferred site locations. 1898 & Co. completed a technology assessment, providing capital cost, O&M cost, and performance information, and performed a site selection study. UAMPS decided on proceeding with two (2) sites; one for 200 MW of reciprocating internal combustion engines, and one for a 1x1 combined cycle facility. 1898 & Co. then held a workshop at UAMPS offices to discuss project sequencing and to lay out a plan to promote the projects to their members and mitigate risk associated with gas supply, generation interconnect, and long lead equipment procurement.

Integrated Resource Planning Support

Duke Energy

Florida, Carolinas, Midwest / September 2024 - January 2025

Project Summary

1898 & Co. supports Duke Energy's annual integrated resource plan (IRP) update by conducting a comprehensive technology assessment for three of its operating companies. The assessment provides capital costs, operations and maintenance (O&M) costs, dispatch parameters, emissions data, and performance information for a wide range of natural gas-fired generation technologies, renewable energy technologies, energy storage, and nuclear options. 1898 & Co. also presents a market update to the Duke Energy team, highlighting market trends and emerging technologies.

Project Experience

Technology Assessments

Experience Since 2019

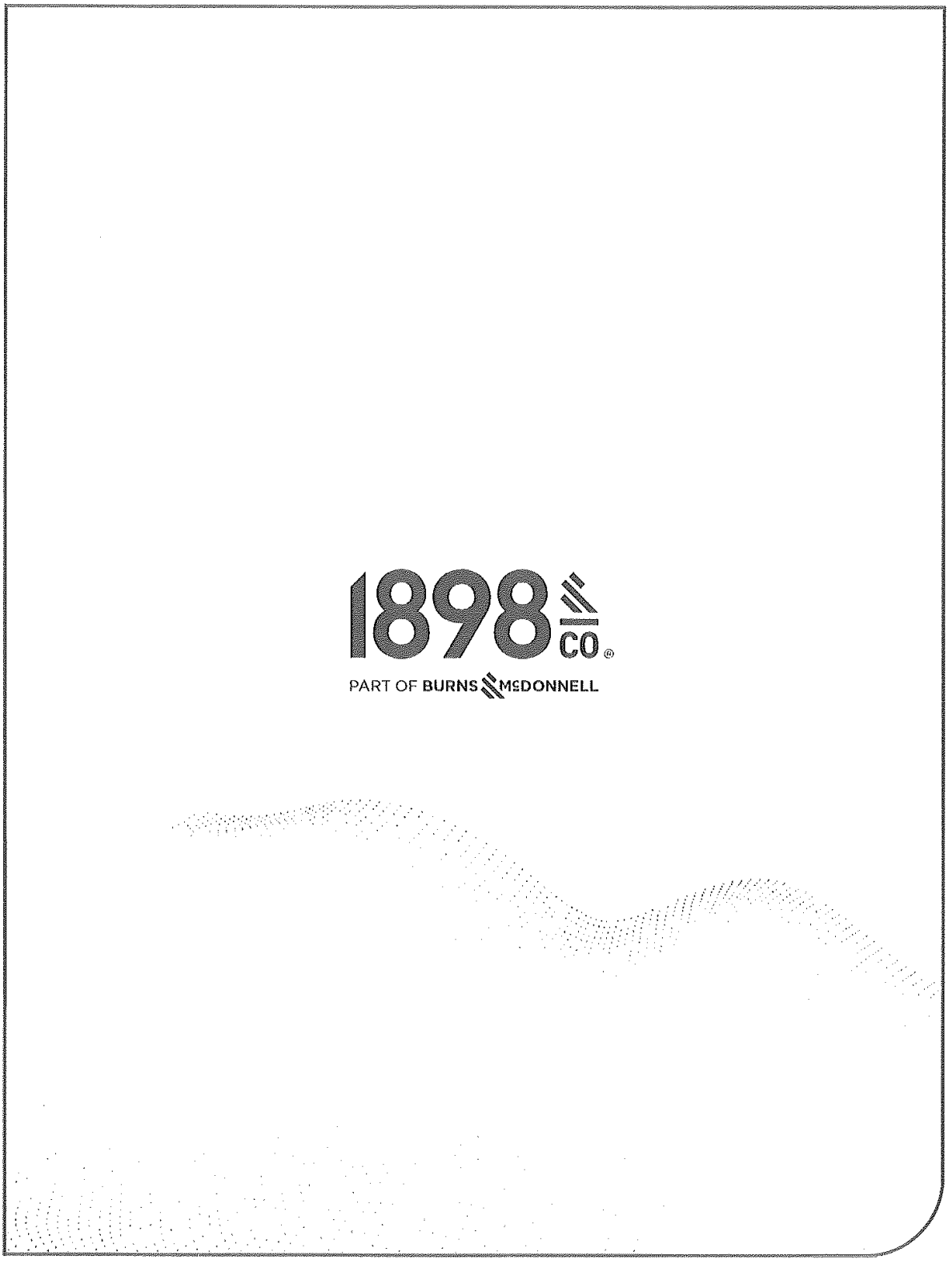
Client Name	Project Location	Study Date	Coal		Natural Gas					Renewable								
			Supercritical Coal	Ultra-Supercritical Coal	Combined Cycle	Simple Cycle	Natural Gas Fuel Cells	Reciprocating Engines	Combustion Turbine	Wind	Solar	Biomass	Municipal Waste	Energy Storage	Hydroelectric - Run of River	Hydroelectric - Pumped Storage	Fuel Cell	Geothermal	Nuclear
Entergy	Louisiana	2025			•	•	•		•	•	•			•					•
CenterPoint Energy	Indiana	2025			•	•	•		•	•	•			•					•
Confidential Client	Pennsylvania	2025			•	•	•												
McPherson Board of Public Utilities	Kansas	2025				•	•												
Confidential Client	US	2025			•	•													
Duke Energy	Midwest, Carolinas, Florida	2025			•	•	•		•	•	•			•					
Confidential Client	Nebraska	2025			•	•	•							•					
Confidential Client	Nebraska	2025			•	•													
Confidential Client	US	2025			•	•	•												
Confidential Client	North Dakota	2025	•		•	•	•	•	•	•	•			•					•
Confidential Client	Nebraska	2025				•	•												
Minnesota Power	Minnesota	2025	•		•	•	•	•	•	•	•			•					•
Confidential Client	Tennessee	2025			•	•	•												•
Confidential Client	Southeast	2025				•	•												
Confidential Client	Utah	2025				•	•												
Confidential Client	Nebraska	2025				•	•												
Confidential Client	North Dakota	2025			•	•	•												
Bryan Texas Utilities	Texas	2025			•	•	•			•	•			•					•
Nightpeak Energy	Texas	2025				•	•												
Rochester Public Utilities	Northcentral	2025				•	•												
Northeast Texas Electric Cooperative	Texas	2025				•	•												
Confidential Client	Midwest	2025				•	•												
Otter Tail Power	Northwest	2025			•	•	•									•			
Montana Dakota Utilities	Northwest	2025			•	•	•												
Confidential Client	Northeast	2025				•	•												
Vistra	South	2025			•	•	•				•								
Confidential Client	Midwest	2025			•	•	•												•
MPPA	Midwest	2025				•	•												
Duke Energy	Southeast, Midwest	2025			•	•	•	•	•	•	•			•					
Confidential Client	Midwest	2025			•	•	•			•	•			•					•
Florida Municipal Power Authority	Southeast	2025			•	•	•				•			•					•
Confidential Client	Southwest	2025				•	•												
Duke Energy	Southeast, Midwest	2024			•	•	•	•	•	•	•			•					
Duke Energy	Southeast, Midwest	2024			•	•	•	•	•	•	•			•					
Duke Energy	Southeast, Midwest	2030			•	•	•	•		•	•			•					
Montana Dakota Utilities	Midwest, US	2029			•	•	•			•	•	•					•		
Duke Energy	Southeast, Midwest	2029			•	•	•	•		•	•			•	•				
Hoosier Energy	Midwest, US	2029			•	•													
Vectren Power	Midwest, US	2029	•		•	•	•			•	•	•			•				

Project Experience

Facility Siting Study Experience

Experience Since 2019

Client Name	Project Name	Project Location	Capacity (MW)	Year	Scientific Site Selection Study	Preliminary Site Selection Study	Nuclear	Natural Gas	Renewables	Public Involvement / Awareness	Site Acquisition Support	Environmental / Technical Analysis
Confidential Client	Minnesota	Midwest, US	800	2024	•	•		•				
Confidential Client	Midwest Advanced Nuclear Siting Study	Midwest, US	1,000 - 2,000	2024	•	•	•					
Nebraska Public Power District	SMR Siting Study	Nebraska	50-300	2023	•	•	•			•		
Confidential Client	Site Selection Study	Kansas and Missouri	750	2024	•	•		•				
Confidential Client	Generation Development	Tennessee	500	2024	•			•				•
Confidential Client	SCCT/Recip/CCCT Development	North Dakota	200-1,200	2024	•	•		•				
Confidential Client	SCCT/Recip/CCCT Development	Utah	400-450	2023	•			•			•	
Central Electric Power Cooperative, Inc.	Dual Fuel Generation Development	South Carolina	470	2023	•			•				
Confidential Client	CC Carbon Capture Site Selection Study	Colorado	400	2023	•	•		•				
Confidential Client	SCCT Grid Resiliency Study	Arizona	1,500	2023	•	•		•				
Rockland Capital	SCCT Siting Study	Arizona	400	2023	•	•		•				
Xcel Energy	BESS Siting Study	Colorado	N/A	2023	•	•		•				
Rochester Public Utilities	Gas Fired Capacity Siting Study	Minnesota	50	2023	•	•		•				
East Kentucky Power Cooperative	RICE Siting Study	Kentucky	242	2023	•	•		•				
Central Electric Power Cooperative, Inc.	BESS Siting Study	South Carolina	150	2023	•				•			
Wabash Valley Power Alliance/ Hoosier Ener	SCCT/CCCT Siting Study	Indiana	600	2023	•	•		•				
Alliant Energy	BESS Storage Siting Study	Wisconsin	N/A	2023	•			•				
Alliant Energy	SCCT/RICE Siting Study	Iowa	400	2023	•	•		•				
Confidential Client	SCCT/Recip Siting Study	Midwest, US	600	2023	•			•				
Colorado Springs Utilities	BESS Relocation Study	Colorado	125	2023	•	•		•				
Kansas Power Pool	Recip Siting	Kansas	35	2020	•	•		•				
Confidential Client	BESS Evaluation Siting Study	Midwest, US	N/A	2019	•			•				


1898 & CO.
PART OF BURNS McDONNELL

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☐ **Not-Public Document – Not For Public Disclosure**
☒ **Public Document – Not-Public Data Has Been Excised**
☐ **Public Document**

Xcel Energy		Information Request No.	2
Docket No.:	E002/CN-25-145		
	Supplemental Response to Information Request 2(D)		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Joey Cherney		
Date Received:	November 3, 2025		

Question:

Reference: Appendix K, Operational and Cost Detail

A. Provide a breakdown of all costs attributable to the Lyon County Generating Station project at the time of the Initial Filing in this docket by the following categories:

1. Planning
2. Permitting
3. Design
4. Procurement
5. Construction
6. Financing

B. For each cost listed in response to Part A, provide a breakdown of the cost in each month by functional class (production, transmission, distribution, general plant, etc.) and by FERC Account.

C. For each cost listed in response to Part B:

1. Provide the calculation of that cost and explain the basis and assumptions used.
2. Provide all documentation supporting that cost, including but not limited to invoices, contracts, memoranda, and communications (internal to the company and with external entities).

D. For any cost reported in response to Part B that Xcel believes is no longer accurate:

1. Provide Xcel's latest cost forecast by month and explain why Xcel believes the original cost estimate is no longer accurate.

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2. Provide all documentation supporting Xcel's belief that the cost has changed, including but not limited to invoices, contracts, memoranda, and communications (internal to the company and with external entities).

This request is ongoing through the completion of any construction of the Lyon County Generating Station – provide supplemental responses quarterly. For any responses that include non-PDF file formats, include these files in their unlocked native format with all formulas and links intact.

Response:

Xcel Energy objects to this Information Request, in part, as overly broad, unduly burdensome, seeking information that is not relevant to the legal criteria to be applied by the Commission, and beyond the scope of discovery allowed in this proceeding. Xcel Energy further objects to the extent that this Information Request seeks documents subject to attorney-client privilege. Subject to and without waiving those objections, Xcel Energy provides the following responses:

A. Please see Not-Public Attachment A to this response, provided in live Excel spreadsheet format, for the requested information. The project was not planned and estimated in the categories requested; therefore, we provide the costs in the following categories:

Category	Description
1	Owner Provide Equipment and Land
2	EPC Contractor
3	Transmission & Substation
4	Gas Supply
5	Xcel Energy Staff, Support Labor & Owners Engineering
6	Unallocated Contingency & Overheads
7	Financing

B. Please see the response to Part A. above.

C.1. Please see the response to Part A. above.

C.2. Xcel Energy objects to this request as overly broad, unduly burdensome, seeking irrelevant information, and seeking information beyond the scope of discovery allowed in this proceeding with respect to the request for "all documentation" and internal communications. Without waiving that objection,

Xcel Energy provides the following documents supporting the cost estimate reflected in the Application:

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a. Attachment A: Summary of estimate and breakdown of calculations.

b. Attachment B:

01: Pricing letter
02: Target price form, indicative pricing for EPC services
03: Land purchase price
04: Substation construction costs
05: Gas pipeline interconnection costs – Unchanged from Nov.

D. **Updated Response:** Since filing the Application and now that the Project is further in the permitting and development process, Xcel Energy had its Engineering, Procurement, and Construction (EPC) contractor develop a comprehensive, bottoms-up cost estimate for the Project. Bottoms-up cost estimates are time- and cost-intensive, so are generally initiated as part of the detailed project design. In this case, however, the Company initiated it as the team began to see market cost pressures – recognizing that a more in-depth analysis would be needed at an earlier stage to ensure that changes in the market were reflected in the Project's cost estimate. This effort required several months and included finalizing the detailed Project scope, developing a full facility model, preparing preliminary site and equipment schematics, determining specific material quantities, sizing major equipment, and obtaining updated pricing from key vendors. As part of this work, the EPC contractor also incorporated a contingency level that reflects current market conditions for both materials and labor.

Upon receiving the initial estimate, Xcel Energy and the EPC contractor engaged in a two-month value-engineering process to further refine the Project scope and identify reasonable cost-reduction opportunities. In parallel with these engineering refinements, Xcel Energy executed purchase contracts for Company-furnished equipment, including the combustion turbines (CTs), generator step-up transformers (GSUs), unit auxiliary transformers (UATs), and breakers.

The primary drivers of the increase from previously filed cost estimates are summarized below:

1. **Escalation in equipment and material costs.**
Since 2022, market prices for key components and materials such as transformers and other critical electrical equipment needed for the Project have risen substantially, with costs nearly doubling over this period. This can be seen in Not-Public **Attachment E** to this supplemental response with regard to the CTs, Transformers and within the EPC costs.

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2. **Revised labor availability and cost assumptions.**
   Earlier estimates assumed that sufficient local union labor would be available during the construction period. The bottoms-up estimate determined that sufficient local labor may not be available to fully support construction. As a result we expect the need to seek union labor from the Twin Cities and potentially other areas. The expected need to draw labor to the area results in labor rate increases of approximately 20 to 35 percent. This adjustment is primarily noted in the EPC cost increase detailed in Not-Public **Attachment E**.
3. **Refinement of clutch technology enabling synchronous condenser functionality.**
   The design that enables the generators to operate as synchronous condensers is new to these units. As the design matured, additional supporting equipment was required, which in turn increased the necessary cooling system capacity. Despite these added costs, incorporating the clutch technology remains significantly more economical than installing stand-alone synchronous condensers. Including the clutches avoids an estimated $120 million in costs for separate synchronous condensers that would otherwise be required at the Garvin Substation.
4. **Identification of a scope gap in gas supply infrastructure.**
   During detailed engineering, a gap was identified between the gas provider's scope and the EPC contractor's responsibilities. To close this gap, the Project must now include gas pressure regulation and heating facilities at the site.
5. **Site-specific geotechnical findings requiring deep foundations.**
   Geotechnical investigations completed after the Application determined that major equipment will require deep foundations, increasing civil and structural costs relative to earlier assumptions.
6. **Advancements in electrical system and plant layout design.**
   As engineering progressed, additional specifications and protective features were incorporated to improve system reliability, operability, and equipment protection. These enhancements increased the scope and cost of the electrical systems.
7. **Cost escalation in substation and transmission components.**
   The substation and transmission line scopes have experienced cost increases similar to those affecting the rest of the electrical equipment market.
   Xcel Energy provides the following documents supporting the cost estimate reflected in the Application:

   Please see Not-Public **Attachment C** to this supplemental response, provided in live Excel spreadsheet format, for the requested cost information. The

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project was not planned and estimated in the categories requested; therefore, we provide the costs in the following categories:

Category	Description
1	Direct Materials
2	Transmission Substation
3	Gen Transmission Line
4	Plant Construction
5	Land Purchase
6	Engineering & Consulting
7	Gas Supply
8	Xcel Energy Staff
9	Contingency and Overheads
10	Financing

Note that we have expanded these categories beyond those included in Attachment A to our original response. These new categories for the most part align with the previous response but add breakouts for the following: Substation, Transmission Lines, Land, Consultants, Xcel Energy Labor.

Xcel Energy agrees to provide a monthly cash flow for the project as a whole; however, to provide a line by line cash flow has the potential to disclose proprietary and privileged information on vendor contracts and payment structures.

Not-Public **Attachment D** to this supplemental response contains the following documentation supporting revised cost estimates:

01: Combustion Turbine Pricing Document
02: EPC Estimate Summary
03: Substation Estimate
04: Transmission Line Estimates Line 1 & Line 2

Xcel Energy also provide**s** Not-Public **Attachment E**, which presents a visual cost progression from the Settlement Agreement estimate, to the Certificate of Need Application estimate, and finally to the current Project budget. While several factors contribute to the overall cost increase, the most significant drivers are (1) rising labor costs resulting from revised labor availability assumptions, and (2) continued escalation in the cost of equipment and materials. Xcel Energy objects to the scope of this request as continuing through Project construction and to the request to provide supplemental quarterly responses. Such requests are overly broad, unduly burdensome, and beyond the scope of discovery allowed in this proceeding.

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Supplemental Response: Subject to and without waiving the foregoing objections, Xcel Energy provides the following updated information regarding the Project's cost estimate. In **Attachment C**, Xcel Energy includes an updated summary of cost estimate and breakdown of calculations that reflects our updated cost estimate. In **Attachment D**, Xcel Energy provides underlying documentation related to that cost estimate. In **Attachment E**, Xcel Energy provides a waterfall summary of the cost increases of the overall project.

Attachments C, D, and E to this supplemental response are designated as "Not-Public" because they include information considered to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential pricing and other contract terms and vendor information. The information has independent economic value, from not being generally known to, and not being readily ascertainable by other parties, who could obtain economic value from its disclosure or use. The disclosure of this information could adversely impact contract negotiations, potentially increasing costs for these services for our customers. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Attachments C, D, and E provided with the Trade Secret version of this supplemental response are marked as "Not-Public" in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachment C is an Excel spreadsheet containing cost breakdowns by category for the project. Attachment D contains PDF copies of documentation supporting project cost proposals. Attachment E is a pdf copy of a waterfall summary illustrating cost progression from the Settlement Agreement cost, to the Certificate of Need Application estimate, and finally to the current Project budget

2. **Authors:** Attachments C and E were drafted by Company project management personnel. The documents included in Attachment D were drafted by vendor and Company project management personnel.

3. **Importance:** Attachments C, D and E include confidential contract and pricing terms and vendor information Xcel Energy maintains as trade secret.

4. **Date the Information was Prepared:** Attachments C and E were created for purposes of this response. See individual documents in Attachment D for creation dates.

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Date: November 13, 2025
Supplemented: February 12, 2026

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Northern States Power Company

Docket No. E002/CN-25-145
OAG Information Request No. 2 Supplement
Attachments C, D, E

Attachments C, D, and E to this supplemental response are designated as "Not-Public" because they include information considered to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). This data includes confidential pricing and other contract terms and vendor information. The information has independent economic value, from not being generally known to, and not being readily ascertainable by other parties, who could obtain economic value from its disclosure or use. The disclosure of this information could adversely impact contract negotiations, potentially increasing costs for these services for our customers. Thus, Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Attachments C, D, and E provided with the Trade Secret version of this supplemental response are marked as "Not-Public" in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

1. **Nature of the Material:** Attachment C is an Excel spreadsheet containing cost breakdowns by category for the project. Attachment D contains PDF copies of documentation supporting project cost proposals. Attachment E is a pdf copy of a waterfall summary illustrating cost progression from the Settlement Agreement cost, to the Certificate of Need Application estimate, and finally to the current Project budget

2. **Authors:** Attachments C and E were drafted by Company project management personnel. The documents included in Attachment D were drafted by vendor and Company project management personnel.

3. **Importance:** Attachments C, D and E include confidential contract and pricing terms and vendor information Xcel Energy maintains as trade secret.

4. **Date the Information was Prepared:** Attachments C and E were created for purposes of this response. See individual documents in Attachment D for creation dates.

[PROTECTED DATA BEGINS

PROTECTED DATA ENDS]

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. E002/CN-25-145
G002/GS-25-154
E002/TL-25-161
G002/GP-25-163

Dated this 18th day of February 2026

/s/

Victor Barreiro
Regulatory Administrator

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3	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-161 Official CC Service List
4	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	25-161 Official CC Service List
5	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-161 Official CC Service List
6	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-161 Official CC Service List
7	Stacy	Kotch Egstad	stacy.kotch@state.mn.us		Minnesota Department of Transportation	395 John Ireland Blvd MS 678 St. Paul MN, 55155 United States	Electronic Service		No	25-161 Official CC Service List
8	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-161 Official CC Service List
9	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-161 Official CC Service List
10	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	25-161 Official CC Service List
11	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	25-161 Official CC Service List
12	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix & Associates		7400 Lyndale Avenue South Suite 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-161 Official CC Service List
13	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-	Electronic Service		No	25-161 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						4400 United States				

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	25-163 Official CC Service List
2	Lisa	Agrimonti	lagrimonti@fredlaw.com	Fredrikson & Byron, P.A.		60 South Sixth Street Suite 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-163 Official CC Service List
3	Justin	Andringa	justin.andringa@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
4	Katherine	Arnold	katherine.arnold@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		No	25-163 Official CC Service List
5	Mara	Ascheman	mara.k.ascheman@xcelenergy.com	Xcel Energy		414 Nicollet Mall Fl 5 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
6	Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy		414 Nicollet Mall7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
7	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	25-163 Official CC Service List
8	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
9	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	25-163 Official CC Service List
10	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
11	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
12	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	25-163 Official CC Service List
13	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General -	445 Minnesota Street Suite	Electronic Service		Yes	25-163 Official CC

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Department of Commerce	1400 St. Paul MN, 55101 United States				Service List
14	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
15	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	25-163 Official CC Service List
16	James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
17	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
18	Martin	Donovan	martin.donovan@state.mn.us		Department of Natural Resources	500 Lafayette Road St Paul MN, 55155 United States	Electronic Service		No	25-163 Official CC Service List
19	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
20	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
21	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
22	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	25-163 Official CC Service List
23	Eden	Faure	eden.faure@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
24	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	25-163 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
25	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	25-163 Official CC Service List
26	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	25-163 Official CC Service List
27	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	25-163 Official CC Service List
28	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
29	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
30	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
31	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	25-163 Official CC Service List
32	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	25-163 Official CC Service List
33	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	25-163 Official CC Service List
34	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	25-163 Official CC Service List
35	Craig	Janezich	craig.janezich@state.mn.us		Public Utilities Commission	121 7th Pl E #350 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
36	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	25-163 Official CC Service List
37	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
38	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
39	Breann	Jurek	bjurek@fredlaw.com	Fredrikson & Byron PA		60 S Sixth St Ste 1500 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
40	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
41	Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center		35 E Wacker Drive Suite 1600 Chicago IL, 60302 United States	Electronic Service		No	25-163 Official CC Service List
42	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
43	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
44	Amber	Lee	amber.lee@stoel.com	Stoel Rives LLP		33 S. 6th Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
45	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
46	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
47	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	25-163 Official CC Service List
48	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	25-163 Official CC Service List
49	Robert	Manning	robert.manning@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
50	Ashley	Marcus	ashley.marcus@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN,	Electronic Service		No	25-163 Official CC Service List

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101 United States				
51	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
52	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
53	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	25-163 Official CC Service List
54	Greg	Merz	greg.merz@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		No	25-163 Official CC Service List
55	Hirsi	Mohamed	hirsi.mohamed@state.mn.us		Public Utilities Commission	121 7th Place E, Suite 350 Saint Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
56	Marta	Monti	marta@energycents.org	Energy CENTS Coalition		823 E. 7th Street St. Paul MN, 55106 United States	Electronic Service		No	25-163 Official CC Service List
57	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
58	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		Yes	25-163 Official CC Service List
59	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
60	Carol A.	Overland	overland@legalectric.org	Legalectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	25-163 Official CC Service List
61	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	25-163 Official CC Service List
62	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	25-163 Official CC Service List
63	Generic Notice	Residential Utilities	residential.utilities@ag.state.mn.us		Office of the Attorney	1400 BRM Tower	Electronic Service		Yes	25-163 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
		Division			General - Residential Utilities Division	445 Minnesota St St. Paul MN, 55101-2131 United States				CC Service List
64	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	25-163 Official CC Service List
65	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapoli MN, 55401 United States	Electronic Service		No	25-163 Official CC Service List
66	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
67	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
68	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	25-163 Official CC Service List
69	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	25-163 Official CC Service List
70	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	25-163 Official CC Service List
71	Melissa	Sheffer	sheffer.melissa@epa.gov	EPA Region 5			Electronic Service		No	25-163 Official CC Service List
72	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	25-163 Official CC Service List
73	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	25-163 Official CC Service List
74	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	25-163 Official CC Service List
75	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
76	Scott	Strand	sstrand@elpc.org	Environmental Law & Policy		60 S 6th Street	Electronic Service		No	25-163 Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Center		Suite 2800 Minneapolis MN, 55402 United States				CC Service List
77	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
78	Haley	Waller Pitts	hwallerpitts@fredlaw.com	Fredrikson & Byron, P.A.		60 S Sixth St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	25-163 Official CC Service List
79	Anthony	Willingham	anthony.willingham@electrifyamerica.com	Electrify America		1950 Opportunity Way Suite 1500 Reston VA, 20190 United States	Electronic Service		No	25-163 Official CC Service List
80	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	25-163 Official CC Service List
81	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	25-163 Official CC Service List