

May 9, 2025

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Response Letter of the Minnesota Department of Commerce
Docket No. E002/AA-23-153

Dear Mr. Seuffert:

On March 3, 2025, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed a petition in the instant docket requesting the Minnesota Public Utilities Commission (Commission) authorize Xcel to implement true-up factors by class for the Company's 2024 Fuel Clause Adjustment (FCA) True-Up.¹

On April 15, 2025, the Minnesota Department of Commerce (Department) filed Comments recommending the Minnesota Public Utilities Commission (Commission) approve the 2024 FCA true-up subject to confirming Xcel's class factor calculations, and requested additional information from the Company.² Specifically, the Department requested live spreadsheets to verify refunds related to Xcel's Sherco 3 outage, an explanation of differences between the Sherco 3 outage refund as detailed in the Petition and what was approved by the Commission in its April 2025 Order, and additional information related to Reactor Coolant Pump seal replacements at Xcel's Prairie Island Unit 1 nuclear facility.

On May 1, 2025, Xcel in Reply Comments provided the requested calculations and additional information.³ The Department reviewed the Company's calculations and resulting class factors, and found them to be reasonable. The Department also reviewed Xcel's explanation for the changes to its Sherco 3 refund as a result of moving from a 12 month refund to a one-time refund in April 2025 with

¹ *In the Matter of the Petition of Northern States Power Company for Approval of the 2024 Annual Fuel Forecast and Monthly Fuel Charges*, Petition, Xcel Energy, March 3, 2025, Docket No. E002/AA-23-153, (eDockets) [20253-215976-01](#).

² *In the Matter of the Petition of Northern States Power Company for Approval of the 2024 Annual Fuel Forecast and Monthly Fuel Charges*, Comments, Minnesota Department of Commerce, April 15, 2025, Docket No. E002/AA-23-153, (eDockets) [20254-217695-01](#).

³ *In the Matter of the Petition of Northern States Power Company for Approval of the 2024 Annual Fuel Forecast and Monthly Fuel Charges*, Reply Comments, Xcel Energy, May 1, 2025, Docket No. E002/AA-23-153, (eDockets) [20255-218447-01](#).

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supporting spreadsheets and found them reasonable. Finally, the Company stated it will provide timely updates regarding potential vendor credits relating to Prairie Island Unit 1.

The Department appreciates the Company's response to Department requests in this docket and recommends the Commission approve Xcel's 2024 true-up and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb

Assistant Commissioner of Regulatory Analysis

AG/ad

Attachment

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response to Reply Comments**

Docket No. E002/AA-23-153

Dated this **9th** day of **May 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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15	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	23-153AA-23-153
16	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	23-153AA-23-153
17	Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy		414 Nicollet Mall - 401 7th Floor Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
18	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	23-153AA-23-153
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20	Lucas	Franco	lfranco@liunagroc.com	LIUNA		81 Little Canada Rd E Little Canada MN, 55117 United States	Electronic Service		No	23-153AA-23-153
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22	Allen	Gleckner	agleckner@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-153AA-23-153
23	Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY		401 Nicollet Mall FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
24	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
25	Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401-7 Minneapolis MN, 55401 United States	Electronic Service		No	23-153AA-23-153

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27	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	23-153AA-23-153
28	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	23-153AA-23-153
29	Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC		PO Box 270636 Superior CO, 80027-9998 United States	Electronic Service		No	23-153AA-23-153
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32	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
33	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
34	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
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36	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-153AA-23-153
37	Ryan	Long	ryan.j.long@xcelenergy.com			414 Nicollet Mall 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
38	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis	Electronic Service		No	23-153AA-23-153

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40	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
41	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	23-153AA-23-153
42	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	23-153AA-23-153
43	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	23-153AA-23-153
44	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
45	Christa	Moseng	christa.moseng@state.mn.us		Office of Administrative Hearings	P.O. Box 64620 Saint Paul MN, 55164-0620 United States	Electronic Service		No	23-153AA-23-153
46	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
47	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-153AA-23-153
48	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	23-153AA-23-153
49	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	23-153AA-23-153
50	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		Yes	23-153AA-23-153
51	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153

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54	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		Yes	23-153AA-23-153
55	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	23-153AA-23-153
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57	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-153AA-23-153
58	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-153AA-23-153
59	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-153AA-23-153
60	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
61	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153
62	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	23-153AA-23-153
63	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153

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65	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	23-153AA-23-153