



414 Nicollet Mall
Minneapolis, MN 55401

May 29, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
COMMISSION INVESTIGATION INTO SELF-COMMITMENT AND SELF-
SCHEDULING OF LARGE BASELOAD GENERATION FACILITIES
DOCKET NO. E999/CI-19-704

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Company), submits to the Minnesota Public Utilities Commission (Commission) this Reply to the May 1, 2025 Comments of the Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket.

The Department recommends the Company indicate where information regarding instances when greater economic commitment led to lost revenue is located in the 2024 Report or provide the information. The Company confirms that during the 2024 reporting period, there were no instances when greater economic commitment led to lost revenue for the King or Sherco resources.

As documented on page 12 of our Report, Figure 4: Operating Statistics by Quarter, MISO did not economically start either the King or Sherco resources during this period. The limited economic run hours shown in Figure 4 represent only periods following must-run commitments where the Company permitted MISO to economically decommit these resources, rather than instances of economic starts.

Since no economic starts or commitments occurred and consequently no instances of greater economic commitment led to lost revenue, there was no need to implement strategies weighing potential lost revenues against environmental benefits from lower emissions during this reporting period.

The Company supports the Department's recommendation to discontinue the best case/worst case reporting requirement, and we respectfully request the Commission accept our Report as supplemented by these Reply Comments.

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 Stephanie Mayers at stephanie.m.mayers@xcelenergy.com or me at rebecca.d.eilers@xcelenergy.com or 612-330-5570 if you have any questions regarding this filing.

SINCERELY,

/s/

REBECCA EILERS
MANAGER, REGULATORY AFFAIRS

cc: Service List

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET Nos. E999/CI-19-704

Dated this 29th day of May 2025

/s/

Christine Schwartz
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	19-704Official
15	Brian	Tulloh	btulloh@misoenergy.org	MISO		2985 Ames Crossing Rd Eagan MN, 55121-2498 United States	Electronic Service		No	19-704Official
16	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	19-704Official