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June 12, 2026

—Via Electronic Filing—

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

RE: PREFERRED DECISION OPTIONS & FOLLOW-UP INFORMATION
APPLICATION FOR AUTHORITY TO INCREASE ELECTRIC RATES
OAH DOCKET NO. 28-2500-40515
DOCKET NO. E002/GR-24-320

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits this filing providing our preferred Decision Options and responses to several items discussed yesterday that required the Company's follow-up. For clarity, we provide all of our new proposed Decision Option Amendments in subpart A below, and provide the Decision Options we support as Attachment A to this filing.[1]

A. Proposed Decision Option Amendments

1011 Remove the Riverside unit from the 2025 Test Year and 2026 Plan Year for the period it is not expected to be used and useful: May 1, 2025 – ~~May 30~~December 31, 2026, and find that due to its removal from rate base, Xcel is not required to refund replacement power costs incurred or MISO capacity revenues tied to the unit during the outage.

3002 Require Xcel to file all the documentation to allow for verification of sales, weather normalization, and revenues, consistent with what Xcel has previously provided in its sales true-up compliance filings in the 2020 and 2021 stay out petitions, as well as in its Docket No. 24 E002/GR-21-630 compliance filings.

[1] Attachment A includes the proposed amendments to the Decision Options the Company provides in this filing. However, it does not include any new Decision Options filed yesterday or today by other parties and Commissioners.

Approve Xcel's request to use actual weather-normalized 2025 sales and 2025 customer counts data in the final 2025 deficiency calculation and final ratemaking; (Xcel, DOC, ALJ).

4008 Order Xcel to use the best available actual system usage at MISO historical peaks, adjusted to account for forecasted class load changes, to calculate the D10S allocator in future rate cases.

5015 Approve RAMP as proposed by Xcel, including the five modifications agreed to by Xcel from the Department's recommendations. For 2026, establish a funding level for RAMP based on late payment charge revenues collected to date and expected revenues at the lower late payment charge established in this case. For future years, establish an annual budget for RAMP of no less than $6 million. Require Xcel to consult with Energy CENTS Coalition and Citizens Utility Board regarding a supplemental funding mechanism for the portion of the RAMP annual budget not funded by late payment charges, if any. Xcel shall monitor late payment charge revenue and the amount of supplemental funding needed from other sources and report this information in annual reports in the electric affordability programs docket. Xcel shall provide a proposal in a compliance filing within 60 days of the Commission's Order. If no objections are filed within 30 days, the proposal for funding the RAMP program in future years shall be approved.

B. Provide or help confirm information on automatic enrollment for PowerOn, including the potential number of additional customers who may be enrolled and the importance of PowerOn.

The Company estimated in filed testimony that auto-enrollment of electric-only, LIHEAP-enrolled customers could increase PowerOn participation by about 40 percent, or an additional 14,000 customers.[2] The increase could be greater if auto-enrollment is extended to customers eligible for, but not currently receiving, LIHEAP assistance.

C. Confirm Sherco 3 & King scheduled close dates and fully depreciated dates requested by Commissioner Sullivan.

The planned closure dates for Allen S. King and Sherco Unit 3 are December 2028 and December 2030, respectively. Based on the currently approved depreciation lives

[2] Ex. Xcel-81 at 16 (Howard Rebuttal).

in base rates, Allen S. King and Sherco Unit 3 will be fully depreciated by June 2037 and December 2034, respectively.

D. Explain whether the Company attempted to replace MISO capacity related to Riverside.

Below are the Company's actions for the Riverside facility:

[PROTECTED DATA BEGINS

PROTECTED DATA ENDS]

E. Respond to or help develop updated language regarding Riverside treatment, including potential Decision Option 1011 language and the Company's preferred alternative Decision Option 1014.

The Company's proposed modification to Decision Option 1011 is provided above. The Company has no preferred alternative to Decision Option 1014. As shown in Attachment A, the Company supports Decision Option 1014 if Decision Option 1010 is not adopted.

F. Verify that Transmission O&M included costs for MVP and MEP projects.

As stated at the hearing, the Company's proposed Transmission O&M expense includes O&M costs for MVP and MEP projects. Please note that MISO RECB revenues and expenses are not included in the cost of service for this rate case as those items are included in the TCR rider.

G. Amount assigned to non-regulated affiliates using the Company's General Allocator.

Commissioner Ham requested information on the allocation of XEI common officers, noting that testimony in the case indicated that the General Allocator assigned approximately 0.15 percent of the costs of the Company's common officers to non-regulated entities. For clarity, while this percentage is included in testimony, it does not represent the portion of XEI common officers that are allocated to the Company's non-regulated affiliates under the Company's General Allocator, as explained below.

As discussed on page 13 of Nicole Doyle's Direct Testimony, the General Allocator is made up of three factors: Total Assets, Total Revenues, and Number of Employees. For NSPM, the average of these three percentages is 38.55447 percent.

The 0.15 percent allocator referred to by Commissioner Ham is the factor of the General Allocator attributable to the Number of Employees that are assigned to non-regulated affiliates. This number does not account for the Total Assets and Total Revenues factors of the General Allocator. When all of these factors are considered, the General Allocator assigns approximately 12.44 percent of the costs to the Company's non-regulated affiliates.

As also noted on page 12 of the Rebuttal Testimony of Nicole Doyle, the Department of Commerce's proposal to use FTE Hours in place of the Company's Number of Employees reduces that factor of the General Allocator from the 0.15 percent attributable to non-regulated affiliates to approximately 0.0932 percent. This would reduce the total amount allocated to the Company's non-regulated affiliates under the General Allocator from 12.44 percent under the Company's proposal to 12.42 percent.

H. Review Robert L. Miller's Rebuttal Schedule 2[3] and determine if the total values can be provided publicly.

The Company has reviewed Robert L. Miller's Rebuttal Schedule 2,[4] and confirmed that the total amounts can be made public. We provide the revised version of this Schedule as Attachment B to this filing.

I. Information on AMI Meters, TCR Rider, and Classification Method Impact.

Commissioners Ham and Sullivan requested additional information about AMI costs.

- The primary costs related to AMI in base rates are currently internal capital labor, which are $3.7M and $4.0M in the 2025 Test Year and 2026 Plan Year.

- There are currently approximately $48 million in revenue requirements related to AMI in the TCR Rider for 2026. AMI costs in the TCR Rider are currently allocated using the P60 allocator. The P60 allocator is derived from Distribution Plant, and classifies and allocates costs to both customer and demand. Xcel Energy's 2026 TCR Petition is currently pending in Docket 25-0386.

- Preliminary analysis indicates that requiring the Company to change the classification and allocation methods for AMI costs in the TCR Rider to classify costs as 1/3 customer, 1/3 demand, and 1/3 energy; to allocate demand costs using the D10S allocator; and to allocate energy costs using the E8760 allocator, would shift approximately $10 million in costs from the residential class to the demand class on an annual basis. Costs for the commercial non-demand class would remain approximately the same.

- The Company prefers Decision Option 1110. To clarify, the Company intends to complete a study comparing the costs and functionality of AMI meters to traditional meters, including an analysis of how the results of the study should impact cost classification and allocation, in its next rate case. The Company requests that the classification and allocation of AMI meters not be changed until the study can be completed, and that the results of the study not be pre-judged at this time.

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[3] Ex. Xcel-54 at Schedule 2 (Miller Rebuttal Trade Secret). Ex. Xcel-56 at Schedule 2 (Miller Rebuttal Public).
[4] *Id.*

J. Return on Equity applied to Transmission Projects.

The Company has followed the approach ordered by the Commission in the Company's last rate case to use the Commission-approved return on equity, instead of the FERC return on equity, for calculating the revenue and expense of its transmission assets. Specifically, Order Point 94 stated the following:

> The Commission approves Xcel's proposal to apply the return on equity approved in this rate case, instead of the Federal Energy Regulatory Commission (FERC) return on equity, to its transmission investments.[5]

As a result, in dockets E002/M-24-371 and E002/M-25-386, the Company applied the Commission-approved ROE to the RECB projects for its 2024-2025 and 2025-2026 TCR rider petitions. For instance, in its November 1, 2024 Petition and Compliance Filing for approval of its proposed 2025 Transmission Cost Recovery Rider, the Company noted the following:

> Consistent with the Commission's July 17, 2023 Order in our most recent approved electric rate case (Docket No. E002/GR-21-630), and the methodology used by the Company in connection with the 2024 TCR Rider, which the Commission recently voted to approve, the Company has applied its current Minnesota authorized return on equity (ROE) of 9.25 percent to calculate the NSP RECB revenue and expense. As a result, although the Company has previously reported on FERC proceedings related to the FERC-authorized ROE that MISO TOs charge for regionally-shared facilities, this is no longer necessary because adjustments to the TCR revenue requirement due to NSP RECB revenue and expense will not be subject to FERC proceedings. Instead, they are aligned with the return included in Minnesota retail rates for these assets, as set by the Commission.

[5] *In the Matter of the Application of Northern States Power Company, dba Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-21-630, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at Order Point 94 (July 17, 2023).

K. Coordinate with Energy Cents Coalition (ECC) and Citizens Utility Board (CUB) to evaluate alternative funding for RAMP.

The Company has consulted with ECC and CUB and jointly recommends alternative decision option 5015, as provided in Section A of this document.

L. Coordinate with the OAG on D10S allocator Decision Options.

The Company has consulted with the OAG. Both the Company and the OAG are in agreement that OAG alternative 4008 is a reasonable result for this proceeding, with the following modifications for clarity.

4008 Order Xcel to use the best available actual system usage at MISO historical peaks, adjusted to account for forecasted class load changes, to calculate the D10S allocator in future rate cases.

The Company and the OAG continue to respectfully disagree about the other decision options related to the D10S allocator. The Company recommends that if the Commission selects Modified 4008, no other decision options are necessary related to this issue, and that if another option is selected it should be 4005.

Portions of this filing and Attachment B are marked as protected Not-Public data. Xcel Energy considers the insurance information in Attachment B to be trade secret pursuant to Minn. Stat. § 13.37, subd. 1(b), as it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. To maintain our competitiveness in these markets, we must maintain the confidentiality of certain information. Information with respect to our insurance premium amounts and what we pay for each unique layer of risk we insure is proprietary to both the Company and our insurers and if it was made publicly available it would provide a competitive advantage to other participants in the markets by creating a known benchmark in the market.

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

Please contact me at ian.m.dobson@xcelenergy.com or contact Amber Hedlund at amber.r.hedlund@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

IAN M. DOBSON
LEAD ASSISTANT GENERAL COUNSEL

Enclosures
cc: Service List

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 0	1010	Initiate a stakeholder process to develop a formal definition of Energy Justice.	Support 1010 or 1012
Volume 0	1012	Reject the ALJ's recommendation in Finding 1218 to initiate a stakeholder process to develop a formal definition of Energy Justice, and deny the Joint Intervenors' request to adopt a definition.	Support 1010 or 1012
Volume 0	1014	Take no further action on the Joint Intervenors' recommendation to recognize affordability and elimination of energy burden.	Support
Volume 0	1016	Deny the proposed disconnection moratorium.	Support
Volume 0	1018	Deny the proposed randomized control trial.	Support
Volume 0	1022	Approve a 2-year multi-year rate plan.	Support
Volume 0	1023	Approve automatic enrollment of LIHEAP-eligible customers and others determined to be eligible in PowerOn.	Support
Volume 1	1002	Allow Xcel Energy to keep depreciation for Sherco 3 and King Plants as filed.	Support
Volume 1	1003	Allow Xcel Energy to create a regulatory asset for Sherco 3 and King Plants.	Support
Volume 1	1005	Approve Xcel's request to earn a return on the prepaid pension asset, based on the Company's WACC.	Support 1007 for purposes of this case only
Volume 1	1007	Approve Xcel's request to earn a return on the prepaid pension asset based on the Company's long-term debt rate.	Support for purposes of this case only
Volume 1	1010	Approve Xcel's request to include the Riverside plant in rate base for the 2025 Test Year and 2026 Plan Year.	Support
Volume 1	1012	Allow Xcel to continue to recover all O&M expenses associated with the Riverside unit during the outage period.	Support
Volume 1	1013	Remove from Xcel's proposed revenue requirement all O&M expense associated with the Riverside unit, other than property taxes and depreciation.	Support if 1010 not adopted
Volume 1	1014	Do not authorize recovery of Riverside's disputed O&M expenses at this time, but authorize Xcel to create a regulatory asset for these expenses subject to a future Commission determination of prudency.	Support if 1010 not adopted

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1015	Allow Xcel to retain all MISO capacity revenues due during the outage period, and not flow them through the capacity tracker approved in the previous rate case.	Support if 1011 adopted
Volume 1	1019	Authorize the Executive Secretary to issue a notice of comment period regarding the prudency of O&M costs associated with the Riverside unit.	Support
Volume 1	1023	Approve Xcel's Time of Use Rate Implementation incremental costs of $3.2 million ($2.8 million – MN jurisdiction) for the 2025 Test Year and 2026 Plan Year.	Support
Volume 1	1026	Allow Xcel Energy to include additional costs of its Extreme Heat/Poor Air Quality Reconnection Program which will increase 2025-2026 revenue requirement by $28,000 and $2.445 million, respectively.	Support
Volume 1	1028	Approve Xcel's request to recover $122.3 million in 2025 and $140.7 million in 2026 for its MN jurisdiction Energy Supply O&M expenses.	Support
Volume 1	1030	Approve Xcel's request to recover $37.4 million of vegetation management expenses in 2025, and $40.9 million in 2026.	Support
Volume 1	1032	Approve Xcel's request to recover $18.9 million of Transmission O&M expenses in 2025, and $19.4 million in 2026.	Support
Volume 1	1035	Approve Xcel's request to recover $27.3 million of Customer Care O&M expenses in 2025, and $27.1 million in 2026.	Support
Volume 1	1037	Approve Xcel's proposal to use Number of Employees in its General Allocator for setting rates.	Support
Volume 1	1039 Xcel Revised	Implement Xcel's proposed Interchange Agreement Allocators of 84.0551% and 84.2171% for Minnesota for ~~both~~ 2025 and 2026 respectively. (Xcel)	Support
Volume 1	1041	Allow Xcel to use the total plant ratio method for allocating wildfire mitigation indirect costs.	Support
Volume 1	1043	Approve Xcel's proposed base pay increase of $367.29 million and $370.33million, or a three percent (3%) increase for 2025 and 2026 test years, respectively.	Support
Volume 1	1043 DOC Revised	Approve Xcel's proposed base pay increase of $367.29 million and $370.33million~~, or a three percent (3%) increase~~ for 2025 and 2026 test years, respectively.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1043 Xcel Revised	Approve Xcel's proposed base pay ~~increase~~expense of $367.29~~3~~ million and $370.33million~~, or a three percent (3%) increase~~ for 2025 and 2026 test years, respectively. (Xcel, ALJ)	Support
Volume 1	1048	Deny the request to have Xcel include an FTE count on a Minnesota jurisdictional basis for its next rate case to assist in the review of future base pay recovery requests.	Support
Volume 1	1048 Xcel Revised	Deny the request to have Xcel include an actual FTE count on a Minnesota electric jurisdictional basis for its next rate case to assist in the review of future base pay recovery requests. (XCEL, ALJ)	Support
Volume 1	1049 Xcel Revised	Allow recovery of Xcel's MN Jurisdictional 2025-2026 long term incentive compensation expense of $11,481,695 ~~million~~ for 2025 test year, and $12,090,503 ~~million~~ for 2026 plan year, respectively. (Xcel)	Support
Volume 1	1051	Approve Xcel's request to recover AIP expense based on a 20% aggregate cap and a 100% target level payout.	Support
Volume 1	1055	Require Xcel to administer the AIP program on an aggregate basis.	Support
Volume 1	1056	Approve Xcel's request to eliminate AIP compliance filings and the requirement for AIP refund.	Support
Volume 1	1058	Allow recovery of all compensation for ten top highest paid executives from Minnesota electric jurisdiction ratepayers requested by Xcel.	Support
Volume 1	1059 Xcel Revised	Alternatively, if recovery of long-term incentive is denied and AIP recovery is capped at 15 percent, deny recovery of the remaining ten top-paid executive compensation amounts of $2.9 million and $3.0 million in 2025 and 2026 respectively.	Support
Volume 1	1063	Allow Xcel to recover its proposed limited availability benefits of $103,003in both 2025 test year and 2026 plan year.	Support
Volume 1	1065 Xcel Revised	~~Allow~~Grant Xcel's request to recover the full amount of Miscellaneous Benefit, Life, and LTD expenses~~at a level set by applying the Department's proposed methodology and inflation factor to 2024 actual expenses, as opposed to the Department's suggested average of actual expenses from 2021 through 2024~~. (Xcel~~, ALJ~~)	Support
Volume 1	1068	Approve Xcel's request to recover the amount of its non-qualified expenses of $44,662 in 2025 test year and $48,394 for 2026 plan year.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1070	Grant Xcel's request to recover the full amount of its board of directors' expenses of $1.2 million in 2025 test year and $1.3 million in 2026 plan year.	Support
Volume 1	1072	Allow Xcel to recover the Outside Services O&M expenses in the amount of $26,843,453 and $25,881,789 for test years 2025-2026, respectively.	Support
Volume 1	1074	Allow Xcel Energy to recover dues of approximately $677,000 annually for EEI.	Support
Volume 1	1075	Allow Xcel Energy to recover dues of approximately $222,000 for Chamber of Commerce.	Support
Volume 1	1078	Approve Xcel's request to recover non-safety awards and administrative expenses of $0.7 million in 2025, and $0.8 million in 2026.	Support
Volume 1	1080	Allow Xcel to recover 100% of its investor relations expenses through the MYRP.	Support
Volume 1	1082	Approve Xcel's request to recover $4.9 million in rate case expenses, amortized over a three-year period of 2025-2027, and to be 100 percent recovered from ratepayers.	Support
Volume 1	1084	Allow Xcel Energy to exclude liquidated damages from O&M Forecast.	Support
Volume 1	1086	Approve Xcel's request to recover Minnesota electrical jurisdiction insurance expenses of $34.2 million for 2025 and $37.2 million for 2026.	Support
Volume 1	1090 Xcel Revised	Implement a symmetrical true-up mechanism to recover actual insurance costs. (Xcel Alternative, ALJ)	Support
Volume 1	1091 Xcel Revised	Allow Xcel to recover its updated forecast Minnesota Electric Jurisdictional property tax expense of $~~184.2~~182.1 million and $~~195.4~~194.3 million for the 2025 Test Year and 2026 Plan Year, subject to a true-up mechanism. (Xcel)	Support
Volume 1	1094	Allow Xcel to continue the property tax expense true-up mechanism.	Support
Volume 1	1096	Allow Xcel recovery of property tax expense that exceeds five percent (5%) of the Commission approved amounts for the Multi-Year Rate Plan.	Support
Volume 1	1097	Approve Xcel Energy's proposed Distribution Capacity Investments as filed, with removing the Hosting Capacity budget, for a total of $106.6 million in 2025 and $191 million in 2026.	Support
Volume 1	1099	Approve Xcel Energy's Distribution Targeted Undergrounding as proposed for $2.3 million in 2025 Test year and $6.7 million in 2026 plan year, subject to Xcel's capital true-up.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1103	Reject Joint Intervenors' proposed Virtal Power Plants.	Support
Volume 1	1106	Allow Xcel Energy to continue their current Distribution Planning.	Support
Volume 1	1108	Approve Xcel Energy's proposed NOx Tracker and require Xcel to provide support for related expenses in annual compliance filings.	Support
Volume 1	1110	Require Xcel Energy to submit a study comparing costs of AMI meters with costs of traditional meters both in use and reading.	Support
Volume 1	1112	Approve cost allocation of AMI meters as 100% customer-related.	Support
Volume 1	1113	Approve Xcel Energy's updated revenue forecast to align with latest approved CSG fee structure, resulting in an increase in other revenues in the 2025 test year of $742,000 and 2026 plan year of $1,415,000, and a decrease to revenue requirements.	Support
Volume 1	1115 Xcel Revised	Approve Xcel's adjustment related to customer advances ~~expenses of ($11.6 million)~~ for both 2025 and 2026. (ALJ, Xcel, Department]	Support
Volume 1	1116 Xcel Revised	~~Allow~~Approve Xcel's adjustments related to ~~adjust~~its nuclear decommissioning accrual ~~amount of zero~~and the end-of-life (EOL) nuclear fuel accrual ~~amounts of approximately $155,000 and $160,000~~ in 2025 and 2026~~, respectively~~. (ALJ, Xcel, Department)	Support
Volume 1	1117	Allow Xcel to discontinue the May 1 separate annual compliance report on nuclear refueling outage expenditures requirement.	Support
Volume 1	1119 Xcel Revised	Approve Xcel's ~~rebuttal~~ adjustments related to ~~FERC accounts 370 and 390 for~~ TD&G depreciation expense. (Xcel, Department, ALJ)	Support
Volume 1	1120 Xcel Revised	Approve Xcel's correction adjustments to MEC 3.0 project ~~of ($4,380,000) and~~ resulting in revenue requirements reductions of ($489,000) and ($448,000) for 2025 and 2026 to accurately allocate costs to all operating Companies. (Xcel, Department, ALJ)	Support
Volume 1	1121	Approve Xcel's adjustment from the removal of one non NSPM distributed intelligence project from MYRP forecast in the amount of $0.2 million in 2025 and 2026.	Support
Volume 1	1122 Xcel Revised	Approve Xcel's proposed adjustment to remove Employee expenses of $~~35,000~~24,000 and $23,000 for 2025 and 2026 ~~test year~~. (Xcel, Department, ALJ).	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1123	Approve Xcel's adjusted IT capital costs related to the Company's Electric Vehicle Programs in the MYRP (2025-2026) budget.	Support
Volume 1	1124 Xcel Revised	Approve Xcel's adjustment related to hosting capacity upgrade expense ~~of $0~~for 2026. (ALJ, Xcel, Joint Intervenors, Department)	Support
Volume 1	1125 Xcel Revised	Approve Xcel's adjustment related to the Luverne Battery Reallocation for ~~expense of $1.3 million~~2025 and 2026. (ALJ, Xcel, Department)	Support
Volume 1	1126	Approve Xcel's adjustment of the cost of service to incorporate 2026 forecasted nuclear Production Tax Credits (PTC), including the PTC refund in the Fuel Clause Adjustment Rider.	Support
Volume 1	1127	Approve Xcel's proposed adjustment for Solar Production Tax Credits in the amount of $84,000 in 2025 and $164,000 in 2026.	Support
Volume 1	1128	Approve Xcel's adjusted baseline PTC amount in base rates for each year of the MYRP, 2025 and 2026, subject to true-up in the RES Rider.	Support
Volume 1	1129 Xcel Revised	Disallow the extension request for the depreciation lives of Hennepin Island and Upper Dam Hydro facilities and instead use a remaining life of 9.2 years, resulting in an increase in depreciation expense of approximately $1.6 million in 2025 and $2.1 million in 2026, and update the net salvage rates resulting in a decrease in depreciation expense of $5.6 million in 2025, and $4.0 million in 2026. (Xcel Energy, Department, ALJ)	Support
Volume 1	1130	Approve Xcel's adjustment to depreciation lives and expense to match the depreciable lives of the Monticello and Prairie Island nuclear plants approved in the 2024-2040 IRP (Docket No. E002/RP-24-67).	Support
Volume 1	1131	Allow Xcel Energy to adjust correctly for a misclassification in FERC accounts related to AMI meters.	Support
Volume 1	1133	Allow Xcel Energy to adjust the TCR Rider to fully remove all AMI capital costs recovered in the TCR Rider revenue and to remove the equivalent rider revenues of ($125,000) for 2025 and ($169,000) for 2026 included in the MYRP cost of service.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1135	Approve Xcel's adjustment to incorporate costs in the 2025-2026 MYRP to comply with Commission's Order in Department Docket No. E002/M-24-27 for Xcel to hire a third-party evaluator to evaluate Xcel's practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of discrepancies in shutoff rates and service reliability, of $50,000 in 2025 test year and $209,000 for plan year.	Support
Volume 1	1136 Xcel Revised	Authorize Xcel Energy to amortize the write-off amount of $~~8.1~~5.9 million over three years and revise~~d~~ the revenue requirement to reflect the three-year amortization beginning in 2025. (Xcel, Department)	Support
Volume 1	1138 Xcel Revised	Approve the Department's wildfire related capital and O&M adjustments to Xcel's proposed wildfire mitigation program resulting in a revenue requirement increase of $6.3 million in 2025 and a decrease of $8.3 million in 2026~~adjusted $48.06 million of larger-scale wildfire-related capital additions for the 2025 test year and 2026 plan years combined, with approximately $9.19 million in annual wildfire-related O&M expenses of wildfire-related operations~~. (Xcel, Department, JIN, ALJ)	Support
Volume 1	1140	Approve Xcel's adjusted budgets for capital and O&M costs related to the Pole Loading Clearance (PLC) program.	Support
Volume 1	1141	Approve Xcel's adjustment for the Research and Experimentation (R&E) Federal and State Tax Credits in the amount of approximately $396,000 for the federal R&E credit and $98,000 for the state R&E credit.	Support
Volume 1	1142	Allow Xcel to include its initial proposed North Dakota investment tax credits (ITC) in 2025 test year and 2026 plan year.	Support
Volume 1	1143	Approve Xcel's proposed budget for its Distributed Communications Infrastructure (Fiber Build-out project) in the amount of $9.6 million in 2025 test year and $10.6 million for 2026 plan year.	Support
Volume 1	1144 Xcel Revised	Approve Xcel Energy's bad debt expense ratios and bad debt expense levels of $~~19.2~~20.3 million for 2025 Test Year and $~~21.4~~23.3 million for 2026 Plan Year.	Support
Volume 1	1146	Approve Xcel's proposal to continue its Sales True-Up during this MYRP.	Support
Volume 1	1147	Approve Xcel's proposed capital true-up mechanism.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 1	1148	Approve Xcel's proposal to continue its Property Tax True-Up mechanism during this MYRP.	Support
Volume 1	1149	Approve Xcel's proposal to establish a CCR Tracker to recover Legacy CCR Rule compliance costs, with cost estimates of $6 million for 2025-2026.	Support
Volume 1	1150	Approve Xcel's proposal to include the CCR tracker in its July 1 Annual Report of Rate Case Approved True-Up Mechanism compliance filing.	Support
Volume 1	1151	Approve Xcel Energy's Bad Debt Tracker with yearly compliance filing.	Support
Volume 1	1153	Approve the Company's 2025-2026 Discrete Capacity budget.	Support
Volume 1	1154	Allow Xcel to discontinue deferral of emission allowance.	Support
Volume 2	2001	Adopt Xcel Energy's proposed capital structure. (If the Commission makes this determination, it may want to adopt the following recommended by Xcel Energy:) a. Adopt Xcel Energy's proposal to delete proposed findings 989 and 990.	Support
Volume 2	2002	Adopt Xcel Energy's proposed cost of long-term debt.	Support
Volume 2	2003	Adopt Xcel Energy's proposed cost of short-term debt.	Support
Volume 2	2004	Adopt Xcel Energy's proposed flotation costs of 8 basis points.	Support
Volume 2	2008	Find that no risk adjustment is necessary.	Support
Volume 2	2009	Adopt Xcel Energy's screening criteria and resulting proxy group.	Support
Volume 2	2013	Determine that the updated Two-Growth Discounted Cash Flow model, checked for reasonableness, is the most appropriate method for estimating cost of equity.	Support
Volume 2	2016	Establish a 10.30 percent return on equity for setting rates in this proceeding.	Support
Volume 2	2024	Do not require Xcel Energy to provide additional information on capital structure or cost of debt in its next rate case. (If the Commission makes this determination, it may want to adopt one or more of the following recommended by Xcel Energy:) a. Adopt Xcel Energy's proposal to delete proposed findings 1205-1212.	Support
Volume 2	2026	Adopt the following overall cost of capital reflecting Xcel Energy's 10.30 percent return on equity for the MYRP. (Table: Common Equity 52.50% at 10.30% cost; Total weighted cost 7.56% for 2025 and 7.55% for 2026)	Support
Volume 3	3001	Approve Xcel Energy's updated sales forecasts for 2025 and 2026.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 3	3002 XE Revised	Require Xcel to file all the documentation to allow for verification of sales, weather normalization, and revenues, consistent with what Xcel has previously provided in its sales true-up compliance filings in the 2020 and 2021 stay out petitions, as well as in its Docket No. 24 E002/GR-21-630 compliance filings. Approve Xcel's request to use actual weather-normalized 2025 sales and 2025 customer counts data in the final 2025 deficiency calculation and final ratemaking;	Support
Volume 3	3003	Approve the Company's updated capacity revenue amounts for 2025 and 2026 to set rates, subject to true-up in the Company's annual capacity tracker filings.	Support
Volume 3	3004	Adjust the Company's cost of service for both 2025 and 2026 to include $171,076 in lost revenues due to the PINGP outage.	Support
Volume 3	3005 Xcel Revised	Update the baseline capacity revenues for both 2025 and 2026, subject to true-up in the Company's annual capacity tracker filings. (Xcel, Department, ALJ)	Support
Volume 4	4001	Determine that each CCOSS model provides useful information and decline to adopt any specific model.	Support
Volume 4	4001 Xcel Revised	~~Determine that each CCOSS model provides useful information and d~~Decline to adopt any specific model. Adopt the ALJ's recommendation to give significantly less weight to the OAG's Peak-and-Average CCOSS and XLI's Hybrid CCOSS, and give the most weight to the Hybrid models proposed by the Department and Xcel Energy as well as the Basic Customer models presented by the Department and the OAG. (ALJ, Staff, Xcel Alternative)	Support
Volume 4	4002 Xcel Revised	Determine that Xcel Energy's Hybrid CCOSS model is the most reasonable based on this record. (Xcel)	Support
Volume 4	4003	Approve Xcel's proposal to classify and allocate production costs using the Stratification Method.	Support
Volume 4	4005	Approve Xcel's calculation of the D10S allocator based on its system peak coincident with the MISO system peak using historical data.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 4	4008 XE/OAG Revised	Order Xcel to use the best available actual system usage at MISO historical peaks, adjusted to account for forecasted class load changes, to calculate the D10S allocator in future rate cases.	Support
Volume 4	4009	Approve Xcel's use of the 12 CP allocator to allocate demand-related transmission costs, for the 2025 and 2026 test year Cost studies.	Support
Volume 4	4010	Approve Xcel's proposal to allocate demand-related transmission costs using the D10S allocator in its future rate cases.	Support
Volume 4	4012	Do not adopt the ALJ's Finding of Fact 1025, which inaccurately describes the allocator.	Support
Volume 4	4013	Approve Xcel's filing of the three Cost studies, using different methods to classify distribution system costs.	Support
Volume 4	4014	Approve Xcel's classification and allocation of distribution costs using a hybrid of the Minimum Size Method and Zero Intercept Method.	Support
Volume 4	4018	Require Xcel to file an updated study calculating its demand adjustment applied to the Minimum System Method in its next rate case.	Support
Volume 4	4020 Xcel Revised	Require Xcel to provide a study showing the costs of AMI meters compared to the costs of traditional meters~~, and to classify the difference between those costs as either demand-or energy-related in Xcel's next rate case~~. (Xcel, Department, ALJ)	Support
Volume 4	4021	Approve Xcel's classification of Other Production O&M costs that vary with energy usage as energy-related.	Support
Volume 4	4023	Approve Xcel's use of the R02 (Base Revenue) allocator to classify and allocate Economic Development Discount Costs.	Support
Volume 5	5001	Adopt Xcel's proposed revenue apportionment for 2025 and 2026.	Support
Volume 5	5005	Adopt Xcel's proposed $11.00 customer charge for both Residential and Small Commercial customers.	Support
Volume 5	5007	Maintain the current ratio between demand and energy charges as proposed by Xcel.	Support
Volume 5	5008	Approve Xcel's proposed increase to the General Service monthly customer charge from $25.98 to $27.50 per month.	Support
Volume 5	5010	Approve Xcel's proposed 4.4% increase to the total dollar amount of demand charge discounts for interruptible service.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 5	5011	Approve Xcel's proposal to eliminate the Annual Minimum Demand Charge (AMDC) from the Peak Controlled Service tariff.	Support
Volume 5	5012	Approve Xcel's proposal to add the performance factor calculation directly to the Peak Controlled Service tariff schedules.	Support
Volume 5	5013	Approve Xcel's proposed cost-based updates to voltage discounts, including revised demand charge discounts and updated energy charge discounts.	Support
Volume 5	5015	Approve RAMP as proposed by Xcel, including the five modifications agreed to by Xcel from the Department's recommendations.	Support
Volume 5	5015a Xcel/ECC/CUB Revised	Approve RAMP as proposed by Xcel, including the five modifications agreed to by Xcel from the Department's recommendations. For 2026, establish a funding level for RAMP based on late payment charge revenues collected to date and expected revenues at the lower late payment charge established in this case. For future years, establish an annual budget for RAMP of no less than $6 million. Require Xcel to consult with Energy CENTS Coalition and Citizens Utility Board regarding a supplemental funding mechanism for the portion of the RAMP annual budget not funded by late payment charges, if any. Xcel shall monitor late payment charge revenue and the amount of supplemental funding needed from other sources and report this information in annual reports in the electric affordability programs docket. Xcel shall provide a proposal in a compliance filing within 60 days of the Commission’s Order. If no objections are filed within 30 days, the proposal for funding the RAMP program in future years shall be approved.	Support
Volume 5	5018	Require Xcel to provide detailed annual program status reports on the eight metrics proposed by the Department, including number of customers served, total program spending, average initial and remaining arrears, number of customers current on payment plans, and number of customers who have paid off their full balance.	Support
Volume 5	5019	Approve Xcel's proposal to raise the LUAC monthly usage eligibility threshold from 300 kWh to 500 kWh within the existing $8.3 million annual budget.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 5	5021	Reject the universal low-income rate proposal as insufficiently developed for Commission evaluation at this time, pending submission of a robust cost-benefit analysis and a clear eligibility determination methodology.	Support
Volume 5	5023	Approve Xcel's proposed Rate Code A30 rate design as filed.	Support
Volume 5	5025	Approve Xcel's proposed underground premium at 50 percent of the cost-study-supported figure of $22.57 per month per fixture, as proposed by Xcel.	Support
Volume 5	5027	Take no action on super-large customer tariff issues in this proceeding and defer all related rate design questions to Docket No. E-002/M-25-289, the dedicated proceeding designated by the Commission for this purpose.	Support
Volume 5	5031	Approve Xcel's continued use of the current late payment charge of 1.5 percent per month (18 percent annually), or $1.00, whichever is greater.	Support
Volume 5	5033	Reduce the late payment charge from 1.5 percent per month to 0.45 percent per month for all residential customers and waive late payment charges entirely for low-income customers.	Support
Volume 5	5034	Waive late payment charges for low-income customers only, while retaining the current 1.5 percent per month charge for all other residential customers.	Support
Volume 5	5035	Approve Xcel's continued use of reconnection fees as currently structured, including the $13.50 fee for AMI customers and the $95.00 fee for AMI opt-out customers effective January 1, 2026.	Support
Volume 5	5038	Approve Xcel's proposed increase to the Conservation Cost Recovery Charge from 0.4955 cents per kWh to 0.6204 cents per kWh, consistent with projected 2025 CIP expenditures of approximately $166.6 million.	Support
Volume 5	5039	Approve Xcel's proposed increases to all three Excess Footage Charges as follows: Service Line from $7.90 to $10.00 per foot; Single-Phase Primary or Secondary Extension from $8.00 to $10.50 per foot; and Three-Phase Primary or Secondary Extension from $13.90 to $17.00 per foot.	Support
Volume 5	5040	Approve Xcel's proposed increases to all Winter Construction Charges as follows: Thawing from $640.00 to $870.00 per Frost Burner; and Trenching from $8.90 to $18.00 per foot.	Support

Volume	Decision Option No.	Decision Option Text	Xcel Energy Position
Volume 5	5041	Approve Xcel's proposed increases to all Dedicated Switching Charges as follows: Monday-through-Saturday rate from \$300.00 to \$800.00 per hour; and Sunday/holiday rate from \$400.00 to \$1,000.00 per hour.	Support
Volume 5	5042	Approve Xcel Energy's proposed updates to the Fuel Adjustment Factor Ratios for Test Year 2025.	Support
Volume 5	5043	Require Xcel to include \$6.1 million in late fee revenues in the Company's cost of service for 2025.	Support
Volume 5	5044	Authorize Xcel to implement the new monthly reserved capacity charge for new ATO/MTO Dual Feeder Service customers and for existing customers upon contract renewal or expiration of existing agreements.	Support
Volume 5	5045	Require Xcel to track revenues under all new ATO/MTO Dual Feeder Service contracts and to report those revenues in the Company's next rate case, along with a forecasted budget of revenues for the proposed test years.	Support

PUBLIC DOCUMENT
NOT-PUBLIC DATA HAS BEEN EXICSED

Northern States Power Company
State of Minnesota Electric Jurisdiction

Docket No. E002/GR-24-320
Exhibit___(RLM-2), Schedule 2 REVISED
Page 1 of 1

Protected data is shaded

Insurance O&M Expense

	State of Minnesota Electric Jurisdiction - Actual Expense							
	2017	2018	2019	2020	2021	2022	2023	2024
Property Insurance								
General Liability Insurance								
Excess Liability Insurance								
Directors and Officers Insurane								
Auto Liab/Physical Damage								
Fiduciary Insurance								
Cyber Insurance *								
Other Insurance								
Nuclear Property Insurance								
Nuclear Interupt Insurance								
Nuclear Liability Insurance								
Nuclear Liability ICRP **								
NEIL Surplus Insurance ***								
Captive distribution (credits) ***								
Total	6,958,176	10,845,242	6,826,855	12,753,673	9,931,295	22,113,813	18,287,192	22,795,044

	State of Minnesota Electric Jurisdiction - Forecast (NO Regulatory Adjustments)							
	2017	2018	2019	2020	2021	2022	2023	2024
Property Insurance								
General Liability Insurance								
Excess Liability Insurance								
Directors and Officers Insurane								
Auto Liab/Physical Damage								
Fiduciary Insurance								
Cyber Insurance *								
Other Insurance								
Nuclear Property Insurance								
Nuclear Interupt Insurance								
Nuclear Liability Insurance								
Nuclear Liability ICRP **								
NEIL Surplus Insurance ***								
Captive distribution (credits) ***								
Total	19,151,065	9,157,356	9,994,867	12,585,539	14,380,287	20,696,212	22,354,933	25,243,205

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 NO. E002/GR-24-320

Dated this 15th day of June 2026

/s/

____

Victor Barreiro
Regulatory Administrator

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