



414 Nicollet Mall  
Minneapolis, MN 55401

October 10, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
2025 ANNUAL REPORT – ADMINISTRATIVE SERVICE AGREEMENT  
DOCKET NO. E,G002/AI-25-245

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) these REPLY COMMENTS to the September 29, 2025 COMMENTS of the Department of Commerce, Division of Energy Resources (Department) in the above-noted docket. The Department addressed our May 30, 2025 Annual Report regarding Xcel's Administrative Service Agreement (ASA) with Xcel Energy Services Inc (XES). The Minnesota Office of the Attorney General, Residential Utilities Division (OAG) submitted a Letter in support of the Department's Comments on October 9, 2025.

In these Reply Comments we respectfully request that the Commission approve the Sixth Amendment to the Service Agreement between the Company and XES as discussed in our May 30, 2025 Annual Report. We appreciate the Department's review of our 2025 ASA Annual Report but disagree with their recommendation, and the OAG's support of the recommendation, to allocate Wildfire Mitigation indirect costs based on Wildfire Mitigation direct costs.

We disagree with the Department's recommendation because a core principal of allocating costs from XES to the Company through the ASA is that costs that cannot be direct assigned should be allocated based on a cost-causative methodology.<sup>1</sup> Direct costs incurred are not a cost-causative method of allocating indirect costs (which for wildfire costs include things like situation awareness information technology (IT)

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<sup>1</sup> The framework of how costs are assigned is outlined in our Cost Allocation and Assignment Manual, initially established in Docket No. E002/GR-92-1185 and reaffirmed in Docket No. E,G999/CI-90-1008.

costs and meteorology/fire science modeling IT costs), and the Company is not clear on how indirect costs can be allocated on a direct cost basis.

Beyond our concern that allocating costs based on a direct cost basis is not a cost-causative methodology, we are also concerned that the Department's recommendation risks distorting indirect cost allocations due to variability in wildfire activity from year to year. Because allocation percentages are updated annually (based on actual figures as of December 31 of each year) and effective from April 1 through March 31 of the following year, a year with significant wildfire activity could disproportionately influence the subsequent year's allocations and not truly represent a cost causative methodology for allocation.

For example, if a significant wildfire occurred in the NSPM Minnesota jurisdiction in one year but not in other jurisdictions, it would not be appropriate to allocate a disproportionate share of indirect wildfire mitigation costs to that jurisdiction in the following year despite no similar occurrence. Discrete wildfire events in jurisdictions drive direct cost assignments specific to those events and do not drive the Company's need to incur indirect costs, such as IT supporting situational awareness tools deployed to continuously monitor assets and conditions across the Company's footprint.

We note that the issue of allocating Wildfire Mitigation indirect costs was also raised in our ongoing electric rate case (Docket No. E002/GR-24-320), by both the Department and Minnesota Office of the Attorney General. In addition to this Reply Comment, we address our opposition to the recommendation to change the allocation method in the Rebuttal Testimony of Company witness Nicole L. Doyle, which has been filed on the same day as this letter in Docket No. E002/GR-24-320.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Brandon Kirschner at [brandon.m.kirschner@xcelenergy.com](mailto:brandon.m.kirschner@xcelenergy.com) or (612) 215-5621 or Lynnette Sweet at [Lynnette.m.sweet@xcelenergy.com](mailto:Lynnette.m.sweet@xcelenergy.com) or (612) 321-3159 if you have questions regarding this filing.

Sincerely,

/s/

AMBER HEDLUND  
MANAGER, REGULATORY AFFAIRS

cc: Service List

## CERTIFICATE OF SERVICE

I, Marie Horner, 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.      E,G002/AI-25-245**

Dated this 10th day of October 2025

/s/

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Marie Horner  
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	AI-25-245
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AI-25-245
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	AI-25-245
4	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	AI-25-245
5	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	AI-25-245
6	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	AI-25-245
7	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	AI-25-245
8	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	AI-25-245
9	Ian M.	Dobson	ian.m.dobson@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401-8 Minneapolis MN, 55401 United States	Electronic Service		No	AI-25-245
10	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	AI-25-245
11	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	AI-25-245
12	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	AI-25-245
13	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	AI-25-245
14	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street	Electronic Service		No	AI-25-245



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	AI-25-245
28	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-245
29	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-245
30	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	AI-25-245
31	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	AI-25-245
32	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	AI-25-245
33	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	AI-25-245
34	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	AI-25-245
35	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	AI-25-245
36	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	AI-25-245
37	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-245
38	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	AI-25-245
39	Nicole	Westling	nicole.westling@state.mn.us		Department of Commerce	85 7th Place E Suite 280 St Paul MN,	Electronic Service		No	AI-25-245

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55001 United States				
40	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-245
41	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	AI-25-245
42	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	AI-25-245