

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.
 - <u>xx</u> 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
1	Generic	Commerce Attorneys	commerce.attorneys@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		Yes	19- 704Official
2	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	19- 704Official
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4	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		Yes	19- 704Official
5	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	19- 704Official
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	19- 704Official
7	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	19- 704Official
8	Holly	Lahd	holly.lahd@target.com	Target Corporation		33 South 6th St CC-28662 Minneapolis MN, 55402 United States	Electronic Service		No	19- 704Official
9	Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	19- 704Official
10	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	19- 704Official
11	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180- 07-MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		No	19- 704Official
12	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	19- 704Official
13	Shane	Stennes	stennes@umn.edu	University of Minnesota		319 15th Avenue SE Minneapolis MN, 55455 United States	Electronic Service		No	19- 704Official

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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