



April 15, 2026

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ELECTRONIC FILING

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

Re: In the Matter of Northern States Power Company's (d/b/a Xcel Energy) Competitive Resource Acquisition Process for up to 800 Megawatts of Firm Dispatchable Generation

In the Matter of Northern States Power Company's (d/b/a Xcel Energy) 2024-2040 Integrated Resource Plan

PUC Docket Numbers: E002/CN-23-212; E002/RP-24-67

Dear Ms. Bergman:

The Minnesota Large Industrial Group ("MLIG") a continuing ad hoc consortium of large industrial end-users of energy in Minnesota spanning multiple utilities and functioning to represent large industrial interests before regulatory and legislative bodies, submits the following comment pursuant to the Notice of Comment Period ("Notice") issued by the Minnesota Public Utilities Commission ("Commission") in this matter on March 11, 2026.

The Commission's Notice identified the following topics open for comment:

- Should the Commission order Xcel to work with interested parties to develop a customer tariff to support customer-owned thermal batteries and file such a tariff proposal within 90 days?

- If so, should the Commission open a new docket to address the Department's recommendation?
 - What information should the Commission require the initial filing to contain?
- Are there other issues or concerns related to this matter?

MLIG thanks the Department of Commerce ("Department"), and the Clean Energy Organizations ("CEOs") for identifying the benefits of thermal batteries, as noted in the Commission's Notice. MLIG agrees that the Commission should explore avenues to develop this technology, and MLIG makes the following recommendations for possible pathways of exploration.

First, while MLIG agrees with the proposal to have Xcel Energy work with interested parties to propose a tariff to support customer-owned thermal batteries, MLIG does not believe the tariff should be limited to Xcel Energy. Rather, the Commission should consider the possible benefits of this nascent technology across the state, and the development of these options should be considered for all electric utilities, not just Xcel Energy. Therefore, MLIG recommends the Commission expand the efforts to develop a proposed tariff in a new docket that is not limited to Xcel Energy.

Second, MLIG believes any initial filings should include 1) the current state of the technology and where and how it has been deployed; 2) the current costs and benefits of the technology; and 3) known or possible barriers to the successful implementation of this technology in Minnesota.

MLIG is encouraged by the attention of the Department and CEOs to this innovative technology, and MLIG supports the possible development of a tariff or other avenues that could test the feasibility of thermal batteries across Minnesota.

Please contact us with any questions regarding this filing.

Sincerely,

STOEL RIVES LLP

/s/ Amber S. Lee

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