

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

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March 11, 2026

**In the Matter of Xcel Energy's 2025 Integrated  
Distribution Plan**

**Docket No. E-002/M-25-142**

**REPLY COMMENTS OF FRESH ENERGY**

On January 28, 2026, Fresh Energy submitted initial Comments in response to the Commission's November 13, 2025 Notice of Comment period for Xcel's 2025 Integrated Distribution Plan. Our comments responded to topics 7-10 of the Notice, focused on Xcel's Proactive Upgrade Proposal.<sup>1</sup>

In our initial comments, we raised questions related to the timing of the proposal and asked the Company to further specify the specific risks associated with delaying project approval until the 2027 IDP.<sup>2</sup>

The Company did not address our questions directly. Instead, the Company further articulated its rationale for why it believes the project is in the public interest.<sup>3</sup> Specifically, the Company provided the following reasons:

- Framework fit
- Procedural compliance
- Risk mitigation and ratepayer protection

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<sup>1</sup> Docket No. E002/M-25-142. Notice of Comment Period (November 13, 2025). See Topics 7-10.

<sup>2</sup> Docket No. E002/M-25-142. Fresh Energy Initial Comments (January 28, 2026).

<sup>3</sup> Docket No. E002/M-25-142. Xcel Energy Reply Comments (February 18, 2026).

- Timeliness and system value

Fresh Energy does not dispute the Company's stated reasons why the proposal may be in the public interest. However, we do not believe any of these reasons support approval in 2025 instead of in a subsequent IDP. Further, deferring a decision on the project until a later IDP would allow the Company to conduct further analysis and make potential updates based on the outcome of Phase 2 of the Proactive Upgrades Working Group. We believe this would provide additional risk mitigation and further strengthen the case for project approval.

Fresh Energy does not oppose the project, but we do not see a clear demonstration of cost savings or additional value for approving this project in the 2025 IDP. Instead, we recommend the Commission defer its decision until the 2027 IDP. We believe this proposal could still use the Proactive Grid Upgrade process in the 2027 IDP.

As discussed in our initial comments, we appreciate the Company being the first to engage in the proactive upgrade process and putting forth a proposal that uses the framework approved in Phase 1 of the working group process. We look forward to continued engagement in the Proactive Grid Upgrade process.

Respectfully submitted,

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