



CITIZENS UTILITY BOARD

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June 17, 2026

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

VIA E-FILING

Re:

**In the Matter of the Application of Xcel
Energy for Authority to Increase Rates for
Electric Utility Service in the State of
Minnesota**

MPUC Docket No. E-002/GR-24-320

Dear Executive Secretary Bergman:

The Citizens Utility Board of Minnesota ("CUB") respectfully offers this letter responding to and strongly opposing the RAMP funding proposal filed by the Energy CENTS Coalition ("ECC") and "developed in partnership with" Northern States Power Company d/b/a Xcel Energy (the "Company") in the above-referenced matter on June 16, 2026.¹

Based on our reading of ECC's letter, we understand that the Company has agreed to supplement funding for the Residential Arrearage Management Program ("RAMP") using shareholder money to ensure the program remains funded at a minimum annual budget of \$6 million through 2028.² This agreement appears to be predicated on the Minnesota Public Utilities Commission ("Commission") approving—or at least ECC supporting—the Company's proposed capital structure and an authorized return on equity ("ROE") of 9.6 percent. While we appreciate the Company's commitment to offering shareholder resources for the purpose of setting up an arrearage forgiveness program, we fundamentally disagree with this attempt to trade RAMP funding for an unjustified ROE increase.

At the Commission's June 11th Agenda Meeting, Commissioner Partridge expressed general support for RAMP but noted she shared CUB's concerns that funding the program solely through late fee revenues would harm the very customers the program is meant to support.³

¹ *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-24-320, Proposed and Preferred Decision Options of the Energy CENTS Coalition at 1 (Jun. 16, 2026) (hereinafter "ECC June 16 Letter").

² See *id.* at 2; *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-24-320, Xcel Letter – Residential Arrears Management Program Funding at 1-2 (Jun. 16, 2026).

³ See Minnesota Public Utilities Commission, Recorded Webcast of June 11, 2026 Hearing, at 6:47:15, available at https://minnesotapuc.granicus.com/player/clip/2707?view_id=2&redirect=true (hereinafter



For this reason, she stated that while she was “in favor of reducing late fees,” she wanted parties to identify an alternative method for funding RAMP at an annual budget of \$6 million.⁴ On June 12th, Commissioner Partridge filed new and preferred decision options suggesting she will support Decision Options 5015 and 5033 (among others), as replicated below:

Residential Arrears Management Program

5015. Approve RAMP as proposed by Xcel, including the five modifications agreed to by Xcel from the Department's recommendations.

Late Payment and Reconnection Fees

5033. Reduce the late payment charge from 1.5 percent per month to 0.45 percent per month for all residential customers and waive late payment charges entirely for low income customers.

If the above decision options are approved, late payment fees will be waived for low-income customers and reduced for the remainder of the residential rate class. Consequentially, the Company has estimated that around \$2 million in reduced late payment fee revenue will remain available for the RAMP budget each year, leaving a \$4 million shortfall that will need to be addressed if the program is to be funded at its full, initially proposed budget of \$6 million. Commissioner Partridge therefore requested the Company file a decision option offering procedural pathways for identifying and proposing alternative funding mechanisms in collaboration with CUB and ECC.⁵

The Company submitted a letter on June 12, 2026, wherein it recommended Alternative Decision Option 5015a in consultation with CUB and ECC:

Approve RAMP as proposed by Xcel, including the five modifications agreed to by Xcel from the Department's recommendations. For 2026, establish a funding level for RAMP based on late payment charge revenues collected to date and expected revenues at the lower late payment charge established in this case. For future years, establish an annual budget for RAMP of no less than \$6 million. Require Xcel to consult with Energy CENTS Coalition and Citizens Utility Board regarding a supplemental funding mechanism for the portion of the RAMP annual budget not funded by late payment charges, if any. Xcel shall monitor late payment charge revenue and the amount of supplemental funding needed from other sources and report this information in annual reports in the electric affordability programs docket. Xcel shall

“Commission June 11 Hearing”); *see also* Ex. CUB-3 at 19-20 (Levenson-Falk Direct); CUB-8 at 21 (Levenson-Falk Surrebuttal).

⁴ Commission June 11 Hearing at 6:56:30.

⁵ *See* Commission June 11 Hearing at 6:49:30 (estimating that setting late payment fees at 0.45 percent per month and waiving such charges for low-income customers would produce roughly one-third of originally anticipated late fee revenues, or approximately \$1.9 million of the \$5.8 million expected for the 2026 plan year. Notably, this figure does not account for those late fees already collected by the Company in 2026 at the 1.5 percent monthly rate).



provide a proposal in a compliance filing within 60 days of the Commission's Order. If no objections are filed within 30 days, the proposal for funding the RAMP program in future years shall be approved.⁶

CUB supports this proposed decision option, which was developed jointly through productive conversation amongst the Company, CUB, and ECC. This option allows the RAMP program and all of its associated ratepayer benefits to proceed while providing additional time to discuss how RAMP will be funded at its full budget moving forward.

Subsequently, on June 16, 2026, ECC and the Company filed companion letters describing a new agreement the two parties arrived at regarding RAMP funding. CUB was not part of the discussions leading to this proposal, and we adamantly oppose it for two primary reasons.

First—and most importantly—the proposal advanced by the Company and ECC is an awful deal for ratepayers. As confirmed in Xcel's June 16, 2026 Letter, this proposal contemplates Xcel shareholders contributing “about \$4 million per year, or \$8 million in total” to fund RAMP through 2028.⁷ Meanwhile, according to the Company's own finance expert, “[t]he estimated impact on the 2025 test year revenue requirement of the change in ROE is approximately \$973,000 for each basis point (\$102.2 million / 105 basis points = \$973,000 per basis point).”⁸ In other words, the difference between maintaining Xcel's current 9.25 percent ROE versus approving an increased, 9.6 percent ROE amounts to over \$34 million in additional costs passed through to ratepayers every year. While we understand this number may require adjustment based on the ultimate revenue requirement approved for recovery, the cost to ratepayers associated with a 35 basis point ROE increase—which would remain in effect until the Commission next sets final rates in a future Xcel electric rate case—far exceeds the benefit of Xcel shareholders temporarily meeting the shortfall in RAMP funding through the end of 2028. This outcome is directly contrary to ECC's stated goal of identifying “supplemental, equitable funding streams for [RAMP] . . . that would expand the program's impact without further burdening customers.”⁹

Second, it is highly inappropriate for ECC to support—for the first time, and in exchange for RAMP funding—a significant increase to authorized ROE after contributing no evidence or analysis on ROE throughout this 18-month proceeding. ECC's substantive contributions to the evidentiary record are found solely in the direct and surrebuttal testimonies of Witness Shardlow. Mr. Shardlow did not address ROE in his testimony, and ECC did not file any legal briefs, proposed findings of fact, conclusions of law and recommendations, or exceptions to

⁶ *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-24-320, Preferred Decision Options and Follow-Up Information at 2 (Jun. 12, 2026).

⁷ *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-24-320, Xcel Letter- Residential Arrears Management Program Funding at 2 (Jun. 16, 2026).

⁸ Ex. JIN-2, Att. 4 at 1 (Chan Direct Testimony).

⁹ Ex. ECC-02 at 5 (Shardlow Surrebuttal).



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the ALJ Report. On the other hand, three finance experts contributed substantial evidence supporting their recommendations to keep Xcel's ROE flat at 9.25 percent (Addonizio) or lower it to 9.0 percent (Kihm) or 8.96 percent (LaConte). Several other parties also opposed any increase to Xcel's ROE in the testimonies, briefs, and exceptions they filed on the record. ECC is not in any position to trade away those arguments or reduce the value of other parties' evidence by suddenly supporting an ROE increase at the 11th hour of this proceeding. It is highly inappropriate, too, for ECC to now offer commentary, for the first time, on Xcel's capital structure and credit rating based in part on a days-old report not introduced into evidence and after oral argument before the Commission has closed.¹⁰

If the Commission wishes to see RAMP funded at an annual budget level of \$6 million, it should adopt Decision Option 5015a, which allows parties to evaluate potential alternative funding pathways that would not have the deleterious effect of charging customers nearly \$35 million to make up for a \$4 million budget shortfall. In the alternative, if the Commission approves RAMP and wishes to make a funding decision at its June 18, 2026 hearing, numerous options are available to bolster the program through ratepayer-funded recovery mechanisms.¹¹

We support Xcel's proposed Decision Option 5015a and recommend that the Commission soundly reject the proposal to trade a 9.6 percent ROE for Xcel's agreement to temporarily fund RAMP with shareholder funds, as described in ECC's June 16, 2026 Letter.

Sincerely,

/s/ Brian Edstrom

Brian Edstrom
Senior Regulatory Advocate
Citizens Utility Board of Minnesota
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¹⁰ Minnesota Rules 1400.8200 and Minnesota Statutes 14.61 and 14.62 make abundantly clear that the contested case record "must close upon the filing of exceptions to the report and presentation of argument." No factual information that is not part of the record may be considered by the Commission in its determination of the case.

¹¹ As the Company acknowledged at the Commission's June 11, 2026 hearing, one of the most direct methods for ensuring \$6 million in RAMP funding is to include those costs in the revenue requirement. Other potential options could include using Department of Energy settlement payments in a manner similar to what is employed for the Automatic Bill Credit Pilot, or to utilize Quality of Service Plan penalties incurred by the Company.



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CERTIFICATE OF SERVICE

**In the Matter of the Application of Xcel
Energy for Authority to Raise Rates in the
State of Minnesota**

MPUC Docket Nos. E-002/GR-24-320

I, Brian Edstrom, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Letter of the Citizens Utility Board of Minnesota

Dated this 17th day of June, 2026.

/s/ Brian Edstrom

Brian Edstrom
Senior Regulatory Advocate
Citizens Utility Board of Minnesota
651-300-4701, ext. 6
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